# BakerHostetler

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July 7, 2022

**VIA EMAIL (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 Mr. Frosh:

We are writing on behalf of our clients, The Integral Group LLC, Integral Property Management LLC, and Integral Youth and Family Project LLC ("The Integral Group"), to provide notice to your office concerning a security incident involving two Maryland residents.[1] The Integral Group's office is located at 191 Peachtree Street, Suite 4100, Atlanta, Georgia 30303.

The Integral Group identified unusual activity in its network that caused certain devices to become unavailable. The Integral Group immediately implemented its incident response plan, took steps to contain the activity, and launched an investigation. A cybersecurity firm that has assisted other companies in similar situations was engaged. The Integral Group also notified law enforcement and worked to support its investigation.

The evidence showed that there was unauthorized activity in the Integral Group's network between March 26, 2022, and April 14, 2022. During that time, an unauthorized actor obtained files stored on the Integral Group's file server. The Integral Group conducted a careful review of those files and on June 9, 2022, determined that the files contained information concerning certain individuals, including two Maryland residents. The information included the individuals' names and Social Security numbers and, for a limited number of Integral Group employees, passport

[1] This notice does not waive the Integral Group's objection that Maryland lacks personal jurisdiction over it regarding any claims relating to this incident.

numbers. In addition, for employees whose job responsibilities included driving, their driver's license number may have been involved, and for those who submitted a workers' compensation claim, medical information submitted in connection with that claim may have been involved.

On July 7, 2022, the Integral Group will mail notification letters via First Class mail to the Maryland residents. A copy of the notification letter is attached. The Integral Group has arranged for the Maryland residents to receive a complimentary one-year membership to credit monitoring and identity theft protection services. The Integral Group also has established a dedicated, toll-free call center that the individuals can call to obtain more information regarding the incident.

To help prevent this type of incident from happening again, the Integral Group is taking steps to enhance the security of its network.

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

Sincerely,

Joseph L. Bruemmer
Partner

Attachment

Return Mail Processing Center
P.O. Box 6336
Portland, OR 97228-6336

<<MailID>>
<<Name 1>>
<<Name 2>>
<<Address 1>>
<<Address 2>>
<<Address 3>>
<<Address 4>>
<<City>><<State>><<Zip>>
<<Country>>

<<Date>>

Dear <<Name1>>:

The Integral Group understands the importance of protecting information.[1] We are writing to let you know of an incident that involved your information. This letter explains what occurred, what we are doing in response, and what you can do.

We identified unusual activity in our network that caused certain devices to be unavailable. We immediately implemented our incident response plan, took steps to contain the activity, and launched an investigation. A cybersecurity firm that has assisted other companies in similar situations was engaged. We also notified law enforcement and are supporting its investigation.

The evidence showed that there was unauthorized activity in our network between March 26, 2022, and April 14, 2022. During that time, an unauthorized actor obtained files stored on our file server. We conducted a careful review of those files and on June 9, 2022, determined that the files contained information that you submitted to us in connection with your employment, including your name, Social Security number, and for a limited number of employees, passport number. In addition, for employees whose job responsibilities included driving, your driver's license number may have been involved, and for those who submitted a workers' compensation claim, medical information submitted in connection with that claim may have been involved.

We wanted to notify you of this incident and to assure you that we take it seriously. We have arranged for you to receive a complimentary one-year membership to Experian's® IdentityWorks℠ credit monitoring service. This product helps detect possible misuse of your information and provides you with identity protection services focused on immediate identification and resolution of identity theft. IdentityWorks℠ is completely free to you, and enrolling in this program will not hurt your credit score. For more information on identity theft prevention and IdentityWorks℠, including instructions on how to activate your complimentary one-year membership, as well as some additional steps you can take in response, please see the additional information provided in this letter.

[1] This notice is being provided by and on behalf of The Integral Group LLC, Integral Property Management LLC, and Integral Youth and Family Project LLC.

We regret that this incident occurred and apologize for any inconvenience. To prevent something like this from happening again, we have taken steps to enhance our existing security measures. If you have any questions, please call 855-927-4422, Monday through Friday, between 9:00 a.m. and 9:00 p.m. Eastern Time.

Sincerely,

Valerie Edwards
Chief Administrative Officer

**Activate IdentityWorks Credit 3B Now in Three Easy Steps**

1. ENROLL by: **September 30, 2022 (**Your code will not work after this date.)
2. VISIT the **Experian IdentityWorks website** to enroll: **www.experianidworks.com/3bcredit**
3. PROVIDE the **Activation Code**: **<<Activation Code>>**

If you have questions about the product, need assistance with identity restoration or would like an alternative to enrolling in Experian IdentityWorks online, please contact Experian's customer care team at 877-890-9332 by **9/30/2022**. Be prepared to provide engagement number **B055292** as proof of eligibility for the identity restoration services by Experian.

**ADDITIONAL DETAILS REGARDING YOUR 12-MONTH EXPERIAN IDENTITYWORKS CREDIT 3B MEMBERSHIP:**

A credit card is **not** required for enrollment in Experian IdentityWorks Credit 3B.

You can contact Experian **immediately without needing to enroll in the product** regarding any fraud issues. Identity Restoration specialists are available to help you address credit and non-credit related fraud.
Once you enroll in Experian IdentityWorks, you will have access to the following additional features:

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

If you believe there was fraudulent use of your information and would like to discuss how you may be able to resolve those issues, please reach out to an Experian agent at 877-890-9332. 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 (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 this Identity Restoration support is available to you for twelve 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. You will also find self-help tips and information about identity protection at this site.

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

** 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 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.identitytheft.gov

**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, 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.

***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.

***If your health information was involved***: It is always advisable to review any statements you may receive from your health insurer or healthcare providers. If you see charges for services that you did not receive, contact your insurer or provider immediately.

The Integral Group LLC is located at 1 Innovation Way, Suite 218A, Woodstock, Georgia 30188 and can be reached at (855) 467-4823.

**Additional Information for Residents of the Following States:**

**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

**North Carolina:** You may contact and obtain information from your state attorney general at: *North Carolina Attorney General's Office*, 9001 Mail Service Centre, Raleigh, NC 27699, 1-919-716-6000 / 1-877-566-7226, www.ncdoj.gov