



AIG Life and Retirement  
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Legal Department  
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STATE OF HAWAII  
CONSUMER PROTECTION

February 26, 2014

Hawaii Office of Consumer Protection  
Leiopapa A Kamehameha Building  
235 South Beretania Street, Suite 801  
Honolulu, Hawaii 96813

RE: Notice of Privacy Risk Incident

Dear Director:

On behalf of The Variable Annuity Life Insurance Company ("VALIC") I am writing to inform you about an incident involving information maintained by VALIC and relating to Hawaii residents.

Specifically, we have determined that a financial advisor formerly associated with VALIC was in possession of information related to some of our customers. We have been working with federal law enforcement on this matter, including obtaining the return of our information. The former financial advisor was arrested by federal law enforcement on September 30, 2013 and is being criminally prosecuted. On or about October 29, 2013, VALIC received a thumb drive from federal law enforcement containing information seized through execution of a search warrant and other information that the former financial advisor provided to law enforcement. VALIC completed its preliminary analysis of the information on the thumb drive on November 12, 2013 and determined that the former financial advisor was in possession of certain VALIC customer information, including customer names and full or partial Social Security Numbers. It took several more weeks to confirm which participants' information was included and determine their current contact information due to the quality, format and age of the data on the drive and the fact that full SSNs were not included in all cases.

We have no indication at this time that the information contained in these files received from law enforcement has been used by the former financial advisor to access VALIC accounts, other than customers whom we previously notified.

Nonetheless, the Company will provide written notice on or about the last week of February 2014 and one year of free identity theft remediation services through AllClear ID to the 4,015 Hawaii customers that were identified through this investigation. A total nationwide population of 774,723 has been identified.



We are continuing to work with law enforcement on this incident. Should you have any questions regarding this information feel free to contact me at 713-831-6316.

Sincerely,

A handwritten signature in black ink, appearing to be "Jim Coppedge", written over a horizontal line.

Jim Coppedge

cc: Melissa Cozart, Privacy Officer AIG Life and Retirement  
Jim Coppedge, General Counsel Group Retirement  
Kyle Jennings, Chief Compliance Officer AIG Life and Retirement

February \*\*, 2014

[PARTICIPANT NAME]  
[ADDRESS1, ADDRESS2]  
[ADDRESS3]  
[PARTICIPANT CITY], [ST] [ZIP]

Dear [PARTICIPANT NAME]:

We wanted to let you know about a situation involving unauthorized access to your personal information. It recently came to our attention that a financial advisor formerly associated with VALIC was in possession of information relating to some of our customers including you. This included customer names and either partial or complete Social Security numbers. There is no indication that your information has been misused.

The financial advisor left VALIC in October of 2007, and during the past six years, we know of no unusual activities involving your VALIC account related to this situation. However, at VALIC, we take the protection of your personal information very seriously and felt it was important to notify you of this situation.

Beginning on the date of this letter, we also are automatically providing you complimentary identity protection services for one year. If a problem should arise concerning your identity, call AllClear ID at xxxxx and a dedicated investigator will do the work necessary to preserve your identity, credit and financial condition. We value the trust you have placed in our company and apologize for any concern this matter may cause you. If you have any questions, please contact AllClear ID who will be happy to assist you.

Sincerely,

# Helpful hints — how to keep your identity safe

Actions that can help protect against misuse of personal information

Take an active role in preserving your name and credit!

Review credit reports and account statements: **Report suspicious activity immediately**

As a precautionary measure we recommend that you remain vigilant for incidents of fraud and identity theft, including by regularly reviewing your account statements and monitoring free credit reports. If you detect suspicious activity on an account, you should immediately notify the financial institution or company with which the account is maintained. You also may promptly report any fraudulent activity or suspected incidence of identity theft to proper law enforcement authorities or the Federal Trade Commission (FTC).

To obtain more information from the FTC, you can visit <http://www.consumer.gov/idtheft> or call 1-877-ID-THEFT (877-438-4338). The FTC mailing address is 600 Pennsylvania Ave, NW, Washington, DC 20580.

Get a copy of your credit report

You may obtain a free copy of your credit report from each of the three major credit reporting agencies once every 12 months by visiting [www.annualcreditreport.com](http://www.annualcreditreport.com) or by calling 877-322-8228. Contact information for the three national credit reporting agencies is provided below:

Equifax (800) 525-6285 <a href="http://www.equifax.com">www.equifax.com</a> P.O. Box 740241 Atlanta, GA 30374	Experian (888) 397-3742 <a href="http://www.experian.com">www.experian.com</a> P.O. Box 2002 Allen, TX 75013	Transunion (800) 680-7289 <a href="http://www.transunion.com">www.transunion.com</a> P.O. Box 2000 Chester, PA 19022
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Request fraud alerts and security freezes

In addition, you may contact the fraud departments of the three national consumer reporting agencies or the FTC to obtain information about placing fraud alerts or security freezes in your file. A security freeze may delay, interfere with or prohibit the timely approval of any subsequent request or application you make, so be sure to understand rules and consequences. In addition, you may be charged a fee for this service.