



VIA EMAIL

Idaho Office of the Attorney General
consumer_protection@ag.idaho.gov

February 18, 2024

Re: Material Service Disruption Caused by Cybersecurity Event at Key Vendor

Dear Attorney General Labrador,

We are writing to inform your office of a vendor cybersecurity event that had a material impact on the normal operations of TIAA-CREF Life Insurance Company (“TC Life”) and its ability to provide services to our customers. Out of an abundance of caution, we have decided to send voluntary notices on TIAA / TC Life letterhead to potentially impacted customers and offer them free identity theft protection services for two years.

Background

On November 3, 2023, we became aware that Infosys McCamish Systems (McCamish) had suffered a cybersecurity event that prevented its ability to process transactions and perform other administrative services for its clients, including TIAA and TC Life.

Services Provided to TIAA and TC Life

McCamish, a division of Infosys, provides third party administration services to TIAA and TC Life individually owned life insurance and annuity contracts. TIAA and TC Life are dependent on McCamish for core transactional processes, including payments, loans, rebalancing, and tax administration.

Actions Taken to Isolate the Cybersecurity Event

McCamish promptly took steps to disconnect and isolate impacted McCamish systems, which resulted in a disruption of their operational support to TIAA and TC Life. We similarly terminated connections between our systems and McCamish to protect our systems from potential harm. TIAA cybersecurity teams scanned our systems, and TIAA has not identified any data or system compromise on our platforms.

Operational Outage Recovery Efforts

Eventually, McCamish sent an email on November 18, stating that systems were available for all customers to begin the business recovery process. We requested that McCamish executive leadership provide an attestation of a clean, secure, and uncompromised environment, which we finally received on November 28.

TIAA cyber and technology teams implemented additional controls to protect our environment during reconnection and file transfer activities between us and McCamish. TIAA and TC Life operations resumed on December 8, 2023, and we are caught up on the processing backlog.

Status of Our Data

McCamish has access to non-public personal information of contract holders. McCamish has engaged an eDiscovery team to review and investigate the data in potentially stolen files and to determine, to the extent possible, the scope of impacted personal information of TIAA / TC Life customers.

We remain in regular contact with McCamish as this investigation continues and we continue to request updates as to the status of our data.

Recently, McCamish identified certain TIAA / TC Life files that were impacted. Based on the names of those files, it is possible that personal information for some of our customers was exfiltrated. That data mining process to determine, to the extent possible, the scope of the impacted personal information of TIAA / TC Life customers is still ongoing. We are told we won't know the results of this investigation until the July timeframe.

It is unlikely we will ever be able to determine with certainty the exact scope of personal information that was compromised. While the information impacted varies from individual to individual, it could include some or all of the following: name, social security number, date of birth, life insurance policy number, annuity contract number, financial account number, and medical information that may have been provided to TIAA or TC Life in relation to a life insurance policy.

Per our usual practice, we are monitoring policy owner accounts for unusual activity and have not detected any unusual activity that is attributable to this cyber event.

Customer Communications

At this time, we are unable to confirm specifically what data was accessed or acquired without authorization, however, out of an abundance of caution, we have decided to send voluntary notices on TIAA / TC Life letterhead to potentially impacted TIAA / TC Life customers and offer them free identity theft protection services for two years, offered by McCamish. We are working through the final edits for these notices.

We continue to work with McCamish and our internal teams to ensure we are reaching out to the appropriate customers. As of today, the estimated number of impacted TIAA / TC Life customers that are residents in your state who will receive a courtesy notification is 1,300.

We anticipate beginning to mail these notices to the potentially impacted TIAA / TC Life customers by the end of February.

Should you have any questions regarding this letter or other aspects of this event, please contact us at (704) 988-6252 or lseyay@tiaa.org.

Sincerely,



Louis Senay
Managing Director, Supervisory Affairs
TIAA-CREF Life Insurance Company