

The Northern Trust Company
50 South LaSalle Street
Chicago, Illinois 60603



Northern Trust

BY EMAIL TO OCP@DCCA.HAWAII.GOV

July 29, 2014

Executive Director Bruce B. Kim
Department of Commerce and Consumer Affairs
Office of Consumer Protection
Leiopapa A Kamehameha Building
235 South Beretania Street, Suite 801
Honolulu, Hawaii 96813
ocp@dcca.hawaii.gov

Dear Director Kim:

Pursuant to Haw. Rev. Stat. §§ 487N-1-2, we are writing to notify you of an unauthorized access to personal information involving 1,267 Hawaii residents in total. Although this unauthorized access did not meet the statutory requirements to notify residents in your state, as a policy matter Northern Trust decided to notify the affected residents, therefore Northern Trust is also notifying you.

The Northern Trust Company ("Northern Trust") is an Illinois-based financial services company that provides payment services to employee and retiree benefits plans for client companies nationwide. To provide those services, Northern Trust maintains certain personal information about plan participants and routinely provides that information to third-party record-keeping companies that assist in administering the benefits plans and programs.

As part of normal procedures, Northern Trust sends participant information to record-keeping companies that assist in administering those benefit plans and programs. On May 17, 2014, a Northern Trust employee transmitted a file containing participant personal information to one of our record-keeping companies. The information included participant name, address, Social Security number, and benefits plan or program account number, as well as other information about the participant's benefits plan or program account, such as payment/deduction amounts and, in some situations, bank routing and account numbers used for direct deposits. In compliance with our policy, that file was transmitted in an encrypted format in order to prevent unauthorized disclosure. The recipient record-keeping company was authorized to receive this type of data for participants in programs and plans that it administers for other companies, but it was not authorized to receive the personal information regarding certain other participants. The one employee of the record-keeping company who viewed the information is trained in handling and protecting personal information, and works with this same type of personal information for other participants.

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Please be assured that we have taken every step necessary to address this incident. Upon learning of this error on May 19, Northern Trust began investigating how this incident occurred and whether the affected individuals were at risk of harm. As noted above, only one employee of the record-keeping company viewed the file. Following a comprehensive investigation, we have determined that appropriate steps were taken to protect the information from misuse. Upon realizing that the encrypted file from Northern Trust contained personal information that was transmitted in error, the employee promptly notified Northern Trust and followed protocol by permanently deleting the file. And, as confirmed in a sworn statement, the information was never forwarded to any other third party and was not retained on the information system of that record-keeper. We are also reviewing our policies and procedures to ensure that a similar incident does not occur in the future.

We have no indication whatsoever that any personal information of the participants is at risk of misuse now or in the future. Nonetheless, as a courtesy, we have taken steps to ensure that those affected are protected from identity theft or other misuse of their data. Northern Trust is offering one year of free credit monitoring to the individuals whose information was included in the file. Northern Trust will also provide a call center to answer questions and assist those that wish to enroll in credit monitoring. We will provide the affected participants formal notice commencing later this week. We have notified all three credit reporting agencies. Attachment A lists Northern Trust clients that had some of their participant information inadvertently transmitted to the record-keeping company.

If you have any questions about this incident or would like additional information, please contact our outside counsel Mary Ellen Callahan at (202) 639-6064, mecallahan@jenner.com.

Sincerely,



Stacey C. Bolton
Senior Vice President, Global Compliance

Attachment (1)

Northern Trust Attachment A

List of Northern Trust Clients¹

Aon Corporation
BJC Health System
CHE Trinity, Inc., including Trinity Health and Gottlieb Memorial Hospital
Deutsche Bank Cash Account Pension Plan
Dow Corning Employees' Retirement Plan
Duke Energy Corporation
Exelis Inc.
Exelon Corporation
Gannett Co., Inc.
Goldman Sachs
Henry Ford Health System
Honeywell International Inc.
HSBC North America Holdings Inc.
Kellogg Company
L'Oreal USA
Louisiana Pacific Corporation
McGraw Hill Financial
Merck & Co
Morgan Stanley
Motorola Solutions, Inc. formerly known as Motorola, Inc.
Navistar, Inc.
NiSource
The Northern Trust Company
The Pension Boards - United Church of Christ, Inc.
Rockwell Automation Pension Plan
R.R. Donnelley and Sons Company
United States Enrichment Corporation's Plan
USG Corporation

¹ that had some of their participant information inadvertently transmitted to the record-keeping company