

March 23, 2022

VIA E-MAIL: Idtheft@oag.state.md.us

Office of the Attorney General
Attn: Security Breach Notification
200 St. Paul Place
Baltimore, MD 21202

Re: Notification Pursuant to Md. Code Com. Law § 14-3501 *et seq.*

Dear Attorney General Frosh:

We are writing on behalf of our client, Charles Schwab & Co., Inc. (“Schwab”), to notify you of a breach of the security of a system involving the personal information of 101 Maryland residents.

On December 16, 2021, Schwab discovered a potential issue regarding certain Schwab chat and email messages. Upon learning of the issue, Schwab immediately remediated the technical issue and initiated a privileged investigation to determine the scope of the incident and identify potentially affected consumers.

Through the investigation, on March 4, 2022, Schwab determined that between May 18, 2021 and December 16, 2021, certain chat and email messages sent through Schwab.com were inadvertently sent to external email systems. The information potentially affected may include customers’ names and one or more of the following: Social Security number or tax identification number, driver’s license or other state identification number, passport number, or username/password. To date, Schwab is not aware of any identity theft, fraud, or financial loss to consumers related to this incident.

Schwab will mail written notification to affected consumers on March 23, 2022, in accordance with law. A template copy of the consumer notification letter is attached at Exhibit A. Because Social Security numbers and tax identification numbers were not impacted for certain of the affected Maryland residents, a version of the attached template copy that does not reference Social Security numbers or tax identification numbers will be mailed to those residents.

Out of an abundance of caution, Schwab will provide the affected Maryland residents with credit monitoring and identity protection services through IdentityForce, at no charge for a period of twenty-four (24) months, and also will staff a support line to answer any questions individuals may have about this incident or the services available to them. Schwab will continue to apply



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multiple layers of security protections, including 24/7 monitoring of its systems and client accounts for any signs of unusual activity.

If you have any further inquiries concerning this notification, please do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink, reading 'Jennifer L. Urban'.

Jennifer L. Urban
Foley & Lardner LLP

Enclosures:

Exhibit A – Sample Notification Letter

Exhibit A



<Name>
<Address>
<Address>
<City>, <ST> <Zip>
<USA>
|||||

<Date>

Questions: **1-866-884-6417**

Clients of independent
investment advisors:
call your advisor directly
or call Schwab Alliance at
1-800-515-2157

Notice of Data Breach

We are writing to let you know about a data event that may involve some of your personal information. Your trust is the foundation of our relationship, and we are committed to protecting the privacy of your information. As we outline below, we are taking steps to help you protect your data. We hope these actions can provide some peace of mind regarding your information's ongoing security.

What Happened?

On December 16, 2021, Schwab discovered a potential issue regarding certain chat and email messages and immediately began an investigation. As a result of the investigation, we recently determined that between May 18, 2021, and December 16, 2021, certain chat and email messages sent through Schwab.com were inadvertently sent to external email systems.

What Information Was Involved?

The information potentially affected may include your name and one or more of the following: Social Security number or tax identification number, driver's license or other state identification number, passport number, or username/password. To be clear, we have no evidence of any misuse of your information or unauthorized access to your Schwab account.

What We Are Doing.

Upon learning of this event, we immediately remediated the issue and worked to identify the information involved and who may be affected.

To help you maintain confidence in the ongoing privacy of your information, we have arranged for you to be able to enroll in credit monitoring and identity protection services from IdentityForce® for two years at no cost to you. To enroll, please follow the instructions provided at the end of this letter. Please note that the deadline to enroll is June 8, 2022.

Schwab will continue to apply its multiple layers of security protections, including the 24/7 monitoring of our systems and client accounts for any signs of unusual activity.

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What You Can Do.

We recommend you review the enclosed “Other Important Information” document for further steps you can take to help protect your information. Additionally, Schwab offers the ability to set up security alerts and to enroll in advanced authentication that makes your Schwab sign-in more secure with two-step verification. To set up your alerts, enroll in two-step verification, or read about Schwab’s Security Guarantee, please visit **schwab.com/schwabsafe**.

Finally, we encourage you, as always, to remain vigilant to protect against potential fraud and/or identity theft by reviewing your financial account statements and monitoring your free credit reports. If you detect any suspicious or unrecognized activity on an account, you should promptly notify the financial institution or company with which the account is maintained.

For More Information.

We recognize the trust our clients place in us and understand the concern this event may cause you. The security of your information is a top priority for Schwab, and we have a dedicated team available to assist you. If you have any questions or concerns, please call us at **1-866-884-6417**, Monday through Friday between 8:00 a.m. and 9:00 p.m. ET, or Saturday and Sunday between 10:00 a.m. and 7:30 p.m. ET. Clients of independent investment advisors, please call your advisor directly or call Schwab Alliance at **1-800-515-2157**.

Ryan Doherty

Ryan Doherty
Chief Privacy Officer
Charles Schwab & Co., Inc.

Independent investment advisors are not owned by, affiliated with, or supervised by Schwab.

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OTHER IMPORTANT INFORMATION

Free Credit Report. You may obtain a copy of your credit report, free of charge, once every 12 months from each of the four nationwide credit-reporting agencies. To order your annual free credit report, please visit **www.annualcreditreport.com** or call toll free at **1-877-322-8228**. You can also order your annual free credit report by mailing a completed Annual Credit Report Request Form (available from the U.S. Federal Trade Commission (“FTC”) website at www.consumer.ftc.gov) to: Annual Credit Report Request Service, PO Box 105281, Atlanta, GA 30348-5281.

- **Equifax**, PO Box 740241, Atlanta, GA 30374, www.equifax.com, 1-800-685-1111
- **Experian**, PO Box 2104, Allen, TX 75013, www.experian.com, 1-888-397-3742
- **TransUnion**, PO Box 2000, Chester, PA 19016, www.transunion.com, 1-800-888-4213
- **Innovis**, PO Box 1689, Pittsburgh, PA 15230-1689, www.innovis.com, 1-800-540-2505

Fraud Alert. You have the right to place an initial or extended “fraud alert” on your file at no cost by contacting any of the four nationwide credit-reporting-agencies identified below. An initial fraud alert is a one-year alert that is placed on a consumer’s credit file. Upon seeing a fraud alert displayed on a consumer’s credit file, a business is required to take steps to verify the consumer’s identity before extending new credit. For that reason, placing a fraud alert can protect you, but also may delay you when you seek to obtain credit. If you are a victim of identity theft and have filed an identity theft report with law enforcement, you may want to consider placing an extended fraud alert, which lasts for seven years, on your credit file.

- **Equifax**, PO Box 105069, Atlanta, GA 30348-5069, www.equifax.com/personal/credit-report-services/credit-fraud-alerts, 1-800-525-6285
- **Experian**, PO Box 9554, Allen, TX 75013, www.experian.com/fraud/center.html, 1-888-397-3742
- **TransUnion**, PO Box 2000, Chester, PA 19016, www.transunion.com/fraud-alerts, 1-800-680-7289
- **Innovis Consumer Assistance**, PO Box 26, Pittsburgh, PA 15230-0026, <https://www.innovis.com/personal/fraudActiveDutyAlerts>, 1-800-540-2505

Security Freeze. You have the right to place, lift, or remove a “security freeze” on your credit report, free of charge. A security freeze prohibits a credit-reporting agency from releasing any information from a consumer’s credit report without written authorization. However, please be aware that placing a security freeze on your credit report may delay, interfere with, or prevent the timely approval of any requests you make for new loans, credit mortgages, employment, housing or other services. Under federal law, you cannot be charged to place, lift, or remove a security freeze. You must place your request for a freeze separately with each of the consumer reporting agencies. To place a security freeze on your credit report, you may do so by contacting each of the consumer reporting agencies through the contact information below:

- **Equifax**, PO Box 105788, Atlanta, GA 30348-5788, www.equifax.com/personal/credit-report-services/credit-freeze, 1-888-298-0045

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- **Experian**, PO Box 9554, Allen, TX 75013, www.experian.com/freeze/center.html, 1-888-397-3742
- **TransUnion**, PO Box 160, Woodlyn, PA 19094, www.transunion.com/credit-freeze, 1-888-909-8872
- **Innovis**, PO Box 26, Pittsburgh, PA 15230-0026, www.innovis.com/personal/securityFreeze, 1-800-540-2505

In order to request a security freeze, you will need to provide some or all of the following information to the credit-reporting agency, depending on whether you do so online, by phone, or by mail (note that if you are requesting a security freeze for your spouse, this information must be provided for him/her as well): (1) full name, with middle initial and any suffixes; (2) Social Security number; (3) date of birth; (4) current address and any previous addresses for the past five years; and (5) any applicable incident report or complaint with a law enforcement agency or the Registry of Motor Vehicles. The request must also include a copy of a government-issued identification card and a copy of a recent utility bill or bank or insurance statement. It is essential that each copy be legible and display your name, current mailing address, and the date of issue. If you are a victim of identity theft, include a copy of either the police report, investigative report, or complaint to a law enforcement agency concerning the identity theft.

The credit-reporting agencies have one business day after receiving your request by toll-free telephone or secure electronic means, or up to three business days after receiving your request by mail, to place a security freeze on your credit report. The credit bureaus must also send written confirmation to you within five business days and may provide you with a unique personal identification number (PIN) or password (or both) that can be used by you to authorize the removal or lifting of the security freeze. It is important to maintain this PIN/password in a secure place, as you will need it to lift or remove the security freeze.

To lift the security freeze in order to allow a specific entity or individual access to your credit report, or to lift a security freeze for a specified period of time, you must submit a request through a toll-free telephone number; by a secure electronic means maintained by a credit-reporting agency; or by sending a written request via regular, certified, or overnight mail to the credit-reporting agencies and include proper identification (name, address, and Social Security number) and the PIN or password provided to you when you placed the security freeze, as well as the identity of those entities or individuals you would like to receive your credit report or the specific period of time you want the credit report available. The credit-reporting agencies have one business day after receiving your request by toll-free telephone or secure electronic means, or three business days after receiving your request by mail, to lift the security freeze for those identified entities or for the specified period of time.

To remove the security freeze, you must submit a request through a toll-free telephone number; by a secure electronic means maintained by a credit-reporting agency; or by sending a written request via regular, certified, or overnight mail to each of the credit bureaus and include proper identification (name, address, and Social Security number) and the PIN or password provided to you when you placed the security freeze. The credit bureaus have one business day after receiving your request by toll-free telephone or secure electronic means, or three business days after receiving your request by mail, to remove the security freeze.

Federal Trade Commission and State Attorneys General Offices. If you believe you have been the victim of identity theft or have reason to believe your personal information has been misused, you should immediately report that to the FTC, your local law enforcement agency, and/or your state attorney general. You may also contact these agencies for information on how to prevent or avoid identity theft and to obtain additional information about fraud alerts and security freezes. This notification was not delayed as a result of a law enforcement investigation.

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You may contact the **FTC** at Consumer Response Center, 600 Pennsylvania Avenue, NW, Washington, D.C. 20580, www.identitytheft.gov, 1-877-ID-THEFT (438-4338). To learn more about protecting yourself from identity theft, visit the FTC's website at www.ftc.gov/bcp/edu/microsites/idtheft.

For District of Columbia Residents: You may also obtain information about avoiding identity theft from the Office of the Attorney General for the District of Columbia by visiting <https://oag.dc.gov/consumer-protection>, emailing consumer.protection@dc.gov, calling (202) 442-9828, or mailing Office of the Attorney General, Office of Consumer Protection, 400 6th Street, NW Washington, D.C. 20001.

For Iowa Residents: You are advised to report suspected incidents of identity theft to law enforcement or the Iowa Attorney General's Office at Office of the Attorney General of Iowa, Consumer Protection Division, Hoover State Office Building, 1305 East Walnut Street, Des Moines, IA 50319, www.iowaattorneygeneral.gov, telephone: 1-515-281-5926 or 1-888-777-4590.

For Maryland Residents: You may obtain information about avoiding identity theft from the Maryland Attorney General's Office: Office of the Attorney General of Maryland, Consumer Protection Division, 200 St. Paul Place, Baltimore, MD 21202, www.oag.state.md.us/Consumer, telephone: (410) 576-6491.

For New Mexico Residents: You have rights pursuant to the Fair Credit Reporting Act ("FCRA"), such as the right to be told if information in your credit file has been used against you, the right to know what is in your credit file, the right to ask for your credit score, and the right to dispute incomplete or inaccurate information. Further, pursuant to the FCRA, the consumer reporting agencies must correct or delete inaccurate, incomplete, or unverifiable information; consumer reporting agencies may not report outdated negative information; access to your file is limited; you must give your consent for credit reports to be provided to employers; you may limit "prescreened" offers of credit and insurance you get based on information in your credit report; and you may seek damages from violators. You may have additional rights under the FCRA not summarized here. Identity theft victims and active duty military personnel have specific additional rights pursuant to the FCRA. We encourage you to review your rights pursuant to the FCRA by visiting www.consumerfinance.gov/f/201504_cfpb_summary_your-rights-under-fcra.pdf, or by writing Consumer Response 30-A, Federal Trade Commission, 600 Pennsylvania Ave., NW, Washington, D.C. 20580.

For New York Residents: You may obtain additional information about security breach response and identity theft prevention and protection from the New York State Office of the Attorney General at <https://ag.ny.gov/> or by calling 1-800-771-7755; the New York State Police at <http://troopers.ny.gov/> or by calling 1-518-457-6721; and/or the New York Department of State at <https://www.dos.ny.gov> or by calling 1-800-697-1220.

For North Carolina Residents: You may obtain additional information about preventing identity theft provided by the North Carolina Attorney General at <https://ncdoj.gov/protecting-consumers/identity-theft/>, by calling 1-877-566-7226, or by writing to 9001 Mail Service Center, Raleigh, NC 27699.

For Oregon Residents: You are advised to report any suspected incidents of identity theft to law enforcement, the FTC, and the Oregon Attorney General at <https://doj.state.or.us>, by calling (877) 877-9392, or writing to Oregon Department of Justice, 1162 Court Street NE, Salem, OR 97301-4096.

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About the IdentityForce® identity theft protection product.

Sontiq's IdentityForce identity theft protection will "alert" you to changes to your credit report and help you understand the content of your credit report at the three major credit-reporting agencies. Should you become a victim of identity theft, you will be provided with fully managed restoration services. Note: You must be over age 18 with a credit file in order to take advantage of the product.

IdentityForce provides you with the following features and benefits:

- Comprehensive credit report monitoring and automated alerts of key changes to your **TransUnion, Experian, and Equifax** credit reports
- 3-in-1 credit report available immediately upon enrollment
- Up to \$1 million in identity theft insurance with \$0 deductible
- Fully managed restoration services for victims of identity theft
- 24/7 live agent Customer Service to provide personalized identity theft victim assistance and answer all your questions

Enroll online or over the phone.

To sign up online, go to <https://secure.identityforce.com/benefit/schwab>.

1. **Landing Page:** Enter your name, email, and Verification Code and click "Enroll Now".
2. **Complete Account Activation:** Complete the form with your required information (i.e., name, Social Security number, date of birth, and home address).
3. **Account Security:**
 - Create a case-sensitive password and choose a secret question and case-sensitive answer.
 - Click whether you would like to receive mobile text alerts.
 - Two-factor authentication is required for setup. Select the method to receive the two-factor authentication code and once received, enter in the appropriate field.
4. **Dashboard:** Once completed, you will see your account dashboard. Clicking on the "My Services" tab will allow you to activate services.
5. **Credit Monitoring and Report:** In order to access your credit report and activate credit monitoring, you will have to answer up to four security questions to verify your identity.

Should you choose to sign up via phone, please contact IdentityForce Member Services at 877-694-3367. Representatives are available 24/7. You will need the Verification Code listed above.