BEFORE THE DIVISION OF INSURANCE DEPARTMENT OF LABOR AND REGULATION STATE OF SOUTH DAKOTA

IN THE MATTER OF INFOSYS MCCAMISH SYSTEMS, LLC

INS 25-31063

CONSENT ORDER

In resolution of the above matter and in lieu of issuance of a Notice of Hearing and a formal hearing, the undersigned parties do hereby agree to the following:

INFOSYS MCCAMISH SYSTEMS, LLC, (IMS) with an address of record of 3225 Cumberland Boulevard SE, Suite 700, Atlanta, GA 30339, is a licensed third-party administrator (TPA) in the State of South Dakota;

IMS is aware that the South Dakota Division of Insurance (Division) has conducted an investigation into its insurance related business;

The Division alleges the following with regard to IMS:

- 1. Between October 29, 2023 and November 2, 2023, IMS experienced a cybersecurity incident (security breach) which compromised sensitive nonpublic personal information of over six-thousand South Dakota consumers, in violation of SDCL 58-29D-8, 58-29D-24, 58-29D-31(2)(4)(8), 58-30-167(8), and ARSD Ch. 20:06:45;
- 2. In 2025, the State of Vermont levied an administrative penalty against IMS via Consent Order, and the State of Oregon fined IMS via Assurance of Voluntary Compliance, in connection with the security breach;
- 3. IMS failed to respond within 20 days the Division's requests for an explanation dated July 10, 2025, in violation of SDCL 58-33-66(1);
- 4. The Director of the Division may revoke IMS's TPA license for any one of the above-cited violations;

IMS is aware of and understands the nature of the allegations and has been informed that it has the right to a Notice of Hearing, counsel, and appeal, and that by signing this Consent Order, waives these rights;

In return for IMS agreeing to, signing, and complying with the provisions of this Consent Order, the Division agrees not to proceed to administrative hearing and agrees that this Consent Order will constitute an informal disposition of this licensing matter pursuant to SDCL 1-26-20;

By the execution of the Consent Order and payment of a penalty, IMS neither admits to nor denies any violation of the laws of the State of South Dakota but waives its right to contest the existence of this Consent Order in any future actions or licensing procedures with the Division;

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IMS agrees to a monetary penalty in the amount of \$30,000 pursuant to SDCL 58-4-28.1, in lieu of an administrative hearing and Final Decision;

IMS further agrees to conduct its business in accordance with the insurance laws and regulations of the State of South Dakota; and

IMS further agrees that this Consent Order may be considered for the purpose of determining the appropriate sanction in any future actions with the Division for any violations of the laws or regulations of the State of South Dakota or for failing to abide by any order of the Director;

Wherefore, good cause appearing from the foregoing, it is hereby ORDERED that IMS pay a monetary penalty in the amount of \$30,000 payable to "South Dakota Division of Insurance" for deposit in the General Fund of the State of South Dakota; and it is further

ORDERED that IMS abide by the agreements made by it in this Consent Order; and it is further

ORDERED that the use of this Consent Order for competitive purposes by an insurance agent or thirdparty administrator holding a license in the State of South Dakota, or by any company holding a Certificate of Authority, or by anyone on their behalf, may be deemed unfair competition and be grounds for suspension or revocation of said license or authority; and it is further

ORDERED that the provisions of this Consent Order shall be effective from the date the Director signs this Order.

Dated at Pierre, South Dakota this Zhang day of ________, 2025.

Larry Deiter, Director South Dakota Division of Insurance

The undersigned, on behalf of IMS, represents it understands the terms of this Consent Order and the waiver of its due process rights and voluntarily enters into this Consent Order.

Dated this 12 day of December	, 2025.
	Signed by:
	Rakesh Udupi
	DC758E0E019249E
	Signature of Authorized Representative
	Rakesh Udupi
	Printed Name
·	AVP - Assistant General Counsel
	Title