



Jim Nussle
President & CEO

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September 13, 2017

Richard F. Smith
Chairman and Chief Executive Officer
Equifax
1550 Peachtree Street NE
Atlanta, GA 30309

Dear Mr. Smith:

The Credit Union National Association (CUNA) represents America's credit unions and their 110 million members. We are writing this letter to voice our concerns over the September 7 announcement of a "cybersecurity incident involving consumer information."

The document contained on Equifax's website states that, "information accessed during the breach primarily includes names, Social Security numbers, birth dates, addresses and, in some instances, driver's license numbers."¹ An additional 209,000 credit card numbers were also stolen. Many of our credit union members and their consumer/members reasonably anticipate they will be harmed based on the scope and impact of this data breach.

Presumably, criminals or a criminal enterprise now has personally identifying information on 143 million American consumers. Equifax's loss of this information puts these consumers at risk for fraud and identity theft as this information is specific to individuals and represents the core of their digital identity. When its members are at risk, credit unions also must take related steps to protect those members. The risk of identity theft could be lifelong when a Social Security number is compromised.

We understand that Equifax is taking steps to directly notify all consumers impacted by the breach and that your organization has made one year of its TrustedID product available to consumers who are the victims of the breach. We are unconvinced that that remedy alone is sufficient.

Considering that Equifax does not have a direct relationship with and may be unknown to consumers, we recommend it minimally take additional steps to ensure consumers have knowledge of the breach and access to mitigation services. Consumers value the protection of their personal and financial information and as a result, may view correspondence from Equifax as junk mail or as a suspicious use of their information because of this lack of direct relationship; therefore, they may miss notification of the breach.

Therefore, we encourage Equifax to develop stronger methods to ensure that all consumers have been contacted and fully appreciate the implication of the breach to their credit file and the risks of identity

¹ <https://investor.equifax.com/news-and-events/news/2017/09-07-2017-213000628>

theft. We leave this method up to your organization but remind you again that a press release and generic letter likely do not suffice for an entity like Equifax that is unknown to many consumers.

We also encourage Equifax to immediately provide more information to consumers and businesses impacted by the breach. The vacuum of information available only serves to sow additional angst for credit unions and consumers and does little to help Equifax protect them from the breach.

We remain unconvinced that the steps you have proposed are sufficient to address this breach. Therefore, we request a detailed briefing regarding the breach and your consumer notification and protection efforts so we can adequately inform our members of the negative impact the data breach might have on their operations and so they can assess their level of risk. Please do not hesitate to contact me at 202-508-6745, to schedule a briefing for me and my staff.

Please feel free to contact me if you have questions about this letter and our position. On behalf of America's credit unions and their 110 million members, thank you for your consideration of our concerns.

Sincerely,

A handwritten signature in black ink, appearing to read "Jim Nussle". The signature is fluid and cursive, with a large initial "J" and "N".

Jim Nussle
President & CEO