Vanguard

## November 21, 2023



Dear

We are writing to notify you of an issue that involves some of your personal information. Based on our forensic investigation completed this month, we learned that, in August 2023, an unauthorized party used the login credentials (*i.e.*, username and password) of some of our clients to access their online Vanguard accounts. Based on our investigation, the credentials appear to have been taken from third parties independent of Vanguard and were not obtained as a result of a compromise of our systems. After entering your credentials, the unauthorized party then used a malicious exploit to bypass two-factor authentication that was set up for your account. The unauthorized party subsequently logged in and fraudulently transferred money from your Vanguard account. The unauthorized party also may have accessed certain information in your account, including name, Social Security number, contact information (*e.g.*, postal address, email address and phone number), date of birth, and Vanguard account number. In addition, the unauthorized party reset a security question and answer associated with your account.

After learning of the issue, we promptly took steps to determine its nature and scope and implemented enhancements to our systems to help prevent further unauthorized login activity. We also engaged leading cybersecurity experts to assist with our forensic investigation. In addition we have taken actions to protect our clients. We have refunded the money that was fraudulently transferred from your account or cancelled the unauthorized transaction. We also locked potentially affected clients' accounts and required a password reset to help protect their accounts. We continue to monitor for suspicious activity.

We are alerting you about this issue so you can take steps to help protect yourself, such as the following:

- Review your Vanguard online account information to ensure it is accurate.
- Change the security questions and answers associated with your online Vanguard account, if you have not done so already.
- Change your login credentials for any other online service where you used a username and password that are the same as or similar to those used for your online Vanguard account.

- Monitor your online Vanguard account for suspicious activity. If you believe fraudulent activity has occurred on your Vanguard account, please call us at 877-223-6977 for support.
- Order a credit report. You are entitled under U.S. law to one free credit report annually from each of the three nationwide consumer reporting agencies. To order your free credit report, visit www.annualcreditreport.com or call toll-free at 1-877-322-8228.

In addition, we have arranged to offer identity protection and credit monitoring services to you for two years at no cost. The attached Reference Guide provides information on registration and recommendations by the U.S. Federal Trade Commission on the protection of personal information.

We regret any inconvenience this may cause you and hope this information is useful to you. At Vanguard, we take seriously our responsibility to protect your information. If you have any questions regarding this issue, please call Erin McElwee 877-662-7447 ext. 34452 between the hours of 9:30am – 4:00pm, M-F.

Sincerely,

Armond Mosley Principal, Head of Self-Directed Personal Investor

## **Reference Guide**

We encourage you to take the following steps:

**<u>Register for Identity Protection and Credit Monitoring Services.</u>** We have secured the services of Kroll to provide identity monitoring at no cost to you for <u>two years</u>. Kroll is a global leader in risk mitigation and response, and their team has extensive experience helping people who have sustained an unintentional exposure of confidential data. Your identity monitoring services<sup>1</sup> include Credit Monitoring, Fraud Consultation, and Identity Theft Restoration.

## How to Activate Your Identity Monitoring Services

- 1. You must activate your identity monitoring services by November 22, 2024. Your Activation Code will not work after this date.
- 2. Visit Enroll.krollmonitoring.com/redeem to activate your identity monitoring services.
- 3.

# Take Advantage of Your Identify Monitoring Services

You've been provided with access to the following services<sup>1</sup> from Kroll:

## Single Bureau Credit Monitoring

You will receive alerts when there are changes to your credit data—for instance, when a new line of credit is applied for in your name. If you do not recognize the activity, you'll have the option to call a Kroll fraud specialist, who can help you determine if it's an indicator of identity theft.

### Fraud Cosultation

You have unlimited access to consultation with a Kroll fraud specialist. Support includes showing you the most effective ways to protect your identity, explaining your rights and protections under the law, assistance with fraud alerts, and interpreting how personal information is accessed and used, including investigating suspicious activity that could be tied to an identity theft event.

### **Identity Theft Restoration**

If you become a victim of identity theft, an experienced Kroll licensed investigator will work on your behalf to resolve related issues. You will have access to a dedicated investigator who understands your issues and can do most of the work for you. Your investigator can dig deep to uncover the scope of the identity theft, and then work to resolve it.

<sup>&</sup>lt;sup>1</sup> Kroll's activation website is only compatible with the current version or one version earlier of Chrome, Firefox, Safari and Edge. To receive credit services, you must be over the age of 18 and have established credit in the U.S., have a Social Security number in your name, and have a U.S. residential address associated with your credit file.

<u>Order Your Free Credit Report.</u> To order your free credit report, visit www.annualcreditreport.com, call toll-free at 1-877-322-8228, or complete the Annual Credit Report Request Form on the U.S. Federal Trade Commission's ("FTC's") website at www.consumer.ftc.gov and mail it to Annual Credit Report Request Service, P.O. Box 105281, Atlanta, GA 30348-5281. The three nationwide consumer reporting agencies provide free annual credit reports only through the website, toll-free number or request form.

When you receive your credit report, review it carefully. Look for accounts you did not open. Look in the "inquiries" section for names of creditors from whom you haven't requested credit. Some companies bill under names other than their store or commercial names. The consumer reporting agency will be able to tell you when that is the case. Look in the "personal information" section for any inaccuracies in your information (such as home address and Social Security number). If you see anything you do not understand, call the consumer reporting agency at the telephone number on the report. Errors in this information may be a warning sign of possible identity theft. You should notify the consumer reporting agencies of any inaccuracies in your report, whether due to error or fraud, as soon as possible so the information can be investigated and, if found to be in error, corrected. If there are accounts or charges you did not authorize, immediately notify the appropriate consumer reporting agency by telephone and in writing. Consumer reporting agency staff will review your report with you. If the information cannot be explained, then you will need to call the creditors involved. Information that cannot be explained also should be reported to your local police or sheriff's office because it may signal criminal activity.

**<u>Report Incidents.</u>** If you detect any unauthorized transactions in a financial account, promptly notify your payment card company or financial institution. If you detect any incident of identity theft or fraud, promptly report the incident to law enforcement, the FTC and your state Attorney General. If you believe your identity has been stolen, the FTC recommends that you take these steps:

- Close the accounts that you have confirmed or believe have been tampered with or opened fraudulently. For streamlined checklists and sample letters to help guide you through the recovery process, please visit https://www.identitytheft.gov/.
- File a local police report. Obtain a copy of the police report and submit it to your creditors and any others that may require proof of the identity theft crime.

You can contact the FTC to learn more about how to protect yourself from becoming a victim of identity theft and how to repair identity theft:

Federal Trade Commission Consumer Response Center 600 Pennsylvania Avenue, NW Washington, DC 20580 1-877-IDTHEFT (438-4338) www.ftc.gov/idtheft/

<u>Consider Placing a Fraud Alert on Your Credit File.</u> To protect yourself from possible identity theft, consider placing a fraud alert on your credit file. A fraud alert helps protect you against the possibility of an identity thief opening new credit accounts in your name. When a merchant checks the credit history of someone applying for credit, the merchant gets a notice that the applicant may be the victim of identity theft. The alert notifies the merchant to take steps to verify the identity of the

applicant. You can place a fraud alert on your credit report by calling any one of the toll-free numbers provided below. You will reach an automated telephone system that allows you to flag your file with a fraud alert at all three consumer reporting agencies. For more information on fraud alerts, you also may contact the FTC as described above.

Equifax	Equifax Information Services LLC	1-800-525-6285	www.equifax.com
	P.O. Box 740241		
	Atlanta, GA 30374		
Experian	Experian Inc.	1-888-397-3742	www.experian.com
_	P.O. Box 9554		
	Allen, TX 75013		
TransUnion	TransUnion LLC	1-800-680-7289	www.transunion.com
	P.O. Box 2000		
	Chester, PA 19016		

<u>Consider Placing a Security Freeze on Your Credit File.</u> You may wish to place a "security freeze" (also known as a "credit freeze") on your credit file. A security freeze is designed to prevent potential creditors from accessing your credit file at the consumer reporting agencies without your consent. Unlike a fraud alert, you must place a security freeze on your credit file at each consumer reporting agency individually. There is no charge to place or lift a security freeze. For more information on security freezes, you may contact the three nationwide consumer reporting agencies or the FTC as described above. As the instructions for establishing a security freeze differ from state to state, please contact the three nationwide consumer reporting agencies to find out more information.

The consumer reporting agencies may require proper identification prior to honoring your request. For example, you may be asked to provide:

- Your full name with middle initial and generation (such as Jr., Sr., II, III)
- Your Social Security number
- Your date of birth
- Addresses where you have lived over the past five years
- A legible copy of a government-issued identification card (such as a state driver's license or military ID card)
- Proof of your current residential address (such as a current utility bill or account statement)

**For Massachusetts Residents.** You have the right to obtain a police report and request a security freeze as described above. The consumer reporting agencies may require that you provide certain personal information (such as your name, Social Security number, date of birth, and address) and proper identification (such as a copy of a government-issued ID card and a bill or statement) prior to honoring your request to place a security freeze on your account.