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November 7, 2018

VIA E-MAIL ONLY

Montana Department of Justice
Office of Consumer Protection
P.O. Box 200151
Helena, MT 59620-0151
E-mail: ocpdatabreach@mt.gov

Re: Notice of Data Event

Dear Sir/Madam:

We represent Unified Trust Company, N.A. (“UTC”), 2353 Alexandria Drive, Suite 100, Lexington, KY 40504, and write to provide notice to your office of an incident that may affect the security of personal information relating to certain Montana residents. This notice may be supplemented with any new significant facts learned subsequent to its submission. By providing this notice, UTC does not waive any rights or defenses regarding the applicability of Montana law, the Montana data event notification statute, or personal jurisdiction.

Nature of the Data Event

On or about February 13, 2018, UTC became aware of suspicious activity within a UTC employee’s email account. Upon learning of this suspicious email activity, UTC promptly launched an internal investigation, with the assistance of third-party forensic investigators. Through this investigation, on or about August 1, 2018, UTC confirmed that there was unauthorized access to two UTC email accounts between December 6, 2017 and February 25, 2018.

On or about October 1, 2018, as the result of a thorough review of the potentially exposed contents of the two email accounts, the investigation confirmed the population of potentially impacted individuals. The types of personal information potentially impacted in relation to this incident include the following: name, date of birth, address, Social Security number, and, for some, financial account number. Beginning on October 1, 2018, UTC took steps to identify the address information necessary for providing notification to the affected individuals.

Notice to Montana Residents

On November 7, 2018, UTC began mailing written notice of this incident to the affected individuals, including one hundred sixty-seven (167) Montana residents. Written notice will be provided in substantially the same form as the letter attached hereto as *Exhibit A*.

Other Steps Taken and to Be Taken

Upon discovering this incident, UTC promptly began an investigation with the assistance of a third-party computer forensics expert to determine the nature and scope of this incident, including identifying the individuals who may be affected, putting in place resources to assist them, and providing them with notice of this incident. UTC identified and mitigated the issue by ensuring that passwords for the affected email accounts were changed. UTC has also taken additional actions to strengthen the security of their email systems, including implementing multi-factor authentication and enhanced security procedures around client accounts, as well as providing additional training to users on how to identify phishing scams.

UTC is providing potentially affected individuals access to 12 months of credit monitoring and identity restoration services, through AllClear ID. Additionally, UTC is providing potentially impacted individuals with guidance on how to better protect against identity theft and fraud, including information on how to place a fraud alert and security freeze on one's credit file, the contact details for the national consumer reporting agencies, information on how to obtain a free credit report, a reminder to remain vigilant for incidents of identity theft and fraud by reviewing account statements and monitoring free credit reports, and encouragement to contact the Federal Trade Commission, their state Attorney General, and law enforcement to report attempted or actual identity theft and fraud.

UTC reported this incident to, and has been cooperating with, their primary federal regulator, the Office for the Comptroller of the Currency (the "OCC"). UTC is also notifying other state regulators and the consumer reporting agencies, as required.

Contact Information

Should you have any questions regarding this notification or other aspects of the data security event, please contact us at 267-930-4801.

Very truly yours,



Alexander Walker of
MULLEN COUGHLIN LLC

ATW/anm