

March 17, 2021

Craig Sharkey
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Consumer Protection Division
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VIA EMAIL: ocpdatabreach@mt.gov

To Whom It May Concern:

On February 22, 2021, the Kroger Company, a Western Union Retail Money Transfer Partner agent, informed Western Union that a file transfer service used by Kroger to transfer large data files associated with its money transfer operations, among other services, was compromised. Western Union's information systems were not affected by this incident, and we have no evidence that any money transfers were impacted.

The file transfer service was provided by Kroger's vendor, Accellion. Kroger used Accellion File Transfer Application (FTA) to transmit operational reports related to money transfers that were initiated or paid out in person at Kroger retail locations, as well as retail locations of additional Kroger-owned retail brands. The compromise resulted in an unauthorized party exfiltrating significant volumes of data and files from Kroger's Accellion FTA instance. Among other files taken from the Kroger FTA instance were compliance monitoring reports associated with Western Union money transfers initiated or paid out at Kroger and its subsidiaries' retail locations.

According to Kroger, Kroger learned of the unauthorized access on January 23, 2021 and the incident occurred between December 24, 2020 and December 29, 2020. Kroger notified the Cincinnati office of the Federal Bureau of Investigation of the incident on January 29, 2021. Kroger has also stated that its own information systems were not impacted. Finally, Kroger has assured us that it no longer uses the impacted service and has created a website for the incident (<https://www.kroger.com/i/accellion-incident>).

On February 25, 2021, Western Union began receiving the data from Kroger necessary to determine what personal information handled by Kroger was affected and which customers were impacted due to the compromise of Kroger's file transfer service. Our investigation revealed that the information affected may have included the following: first name, last name, address, phone number, driver's license number or other government-issued identification, and Social Security Number. Notification letters are

scheduled to be mailed to eight affected residents of Montana on March 17, 2021. A sample copy of the individual notification letter is enclosed. Western Union is offering those individuals complimentary access to Experian IdentityWorks for a period of two years. The IdentityWorks service includes identity restoration, credit monitoring, identity theft insurance, and fraud detection tools.

We take this matter very seriously and are fully committed to protecting the privacy and security of our customers' information. As noted above, after learning of this incident, we immediately initiated an investigation. We have confirmed that Kroger stopped using the affected file transfer service provided by Accellion. Although our own systems were not impacted and this event has no material impact on Western Union, we will be reviewing Kroger's security practices and monitoring the circumstances surrounding this event.

Sincerely,

A handwritten signature in blue ink, appearing to read 'H + J' or similar, with a large loop at the end.

Craig Sharkey
Western Union Financial Services, Inc.

Attachment