



STATE OF CONNECTICUT

INSURANCE DEPARTMENT

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 IN THE MATTER OF : DOCKET MC 24-98
 Trinity Universal Insurance Company :
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STIPULATION AND CONSENT ORDER

WHEREAS, Trinity Universal Insurance Company, (hereinafter referred to as "Trinity Universal" or the Respondent") is an accredited reinsurer, incorporated under the laws of the State of Texas with its principal business address at 8360 LBJ Freeway, Suite 400, Dallas, TX, 75243;

WHEREAS, pursuant to Conn. Gen. Stat. §38a-16, the Insurance Commissioner has conducted an investigation of Trinity Universal's conduct relating to the personal identifiable and other information it maintains of its Connecticut members;

WHEREAS, the Insurance Commissioner has determined that Trinity Universal failed to exhibit an acceptable level of good management, as it is required for licensure as an accredited reinsurer by Conn. Gen. Stat. §38a-85(c), when it discovered that a padlocked case ("Lockbox") containing backup tapes of certain servers was missing from its Jacksonville, Florida office. The Lockbox contained files with unencrypted personal information of 20,806 Connecticut members, which files, despite Respondent's personnel search of the Jacksonville Office were unable to be located, resulting in the loss of the tapes and the personal information of such Connecticut residents, including names, addresses, driver's licenses, Social Security numbers, financial account information, and claims information such as health insurance and medical information ("the Loss");

WHEREAS, during the period of time the Lockbox went missing a moving company engaged by the Respondent was working onsite and was unable to locate the missing Lockbox.

WHEREAS, the Respondent notified law enforcement that the Lockbox was missing.

WHEREAS, the Insurance Commissioner has reviewed the Data Classification and Handling Policy (the "Policy") and the Data Classification and Handling Guideline (the "Guideline") that apply to Trinity Universal, and determined that they comply with Conn. Gen. Stat. §38a-38 and §38a-8-124 through 38a-126, inclusive, of the Regulations of Connecticut State Agencies;

WHEREAS, the Insurance Commissioner has determined that the failure of an employee of an affiliate of Trinity Universal who was providing services to Trinity Universal to comply with the Policy and the Guideline constituted a failure to properly safeguard the personal information from potential misuse by third parties in violation of Conn. Gen. Stat. §42-471;

WHEREAS, Trinity Universal cooperated with the Insurance Commissioner's review of this matter, and confirmed to the Insurance Commissioner that it has remediated the incident;

WHEREAS, Trinity Universal has identified and notified its members whose personal identifiable information and/or Social Security Number was on the unencrypted backup tapes;

WHEREAS, Trinity Universal has undertaken steps to improve data and personnel security;

WHEREAS, it is understood and agreed that this Stipulation and Consent Order shall not be construed as having the effect of either limiting or expanding existing rights, if any, of third parties in connection with the Loss and with Trinity Universal's activities alleged herein;

WHEREAS, this Stipulation and Consent Order has been entered into for purposes of settlement only and nothing contained in this Stipulation and Consent Order including, but not limited to, the payment of any monetary penalty and any recitation set forth herein, shall constitute an assumption of liability by Trinity Universal or any of its past or present parents, affiliates or subsidiaries in connection with the Loss;

WHEREAS, for purposes of this administrative action, Trinity Universal admits the allegations contained herein and, to avoid the expense and time-consuming process of formal administrative proceedings or future litigation, voluntarily waives:

1. any right to a hearing before the Commissioner;
2. any requirement that the Commissioner's decision contain a statement of findings of fact and conclusions of law; and
3. any and all rights to object to or challenge before the Commissioner or in any judicial proceeding involving the Commissioner any aspect, provision, or requirement of this Stipulation and Consent Order.

NOW THEREFORE, upon consent of the parties, it is hereby agreed and ordered that:

1. The Insurance Commissioner has jurisdiction over Trinity Universal and the subject matter of this administrative proceeding.
2. Pursuant to Conn. Gen. Stat. §38a-2, Trinity Universal is assessed a monetary penalty in the amount of \$5,000, payable to the Treasurer of the State of Connecticut upon execution of this Stipulation and Consent Order, to resolve any alleged violation of Conn. Gen. Stat. §§38a-38, 38a-85(c), 38a-478o, 42-471, or any other Connecticut law applicable to the Loss.
3. Trinity Universal has made available to affected members residing in Connecticut the following remedies for a period of two (2) years from the date of enrollment of such Trinity Universal member: (a) credit monitoring services through Identity Defense Complete, which shall consist of single bureau credit monitoring; and (b) \$1,000,000 of Identity Theft insurance.
4. Trinity Universal shall provide appropriate notice to the Insurance Department in the event that it discovers any future information security incidents, as defined by §38a-38.
5. This Stipulation and Consent Order shall not be construed as limiting the authority of the Insurance Commissioner to investigate and take appropriate action with regard to undisclosed or unknown matters relating to the subject matter of this Stipulation and Consent Order which may be subsequently identified.
6. This Stipulation and Consent Order shall not be construed as (a) limiting or curtailing the authority of any other government agency to investigate or take action in relation to the matters set forth in this Stipulation and Consent Order; or (b) serve as a release with respect to any other government agency actions.

Consented and agreed to this 20th day of August, 2024.

TRINITY UNIVERSAL INSURANCE COMPANY

BY:


Name: Vanessa L. Ramirez-Vollmar
Assistant Secretary

CERTIFICATION

The undersigned deposes and says that he/she has duly executed this Stipulation and Consent Order on this 20th day of August 2024 for and on behalf of Trinity Universal Insurance Company that he/she is the Assistant Secretary of such company, and he/she has authority to execute and file such instrument.

BY: [Signature]

State of Illinois

County of COOK

Personally appeared on this 20th day of August 2024, Vanessa Ramirez-Vollmar signer and sealer of the foregoing Stipulation and Consent Order, acknowledged same to be his/her free act and deed before me.

[Signature]
Notary Public/Commissioner of the Superior Court



Section Below To Be Completed by State of Connecticut Insurance Department

Dated at Hartford, Connecticut this 6th day of September 2024.

[Signature]
Andrew N. Mais
Insurance Commissioner