JOSH STEIN
ATTORNEY GENERAL

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REPLY TO:
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September 28, 2017

TransUnion
c/o John W. Blenke
555 West Adams Street
Chicago, Illinois 60661

RE: **TransUnion data security**

Dear Mr. Blenke:

In light of the recent and extremely concerning Equifax security breach, I am writing to request that TransUnion provide the North Carolina Attorney General's office with information relating to its own data security practices and procedures. The Equifax incident is alarming given the amount of information exposed and the nature of the information involved. Because TransUnion, as an entity engaged in the same type of credit reporting business as Equifax, collects the same type of highly sensitive information on consumers as Equifax, we believe it is appropriate to request that TransUnion provide us with information regarding steps it is taking to prevent security breaches.

Furthermore, we urge TransUnion to examine its current security procedures to determine if they are sufficient and suitable to protect consumers' personal information. It is vitally important that the safety tools and technology in place are up-to-date, utilizing any available safety measures, and that any vulnerabilities are patched as soon as possible to prevent another disastrous data breach.

In addition, recent reports have indicated that TransUnion is using the Equifax breach as an opportunity to sell its own credit lock products, and as it pushes these products on consumers may be making misrepresentations regarding security freezes. Security freezes are a valuable resource for consumers in order to lock down access to their credit reports in the wake of the Equifax and other breaches. It is troubling to hear that TransUnion may be confusing consumers and mischaracterizing the nature of a security freeze – for example, by indicating that consumers will not have control of the access to their credit information with a security freeze - in order to induce consumers into signing up for TransUnion propriety products for a monthly fee.

Regarding TransUnion's current security technology and procedures, and TransUnion's sales efforts, we are requesting that you answer the following questions and provide the following information.

1. Describe any and all safeguards TransUnion has in place to prevent unauthorized access to consumer personal information. Please include in your response any and all information pertaining to safeguards regarding encryption technologies and password hashing techniques.

2. When were TransUnion's current security measures last updated and/or patched? Please include in your response information regarding the last time the system was updated or patched as well as copies of all policies and procedures in place at TransUnion regarding any operating system or application software patch management.

3. How many complaints, cancellations, or requests for reimbursements/refunds has TransUnion received since September 7, 2017, from consumers who wanted to sign up for a security freeze but ended up with a proprietary credit lock or proprietary credit monitoring or consumers who signed up for a free proprietary credit lock but ended up with unwanted fee-based credit monitoring? Please include a copy of any complaints, cancellations, and requests for refunds in your response in your response. In addition, in your response please include the services included and the terms and conditions of TransUnion's proprietary credit lock product and the services included and the terms and conditions for TransUnion's proprietary credit monitoring product. Also include information about the steps a consumer wanting a security freeze must go through in order to access the security freeze sign up page.

Please provide the above requested information no later than October 13, 2017. Thank you for your attention to this matter. If you have any questions, feel free to contact me directly at 919-716-6013 or kdarruda@ncdoj.gov.

Sincerely,

Kimberley A. D'Arruda
Special Deputy Attorney General