

CONTINENTAL GENERAL INSURANCE COMPANY

How was the information exposed, lost, stolen, or breached, including the specific roles and responsibilities of Third-Party Service Providers, if any?

Continental General Insurance Company ("CGIC") contracts with MassMutual Ascend Life Insurance Company ("MMA") to administer its life insurance policies and annuities. MMA's vendor, Pension Benefit Information, LLC ("PBI"), provides MMA with regulatory compliance and operational support services to determine whether policyholders are still living. CGIC's communications have been with its administrator, MMA. MMA notified CGIC that PBI was affected by the MOVEit zero-day security vulnerability resulting in an unauthorized party's access to certain customer data held by PBI. MMA informed CGIC that once PBI discovered it was victim to the MOVEit zero-day security vulnerability, PBI completed the recommended patching and remediation steps, notified law enforcement of the incident, and engaged in an investigation to determine the extent of the incident. PBI's investigation confirmed that a threat actor exploited the zero-day MOVEit vulnerability and accessed one of PBI's servers between May 29 and May 30, 2023. To date, the threat actor has not posted any data related to the PBI Incident to its leak site.

MMA received confirmation from PBI on July 11 that MMA customer records were included in the security incident, and in response MMA suspended all transmissions of data to PBI and began its investigation. On July 14 MMA notified CGIC of the incident and of its ongoing investigation, and on July 20 confirmed that certain CGIC customer records held by MMA were affected. CGIC began investigating the event and its obligations through communications with MMA (and indirectly with PBI through MMA) and concluded on July 27 that the incident involved certain CGIC policyholder information that would trigger notice requirements.

Statement that outlines the steps being taken to investigate and notify Consumers affected by the Cybersecurity Event.

MMA confirmed that it will be working with PBI to provide consumer notices, including for the business MMA administers on behalf of CGIC. MMA informed CGIC that PBI engaged Kroll to administer notice letters to affected individuals and to establish a call center to field inquiries. MMA has confirmed that consumers will be offered 24 months of complimentary identity monitoring provided through Kroll. Because CGIC administers its life insurance and annuity policies through an administrator, consumers are not accustomed to receiving communications directly from CGIC. Accordingly, CGIC has been working with MMA that has been working with PBI, to have PBI (as the actual entity who experienced the breach) send out the consumer notices. CGIC has reviewed and approved the attached consumer notice.