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Kate Lucente
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March 20, 2022

VIA E-MAIL: IDTHEFT@OAG.STATE.MD.US

The Honorable Brian E. Frosh
Office of the Attorney General
Attn: Security Incident Notification
200 St. Paul Place
Baltimore, MD 21202

Re: Security Incident Notification

Dear Attorney General Frosh:

We are providing notice on behalf of TransNational Bankcard L.L.C. ("TransNational") about an incident involving approximately 104 Maryland residents.

On February 2, 2022, TransNational discovered a security incident, and promptly launched an investigation. While TransNational's investigation is still ongoing, on February 12, 2022, TransNational determined that the incident may have resulted in a security breach of the personally identifiable information of some Maryland residents.

Based on our investigation to date, the impacted information includes name and individual taxpayer identification number or Social Security number for some residents, who are the owners or officers of TransNational's enterprise customers. There has been no breach of cardholder data associated with this incident. Upon discovery of the incident, we promptly launched an investigation and took steps to mitigate possible adverse effects.

TransNational intends to provide written notification to the affected individuals on March 21, 2022. A copy of the notification letter is enclosed.

If you have any questions regarding this incident, please contact me at (206) 839-4854 or kate.lucente@us.dlapiper.com.



Sincerely,

A handwritten signature in black ink, appearing to read 'Kate Lucente', with a stylized flourish at the end.

Kate Lucente

DLA Piper LLP (US)

Enclosure

March 21, 2022

Return Mail Processing
PO Box 589
Claysburg, PA 16625-0589

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SAMPLE A SAMPLE - L01 LETTER 1

APT ABC

123 ANY STREET

ANYTOWN, ST 12345-6789



Notice of Data Breach

Dear Sample A. Sample:

We are writing to inform you of a data security incident that may have affected your personal information held by TransNational Bankcard L.L.C. (“TransNational”). TransNational takes this incident seriously. This notice explains what occurred and provides information on steps you can take to protect your information.

What Happened?

TransNational discovered a security incident on February 2, 2022. Upon detecting the incident, TransNational immediately launched an investigation. While our investigation is still ongoing, we have determined that the incident impacted certain personal information relating to individual owners or officers of TransNational enterprise customers.

What Information Was Involved?

The information impacted varies by individual and includes name, address, email address, and individual taxpayer identification number or Social Security number, relating to individual owners or officers of TransNational enterprise customers.

What We Are Doing?

Protecting your personal information is of paramount importance to TransNational. Upon discovery of the incident, we promptly launched an investigation and took steps to mitigate possible adverse effects. We have also notified law enforcement of this incident, but this notification has not been delayed as a result of a law enforcement investigation.

In addition, TransNational is providing you with a 24-month subscription to Experian IdentityWorksSM, at no charge. Please see the *Enrollment and Identity Theft Protection Information* below for more information and enrollment instructions for this credit monitoring and identity protection services.

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H6847-L01

What You Can Do

While we currently have no evidence indicating that your personal information has been fraudulently used as a result of this incident, we recommend you remain vigilant and take steps to reduce the risk of potential fraud, including by reviewing personal accounts statements and credit reports, as well as enrolling in complimentary **Experian IdentityWorks ExtendCARE™**. Please also review the enclosed ***Enrollment and Identity Theft Protection Information*** and ***Additional Information*** for further information on how to protect against identity theft and fraud.

For More Information

If you have any further questions regarding this incident, or would like an alternative to enrolling online, please call the dedicated and confidential toll-free telephone line that we have set up to respond to questions, at (800) 960-1799 toll-free. This response line is staffed with professionals familiar with this incident and knowledgeable on what you can do to protect against misuse of your information. The response line is available Monday through Friday from 8 am – 10 pm Central, or Saturday and Sunday from 10 am – 7 pm Central (excluding major U.S. holidays). Be prepared to provide your engagement number **B028979**.

We sincerely apologize and regret any concern this incident may have caused.

Sincerely,

TransNational

Enrollment and Identity Theft Protection Information

To help protect your identity, we are offering complimentary access to Experian IdentityWorksSM for twenty-four (24) months.

If you believe there was fraudulent use of your information as a result of this incident and would like to discuss how you may be able to resolve those issues, please reach out to an Experian agent. If, after discussing your situation with an agent, it is determined that identity restoration support is needed then an Experian Identity Restoration agent is available to work with you to investigate and resolve each incident of fraud that occurred from the date of the incident (including, as appropriate, helping you with contacting credit grantors to dispute charges and close accounts; assisting you in placing a freeze on your credit file with the three major credit bureaus; and assisting you with contacting government agencies to help restore your identity to its proper condition).

Please note that Identity Restoration is available to you for twenty-four (24) months from the date of this letter and does not require any action on your part at this time. The Terms and Conditions for this offer are located at www.ExperianIDWorks.com/restoration.

While identity restoration assistance is immediately available to you, we also encourage you to activate the fraud detection tools available through Experian IdentityWorks as a complimentary twenty-four (24) months membership. This product provides you with superior identity detection and resolution of identity theft. To start monitoring your personal information, please follow the steps below:

- Ensure that you **enroll by June 30, 2022**. Please note: **YOUR CODE WILL NOT WORK AFTER THIS DATE**
- **Visit** the Experian IdentityWorks website to enroll: www.experianidworks.com/credit
- Provide your **activation code: ABCDEFGHI**

If you have questions about the product, need assistance with Identity Restoration that arose as a result of this incident or would like an alternative to enrolling in Experian IdentityWorks online, please contact Experian's customer care team at **(800) 960-1799** by **June 30, 2022**. Be prepared to provide engagement number **B028979** as proof of eligibility for the Identity Restoration services by Experian.

ADDITIONAL DETAILS REGARDING YOUR TWENTY-FOUR MONTH EXPERIAN IDENTITYWORKS MEMBERSHIP

A credit card is not required for enrollment in Experian IdentityWorks. You can contact Experian immediately regarding any fraud issues, and have access to the following features once you enroll in Experian IdentityWorks:

- **Experian credit report at signup:** See what information is associated with your credit file. Daily credit reports are available for online members only.¹
- **Credit Monitoring:** Actively monitors Experian file for indicators of fraud.
- **Identity Restoration:** Identity Restoration specialists are immediately available to help you address credit and non-credit related fraud.
- **Experian IdentityWorks ExtendCARETM:** You receive the same high-level of Identity Restoration support even after your Experian IdentityWorks membership has expired.
- **\$1 Million Identity Theft Insurance²:** Provides coverage for certain costs and unauthorized electronic fund transfers.

¹ Offline members will be eligible to call for additional reports quarterly after enrolling.

² The Identity Theft Insurance is underwritten and administered by American Bankers Insurance Company of Florida, an Assurant company. Please refer to the actual policies for terms, conditions, and exclusions of coverage. Coverage may not be available in all jurisdictions.



Additional Information

The Federal Trade Commission (FTC) recommends that you remain vigilant by checking your free credit reports periodically. Checking your credit reports periodically can help you spot problems and address them quickly. You can also order free copies of your annual reports through www.annualcreditreport.com, by calling toll-free 1-877-322-8228, or by mailing an Annual Credit Report Request Form (available at www.annualcreditreport.com) to Annual Credit Report Request Service, P.O. Box 105281, Atlanta, GA, 30348-5281. You may also purchase a copy of your credit report by contacting one or more of the three national credit reporting agencies listed in the table below. You should monitor your financial accounts for any suspicious activity. For more information about steps you can take to reduce the likelihood of identity theft or fraud, call 1-877-ID-THEFT (877-438-4338), visit the FTC's website at <http://www.ftc.gov/bcp/edu/microsites/idtheft/>, or write to: Federal Trade Commission, 600 Pennsylvania Avenue, NW, Washington, DC 20580. However, if you believe you are the victim of identity theft, you should immediately contact your local law enforcement agency, your state's attorney general, or the FTC.

Contact Information for Consumer Reporting Agencies and Information on Credit Report Fraud Alerts

You may also place an initial or extended fraud alert on your credit file free of charge. A fraud alert tells creditors to contact you before they open any new accounts or change your existing accounts. An initial fraud alert lasts 1-year and is placed on a consumer's credit file. Upon seeing a fraud alert display on a consumer's credit file, a business is required to take steps to verify the consumer's identity before extending new credit. If you are a victim of identity theft, you are entitled to an extended fraud alert, which is a fraud alert lasting 7 years. To place a fraud alert, you can call any one of the three major credit bureaus at the contact information below or place fraud alerts online at the websites below. As soon as one credit bureau confirms your fraud alert, the others are notified to place fraud alerts.

	Experian	Equifax	TransUnion
Phone	1-888-397-3742.	1-800-525-6285 or 1-888-766-0008	1-800-680-7289
Address	Experian Fraud Division P.O. Box 9554 Allen, TX 75013	Equifax Consumer Fraud Division PO Box 740256 Atlanta, GA 30374	TransUnion LLC P.O. Box 2000 Chester, PA 19016
Online Credit Report Fraud Alert Form	https://www.experian.com/fraud/center.html	https://www.equifax.com/personal/credit-report-services/	https://fraud.transunion.com/fa/fraudAlert/landingPage.jsp

Information on Security Freezes

In addition, you may place a security freeze on your credit file. A security freeze will block a credit bureau from releasing information from your credit report without your prior written authorization, so that no new credit can be opened in your name without the use of a Personal Identification Number (PIN) that is issued to you when you initiate a freeze. If you place a security freeze, potential creditors and other third parties will not be able to access your credit report unless you temporarily lift the freeze. Therefore, please be aware that it may delay, interfere with, or prevent the timely approval of any requests you make for new loans, mortgages, employment, housing or other services.

To place a security freeze on your credit report, you may send a written request separately to **each** of the below listed major consumer reporting agencies by regular, certified, or overnight mail. You can also place security freezes online by visiting **each** consumer reporting agency online. You can also contact the FTC for additional information about fraud alerts and security freezes. The following information should be included when requesting a security freeze:

- 1) Full name, with middle initial and any suffixes;
- 2) Social Security number;
- 3) Date of birth (month, day, and year);
- 4) Current address and previous addresses for the past five (5) years;
- 5) Proof of current address, such as a current utility bill or telephone bill;
- 6) Other personal information as required by the applicable credit reporting agency;

If you request a security freeze online or by phone, then the credit reporting agencies have one (1) business day after receiving your request to place a credit freeze on your credit file report. If you request a lift of the credit freeze online or by phone, then the credit reporting agency must lift the freeze within one (1) hour. If you request a credit freeze or lift of a credit freeze by mail, then the credit agency must place or lift the credit freeze no later than three (3) business days after getting your request.

	Experian	Equifax	TransUnion
Address	Experian Security Freeze P.O. Box 9554 Allen, TX 75013	Equifax Security Freeze P.O. Box 105788 Atlanta, Georgia 30348	TransUnion LLC P.O. Box 2000 Chester, PA 19016
Online Security Freeze Form	https://www.experian.com/freeze/center.html	https://www.equifax.com/personal/credit-report-services	https://www.transunion.com/credit-freeze

State-Specific Information

You can obtain further information on how to file such a complaint by way of the contact information listed above. Instances of known or suspected identity theft should also be reported to law enforcement, including your state Attorney General.

If you are a resident of the following states, the below information applies to you.

For District of Columbia residents: The Attorney General can be contacted at Office of the Attorney General for the District of Columbia, 441 4th St. NW, Washington, DC 20001, <https://oag.dc.gov>, Telephone: (202) 727-3400

For Kentucky residents: The Attorney General can be contacted at, 700 Capitol Avenue, Suite 118 Frankfort, Kentucky 40601, www.ag.ky.gov, Telephone: 1-502-696-5300.

For Maryland residents: The Attorney General can be contacted at Office of the Attorney General of Maryland, Consumer Protection Division, 200 St. Paul Place Baltimore, MD 21202, www.oag.state.md.us/Consumer, Telephone: 1-888-743-0023.



For New Mexico residents: You have rights pursuant to the Fair Credit Reporting Act, 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 Fair Credit Reporting Act, 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 a violator. You may have additional rights under the Fair Credit Reporting Act not summarized here. Identity theft victims and active duty military personnel have specific additional rights pursuant to the Fair Credit Reporting Act. You can review your rights pursuant to the Fair Credit Reporting Act by visiting www.consumerfinance.gov/f/201504_cfpb_summary_your-rights-under-fcra.pdf, or by writing Consumer Response Center, Room 130-A, Federal Trade Commission, 600 Pennsylvania Ave. N.W., Washington, D.C. 20580.

For New York residents: The Attorney General can be contacted at 120 Broadway, 3rd Floor New York, NY 10271, Fax: 212-416-6003, breach.security@ag.ny.gov.

For North Carolina residents: The Attorney General can be contacted at 9001 Mail Service Center, Raleigh, NC 27699, 919-716-6400, www.ncdoj.gov.

For Oregon residents: The Attorney General can be contacted at Oregon Department of Justice, 1162 Court Street NE, Salem, OR 97301, Telephone: 1-877-877-9392, www.doj.state.or.us/.

For all other residents: Information on how to contact your state attorney general may be found at www.naag.org/naag/attorneys-general/whos-my-ag.php.