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June 30, 2022

VIA E-MAIL (IDTHEFT@OAG.STATE.MD.US)

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

Re: Incident Notification

Dear Attorney General Frosh:

We are writing on behalf of our client, the Energy Cooperative (the “Energy Coop”), to notify your office of a cybersecurity incident. The Energy Coop’s headquarters are located at 1500 Granville Road, Newark, OH 43055.

The Energy Coop completed an investigation into an incident involving unauthorized access to the Energy Coop’s computer systems. Upon identifying the unauthorized access, the Energy Coop immediately took steps to secure its systems, a cybersecurity firm was engaged, and a thorough investigation was conducted. The investigation determined that there was unauthorized access to the Energy Coop’s systems between February 3 and 19, 2022. The investigation was unable to identify all of the files that the unauthorized actor viewed or accessed, so out of an abundance of caution, the Energy Coop conducted a thorough review of the folders identified by the cybersecurity firm as having been accessed by the unauthorized actor. On June 3, 2022, it was determined that one or more of the files in those folders contained the name and Social Security numbers of fourteen Maryland residents.

Beginning today, the Energy Coop began mailing a notification letter to each of the fourteen Maryland residents in accordance with Md. Code Ann., Com. Law § 14-3504 via United States First-Class mail.¹ A copy of the notification letter is enclosed. The Energy Coop will offer each

¹ This report does not waive the Energy Cooperative’s objection that Maryland lacks regulatory authority over it related to any claims that may arise from this incident.

June 30, 2022

Page 2

of the Maryland residents a complimentary one-year subscription to identity monitoring services through IDX. The Energy Coop also will establish a dedicated, toll-free call center that individuals can call to obtain more information regarding the incident.

To help prevent something like this from happening again, the Energy Coop is enhancing its existing information security measures and providing additional training to its employees, including employing multi-factor authentication and protection against malicious email and weblinks.

Please do not hesitate to contact me if you have any questions regarding this matter.

Sincerely,

Ryan M. Christian

Ryan M. Christian, Sr.
Counsel

Enclosure



Address for Return Mail
P.O. Box 1907
Suwanee, GA 30024

To Enroll, Please Call:
1-833-423-2936
Or Visit:
<https://app.idx.us/account-creation/protect>
Enrollment Code:
<<XXXXXXXXXX>>

<<Name 1>> <<Name 2>>
<<Address 1>>
<<Address 2>>
<<City>>, <<State>> <<Zip>>

June 30, 2022

<<Notice of Data Breach (for CA Residents Only)>>

Dear <<Name 1>> <<Name 2>>:

We addressed a security incident that involved some of your information. This letter explains the incident, the measures we have taken, and some steps you may consider taking in response.

What Happened? We identified a data security incident. We immediately took steps to secure our systems and began an investigation. A cybersecurity firm was engaged to assist. Our investigation determined that an unauthorized actor gained access to some of our computer systems between February 3 and 19, 2022, and exfiltrated copies of some of our files during that time. We conducted a thorough review of these files and determined that they contained certain personal information.

What Information was Involved? The accessed files contained your name and Social Security number.

What Are We Doing in Response? To help prevent a similar incident from happening again, we are enhancing our existing information security measures and providing additional training to our employees, including multi-factor authentication and protection against malicious email and weblinks. As a precaution, we are offering you free access to IDX's identity protection services for <<12/24>> months. This service helps detect possible misuse of your personal information and provides you with identity protection services focused on immediate identification and resolution of identity theft. This service is completely free to you and enrolling in this program will not hurt your credit score.

What You Can Do. To activate your **complimentary membership**, please visit the below website:

Visit <https://app.idx.us/account-creation/protect> to activate and take advantage of your identity monitoring services.

*You have until **September 30, 2022**, to activate your identity monitoring services.*

Enrollment Code: <<XXXXXXXXXX>>.

For additional steps you may consider taking to protect your personal information, please see the additional information provided with this letter.

For More Information. We have opened a dedicated call center to answer any questions you may have about the incident and our response. If you have any questions, please call 1-833-423-2936, Monday through Friday, between 9:00 a.m. and 9:00 p.m. Eastern Time.

Sincerely,

Todd P. Ware
President and Chief Executive Officer



ENROLLMENT INSTRUCTIONS

1. Website and Enrollment. Go to <https://app.idx.us/account-creation/protect> and follow the instructions for enrollment using your Enrollment Code provided at the top of the letter.

2. Activate the credit monitoring provided as part of your IDX identity protection membership. The monitoring included in the membership must be activated to be effective. Note: You must have established credit and access to a computer and the internet to use this service. If you need assistance, IDX will be able to assist you.

3. Telephone. Contact IDX at 1-833-423-2936 to gain additional information about this event and speak with knowledgeable representatives about the appropriate steps to take to protect your credit identity.

If you discover any suspicious items and have enrolled in IDX identity protection, notify IDX immediately by calling or by logging into the IDX website and filing a request for help.

If you file a request for help or report suspicious activity, you will be contacted by a member of our ID Care team who will help you determine the cause of the suspicious items. In the unlikely event that you fall victim to identity theft as a consequence of this incident, you will be assigned an ID Care Specialist who will work on your behalf to identify, stop and reverse the damage quickly.

ADDITIONAL STEPS YOU CAN TAKE

We remind you it is always advisable to be vigilant for incidents of fraud or identity theft by reviewing your account statements and free credit reports for any unauthorized activity. You may obtain a copy of your credit report, free of charge, once every 12 months from each of the three nationwide credit reporting companies. To order your annual free credit report, please visit www.annualcreditreport.com or call toll free at 1-877-322-8228. Contact information for the three nationwide credit reporting companies is as follows:

- *Equifax*, PO Box 740241, Atlanta, GA 30374, www.equifax.com, 1-800-685-1111
- *Experian*, PO Box 2002, Allen, TX 75013, www.experian.com, 1-888-397-3742
- *TransUnion*, PO Box 2000, Chester, PA 19016, www.transunion.com, 1-800-916-8800

If you believe you are the victim of identity theft or have reason to believe your personal information has been misused, you should immediately contact the Federal Trade Commission and/or the Attorney General's office in your state. You can obtain information from these sources about steps an individual can take to avoid identity theft as well as information about fraud alerts and security freezes. You should also contact your local law enforcement authorities and file a police report. Obtain a copy of the police report in case you are asked to provide copies to creditors to correct your records. Contact information for the Federal Trade Commission is as follows:

- *Federal Trade Commission*, Consumer Response Center, 600 Pennsylvania Avenue NW, Washington, DC 20580, 1-877-IDTHEFT (438-4338), www.ftc.gov/idtheft

Fraud Alerts and Credit or Security Freezes:

Fraud Alerts: There are two types of general fraud alerts you can place on your credit report to put your creditors on notice that you may be a victim of fraud—an initial alert and an extended alert. You may ask that an initial fraud alert be placed on your credit report if you suspect you have been, or are about to be, a victim of identity theft. An initial fraud alert stays on your credit report for one year. You may have an extended alert placed on your credit report if you have already been a victim of identity theft with the appropriate documentary proof. An extended fraud alert stays on your credit report for seven years.

To place a fraud alert on your credit reports, contact one of the nationwide credit bureaus. A fraud alert is free. The credit bureau you contact must tell the other two credit bureaus, and all three will place an alert on their versions of your report. For those in the military who want to protect their credit while deployed, an Active-Duty Military Fraud Alert lasts for one year and can be renewed for the length of your deployment. The credit bureaus will also take you off their marketing lists for pre-screened credit card offers for two years, unless you ask them not to do so.

Credit or Security Freezes: You have the right to put a credit freeze, also known as a security freeze, on your credit file, free of charge, which makes it more difficult for identity thieves to open new accounts in your name. That's because most creditors need to see your credit report before they approve a new account. If they can't see your report, they may not extend the credit.

How do I place a freeze on my credit reports? There is no fee to place or lift a security freeze. Unlike a fraud alert, you must separately place a security freeze on your credit file at each credit reporting company. For information and instructions to place a security freeze, contact each of the credit reporting agencies at the addresses below:

- **Experian Security Freeze**, PO Box 9554, Allen, TX 75013, www.experian.com
- **TransUnion Security Freeze**, PO Box 2000, Chester, PA 19016, www.transunion.com
- **Equifax Security Freeze**, PO Box 105788, Atlanta, GA 30348, www.equifax.com

You'll need to supply your name, address, date of birth, Social Security number and other personal information.

After receiving your freeze request, each credit bureau will provide you with a unique PIN (personal identification number) or password. Keep the PIN or password in a safe place. You will need it if you choose to lift the freeze.

How do I lift a freeze? A freeze remains in place until you ask the credit bureau to temporarily lift it or remove it altogether.

If the request is made online or by phone, a credit bureau must lift a freeze within one hour. If the request is made by mail, then the bureau must lift the freeze no later than three business days after getting your request.

If you opt for a temporary lift because you are applying for credit or a job, and you can find out which credit bureau the business will contact for your file, you can save some time by lifting the freeze only at that particular credit bureau. Otherwise, you need to make the request with all three credit bureaus.

The Energy Cooperative's mailing address is 1500 Granville Rd, Newark, OH 43055. Its telephone number is 1-800-255-6815.

Additional information for residents of the following states:

Connecticut: You may contact and obtain information from your state attorney general at:

Connecticut Attorney General's Office, 165 Capitol Ave, Hartford, CT 06106, 1-860-808-5318, www.ct.gov/ag

Maryland: You may contact and obtain information from your state attorney general at:

Maryland Attorney General's Office, 200 St. Paul Place, Baltimore, MD 21202, 1-888-743-0023 / 1-410-576-6300, www.oag.state.md.us

New York: You may contact and obtain information from these state agencies:

New York Department of State Division of Consumer Protection, One Commerce Plaza, 99 Washington Ave., Albany, NY 12231-0001, 518-474-8583 / 1-800-697-1220, <http://www.dos.ny.gov/consumerprotection>; and

New York State Office of the Attorney General, The Capitol, Albany, NY 12224-0341, 1-800-771-7755, <https://ag.ny.gov>

Rhode Island: This incident involves three individuals in Rhode Island. Under Rhode Island law, you have the right to file and obtain a copy of a police report. You also have the right to request a security freeze, as described above. You may contact and obtain information from your state attorney general at:

Rhode Island Attorney General's Office, 150 South Main Street, Providence, RI 02903, 1-401-274-4400, www.riag.ri.gov

A Summary of Your Rights Under the Fair Credit Reporting Act: The federal Fair Credit Reporting Act (FCRA) promotes the accuracy, fairness, and privacy of information in the files of consumer reporting agencies. There are many types of consumer reporting agencies, including credit bureaus and specialty agencies (such as agencies that sell information about check writing histories, medical records, and rental history records). Your major rights under the FCRA are summarized below. For more information, including information about additional rights, go to www.consumerfinance.gov/learnmore or write to: Consumer Financial Protection Bureau, 1700 G Street NW, Washington, DC 20552.

- You must be told if information in your file has been used against you.
- You have the right to know what is in your file.
- You have the right to ask for a credit score.
- You have the right to dispute incomplete or inaccurate information.
- 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 reports to be provided to employers.
- You may limit "prescreened" offers of credit and insurance you get based on information in your credit report.
- You have a right to place a "security freeze" on your credit report, which will prohibit a consumer reporting agency from releasing information in your credit report without your express authorization.
- You may seek damages from violators.
- Identity theft victims and active-duty military personnel have additional rights.