



-- CONFIDENTIAL --

October 12, 2022

Via Email

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

Re: Notice of Data Incident

Dear Attorney General Frosh,

Associated Administrators, LLC, is a third-party administrator of retirement benefits on behalf of its client pension funds, the Food Employers Labor Relations Association and United Food and Commercial Workers Pension Fund and the United Food and Commercial Workers Unions and Participating Employers Pension Fund (the "Pension Funds"). Associated Administrators, LLC ("Associated") and the Pension Funds have their principal place of business at 911 Ridgebrook Road, Sparks, Maryland 21152. This correspondence is to notify you, on behalf of Associated and the Pension Funds, of a security incident involving unauthorized disclosure of personally identifiable information ("PII"), via an email forwarded to a non-business email address.

1. Nature of the Incident

On September 2, 2022, Associated became aware of an email that was forwarded to a non-business email address which contained the names and social security numbers (SSNs) of individual Pension Funds Participants. The disclosure did not contain or involve any health or medical information. Upon discovering this event, the email account was disabled and formally investigated. Associated identified sixteen (16) unique names and SSNs contained in the body of the forwarded email. **Of these sixteen individuals, eight (8) are Maryland residents.**

Associated Administrators reasonably believes the email was sent encrypted, the PII is no longer accessible and it was not misused. However, in an abundance of caution, Associated is taking steps to mitigate the data event, sending notice to all affected individuals and offering free credit monitoring service for a period of one year.

2. Notice to Maryland Residents and Sample Notice

After making formal notice to the Maryland Office of the Attorney General, in accordance with the Maryland Personal Information Protection Act ("PIPA"), Md. Code Ann. Comm. Law 14-3504, Associated Administrators, on behalf of the Pension Funds, will send a timely notice to the eight (8) Maryland residents who were affected by the data event. The letter to Maryland residents will be mailed both via USPS First Class Mail and Certified



Mail, and will contain all required information and notifications in accordance with PIPA. Written notice is being provided in substantially the same form as the letter attached hereto as **Exhibit A**.

3. Mitigating Steps Taken In Response

Associated Administrators, LLC adheres to strict privacy and security policies and requires that all employees adhere to the highest level of confidentiality and privacy in handling sensitive member data. Associated Administrators contacted the recipient of the forwarded email and requested affirmation that the email was securely deleted and has not been misused. The recipient has indicated that the email was deleted, the PII is no longer accessible and it was not misused.

Associated utilizes a secure email system which scans and automatically encrypts external emails containing PII. Associated took steps to ensure this security control was operational and functioning properly at the time the email was forwarded externally. Associated is reminding all staff of proper use of company email systems and precautionary steps against external disclosures to unintended recipients.

Associated is offering one year of credit monitoring service through Experian to all affected individuals, and is covering the cost of the service. Associated will advise individuals on steps to take for reporting suspected identity theft or fraud to credit bureaus, financial institutions, the Federal Trade Commission and other federal and state agencies. Associated is offering additional guidance, including instruction on how to place a fraud alert and security freeze on credit files and financial accounts, contact info for national consumer reporting agencies, information on how to obtain a free credit report, and any other such guidance that each individual may seek.

Associated Administrators, LLC has always been, and continues to be, dedicated to protecting all confidential and sensitive information in its possession.

4. Contact Information

If you have any questions about this data event or need additional information, please do not hesitate to contact the Privacy Officer referenced below.

Sincerely,

Katrina N. Shank, Privacy Officer
Associated Administrators, LLC
911 Ridgebrook Road
Sparks, MD 21152
410-855-4931
katrinas@associated-admin.com



EXHIBIT A



Sample Notice to Maryland Residents

October , 2022

NAME
ADDRESS
ADDRESS

RE: Potential Data Incident

Dear NAME:

We are contacting you on behalf of the [NAME OF APPLICABLE CLIENT FUND] (the "Fund") regarding an incident that was recently discovered by Associated Administrators, LLC ("Associated"), the administrative Fund office for the Fund. This incident may have affected your Personally Identifiable Information ("PII").

What Happened? Associated became aware of an email that was forwarded to a non-business email address which contained the names and social security numbers (SSNs) of individual Fund Participants. The disclosure did not contain or involve any health or medical information. Upon discovering this event, the email account was disabled and formally investigated. Associated reasonably believes the email was sent encrypted and was not misused. The recipient of the email has indicated the email has been deleted, the PII is no longer accessible and it has not been misused.

What Information Was Involved? Your name and Social Security Number were included in the body of the email.

What We are Doing. Although we have no indication or reason to believe that the information has or will be misused, as a precautionary measure, we are offering you credit monitoring and ID protection services for one year at no cost to you through Experian's® IdentityWorksSM. If you would like to enroll in this service, please complete the enclosed form and return it in the envelope provided within 30 days of the date of this letter. You may also contact the Privacy Officer at Associated Administrators, LLC by calling 410-855-4931.

Associated suggests that you closely monitor your bank and credit card accounts and routinely obtain your credit report from one or more of the national credit reporting companies. You may get a free copy of your credit report annually from each of the three national credit monitoring agencies in these ways:

- go to AnnualCreditReport.com, or
- call Annual Credit Report at 1-877-322-8228

Below is a list of the three national credit reporting agencies and their contact information. You can order a copy of your credit report from them or request a freeze on your credit:

**Equifax**

Equifax.com

888-EQUIFAX (888-378-4329)

Experian

Experian.com

888-EXPERIAN (888-397-3742)

Transunion

TransUnion.com

833-395-6938

To learn more about how to take proactive steps to protect yourself against identity theft, you may contact the Federal Trade Commission (FTC) at the FTC website (www.ftc.gov), by dialing 1-877-ID-Theft (1-877-438-4338), or by writing to the FTC at the following address:

FTC Consumer Response Center
600 Pennsylvania Ave, NW, H-130
Washington DC 20580

You may also obtain information from the Office of the Maryland Attorney General about steps you can take to avoid identity theft. You may contact the Maryland Attorney General at:

Office of the Maryland Attorney General
Consumer Protection Division
200 St. Paul Place
Baltimore, MD 21202
888-743-0023 410-576-6300
www.oag.state.md.us

We apologize for this incident and any inconvenience it may cause you. Associated Administrators, LLC is committed to the privacy and security of confidential data, including protecting your personal information, and we want to assure you that our company enforces strict policies and procedures to protect your privacy. Should you have questions or concerns regarding this matter, please do not hesitate to contact the Privacy Officer at 410-855-4931.

Sincerely,

Associated Administrators, LLC
Katrina Shank, Privacy Officer
911 Ridgebrook Rd.
Sparks, MD 21152
410-855-4931