

## **NOTICE OF DATA BREACH**

GreatBanc Trust Company serves as the Trustee of certain Employee Stock Ownership Plans. We respect the privacy of our customers and their plan participants, which is why we are providing information about an incident that may affect the security of your personal information if you are a plan participant.

### **What Happened?**

For the first time in our history, during the week of October 23, 2017, we received indication that one of our computers was improperly accessed as the result of an email phishing scam. We immediately began an investigation and hired a computer forensic specialist to assist us. The investigation revealed that an unauthorized third party accessed one of our email accounts. The unauthorized third party created an email folder and attempted to direct emails relating to “wire transfers” to the account. We have no evidence to suggest that any emails in the account were copied or transferred. We then retained counsel experienced in data breach to assist us with complying with regulatory requirements. Despite having no indication that individual emails were accessed, we were advised that we needed to undertake a comprehensive review of all of the information contained in the email account to ascertain if any personal information *could have been accessed*.

### **What Information Was Involved?**

Based on that review we have determined that the personal information of certain plan participants, such as name, address, date of birth and/or social security number, was contained in the email account. While we cannot determine whether the personal information was viewed, we have no reason to believe that it has been misused in any way.

### **What We Are Doing.**

GreatBanc Trust Company values the privacy of our customers and their plan participants and deeply regrets that this incident occurred. In order to minimize the possibility of a future attack and to protect the privacy of our valued customers and their plan participants, we have implemented additional security measures in response to this incident, including: additional educational training and testing and two-factor authentication before emails can be accessed outside the office. In July, we will implement a portal for the transfer of sensitive documents, which will eliminate those from running through the email system.

### **What You Can Do.**

To learn about steps that you may take to guard against identity theft or fraud, please review the information about Identity Theft Protection that follows this Notice.

### **Other Important Information.**

As a precaution, we have arranged to have AllClear ID protect the identity of affected plan participants for 12 months at no cost to such plan participants. The identity protection services start on the date of this notice and an impacted plan participant may use them at any time during the next 12 months.

AllClear Identity Repair: This service is automatically available to affected participants with no enrollment required. If a problem arises, simply call 1-855-326-5116 and a dedicated investigator will help recover financial losses, restore your credit and make sure your identity is returned to its proper condition.

AllClear Fraud Alerts and Credit Monitoring: This service offers the ability to set, renew and remove 90-day fraud alerts on your credit file to help protect you from credit fraud. In addition, it provides credit monitoring services, a once annual credit score and credit report, and a \$1M identity theft insurance

policy. To enroll in this service, you must be an affected participant and you will need to provide your personal information to AllClear ID.

Please contact AllClear ID at 1-855-326-5116 to inquire whether you have been impacted and are eligible for these services. If AllClear ID confirms that you have been impacted, you can enroll over the phone or online with the unique redemption code with which AllClear ID will provide you over the phone.

Please note: Following enrollment, additional steps are required by you in order to activate your phone alerts and fraud alerts, and to pull your credit score and credit file. Additional steps may also be required in order to activate your monitoring options.

**For More Information.**

If you have further questions or concerns about this incident, you may contact AllClearID at 1-855-326-5116, Monday through Saturday, 8:00 a.m. – 8:00 p.m. Central Time.

Your privacy and security are extremely important to us and we sincerely regret any inconvenience or concern caused by this incident.

Julie A. Govreau  
Senior Vice President & General Counsel  
GreatBanc Trust Company

## Information about Identity Theft Protection

We recommend that you regularly review statements from your accounts and periodically obtain your credit report from one or more of the national credit reporting companies. You may obtain a free copy of your credit report online at [www.annualcreditreport.com](http://www.annualcreditreport.com), by calling toll-free 1-877-322-8228, or by mailing an Annual Credit Report Request Form (available at [www.annualcreditreport.com](http://www.annualcreditreport.com)) to: Annual Credit Report Request Service, P.O. Box 105281, Atlanta, GA, 30348-5281. You may also purchase a copy of your credit report by contacting one or more of the three national credit reporting agencies listed below.

**Equifax:** P.O. Box 740241, Atlanta, Georgia 30374-0241, 1-800-685-1111, [www.equifax.com](http://www.equifax.com)  
**Experian:** P.O. Box 9532, Allen, TX 75013, 1-888-397-3742, [www.experian.com](http://www.experian.com)  
**TransUnion:** P.O. Box 1000, Chester, PA 19022, 1-800-888-4213, [www.transunion.com](http://www.transunion.com)

When you receive your credit reports, review them carefully. Look for accounts or creditor inquiries that you did not initiate or do not recognize. Look for information, such as home address and Social Security number, that is not accurate. If you see anything you do not understand, call the reporting agency at the telephone number on the report.

We recommend you remain vigilant with respect to reviewing your account statements and credit reports, and promptly report any suspicious activity or suspected identity theft to us and to the proper law enforcement authorities, including local law enforcement, your state's attorney general and/or the Federal Trade Commission ("FTC"). You may contact the FTC or your state's regulatory authority to obtain additional information about avoiding identity theft.

**Federal Trade Commission**, Consumer Response Center, 600 Pennsylvania Avenue, NW, Washington, D.C. 20580, 1-877-IDTHEFT (438-4338), [www.ftc.gov/idtheft](http://www.ftc.gov/idtheft)

**For residents of Maryland:** You may also obtain information about preventing and avoiding identity theft from the Maryland Office of the Attorney General:

**Maryland Office of the Attorney General**, Consumer Protection Division  
200 St. Paul Place, Baltimore, MD 21202, 1-888-743-0023, [www.oag.state.md.us](http://www.oag.state.md.us)

**For residents of Massachusetts:** You also have the right to obtain a police report.

**For residents of North Carolina:** You may also obtain information about preventing and avoiding identity theft from the North Carolina Attorney General's Office:

**North Carolina Attorney General's Office**, Consumer Protection Division  
9001 Mail Service Center, Raleigh, NC 27699-9001, 1-877-5-NO-SCAM, [www.ncdoj.gov](http://www.ncdoj.gov)

**Fraud Alerts:** There are also two types of fraud alerts that you can place on your credit report to put your creditors on notice that you may be a victim of fraud: an initial alert and an extended alert. You may ask that an initial fraud alert be placed on your credit report if you suspect you have been, or are about to be, a victim of identity theft. An initial fraud alert stays on your credit report for at least 90 days. You may have an extended alert placed on your credit report if you have already been a victim of identity theft with the appropriate documentary proof. An extended fraud alert stays on your credit report for seven years. You can place a fraud alert on your credit report by calling the toll-free fraud number of any of the three national credit reporting agencies listed below.

Equifax: 1-888-766-0008, [www.equifax.com](http://www.equifax.com)  
Experian: 1-888-397-3742, [www.experian.com](http://www.experian.com)  
TransUnion: 1-800-680-7289, [fraud.transunion.com](http://fraud.transunion.com)

**Credit Freezes (for Non-Massachusetts Residents):** You may have the right to put a credit freeze, also known as a security freeze, on your credit file, so that no new credit can be opened in your name without the use of a PIN number that is issued to you when you initiate a freeze. A credit freeze is designed to prevent potential credit grantors from accessing

your credit report without your consent. If you place a credit freeze, potential creditors and other third parties will not be able to get access to your credit report unless you temporarily lift the freeze. Therefore, using a credit freeze may delay your ability to obtain credit. In addition, you may incur fees to place, lift and/or remove a credit freeze. Credit freeze laws vary from state to state. The cost of placing, temporarily lifting, and removing a credit freeze also varies by state, generally \$5 to \$20 per action at each credit reporting company. *Unlike a fraud alert, you must separately place a credit freeze on your credit file at each credit reporting company.* Since the instructions for how to establish a credit freeze differ from state to state, please contact the three major credit reporting companies as specified below to find out more information:

Equifax:	P.O. Box 105788, Atlanta, GA 30348, <a href="http://www.equifax.com">www.equifax.com</a>
Experian:	P.O. Box 9554, Allen, TX 75013, <a href="http://www.experian.com">www.experian.com</a>
TransUnion LLC:	P.O. Box 2000, Chester, PA, 19022-2000, <a href="http://freeze.transunion.com">freeze.transunion.com</a>

You can obtain more information about fraud alerts and credit freezes by contacting the FTC or one of the national credit reporting agencies listed above.

**Credit Freezes (for Massachusetts Residents):** Massachusetts law gives you the right to place a security freeze on your consumer reports. A security freeze is designed to prevent credit, loans and services from being approved in your name without your consent. Using a security freeze, however, may delay your ability to obtain credit. You may request that a freeze be placed on your credit report by sending a request to a credit reporting agency by certified mail, overnight mail or regular stamped mail to the address below:

Equifax:	P.O. Box 105788, Atlanta, GA 30348, <a href="http://www.equifax.com">www.equifax.com</a>
Experian:	P.O. Box 9554, Allen, TX 75013, <a href="http://www.experian.com">www.experian.com</a>
TransUnion LLC:	P.O. Box 2000, Chester, PA, 19022-2000, <a href="http://freeze.transunion.com">freeze.transunion.com</a>

*Unlike a fraud alert, you must separately place a credit freeze on your credit file at each credit reporting company.* The following information should be included when requesting a security freeze (documentation for you and your spouse must be submitted when freezing a spouse's credit report): full name, with middle initial and any suffixes; Social Security number; date of birth (month, day and year); current address and previous addresses for the past five (5) years; and applicable fee (if any) or incident report or complaint with a law enforcement agency or the Department of Motor Vehicles. The request should also include a copy of a government-issued identification card, such as a driver's license, state or military ID card, and a copy of a utility bill, bank or insurance statement. Each copy should be legible, display your name and current mailing address, and the date of issue (statement dates must be recent). The credit reporting company may charge a reasonable fee of up to \$5 to place a freeze or lift or remove a freeze, unless you are a victim of identity theft or the spouse of a victim of identity theft, and have submitted a valid police report relating to the identity theft to the credit reporting company.