VIA ELECTRONIC MAIL

January 19, 2022

Office of the Attorney General
Attn: Security Breach Notification
200 St. Paul Place
Baltimore, MD 21202
Idtheft@oag.state.md.us

RE: Notification of MRIoA Security Incident

Dear Office of the Attorney General representative:

CVS Caremark ("Caremark") is writing to notify the Office of the Attorney General (the "Office") that a security incident that occurred at one of its vendors, Medical Review Institute of America ("MRIoA"), affected one (1) Maryland resident who is a member of the Coca-Cola Consolidated group health plan. Caremark is the pharmacy benefit manager ("PBM") for Coca-Cola Consolidated and is providing this notice to the Office on its behalf and in accordance with Md. Code Ann., Com. Law § 14-3504(h).

I. Brief Description of the Breach

On November 9, 2021, MRIoA learned that it was the victim of a sophisticated cyber-attack. Once the attack was discovered, MRIoA quickly took steps to secure and safely restore its systems and operations. Further, MRIoA immediately engaged third-party forensic and incident response experts to conduct a thorough investigation of the incident's nature and scope and assist in the remediation efforts. MRIoA also contacted the FBI to inform them of the incident and seek guidance. On November 12, 2021, MRIoA discovered that the incident involved the unauthorized acquisition of information.

On November 16, 2021, to the best of MRIoA's ability and knowledge, the information was retrieved, and a confirmation of deletion was subsequently obtained. Once the information was retrieved, MRIoA began determining the individuals impacted in the incident. As of now, there is no evidence indicating misuse of any of the impacted information.

MRIoA is contracted directly by Caremark to perform clinical reviews of certain services and treatments. These clinical reviews are conducted for members whose group health plans contract with Caremark for PBM services, which includes Coca-Cola Consolidated.

II. How MRIoA Responded

In response to this incident, MRIoA implemented and/or is continuing to implement additional cybersecurity safeguards to its existing infrastructure to better minimize the likelihood of this type of event occurring again, including:

- Constant monitoring of systems with advanced threat hunting and detection software
- Adding additional multifactor authentication protections when attempting system access
- New servers built from the ground up to ensure all threat remnants were removed
- Working with external third-party cybersecurity experts to assist in the security efforts
- Deploying a hardened and new backup environment
- Enhancing employee cybersecurity training
- Reviewing, revising, and amending existing cybersecurity policies as necessary

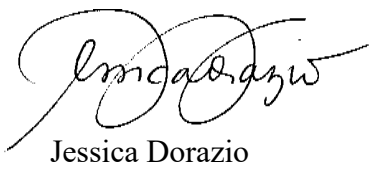
III. How Caremark Responded

On November 19, 2021, MRIoA provided Caremark with a cursory list of affected individuals. Because the list lacked certain important information, Caremark promptly initiated a review of this list to identify members, their benefit plans, and their addresses. The list Caremark received from MRIoA did not consistently include this information. Caremark worked diligently, and expended considerable time and resources, to review the limited, inconsistent personal information included in the MRIoA list to locate the addresses of the individuals listed and the other information necessary to attribute them to their respective employer groups. Caremark has also had several communications with MRIoA regarding this breach to assist in its own investigation and review of the matter.

In accordance with its obligations set forth at 45 C.F.R. §164.404 (notifications to individuals by a HIPAA covered entity) and Maryland law, MRIoA will be issuing notification on behalf of Coca-Cola Consolidated to the impacted Maryland member by first class U.S. mail. A template copy of the notification that will be sent to the impacted member is attached.

I want to assure you that Caremark expects its vendors to adhere to the highest of privacy standards. If you have any questions, you may contact me at 860-273-4006 and DorazioJ1@aetna.com or by mail at 151 Farmington Avenue, RC61, Hartford, CT 06156.

Sincerely,



Jessica Dorazio
Executive Director, Senior Counsel – Privacy & Security

<FirstName> <LastName>
<Address1>
<Address2>
<City><State><Zip>

<date>

Re: Notice of Data Breach

Dear <First Name> <Last Name>,

At the Medical Review Institute of America ("MRIoA"), we value transparency and respect the privacy of your information, which is why, as a precautionary measure, we are writing to let you know about a data security incident that may involve your protected personal information, what we did in response, and steps you can take to protect yourself against possible misuse of the information. Please note that you are receiving this letter because your information was provided to us to facilitate a clinical review of a health care service you requested or received through CVS Caremark, the pharmacy benefit manager for the [COVERED ENTITY] group health plan.

What Happened

On November 9, 2021, we learned that we were the victim of a sophisticated cyber-attack. Once we found out, we quickly took steps to secure and safely restore our systems and operations. Further, we immediately engaged third-party forensic and incident response experts to conduct a thorough investigation of the incident's nature and scope and assist in the remediation efforts. We also contacted the FBI to inform them of the incident and seek guidance. On November 12, 2021, we discovered that the incident involved the unauthorized acquisition of information.

On November 16, 2021, to the best of our ability and knowledge, we retrieved and subsequently confirmed the deletion of the obtained information. Our investigation into the cause of the incident is ongoing. However, once we retrieved the information, we began determining the individuals impacted in the incident. Further, based on a comprehensive review, we discovered that your protected health information was included in the incident. ***However, as of now, we have no evidence indicating misuse of any of your information.***

What Information Was Involved

The types of protected health information potentially involved (only if this information was provided to MRIoA by the organization named above) are your demographic information (i.e., first and last name, gender, home address, phone number, email address, date of birth, and social security number); clinical information (i.e., medical history/diagnosis/treatment, dates of service, lab test results, prescription information, provider name, medical account number, or anything similar in your medical file and/or record); and financial information (i.e., health insurance policy and group plan number, group plan provider, claim information).

What We Are Doing

As explained above, we took immediate steps to secure our systems and engaged third-party forensic experts to assist in the investigation. Further, in response to this incident, we implemented and/or are continuing to implement additional cybersecurity safeguards to our existing robust infrastructure to better minimize the likelihood of this type of event occurring again, including:

- Constant monitoring of our systems with advanced threat hunting and detection software;
- Adding additional authentication protections when attempting to access the systems;
- New servers built from the ground up to ensure all threat remnants were removed;

- Working with external third-party cybersecurity experts to assist us in our security efforts;
- Deploying a hardened and new backup environment;
- Enhancing our employee cybersecurity training; and
- Reviewing, revising, and amending our existing cybersecurity policies as necessary.

What You Can Do

The security and privacy of the information contained within our systems is a top priority for us. Therefore, while we have no evidence indicating your information was misused, we strongly recommend that you remain vigilant, monitor and review all of your financial and account statements, and report any unusual activity to the institution that issued the record and law enforcement. In addition, please see "***OTHER IMPORTANT INFORMATION***" on the following pages for guidance on how to best protect your identity.

Further, to help relieve concerns and restore confidence following this incident, we have secured the services of Kroll to provide identity monitoring at no cost to you for one year. Kroll is a global leader in risk mitigation and response, and their team has extensive experience helping people who have sustained an unintentional exposure of confidential data. Your identity monitoring services include Credit Monitoring, Web Watcher, Fraud Consultation, and Identity Theft Restoration.

Visit **<<IDMonitoringURL>>** to activate and take advantage of your identity monitoring services.

*You have until **<<Date>>** to activate your identity monitoring services.*

Membership Number: **<<Member ID>>**

For more information about Kroll and your Identity Monitoring services, you can visit info.krollmonitoring.com.

If you prefer to activate these services offline and receive monitoring alerts via the US Postal Service, you may activate via our automated phone system by calling 1-888-653-0511, Monday through Friday, 8:00 a.m. to 5:30 p.m. Central time, excluding major U.S. holidays. Please have your membership number located in your letter ready when calling. Please note that to activate monitoring services, you will be required to provide your name, date of birth, and Social Security number through our automated phone system.

For More Information

We sincerely regret this incident occurred and for any concern it may cause. We understand that you may have questions about it beyond what is covered in this letter. To assist you with questions regarding this incident, representatives are available for 90 days from the date of this letter, between the hours of 8:00 am to 8:00 pm Eastern time, Monday through Friday. Please call the helpline 1-xxx-xxx-xxxx and supply the fraud specialist with your unique code listed below. To extend these services, enrollment in the monitoring services described above is required.

Sincerely yours,

[signature]

Ron Sullivan, President/CEO

KROLL

TAKE ADVANTAGE OF YOUR IDENTITY MONITORING SERVICES

You have been provided with access to the following services from Kroll:

Single Bureau Credit Monitoring

You will receive alerts when there are changes to your credit data—for instance, when a new line of credit is applied for in your name. If you do not recognize the activity, you'll have the option to call a Kroll fraud specialist, who will be able to help you determine if it is an indicator of identity theft.

Web Watcher

Web Watcher monitors internet sites where criminals may buy, sell, and trade personal identity information. An alert will be generated if evidence of your personal identity information is found.

Fraud Consultation

You have unlimited access to consultation with a Kroll fraud specialist. Support includes showing you the most effective ways to protect your identity, explaining your rights and protections under the law, assistance with fraud alerts, and interpreting how personal information is accessed and used, including investigating suspicious activity that could be tied to an identity theft event.

Identity Theft Restoration

If you become a victim of identity theft, an experienced Kroll licensed investigator will work on your behalf to resolve related issues. You will have access to a dedicated investigator who understands your issues and can do most of the work for you. Your investigator will be able to dig deep to uncover the scope of the identity theft, and then work to resolve it.

Kroll's activation website is only compatible with the current version or one version earlier of Chrome, Firefox, Safari and Edge.

To receive credit services, you must be over the age of 18 and have established credit in the U.S., have a Social Security number in your name, and have a U.S. residential address associated with your credit file.

OTHER IMPORTANT INFORMATION

Obtain and Monitor Your Credit Report. We recommend that you obtain a free copy of your credit report from each of the three nationwide credit reporting agencies once every 12 months by visiting http://www.annualcreditreport.com, calling toll-free 877-322-8228, or by completing an Annual Credit Report Request Form and mailing it to Annual Credit Report Request Service, P.O. Box 105281, Atlanta, GA 30348. You can access the request form at https://www.annualcreditreport.com/requestReport/requestForm.action. Alternatively, you can elect to purchase a copy of your credit report by contacting one of the three national credit reporting agencies. The three nationwide credit reporting agencies' contact information are provided below to request a copy of your credit report or general identified above inquiries.

Equifax	Experian	TransUnion
(888) 766-0008	**(888) 397-3742**	**(800) 680-7289**
P.O. Box 740256	P.O. Box 2104	P.O. Box 1000
Atlanta, GA 30348	Allen, TX 75013	Chester, PA 19016
www.equifax.com	www.experian.com	www.transunion.com

Security Freeze (also known as a Credit Freeze). Following is general information about how to request a security freeze from the three credit reporting agencies. While we believe this information is accurate, you should contact each agency for the most accurate and up-to-date information. 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. In addition, in some states, the agency cannot charge you to place, lift or remove a security freeze. There might be additional information required, and as such, to find out more information, please contact the three nationwide credit reporting agencies (contact information provided above).

Equifax Security Freeze	Experian Security Freeze	TransUnion Security Freeze & Fraud Victim Assistance Dept.
P.O. Box 105788	P.O. Box 9554	P.O. Box 380
Atlanta, GA 30348	Allen, TX 75013	Chester, PA 19016
https://www.equifax.com/personal/credit-report-services/credit-freeze/	www.experian.com/freeze	https://www.transunion.com/credit-freeze

Consider Placing a Fraud Alert on Your Credit Report. You may want to consider placing a fraud alert on your credit report. An initial fraud alert is free and will stay on your credit file for at least twelve months. The alert informs creditors of possible fraudulent activity within your report and requests that the creditor contact you before establishing any accounts in your name. To place a fraud alert on your credit report, contact any of the three nationwide credit reporting agencies identified above. Additional information is available at https://www.equifax.com/personal/credit-report-services/credit-fraud-alerts/

Remain Vigilant, Review Your Account Statements and Notify Law Enforcement of Suspicious Activity. As a precautionary measure, we recommend that you remain vigilant by closely reviewing your account statements and credit reports. If you detect any suspicious activity on an account, we strongly advise that you promptly notify the financial institution or company that maintains the account. Further, you should promptly report any fraudulent activity or any suspected incidence of identity theft to proper law enforcement authorities, including your state attorney general and the Federal Trade Commission (FTC). To file a complaint or to contact the FTC, you can (1) send a letter to the *Federal Trade Commission*, Consumer Response Center, 600 Pennsylvania Avenue NW, Washington, DC 20580; (2) go to IdentityTheft.gov/databreach; or (3) call 1-877-ID-THEFT (877-438-4338). Complaints filed with the FTC will be added to the FTC's Identity Theft Data Clearinghouse, a database made available to law enforcement agencies.

Take Advantage of Additional Free Resources on Identity Theft. We recommend that you review the tips provided by the Federal Trade Commission's Consumer Information website, a valuable resource with some helpful tips on how to protect your information. Additional information is available at https://www.consumer.ftc.gov/topics/privacy-identity-online-security. For more information, please visit IdentityTheft.gov or call 1-877-ID-THEFT (877-438-4338). In addition, a copy of Identity Theft – A Recovery Plan, a comprehensive guide from the FTC to help you guard against and deal with identity theft, can be found on the FTC's website at https://www.consumer.ftc.gov/articles/pdf 0009_identitytheft_a_recovery_plan.pdf.

District of Columbia Residents: You can obtain information from the FTC and the Office of the Attorney General for the District of Columbia about steps to take to avoid identity theft. You can contact the D.C. Attorney General at: 441 4th Street, NW, Washington, DC 200001, 202-727-3400, www.oag.dc.gov. **Iowa residents** may also wish to contact the Office of the Attorney general on how to avoid identity theft by calling 515-281-5164 or by mailing a letter to the Attorney General at: *Office of the Attorney General of Iowa,* Hoover State Office Building, 1305 E. Walnut Street, Des Moines, IA 50319. **Maryland residents** may wish to review the information the Attorney General, who can be contacted at 200 St. Paul Place, 16th Floor, Baltimore, MD 21202, 1-888-743-0023, or visiting www.oag.state.md.us. **Massachusetts residents**: State law advises you that you have the right to obtain a police report. Further, you have the right to obtain 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. To request a security freeze be placed on your credit report, please be prepared to provide any or all of the following: your full name, social security number, address(es), date of birth, a copy of a government issued identification card, a copy of a utility bill, bank or insurance information, or anything else the credit reporting agency needs to place the security freeze. Further information regarding credit freezes, including the contact information for the credit reporting agencies, may be found above in section titled "Security Freeze (also known as a Credit Freeze)." **New Hampshire residents** have the right to ask that the three nationwide credit reporting agencies place fraud alerts in their file (as described above) and or request a security freeze (as described above). To place or fraud alert on your file or request the security freeze, please contact three credit reporting agencies identified above. **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. **New York Residents**: You may also contact the following state agencies for information regarding security breach response and identity theft prevention and protection information: New York Attorney General's Office Bureau of Internet and Technology, (212) 416-8433, https://ag.ny.gov/internet/resource-center and or NYS Department of State's Division of Consumer Protection, (800) 697-1220, https://www.dos.ny.gov/consumerprotection. **North Carolina residents** may wish to review the information provided by the North Carolina Attorney General at www.ncdoj.gov, or by contacting the Attorney General by calling 877-5-NO-SCAM (Toll-free within North Carolina) or by mailing a letter to the Attorney General at *North Carolina Attorney General's Office, Consumer Protection Division,* 9001 Mail Service Center Raleigh, NC 27699. **Oregon Residents**: State laws advise you to report any suspected identity theft to law enforcement, as well as the Federal Trade Commission. You can contact the Oregon Attorney General at: Oregon Department of Justice, 1162 Court Street NE, Salem, OR 97301-4096, (877) 877- 9392, www.doj.state.or.us. **Rhode Island residents** have the right to obtain a police report (if one was filed. Alternatively, you can file a police report). Further, you can obtain information from the Rhode Island Office of the Attorney General about steps you can take to help prevent identity theft. You can contact the Rhode Island Attorney General at: 150 South Main Street, Providence, RI 02903, (401) 274-4400, www.riag.ri.gov. As noted above, you have the right to place a security freeze on your credit report at no charge, but note that consumer reporting agencies may charge fees for other services. **West Virginia residents** have the right to ask that the three nationwide credit reporting agencies place fraud alerts in their file (as described above) and or request a security freeze (as described above). To place or fraud alert on your file or request the security freeze, please contact three credit reporting agencies identified above.