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April 23, 2020



P.O. Box 2600
Valley Forge, PA 19482-2600

vanguard.com

Dear [REDACTED],

Vanguard is committed to protecting the confidentiality and security of our clients' information. We are writing to inform you of an issue involving some of your Vanguard account information. This notice provides you with information about the issue, measures we have taken, and some steps you can take in response.

We've recently discovered that your transfer request was sent to an incorrect financial institution and, as a result, your personal information was disclosed to the incorrect financial institution. Vanguard became aware of the transfer error during an internal audit. Vanguard has contacted the recipient financial institution and requested the return of your transfer paperwork. The information contained on your transfer request included your name, Social Security number, Vanguard account number, and [REDACTED] account number.

Vanguard sent you an email on March 27 to request that you submit new transfer paperwork, because the transferring financial institution requires a Medallion Signature Guarantee.

Although to date we have no evidence that any of your information has been misused, out of an abundance of caution, we wanted to let you know this happened and assure you we take it very seriously. As a precaution, we've already placed a security alert on your account. We also recommend that you take these steps:

- Add additional security features to your Vanguard accounts. For example, add a password and/or restrict Web or telephone access to your accounts. Call us at 800-608-8614 to learn more about the enhanced security features Vanguard has to offer.
- Carefully examine all Vanguard account statements and transaction confirmations to make sure there has not been any unauthorized activity.
- For some additional steps you can take to protect yourself, please see the pages that follow this letter.

Identity protection

To help protect your identity, we are offering a complimentary 24 month membership of Experian IdentityWorks. This product helps detect possible misuse of your personal information and provides you with superior identity protection support focused on immediate identification and resolution of identity theft.

Please note that Identity Restoration is available to you for 24 months from the date of this letter and does not require any action on your part at this time. The Terms and Conditions for this offer are located at www.ExperianIDWorks.com/restoration.

While identity restoration assistance is immediately available to you, you may also choose to activate the fraud detection tools available through Experian IdentityWorks as a complimentary 24 month membership. This product provides you with superior identity detection and resolution of identity theft. To start monitoring your personal information, please follow the steps below:

- Ensure that you enroll by 12/31/2020 (Your code will not work after this date.)
- Visit the Experian IdentityWorks website to enroll: www.experianidworks.com/plus2
- Provide your activation code: [REDACTED]

If you have questions about the product, need assistance with Identity Restoration that arose as a result of this incident or would like an alternative to enrolling in Experian IdentityWorks online, please contact Experian's customer care team at 1-877-890-9332 by 12/31/2020. Be prepared to provide engagement number DB1504as proof of eligibility for the Identity Restoration services by Experian.

ADDITIONAL DETAILS REGARDING YOUR 24 MONTH EXPERIAN IDENTITYWORKS MEMBERSHIP:

A credit card is not required for enrollment in Experian IdentityWorks.

You can contact Experian immediately regarding any fraud issues, and have access to the following features once you enroll in Experian IdentityWorks:

- **Experian credit report at signup:** See what information is associated with your credit file. Daily credit reports are available for online members only.*
- **Credit Monitoring:** Actively monitors your Experian file for indicators of fraud.
- **Internet Surveillance:** Technology searches the web, chat rooms & bulletin boards 24/7 to identify trading or selling of your personal information on the Dark Web.
- **Identity Restoration:** Identity Restoration specialists are immediately available to help you address credit and non-credit related fraud.
- **Experian IdentityWorks ExtendCARE™:** You receive the same high-level of Identity Restoration support even after your Experian IdentityWorks membership has expired.
- **\$1 Million Identity Theft Insurance**:** Provides coverage for certain costs and unauthorized electronic fund transfers.
- **Lost Wallet:** Provides assistance with canceling/replacing lost or stolen credit, debit, and medical cards.
- **Fraud Alerts:** Ability to place fraud alerts on your credit file to help protect you from credit fraud.

We regret any inconvenience or concern this issue may cause you. To help prevent something like this from happening in the future, we are analyzing Vanguard's processes for further improvement opportunities.

Contact information

Please feel free to contact [REDACTED] who is familiar with the information contained in this letter and will be pleased to assist you with additional safeguards and any questions you may have. You may reach him at 800-[REDACTED].

We take the obligation to protect your information very seriously, and we appreciate your continued confidence in Vanguard.

Sincerely,

[REDACTED]
Principal, Client Services and Operations
Retail Investor Group

ADDITIONAL STEPS YOU CAN TAKE

We remind you to remain 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. Contact information for the three nationwide credit reporting companies is as follows:

- *Equifax*, PO Box 740241, Atlanta, GA 30374, www.equifax.com, 1-800-685-1111
- *Experian*, PO Box 2002, Allen, TX 75013, www.experian.com, 1-888-397-3742
- *TransUnion*, PO Box 2000, Chester, PA 19016, www.transunion.com, 1-800-916-8800

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 state. You can obtain information from these sources about steps an individual can take to avoid identity theft as well as information about fraud alerts and security freezes. You should also contact your local law enforcement authorities and file a police report. Obtain a copy of the police report in case you are asked to provide copies to creditors to correct your records. Contact information for the Federal Trade Commission is as follows:

- *Federal Trade Commission*, Consumer Response Centre, 600 Pennsylvania Avenue NW, Washington, DC 20580, 1-877-IDTHEFT (438-4336), www.ftc.gov/idtheft

Fraud Alerts: There are two types of fraud alerts 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 contacting any of the three national credit reporting agencies.

Credit Freezes: You have the right to put a credit freeze, also known as a security freeze, on your credit file, free of charge, so that no new credit can be opened in your name without the use of a PIN that is issued to you when you initiate a freeze. A security freeze is designed to prevent potential credit grantors from accessing your credit report without your consent. If you place a security 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 security freeze may delay your ability to obtain credit.

There is no fee to place or lift a security freeze. Unlike a fraud alert, you must separately place a security freeze on your credit file at each credit reporting company. For information and instructions to place a security freeze, contact each of the credit reporting agencies at the addresses below:

- *Experian Security Freeze*, PO Box 9554, Allen, TX 75013, www.experian.com
- *TransUnion Security Freeze*, PO Box 2000, Chester, PA 19016, www.transunion.com
- *Equifax Security Freeze*, PO Box 105788, Atlanta, GA 30348, www.equifax.com

To request a security freeze, you will need to provide the following information:

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 years, provide the addresses where you have lived over the prior five years
5. Proof of current address such as a current utility bill or telephone bill
6. A legible photocopy of a government issued identification card (state driver's license or ID card, military identification, etc.)

7. If you are a victim of identity theft, include a copy of the police report, investigative report, or complaint to a law enforcement agency concerning identity theft.

The credit reporting agencies have one business day after receiving your request by toll-free telephone or secure electronic means, or three business days after receiving your request by mail, to place a security freeze on your credit report. The credit bureaus must also send written confirmation to you within five business days and provide you with a unique personal identification number ("PIN") or password or both that can be used by you to authorize the removal or lifting of the security freeze.

To lift the security freeze in order to allow a specific entity or individual access to your credit report, or to lift a security freeze for a specified period of time, you must submit a request through a toll-free telephone number, a secure electronic means maintained by a credit reporting agency, or by sending a written request via regular, certified, or overnight mail to the credit reporting agencies and include proper identification (name, address, and Social Security number) and the PIN or password provided to you when you placed the security freeze as well as the identity of those entities or individuals you would like to receive your credit report or the specific period of time you want the credit report available. The credit reporting agencies have one business day after receiving your request by toll-free telephone or secure electronic means, or three business days after receiving your request by mail, to lift the security freeze for those identified entities or for the specified period of time.

To remove the security freeze, you must submit a request through a toll-free telephone number, a secure electronic means maintained by a credit reporting agency, or by sending a written request via regular, certified, or overnight mail to each of the three credit bureaus and include proper identification (name, address, and Social Security number) and the PIN number or password provided to you when you placed the security freeze. The credit bureaus have one business day after receiving your request by toll-free telephone or secure electronic means, or three business days after receiving your request by mail, to remove the security freeze.

If you are a resident of Connecticut, Maryland, Massachusetts, North Carolina, or Rhode Island, you may contact and obtain information from your state attorney general at:

- *Connecticut Attorney General's Office*, 55 Elm Street, Hartford, CT 06106, 1-860-808-5318, www.ct.gov/ag
- *Maryland Attorney General's Office*, 200 St. Paul Place, Baltimore, MD 21202, 1-888-743-0023 / 1-410-576-6300, www.oag.state.md.us
- *Office of the Massachusetts Attorney General*, One Ashburton Place, Boston, MA 02108, 1-617-727-8400, www.mass.gov/ag/contact-us.html
- *North Carolina Attorney General's Office*, 9001 Mail Service Centre, Raleigh, NC 27699, 1-919-716-6400 / 1-877-566-7226, www.ncdoj.gov
- *Rhode Island Attorney General's Office*, 150 South Main Street, Providence, RI 02903, 1-401-274-4400, www.risag.ri.gov

If you are a resident of Massachusetts or Rhode Island, note that pursuant to Massachusetts or Rhode Island law, you have the right to file and obtain a copy of a police report. You also have the right to request a security freeze.