



**CAYMAN
NATIONAL**

16263

URGENT AND IMPORTANT

22 November 2019

Name and address

Dear

Notification of Criminal Data Breach

We are deeply sorry to advise you that Cayman National in the Isle of Man has experienced a criminal data breach and that your data may have been affected.

What happened?

Based on forensic investigations to date, it appears that an unauthorised third party gained access to our electronic systems and obtained confidential data relating to our clients and our business.

We are aware that certain of the confidential data stolen has been published online, including personal, corporate, trust, and financial data, such as clients' names, addresses, account numbers, account balances, and bank statements.

We are also aware of claims made by third parties online that other confidential information, including copies of passports, KYC data, and communications between us and our clients, has been stolen and made available online. We are urgently investigating those claims. At this time, we also cannot rule out the possibility that they may release further stolen confidential information in the future.

What are we doing?

We are continuing to investigate the extent of the theft of confidential data as a matter of urgency. We have appointed specialist forensic and cyber security experts to assist with the investigation and further enhance the security of our systems and processes.

We have notified and will continue to liaise with the relevant regulators and authorities.

What should you do?

Cayman National Bank (Isle of Man) Limited and Cayman National Trust Company (Isle of Man) Limited
Cayman National House 4-8 Hope Street Douglas Isle of Man IM1 1AQ British Isles
T +44 (0)1624 646900 F +44 (0)1624 662192 info@caymannational.com www.caymannational.im

Member of the Republic Financial Holdings group of companies. Cayman National Bank (Isle of Man) Limited and Cayman National Trust Company (Isle of Man) Limited are registered in the Isle of Man numbered 025966C and 131302C respectively.

VAT No GB 000 717 527

Cayman National Bank (Isle of Man) Limited and Cayman National Trust Company (Isle of Man) Limited are licensed by the Isle of Man Financial Services Authority.



CAYMAN NATIONAL

As at this date, there have been no confirmed instances of fraud or identity theft.

However, we recommend that you continue to be extra vigilant in order to protect yourself. The stolen data could potentially be used for fraudulent purposes. We encourage you to be on the lookout for any suspicious communications requesting information or payment from you. Please be cautious of any communications purporting to come from us, particularly if any factor is different (e.g.: a different phone number, address, email, voice, instruction, etc.) Please remember that we will never contact you unprompted to ask for your account details or security information and we will never ask you to disclose your passwords.

If you suspect any suspicious activity, you should report it to your local police and our dedicated Breach Support Line, as detailed below.

We deeply regret having to write to you regarding this incident. Our commitment to security is paramount. We will strive to minimise any possible implications caused by this incident and to ensure the future safety of your data.

Should you have any questions, kindly contact our Breach Support Line on +44 800 640 9928 or email dataenquiry@caymannational.im. Please also call this number if you have any concerns or suspicions, however minor. We will continue to update our website www.caymannational.im with material developments in relation to this matter.

We thank you for your understanding.

Yours sincerely

Nigel Gautrey
Managing Director

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**CAYMAN
NATIONAL**

CONFIDENTIAL

20 December, 2019

[Name
Address]

CRIMINAL DATA BREACH: SUPPLEMENTAL NOTICE TO UNITED STATES RESIDENTS

Dear [Name]:

You recently received a letter from Cayman National in the Isle of Man, dated 22 November 2019, advising you that some of your personal information may have been compromised as a result of a criminal data breach.

At this time, our investigation is ongoing. As of this date, there have been no confirmed instances of fraud or identity theft.

We are sending this supplemental notice to provide you with further information regarding the personal data that has been potentially compromised and additional information about how best to protect yourself from identity theft, including details of a credit monitoring service we are offering you.

Personal Data Potentially Compromised

The personal data we hold on customers resident in the United States varies but may include data elements such as name, email address, address and/or P.O. Box address, Social Security number, Passport number, Driver's License number, and/or Visa number (if applicable). The specific set of personal data we hold will vary by individual customer. However, we are writing to advise you that, if you provided us with this information at some point in the past, it may have been compromised.

Other personal and financial information, such as: your client ID number with us, compliance level and method, account type(s), account number(s), account balance(s), source currency, and bank statements, and communications between us and our customers and internal

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communications relating to our customers may also have been compromised.

We are continuing to investigate the extent of the data theft and will update our website www.caymannational.im with material developments.

Credit Monitoring

We have teamed up with Equifax Limited credit reference agency to offer you free unlimited access to Credit Watch Gold with WebDetect online for 24 months.

Equifax® Credit Watch™ Gold with WebDetect Features

- Equifax® credit file monitoring and alerts to key changes to your Equifax credit report.
- Wireless alerts (available online only and data charges may apply).
- Access to your Equifax credit report.
- Internet Scanning¹ monitors suspicious web sites for your Social Security, Passport, Credit Card, Bank, and Insurance Policy Numbers, and alerts you if your private information is found there.
- Automatic Fraud Alerts² with a fraud alert, potential lenders are encouraged to take extra steps to verify your ID before extending credit.
- Up to \$25,000 Identity Theft Insurance³.
- Live agent Customer Service 7 days a week from 8 to 8.

¹ Internet scanning, will scan for your Social Security number (if you choose to), up to 5 bank account numbers, up to 6 credit/debit card numbers you provide, up to 3 email addresses, up to 10 medical ID numbers, and up to 5 passport numbers. Internet scanning scans thousands of Internet sites where consumers' personal information is suspected of being bought and sold, and is constantly adding new sites to those it searches. However, the Internet addresses of these suspected Internet trading sites are not published and frequently change, so there is no guarantee that Internet scanning is able to locate and search every possible Internet site where consumers' personal information is at risk of being traded.

² The Automatic Fraud Alert feature made available to consumers by Equifax Information Services LLC and fulfilled on its behalf by Equifax Consumer Services LLC.

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Enrolment Instructions

You must register before **16 March 2020** to activate this service.

To sign up online for online delivery go to http://myservices.equifax.com/efx1_bresngis

1. **Welcome Page:** Enter the Activation Code [INSERT CODE] in the "Activation Code" box and click the "Submit" button.
2. **Register:** Complete the form with your contact information (name, gender, home address, date of birth, Social Security Number and telephone number) and click the "Continue" button.
3. **Create Account:** Complete the form with your email address, create a User Name and Password, check the box to accept the Terms of Use and click the "Continue" button.
4. **Verify ID:** The system will then ask you up to four security questions to verify your identity. Please answer the questions and click the "Submit Order" button.
5. **Order Confirmation:** This page shows you your completed enrolment. Please click the "View My Product" button to access the product features.

Identity Restoration

- If you become a victim of identity theft, an Equifax identity restoration specialist will work on your behalf to help you restore your identity. To be eligible for Identity Restoration, you must complete the enrolment process for the subscription offer by the enrolment deadline above. Call the phone number listed in your online member centre for assistance.

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Additional Information and Resources

The attached document describes additional steps you can take to help protect yourself, including phishing guidance and recommendations by the Federal Trade Commission regarding identity theft protection and details on how to place a fraud alert or a security freeze on your credit file.

For More Information

Should you have any questions, kindly contact our Breach Support Line at +011 44 800 640 9928 or email dataenquiry@caymannational.im. Please also call this number or your usual contact at Cayman National if you have any concerns or suspicions, however minor.

Yours sincerely,

Nigel Gautrey

Managing Director

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Additional Information and Resources

Contact information for the three nationwide credit reporting companies is as follows:

Equifax	Experian	TransUnion
Phone: 1-800-685-1111 P.O. Box 740256 Atlanta, Georgia 30348 www.equifax.com	Phone: 1-888-397-3742 P.O. Box 9554 Allen, Texas 75013 www.experian.com	Phone: 1-888-909-8872 P.O. Box 105281 Atlanta, GA 30348-5281 www.transunion.com

Free Credit Report. We remind you to be vigilant for incidents of fraud or identity theft by reviewing your account statements and free credit reports for any unauthorized activity. You may obtain a copy of your credit report, free of charge, once every 12 months from each of the three nationwide credit reporting companies. To order your annual free credit report, please visit www.annualcreditreport.com or call toll free at 1-877-322-8228. You can also order your annual free credit report by mailing a completed Annual Credit Report Request Form (available from the U.S. Federal Trade Commission's ("FTC") website at www.consumer.ftc.gov) to: Annual Credit Report Request Service, P.O. Box 105281, Atlanta, GA 30348-5281.

For Massachusetts residents:

You may obtain one or more (depending on the state) additional copies of your credit report, free of charge. You must contact each of the credit reporting agencies directly to obtain such additional report(s).

Security Freeze. Security freezes, also known as credit freezes, restrict access to your credit file, making it harder for identity thieves to open new accounts in your name. However, please be aware that placing a security freeze on your credit report may delay, interfere with, or prevent the timely approval of any requests you make for new loans, credit mortgages, employment, housing or other services.

You can freeze and unfreeze your credit file for free. You also can get a free freeze for your children who are under 16. And if you are someone's guardian, conservator or have a valid power of attorney, you can get a free freeze for that person, too.

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How will these freezes work? If you request a freeze online or by phone, Equifax must place the freeze within one business day. If you request a lift of the freeze, Equifax must lift it within one hour. If you make your request by mail, Equifax must place or lift the freeze within three business days after it gets your request. You also can lift the freeze temporarily without a fee.

Don't confuse freezes with locks. They work in a similar way, but locks may have monthly fees. If you want a free freeze guaranteed by federal law, then opt for a freeze, not a lock.

In order to request a security freeze, you will need to provide some or all of the following information to Equifax, depending on whether you do so online, by phone, or by mail:

1. Your full name (including middle initial as well as Jr., Sr., II, III, etc.);
2. Social Security Number;
3. Date of birth;
4. If you have moved in the past five (5) years, the addresses where you have lived over the prior
5. five years;
6. Proof of current address, such as a current utility bill, telephone bill, rental agreement, or deed;
7. A legible photocopy of a government issued identification card (state driver's license or ID
8. card, military identification, etc.);
9. Social Security Card, pay stub, or W2;
10. If you are a victim of identity theft, include a copy of either the police report, investigative report, or complaint to a law enforcement agency concerning identity theft.

Fraud Alerts. A fraud alert tells businesses that check your credit that they should check with you before opening a new account. As of September 18, 2018 when you place a fraud alert, it will last one year, instead of 90 days. Fraud alerts will still be free and identity theft victims can still get an extended fraud alert for seven years.

Federal Trade Commission and State Attorneys General Offices. If you believe you are the victim of identity theft or have reason to believe your personal information has been misused, you should immediately contact the Federal Trade Commission and/or the Attorney General's office in your home state. You may also contact these agencies for information on how to prevent or avoid identity theft. You may contact the Federal Trade Commission, Consumer Response Center, 600 Pennsylvania Avenue, NW, Washington, DC 20580, www.ftc.gov/bcp/edu/microsites/idtheft/, 1-877-IDTHEFT (438-4338).

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Reporting of identity theft and obtaining a police report. You have the right to obtain any police report filed in the United States in regard to this incident. If you are the victim of fraud or identity theft, you also have the right to file a police report.

For Massachusetts residents: Under Massachusetts law, you have the right to obtain any police report filed in regard to this incident. If you are the victim of identity theft, you also have the right to file a police report and obtain a copy of it.

Guidance on how to spot "Phishing" communications

Please remain vigilant as it is possible that cyber criminals may use the data stolen from Cayman National in the Isle of Man in order to create authentic-looking hoax communications, which appear to come from someone you know and include details personal to you.

Please read all communications carefully and be cautious of any communications, that:

- Appear to come from Cayman National (or someone else you know) but have a misspelt address or slightly different domain name. Our email addresses for the Isle of Man end @caymannational.im. However, even emails that appear to come from a valid email domain may still be phishing emails, so it is important to consider other factors;
- Look unusual, unfamiliar, or not in keeping with the usual style of the sender;
- Make urgent appeals for fast action or invoke emotions such as fear;
- Request sensitive data or a payment;
- Include attachments, especially if they are unexpected, out of context, or are of an unexpected file type (such as a .exe file);
- Contain links, especially links to sites which do not appear connected to the email. You can check the true destination of the link by hovering your mouse over it, without clicking on it.

If you are suspicious about an email, do not click on any attachments or links or reply to or forward the email.

If an email or any other type of communication appears to be from someone you trust, but is asking you to provide sensitive information

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or make an unusual financial transaction, call or text the real sender to check.

If you are suspicious about an email that appears to come from Cayman National, you can send the email as an attachment (please do not forward it) to dataenquiry@caymannational.im with the subject: CRIMINAL DATA BREACH - SUSPECTED PHISHING. The Cayman National team can then verify whether it is a genuine email from us or a phishing email and take appropriate action.

If you do not wish to send the email as an attachment, you could send a screen shot of the email to dataenquiry@caymannational.im and then delete it, or simply delete it.

For more information on phishing emails you can visit <https://www.consumer.ftc.gov/articles/how-recognize-and-avoid-phishing-scams>.

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