

Morgan Lewis

Kristin M. Hadgis

Partner
215.963.5563
kristin.hadgis@morganlewis.com

July 19, 2022

VIA EMAIL TO IDTHEFT@OAG.STATE.MD.US

State of Maryland
Office of the Attorney General
200 St. Paul Place
Baltimore, MD 21202
Attn: Security Breach Notification

Re: Notice of Data Security Incident of LifeWorks US Inc. as Vendor to Blue Cross and Blue Shield of Massachusetts, Inc. and Blue Cross and Blue Shield of Massachusetts HMO Blue, Inc. Involving 22 Maryland Residents

Dear Office of the Attorney General:

This Firm represents Blue Cross and Blue Shield of Massachusetts, Inc. and Blue Cross and Blue Shield of Massachusetts HMO Blue, Inc. (collectively, "Blue Cross") and we are writing to notify your office and provide details regarding the nature and circumstances of a recent data security incident involving LifeWorks US Inc. ("LifeWorks"), a third-party retirement plan administrator vendor under contract to Blue Cross.

On or about June 20, 2022, it came to Blue Cross' attention that on May 17, 2022, a now former employee of LifeWorks emailed spreadsheets to that employee's personal email addresses and copied a personal email address of another former Lifeworks employee. The former employee says this was done to preserve a spreadsheet formula. The former employee attempted to delete the personally identifiable information of individuals contained in the spreadsheets before sending, but inadvertently left data about certain individuals who are eligible for or have received pension benefits from Blue Cross in the spreadsheets. LifeWorks confirmed that the former employees attested to them that they deleted the spreadsheets from their personal email accounts. LifeWorks also provided screen shot evidence of the deletions. Blue Cross has no reason to believe that the information was not deleted or that it has been used inappropriately, but out of an abundance of caution, we are sending this notice to you.

After investigation, Blue Cross has determined that the information in the spreadsheets included names, addresses, social security numbers, and benefit information of certain current and former Blue Cross employees. Although Blue Cross has no evidence that the disclosed personal information has been used inappropriately beyond what is described above, Blue Cross will send notifications by mail to the affected individuals to explain what happened, what information was involved, what Blue Cross has done, and how affected individuals can contact Blue Cross with questions. Blue Cross is also making an offer of two years of credit monitoring to the affected

Morgan, Lewis & Bockius LLP

1701 Market Street
Philadelphia, PA 19103-2921
United States

 +1.215.963.5000
 +1.215.963.5001

State of Maryland
Office of the Attorney General
July 19, 2022
Page 2

individuals. Blue Cross' contracts with LifeWorks require LifeWorks to keep Blue Cross' employee information confidential and to have security procedures in place to minimize data security incidents, and Blue Cross will continue to take steps to ensure that data held by LifeWorks on Blue Cross' behalf is adequately secured.

Further information about what Blue Cross has done and is recommending to the individuals in question can be found in the enclosed notification that Blue Cross will send to 22 Maryland residents via mail on July 20, 2022.

If you have any questions, please do not hesitate to contact me.

Regards,


Kristin M. Hadgis

Enclosure



MASSACHUSETTS

Return Mail Processing
PO Box 999
Suwanee, GA 30024

23 1 4847 *****SNGLP

SAMPLE A. SAMPLE - L01

APT ABC



123 ANY ST

ANYTOWN, US 12345-6789



July 20, 2022

Re: Notice of Data Security Incident at LifeWorks US Inc.

Dear Sample A. Sample:

We are writing to notify you of the potential exposure of your personal information in a recent data security incident at LifeWorks US Inc., an outside vendor used by Blue Cross and Blue Shield of Massachusetts, Inc. and Blue Cross and Blue Shield of Massachusetts HMO Blue, Inc. (collectively, “Blue Cross”) for services related to administration of the Retirement Income Trust (the “pension plan”) including payments to pension beneficiaries.

According to LifeWorks, there is no indication that your personal information was misused in any way that could cause harm to you, but we have a responsibility to share with you what happened, what information was involved, what is being done in response to this incident, and what you can do to protect your privacy.

What Happened?

On or about June 20, 2022, LifeWorks informed Blue Cross that on May 17, 2022, a now former LifeWorks employee emailed spreadsheets containing personal information of individuals eligible for or receiving pension benefits from Blue Cross to the employee’s personal email addresses and copied the personal email address of another former Lifeworks employee. The former employee says this was done to preserve a formula in the spreadsheet for future use and that the former employee attempted to delete the personally identifiable data in the spreadsheets before sending them, but inadvertently left some information in the spreadsheet, including yours. The former employees have told LifeWorks and their subsequent employer that they did not share the spreadsheets with anyone else and deleted the email and spreadsheets from their personal email accounts.

What Information Was Involved?

Again, there is no indication that your personal information is at risk of misuse or exposure beyond what is described above. But the information in the spreadsheets included your name, address, social security number, and in some cases pension benefit information.

What We Are Doing

Blue Cross is committed to maintaining the privacy and security of your information and is taking this incident very seriously. Since learning of the event, we have taken steps to determine the data involved, details of the incident, and LifeWorks’ plan to prevent reoccurrence. Our contracts with LifeWorks have always required LifeWorks to keep the information of our current and former employees confidential and to have security

procedures in place to minimize data security incidents, and we will continue to take steps to ensure that data held by LifeWorks on Blue Cross' behalf is adequately secured.

To help protect your identity, we are offering you a 24-month membership of Experian's® IdentityWorksSM at no cost to you. This product provides you with identity detection and resolution of identity theft. To activate your membership and start monitoring your personal information please follow the steps below:

- Ensure that you **enroll by: October 31, 2022** (Your code will not work after this date.)
- **Visit** the Experian IdentityWorks website to enroll: <https://www.experianidworks.com/3bcredit>
- Provide your individual **activation code: ABCDEFGHI**

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 1-877-890-9332 from Monday through Friday 8 am – 10 pm CST, Saturday and Sunday 10 am – 7 pm CST (excluding major U.S. holidays) by **October 31, 2022**. Be prepared to provide engagement number **B055863** as proof of eligibility for the identity restoration services by Experian.

Additional details regarding your 24-MONTH EXPERIAN IDENTITYWORKS Membership:

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

You can contact Experian **immediately** regarding any fraud issues, and have access to the following features once you enroll in Experian IdentityWorks:

- **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 ExtendCARETM:** 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 1-877-890-9332. 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 24 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.

® Registered Marks of the Blue Cross and Blue Shield Association. ®' Registered Marks, TMTrademarks and SMService Marks are the property of their respective owners. © 2022 Blue Cross and Blue Shield of Massachusetts, Inc., or Blue Cross and Blue Shield of Massachusetts HMO Blue, Inc.

What You Can Do

We encourage you to enroll in the credit monitoring services offered above, which will alert you to any attempt to establish a new line of credit using your name and social security number.

There are several additional steps you can take to protect your privacy and ensure that your personal information is not used improperly, all of which are best practices individuals should regularly implement.

Carefully review financial statements sent to you by your bank, credit card company, other financial institutions, and government entities, like the IRS, and immediately notify them by phone or email of any suspicious transactions or activity and follow up in writing if you make the notification by phone.

The attached reference guide provides more information and resources.

For More Information

If you have questions or concerns not answered by this letter, please call 1-800-238-6616. Please know that we take this matter very seriously, and we apologize for any concern and inconvenience this may cause you.

Sincerely,

A handwritten signature in cursive script that reads "Jennifer Abdel-Samed".

Jennifer Abdel-Samed
Chief Compliance and Privacy Officer
Blue Cross and Blue Shield of Massachusetts, Inc.
101 Huntington Avenue, Boston, MA 02199

REFERENCE GUIDE

If you suspect that you are a victim of identity theft or credit fraud, we encourage you to remain vigilant and consider taking the following steps:

Order Your Free Credit Report. To order your free credit report, visit www.annualcreditreport.com, call toll-free at 877-322-8228, or complete the Annual Credit Report Request Form on the U.S. Federal Trade Commission's website at www.ftc.gov and mail it to Annual Credit Report Request Service, P.O. Box 105281, Atlanta, GA 30348-5281. Do not contact the three credit bureaus individually; they provide your free report only through the website or toll-free number.

When you receive your credit report, review the entire report carefully. Look for any inaccuracies and/or accounts you don't recognize and notify the credit bureaus as soon as possible if there are any.

You have rights under the federal Fair Credit Reporting Act ("FCRA"). These include, among others, the right to know what is in your file; to dispute incomplete or inaccurate information; and to have consumer credit reporting agencies correct or delete inaccurate, incomplete, or unverifiable information. For more information about the FCRA, please visit <https://www.consumer.ftc.gov/articles/pdf-0096-fair-credit-reporting-act.pdf> or www.ftc.gov

Place a Fraud Alert on Your Credit File: To protect yourself from possible identity theft, consider placing a fraud alert on your credit file. A fraud alert helps protect you against the possibility of an identity thief opening new credit accounts in your name. When a merchant checks the credit history of someone applying for credit, the merchant gets a notice that the applicant may be a victim of identity theft. The alert notifies the merchant to take steps to verify the identity of the applicant. You can report potential identity theft to all three of the major credit bureaus by calling any one of the toll-free fraud numbers below. You will reach an automated telephone system that allows you to flag your file with a fraud alert at all three bureaus.

Equifax	Experian	TransUnion
www.equifax.com	www.experian.com	www.transunion.com
1-800-525-6285	1-888-397-3742	1-800-680-7289
P.O. Box 740241 Atlanta, Georgia 30374-0241	P.O. Box 9532 Allen, Texas 75013	Fraud Victim Assistance Division P.O. Box 2000 Chester, Pennsylvania 19016

Place a Security Freeze on Your Credit File. You have the right to place a "security freeze" on your credit file. A security freeze generally will prevent creditors from accessing your credit file at the three nationwide credit bureaus without your consent. You can request a security freeze free of charge by contacting the credit bureaus using the same contact information noted above.

The credit bureaus may require that you provide proper identification prior to honoring your request. 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. If you have moved in the past five (5) years, provide the addresses where you have lived over the prior five years.
5. Proof of current address, such as a current utility bill or telephone bill
6. A legible photocopy of a government issued identification card (state driver's license or ID card, military identification, etc.)

7. If you are a victim of identity theft, include a copy of either the police report, investigative report, or complaint to law enforcement agency concerning identity theft

Placing a security freeze on your credit file may delay, interfere with, or prevent timely approval of any requests you make for credit, loans, employment, housing or other services. For more information regarding credit freezes, please contact the credit reporting agencies directly.

Contact the U.S. Federal Trade Commission. If you detect any incident of identity theft or fraud, promptly report the incident to your local law enforcement authorities, your state Attorney General and the Federal Trade Commission (“FTC”). If you believe your identity has been stolen, the FTC recommends that you take these additional steps.

- Close the accounts that you have confirmed or believe have been tampered with or opened fraudulently. Use the FTC’s ID Theft Affidavit (available at www.ftc.gov/idtheft) when you dispute new unauthorized accounts.
- File a local police report. Obtain a copy of the police report and submit it to your creditors and any others that may require proof of the identity theft crime.

You can learn more about how to protect yourself from becoming an identity theft victim (including how to place a fraud alert or security freeze) by contacting the FTC:

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

For 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 20001, 202-727-3400, www.oag.dc.gov

For Iowa Residents: State law advises you to report any suspected identity theft to law enforcement or to the Attorney General.

For Maryland Residents: You can obtain information from the Maryland Office of the Attorney General about steps you can take to help prevent identity theft. You can contact the Maryland Attorney General at: 200 St. Paul Place, Baltimore, MD 21202, 888-743-0023, www.oag.state.md.us

For Massachusetts Residents: You have a right to request from us a copy of any police report filed in connection with this incident. If you are the victim of identity theft, you also have the right to file a police report and obtain a copy of it. As noted above, you also have the right to place a security freeze on your credit report at no charge.

For 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>

NYS Department of State's Division of
Consumer Protection
(800) 697-1220
<https://www.dos.ny.gov/consumerprotection>

For North Carolina Residents: You can obtain information from the Federal Trade Commission and the North Carolina Office of the Attorney General about steps you can take to help prevent identity theft. You can contact the North Carolina Attorney General at: 9001 Mail Service Center, Raleigh, NC 27699, 1-877-566-7226, www.ncdoj.gov

For 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

For Rhode Island Residents: 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.