



CONSUMER PROTECTION DIVISION
RECEIVED

July 10, 2008

JUL 14 2008

Name: Adam G. Ciongoli
Direct Line: 212-915-8899

E-mail: adam.ciongoli@willis.com
Fax: 212-519-5407
Website: www.willis.com

Ms. Linda Conti
Assistant Attorney General OFFICE OF ATTORNEY GENERAL
Maine Attorney General
6 State House Station
Augusta, ME 04333-0006

Dear Assistant Attorney General Conti:

Pursuant to our obligations under Me. Rev. Stat. tit. 10 §1347, I am writing to notify you that Willis is investigating the inadvertent loss of computer backup tapes containing confidential client information. We understand this loss occurred on June 9, 2008 when those tapes were being transported from our facilities in Mumbai to an off-site storage facility in Mumbai. We learned about this matter on June 10, 2008, New York time.

We have been working with the law enforcement authorities, as well as conducting our own investigation into the loss. The tapes were not marked in any way that would indicate where they were from or what they contained, and they are kept in a format that would prohibit casual access to their contents. Furthermore, based on the current facts in our possession there is no reason to believe that the tapes have fallen into the wrong hands, or that any information has been accessed or used improperly. Further, our IT systems were not compromised by this incident, and the original data remains in our possession. We are currently doing a thorough review of our data security procedures and plan to take appropriate measures to safeguard information.

We have been analyzing the data contained in the tapes since we discovered the loss so that we can alert affected parties in as timely a manner as possible. Although our review is ongoing, we have identified that the tapes included some information about Maine clients and their employees, including potentially bank account details, as well as Social Security numbers. The number of individuals affected in Maine is approximately 56. We began notifying affected clients and individuals on a rolling basis starting on June 23, 2008. Attached you will find copies of the disclosure letters sent to the following:

Willis Associates	See Attachment 1
Willis Contractors	See Attachment 2
Willis Vendors	See Attachment 3
Willis Commercial Clients	See Attachment 4
Willis Employee Benefits Clients and their employees	See Attachment 5

We are also reviewing the options of offering assistance to individuals affected by this disclosure in the form of free credit monitoring, identity theft and fraud protection services. We also have established toll-free numbers and email addresses here at Willis so that affected parties can ask us questions or raise concerns.

In the meantime, if you have any questions about this matter, please do not hesitate to contact me at 212 915 8899.

Sincerely,

A handwritten signature in black ink, appearing to read 'A. Ciongoli', written in a cursive style.

Adam G. Ciongoli
Group General Counsel

ATTACHMENT 1

Willis

Telephone: 212-915-8888
Website: www.willis.com

June 24, 2008

Name
Address
Address

Dear Name:

I am writing to inform you that Willis is investigating a loss of computerized data that occurred recently during routine transport of backup tapes to a storage facility. We have just learned that the tapes contained your personal information, including your name, bank account information and Social Security number.

Willis takes the protection of your personal information extremely seriously, and we greatly regret this incident. We are working with local law enforcement authorities to recover the lost data and continue to investigate the matter. At this stage, we have no reason to believe the data was specifically targeted, or that any information has been accessed or used improperly. This was an isolated event, and we believe the likelihood of any potential criminal misuse of the data, while difficult to predict with absolute certainty, is minimal.

Nonetheless, we want to make sure you have resources available to protect your personal information. We have therefore arranged for you to receive free identity theft protection for two years through IDFreeze™ from TrustedID™, a leading provider of identity theft solutions. A fact sheet on the product is attached for your information.

In order to register for this service online, please go to www.trustedid.com/willis and enter activation code WGH2687. You can also order by telephone, 24 hours a day, seven days a week at 1-888-880-0761. Identity theft specialists are available at this number to answer questions regarding this event.

Please be assured that we will keep you informed of any developments in the investigation that may be of importance to you. We sincerely apologize for any concern or inconvenience this incident may cause you.

Maintaining the integrity of confidential information is extremely important to us, and we are thoroughly reviewing our security procedures to help ensure we are taking appropriate measures to safeguard your information now and in the future.

Sincerely,



Joe Plumeri
Chairman and Chief Executive Officer
Willis Group Holdings Limited

Willis
One World Financial Center
200 Liberty Street
New York, NY 10281

ATTACHMENT 2

Confidential Draft
6/23/08 8:00 PM

Individual Contractor Letter

Letter to Individual Contractors

Date:

Name
Address
City, State Zip Code

Dear <Name of individual contractor>:

I am writing to inform you that Willis is investigating a loss of computerized data that occurred recently when backup tapes were inadvertently lost while in transit to a storage facility. As one of our individual contractors, your personal information, including your name, Social Security number and your bank account details, may have been included on the tapes.

Willis takes the protection of personal information extremely seriously, and we greatly regret this incident. We are working with local law enforcement authorities to recover the lost data and continue to investigate the matter. At this stage, we have no reason to believe the data were specifically targeted, or that any information has been accessed or used improperly. This was an isolated event, and we believe the likelihood of any potential criminal misuse of the data, while difficult to predict with absolute certainty, is minimal.

Nonetheless, we want to make sure you have resources available to protect your personal information. We have therefore arranged for you to receive free identity theft protection for two years through IDFreeze™ from TrustedID™, a leading provider of identity theft solutions. In order to register for this service online, please go to www.trustedid.com/willis and enter activation code WGH2687. You can also order by telephone, 24 hours a day, seven days a week at 1-888-880-0761. Identity theft specialists are available at this number to answer any questions regarding this event.

Please be assured that we will keep you informed of any developments in the investigation that may be of importance to you. We sincerely apologize for any concern or inconvenience this incident may cause you.

Maintaining the integrity of confidential information is extremely important to us, and we are thoroughly reviewing our security procedures to help ensure we are taking appropriate measures to safeguard your information now and in the future.

Sincerely,

<Signatory>

ATTACHMENT 3

Vendor Letter

Date: June XX 2008

Vendor name
Address
City, State Zip Code

Dear <Name of vendor>:

I am writing to inform you that Willis is investigating a loss of computerized data that occurred recently when backup tapes were inadvertently misplaced while in transit to a storage facility. We are working with local law enforcement authorities to recover the lost tapes and continue to investigate the matter.

We have no reason at this stage to believe that the tapes were specifically targeted, or that any information has been accessed or used improperly. This was an isolated event, and we believe the likelihood of any potential criminal misuse of the data, while difficult to predict with absolute certainty, is minimal. Further, our IT systems were not compromised by this incident, and the original data remains in our possession.

However, I regret to say that the backup tapes included bank account information about your company that we use in the course of conducting business with you. Although we believe the risk to our valued business partners is minimal, Willis still considers it unacceptable. We are, therefore, taking steps to notify you and others affected and offer our assistance as you take appropriate internal precautions. We have set up a dedicated toll-free helpline for you at 1-866-345-4096 and a representative will be available to answer your questions between 9 am and 6 pm, Eastern Time, Monday through Friday. Or if you prefer, you may email Helpline@willis.com with your questions. We stand ready to assist you to the best of our ability.

Please be assured that we will keep you informed of any developments in our investigation that may be of importance to you.

At Willis, we are passionate about our strong, open relationship with our business partners, and I sincerely apologize for this incident, as well as for any concern or inconvenience that it may cause.

Maintaining the integrity of confidential information is extremely important to us, and we are thoroughly reviewing our security policies to help ensure we are taking appropriate measures to safeguard data.

Sincerely,

<signatory>

ATTACHMENT 4

Willis

One World Financial Center
200 Liberty Street
New York, NY 10281

Dear Sir or Madam,

I am writing to inform you that Willis is investigating a loss of computerized data that occurred recently when backup tapes were inadvertently misplaced while in transit to a storage facility. We are working with local law enforcement authorities to recover the lost tapes and continue to investigate the matter.

We have no reason at this stage to believe that the tapes were specifically targeted, or that any information has been accessed or used improperly. This was an isolated event, and we believe the likelihood of any potential criminal misuse of the data, while difficult to predict with absolute certainty, is minimal. Further, our IT systems were not compromised by this incident, and the original data remains in our possession.

However, I regret to say that the backup tapes included bank account information about your company that we use in the course of conducting business with you.

Although we believe the risk to our valued clients is minimal, Willis still considers it unacceptable. We are, therefore, taking steps to notify you and others affected and offer our assistance as you take appropriate internal precautions. We have set up a dedicated toll-free helpline for you at 1-866-345-4096 and a representative will be available to answer your questions between 9 am and 6 pm, Eastern Time, Monday through Friday. Or if you prefer, you may email HelpLineUS@willis.com with your questions. We stand ready to assist you to the best of our ability.

Please be assured that we will keep you informed of any developments in our investigation that may be of importance to you.

At Willis, we are passionate about our strong, open relationship with our clients, and I sincerely apologize for this incident, as well as for any concern or inconvenience that it may cause.

Maintaining the integrity of confidential information is extremely important to us, and we are thoroughly reviewing our security policies to help ensure we are taking appropriate measures to safeguard data.

Sincerely,



Chief Operating Officer
On behalf of Willis North America

ATTACHMENT 5

Willis

One World Financial Center
200 Liberty Street
New York, NY 10281

Dear Sir or Madam,

I am writing to inform you that Willis is investigating a loss of computerized data that occurred recently when backup tapes were inadvertently misplaced while in transit to a storage facility. We are working with local law enforcement authorities to recover the lost tapes and continue to investigate the matter.

We have no reason at this stage to believe that the tapes were specifically targeted, or that any information has been accessed or used improperly. This was an isolated event, and we believe the likelihood of any potential criminal misuse of the data, while difficult to predict with absolute certainty, is minimal. Further, our IT systems were not compromised by this incident, and the original data remains in our possession.

However, I regret to say that the backup tapes included the names and Social Security numbers, and in some cases, the bank account details for a number of your employees. As you know, we hold this information in order to serve your Employee Benefits account.

Although we believe the risk to your employees is minimal, Willis still considers it unacceptable. We are, therefore, taking steps to notify you and other affected clients, and are offering our assistance in providing the appropriate precautionary measures for your employees.

We are in the process of making available identify theft protection and monitoring from a credit monitoring agency for your affected employees, should you feel you need it. We expect those arrangements will be in place shortly and will notify you of the details at that time. We also will be notifying your individual employees directly and kindly ask that you provide us with their addresses. We will call you to discuss the best way to accomplish this.

Please be assured we will keep you informed of any developments in the investigation that may be of importance to you. We have also set up a dedicated toll-free helpline for clients at 1-866-345-4096 and a representative will be available to answer your questions between 9 am and 6 pm, Eastern Time, Monday through Friday. Or if you prefer, you may email HelpLineUS@willis.com with your questions.

At Willis, we are passionate about our strong, open relationship with our clients, and I sincerely apologize for this incident as well as for any concern or inconvenience that it may cause you and your employees.

Maintaining the integrity of confidential information is extremely important to us, and we are thoroughly reviewing our security policies to help ensure we are taking appropriate measures to safeguard personal data.

Sincerely,



Chief Operating Officer
On behalf of Willis North America

Willis

One Glenlake Parkway
11th Floor
Atlanta, GA 30328

[Date]

[First Name, Last Name]

[Address1]

[Address2]

[City, State Zip]

Dear [First Name, Last Name]:

I am writing on behalf of Willis and Benefits Headquarters (BHQ). We provide employee benefits services for your employer. We want to inform you that computer backup tapes containing certain personal information were lost while in transit to a storage facility. The tapes included your <name and Social Security number> / <name, Social Security number and bank account details> / <name, Social Security number, bank account details, and personal health information (PHI)>, which Willis retains in order to provide benefits administration for you and your colleagues.

Willis takes the protection of personal information extremely seriously, and we greatly regret this incident. We are working with local law enforcement authorities to recover the lost data and continue to investigate the matter. At this stage, we have no reason to believe the data was specifically targeted, or that any information has been accessed or used improperly. This was an isolated event, and we believe the likelihood of any potential criminal misuse of the data, while difficult to predict with absolute certainty, is minimal.

Nonetheless, we want to make sure you have resources available to protect your personal information. We have therefore arranged for you to receive free identity theft protection for two years through IDFreeze™ from TrustedID™, a leading provider of identity theft solutions. In order to register for this service online, please go to www.trustedid.com/willis and enter activation code WGH2687. You can also order by telephone, 24 hours a day, seven days a week at 1-888-880-0761. Identity theft specialists are available at this number to answer any questions regarding this event.

Please be assured that we will keep you informed of any developments in the investigation that may be of importance to you. I sincerely apologize for any concern or inconvenience that this incident may cause you.

Maintaining the integrity of confidential information is extremely important to us, and we are thoroughly reviewing our security policies to help ensure we are taking appropriate measures to safeguard your information.

Sincerely,

[Signatory]

[Title]

Willis North America Employee Benefits

Enclosures: TrustedID® document



Product Overview

IDFreeze™ is the only complete solution for protecting your identity and credit. You get peace of mind that your identity is safe, with a solution that allows you to control your personal credit information with convenient and easy online tools.

Fraud Flag Placement

Credit grantors are requested to verify your identity before taking any action that could put your credit at risk. Your contact information is placed in a special note on your Equifax, Experian and TransUnion credit reports.

Anti-Spyware Protection

You receive comprehensive anti-spyware software which you can install on up to three different computers.

Credit Report Evaluation

Automatically receive your credit reports from Equifax, Experian and TransUnion annually and review your credit history to ensure your identity has not been compromised.

\$1,000,000 Warranty

We back our service with a \$1,000,000 limited warranty to cover out-of-pocket costs associated with identity theft not covered by IDFreeze. See details [here](#).

Live Identity Theft Specialists

Get answers from an identity theft and restoration specialist any time, via telephone or email, available 24 hours per day.

Stop Pre-Approved Credit Card Offers

Removes your name from the marketing databases frequently sold by Equifax, Experian and TransUnion. Stops pre-approved credit card offers - a possible source of identity theft.

Credit Card, Bank Account and Social Security Number Monitoring

Monitors your most valuable personal numbers to help detect if they have been stolen. You receive an immediate email alert when IDFreeze™ finds signs that your information has been compromised, providing an early warning of theft.

Lost Wallet Protection

Store your credit card numbers with TrustedID, and if you ever lose your wallet, just call our protection team. We'll help you cancel your cards and receive new ones as quickly as possible.