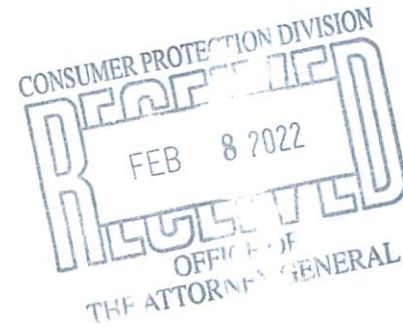


Angelo A. Stio, III
Angelo.stio@troutman.com

February 7, 2022

VIA OVERNIGHT DELIVERY

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



Re: Incident Notification

Dear Attorney General Frosh:

This firm represents Progrexion ASG, Inc. ("Progrexion") which is located at 257 East 200 South, Salt Lake City, UT 84111. We are writing, pursuant to Md. Code, Com. Law § 14-3504, to provide preliminary notice of an incident that occurred at Progrexion related to sixty-eight (68) Maryland residents. The incident did not involve the type of data that would constitute a breach as defined by Md. Code, Com. Law § 14-3504. Nonetheless, Progrexion intends to provide notice to these consumers and offer Experian's IdentityWorksSM credit monitoring and identity theft protection services.

On December 23, 2021, Progrexion discovered patterns that indicated an unknown third-party was using one of Progrexion's public facing platforms to request certain information that helps individuals decide if Progrexion's assistance is required. It appears that the unknown third-party was in possession of certain personal information about the affected individuals from a source other than Progrexion, and then used that information to access a report containing FICO score, account number or institution identity (e.g., name of a bank) and limited details about that account (e.g., if any payments were late).

Upon discovering the third party's actions, Progrexion took its public facing platform offline to prevent any additional requests from being made and it enhanced access controls on its platform in order to reduce the risk of a similar incident occurring.

While these incidents may not constitute a "breach" within the meaning of the Maryland statute, we are notifying you out of an abundance of caution. We also intend to notify the Maryland consumers and offer them free identity theft and credit monitoring services through Experian for twenty-four (24) months.

We have also attached a sample of the notification letter for reference, which will be sent to the Maryland residents on or about February 14, 2022.

Should you have any questions or concerns about this matter, please do not hesitate to contact me.

Sincerely,

A handwritten signature in blue ink, appearing to read "Angelo A. Stio, III".

Angelo A. Stio, III

Enclosure

Company Letterhead

[DATE]

[CONTACT INFORMATION]

Re: An Important Message

Dear <<Name 1>>

On behalf of Progrexion ASG, Inc. ("Progrexion"), which is located at 257 East 200 South, Salt Lake City, UT 84111, we are writing to advise you of an incident ("Incident") that may involve unauthorized access to some of your information. This letter provides important information about the Incident and outlines some resources that may help you protect your privacy.

WHAT HAPPENED?

On December 23, 2021, Progrexion discovered patterns that indicated an unknown third-party was using one of Progrexion's public facing platforms to request certain information that helps individuals decide if Progrexion's assistance is required. It appears that the unknown third-party was in possession of certain personal information about you from a source other than Progrexion, and then used that information to access a report containing your FICO score, account number or institution identity (e.g., name of a bank) and limited details about that account (e.g., if any payments were late) (the "Incident").

WHAT INFORMATION WAS INVOLVED?

The information that was potentially involved in the Incident may have included your FICO score, account numbers or institution identity (e.g., name of a bank) and limited details about that account (e.g., if any payments were late, balances and the like). It is important to note that the third party *did not* access from Progrexion your social security number, or any passwords or access codes to accounts that you maintain.

WHAT WE ARE DOING?

Progrexion is committed to protecting the privacy of your information. Upon discovering the third party's actions, Progrexion took its public facing platform offline to prevent any additional requests from being made and it enhanced access controls on its platform in order to reduce the risk of a similar incident occurring.

In an abundance of caution and to help you under the circumstances with any prior events unrelated to Progrexion that involved the third party's access to your personal information, Progrexion has arranged for you to receive a complimentary twenty four (24) month membership in Experian's IdentityWorksSM. *The details of how to obtain Experian's services are attached to this letter.*

WHAT YOU CAN DO?

Outlined below are a number of ways that you can protect yourself.

1. **Sign Up for Credit Monitoring.** We encourage you to take advantage of the complimentary credit monitoring services we are providing. As noted above, a description

of the credit monitoring services is provided in the attached material.

2. **Monitor Account Statements and Free Credit Reports.** You should remain vigilant for incidents of financial fraud and identity theft by regularly reviewing your account statements and monitoring free credit reports.
3. **Contact the Federal Trade Commission, Law Enforcement and Credit Bureaus.** To report incidents of identity theft or to learn about steps you can take to protect yourself from identity theft, you may contact the Federal Trade Commission ("FTC"), your state's Attorney General's office, or law enforcement. To learn more, you can go to the FTC's websites at www.IdentityTheft.gov and www.ftc.gov/idtheft; call the FTC at (877) IDTHEFT (438-4338); or write to: FTC Consumer Response Center, 600 Pennsylvania Avenue, NW, Washington, DC 20580.

You may contact the nationwide credit reporting agencies at:

Equifax	Experian	TransUnion
(800) 525-6285	(888) 397-3742	(800) 680-7289
P.O. Box 740241	P.O. Box 9701	Fraud Victim Assistance
Atlanta, GA 30374-0241	Allen, TX 75013	Division
www.equifax.com	www.experian.com	P.O. Box 2000
		Chester, PA 19016-2000
		www.transunion.com

4. **Obtain Free Copy of Credit Reports.** You may also periodically obtain credit reports from each nationwide credit reporting agency. If you discover information on your credit report arising from a fraudulent transaction, you should request that the credit reporting agency delete that information from your credit report file. In addition, under the Fair Credit Reporting Act ("FCRA"), you are entitled to one free copy of your credit report every 12 months from each of the three nationwide credit reporting agencies. TransUnion, Equifax and Experian are offering free weekly credit reports on www.AnnualCreditReport.com through April 20, 2022 as part of their efforts to support all Americans during the Covid-19 pandemic. You may obtain a free copy of your credit report by going to www.AnnualCreditReport.com or by calling (877) 322-8228.
5. **Additional Rights Under the FCRA.** You have rights pursuant to the 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 <https://www.consumer.ftc.gov/articles/pdf-0096-fair-credit-reporting-act.pdf>, or by writing Consumer Response Center, Room 130-A, Federal Trade Commission, 600

Pennsylvania Ave. N.W., Washington, D.C. 20580.

6. **Request Fraud Alerts and Security Freezes.** You may obtain additional information from the FTC and the credit reporting agencies about fraud alerts and security freezes. Each CRA may have different procedures for placing, lifting or removing a freeze.

You can add a fraud alert to your credit report file to help protect your credit information. A fraud alert can make it more difficult for someone to get credit in your name because it tells creditors to follow certain procedures to protect you, but it also may delay your ability to obtain credit. You may place a fraud alert in your file by calling one of the three nationwide credit reporting agencies listed above. As soon as that agency processes your fraud alert, it will notify the other two agencies, which then must also place fraud alerts in your file.

You may also place a security freeze on your credit reports, 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 with each of the three national consumer reporting agencies: Equifax (www.equifax.com); Experian (www.experian.com); and TransUnion (www.transunion.com). To place a security freeze on your credit report, you may send a written request by regular, certified or overnight mail at the addresses below. You may also place a security freeze through each of the consumer reporting agencies' websites or over the phone, using the contact information below.

Equifax Security Freeze
PO Box 105788
Atlanta, GA 30348
<https://www.freeze.equifax.com>
1-800-685-1111

Experian Security Freeze
PO Box 9554
Allen, TX 75013
<http://experian.com/freeze>
1-888-397-3742

TransUnion Security Freeze
PO Box 2000
Chester, PA 19016
<http://transunion.com/freeze>
1-888-909-8872

In order to request a security freeze, you will need to provide the following information:

1. Your full name (including middle initial as well as Jr., Sr., II, III, etc.);
2. Social Security Number;
3. Date of birth;
4. The complete address including proof of current address, such as a current utility bill, bank or insurance statement or telephone bill;
5. If you have moved in the past 2 years, give your previous addresses where you have lived for the past 2 years;
6. A legible photocopy of a government issued identification card (state driver's license or ID card, military identification, etc.); and
7. 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 identity theft.

If the request for a security freeze is made by toll-free number or secure electronic means, the credit reporting agencies have one (1) business day after receiving the request to place the security freeze on your credit report. If the request is made by mail, the credit reporting agencies have three (3) business days after receiving the request to place a security freeze on your credit report. The credit reporting agencies must also send written confirmation to you within five (5) business days and provide you with a mechanism to enable you to remove a security freeze and upon receiving proper identification from you, the consumer reporting agency shall remove a security freeze within one (1) hour after receiving the request by telephone for removal or within three (3) business days after receiving the request by mail for removal.

To remove a security freeze, you must make a request to each of the credit reporting agencies by mail, through their website, or by phone (using the contact information above). You must provide proper identification (name, address, and social security number) and the PIN number or password provided to you when you placed the security freeze. There is no fee to place or lift a security freeze.

- 7. Additional Information for Certain States.** Please review the last page of this letter for additional information for certain states.

FOR MORE INFORMATION

Please do not hesitate to contact our support agents if you have any questions or concerns by calling [_____]. Our support agents are available Monday through Friday, from 9:00 a.m. to 9:00 p.m. Eastern Time, excluding U.S. holidays.

Sincerely,

Progrexion ASG, Inc.

Encls.

ADDITIONAL INFORMATION FOR CERTAIN STATES

For residents of California: Visit the California Office of Privacy Protection (www.oag.ca.gov/privacy) for additional information on protection against identity theft.

For residents of Maryland: You may obtain information about avoiding identity theft from the Maryland Attorney General's Office at:

Office of the Attorney General
Consumer Protection Division
200 St. Paul Place
Baltimore, MD 21202
(888) 743-0023
www.oag.state.md.us

For residents of North Carolina: You may obtain information about preventing identity theft from the North Carolina Attorney General's Office at:

North Carolina Department of Justice
Attorney General Josh Stein
9001 Mail Service Center
Raleigh, NC 27699-9001
(919) 716-6400
<http://www.ncdoj.com>

For residents of Oregon: You may report suspected identity theft to local law enforcement, including the Oregon Attorney General at:

Oregon Department of Justice
1162 Court St. NE
Salem, Oregon 97301
(877) 877-9392
<https://www.doj.state.or.us/>

[EXPERIAN INFORMATION]