



Sent via Email

May 17, 2022

Attorney General Brian E Frosh
Office of the Attorney General

NATURE OF UNAUTHORIZED ACCESS

On April 20, 2022, we inadvertently sent a report containing personal information of one Maryland resident-participant through secure message to an HR Representative at another firm with whom Schwab also has a relationship. The recipient informed Schwab of the error on the same day and the message was deleted. We have no evidence of unauthorized use of personal information.

Participant name, Social Security number, date of birth, and physical address were viewable.

NUMBER OF RESIDENTS AFFECTED

This incident involves the unauthorized transmission of personal information of one individual residing in Maryland. On May 18, 2022, the Retirement Plan Services team at Schwab will send a letter to the individual via USPS notifying them of the incident. Please find attached an example of the notification letter sent to the impacted individual.

STEPS BEING TAKEN BY THE COMPANY

A data incident report was logged in Schwab's internal data incident reporting tool to keep record of this incident. The message containing the personal information has been deleted. We believe the likelihood of fraud or misuse is minimal.

CONTACT INFORMATION

If you have any questions or need additional information, please contact me as noted below.

Respectfully submitted,

Max Ruston
Chief Privacy Officer
Charles Schwab & Co., Inc.
Telephone: (415) 667-1511
Email: max.ruston@schwab.com

March 16, 2022

Name
Address
City, State ZIP



Important information about your account

On behalf of Schwab Retirement Plan Services, Inc. ("SRPS"), the provider of record-keeping and related services to the Aledade 401(k) Savings and Investment Plan, we are writing to you to address an incident involving the exposure of your sensitive personal information.

What happened

On April 20, 2022, we inadvertently sent a report with your personal information to an HR Representative at another Plan Sponsor. The recipient promptly informed SRPS of the error and confirmed the information has been deleted.

We have no evidence of unauthorized use of your personal information at Schwab and are not aware of unauthorized activity in your accounts. If you have identified unauthorized use of your personal information or unauthorized activity in your accounts, please call us immediately at 1-800-724-7526 from 8 a.m. to 10 p.m ET, Monday through Friday, to let us know.

We apologize for the error and any inconvenience that this may cause you.

What information was included

The personal information included your name, Social Security number, and address.

What steps we are taking

The recipient confirmed that your information has been deleted. As a precaution, however, we are providing a two-year credit monitoring subscription from IdentityForce at no cost to you. To subscribe, please see the enclosed information sheet and use the unique verification code provided.

What steps we recommend you take

We recommend that you review your recent and future account statements carefully to ensure all transactions are authorized. We also recommend that you visit SchwabSafe at www.workplace.schwab.com/schwabsafe to learn more about security measures designed to help keep your personal and financial information safe online.

We can place a verbal password on your retirement plan account. If you choose to have a verbal password, you will be required to provide this additional password whenever you contact SRPS by phone. To place a verbal password on your retirement plan account, please call SRPS at 1-800-724-7526.

We encourage you to monitor your financial accounts and credit reports and to report any suspicious or unrecognized activity to local law enforcement and your financial institution(s).

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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, contact 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
- **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

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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. 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 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 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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Verification Code: << CODE >>

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.

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