



MULLEN
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October 28, 2022

VIA E-MAIL

Office of the Attorney General
Attn: Security Breach Notification
200 St. Paul Place
Baltimore, MD 21202
E-mail: idtheft@oag.state.md.us

Re: Notice of Data Event

Dear Sir or Madam:

We represent CompSource Mutual Insurance Company (“CompSource”) located at 1901 N. Walnut Avenue, Oklahoma City, OK 73105, and are writing to notify your office of an incident that may affect the security of certain personal information relating to one (1) Maryland resident. The investigation into this matter is ongoing, and this notice will be supplemented with any new significant facts learned subsequent to its submission. By providing this notice, CompSource does not waive any rights or defenses regarding the applicability of Maryland law, the applicability of the Maryland data event notification statute, or personal jurisdiction.

Nature of the Data Event

In July 2022, CompSource detected suspicious activity within its network. In response, CompSource took immediate steps to ensure the security of its network and promptly investigated the identified activity with the assistance of computer forensic specialists to confirm its nature and scope, and to identify any data potentially at risk. Through the investigation, CompSource determined data contained in a limited number of network locations were accessed or acquired by an unauthorized actor between July 16, 2022 and July 19, 2022. Therefore, CompSource undertook a comprehensive and time-intensive review of the documents present in these locations to identify the specific information at risk of unauthorized access or acquisition and the corresponding individuals and companies. On September 29, 2022, CompSource identified certain individuals whose information was present during the window of access. CompSource worked thereafter to confirm valid address for these individuals so it could provide notice as soon as possible thereafter.

The information that could have been subject to unauthorized access includes name and health insurance information.

Notice to Maryland Resident

On October 28, 2022, CompSource began providing written notice of this incident to one (1) Maryland resident. Written notice is being provided in substantially the same form as the letter attached here as ***Exhibit A***.

Other Steps Taken and To Be Taken

Upon discovering the event, CompSource moved quickly to respond to the incident, including assessing the security of its email network and conducting a comprehensive investigation to confirm any risk to information within its network. CompSource reported the incident to the Federal Bureau of Investigation and is aware of and cooperating with its ongoing investigation in response to this event.

CompSource is providing access to credit monitoring services to individuals whose personal information was potentially affected by this incident, at no cost to these individuals. Additionally, CompSource is providing impacted individuals with guidance on how to better protect against identity theft and fraud. CompSource is providing individuals with information on how to place a fraud alert and security freeze on one's credit file, the contact details for the national consumer reporting agencies, information on how to obtain a free credit report, a reminder to remain vigilant for incidents of fraud and identity theft by reviewing account statements and monitoring free credit reports, and encouragement to contact the Federal Trade Commission, their state Attorney General, and law enforcement to report attempted or actual identity theft and fraud.

Contact Information

Should you have any questions regarding this notification or other aspects of the data security event, please contact us at (267) 930-4741.

Very truly yours,

James Paulino of
MULLEN COUGHLIN LLC

JMP/rhb
Enclosure

EXHIBIT A

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

<<Mail ID>>

<<Name 1>>

<<Name 2>>

<<Address 1>>

<<Address 2>>

<<Address 3>>

<<Address 4>>

<<Address 5>>

<<City>><<State>><<Zip>>

<<Country>>

<<Date>>

NOTICE OF <<Variable Header>>

Dear <<Name 1>>:

CompSource Mutual Insurance Company writes to notify you of a recent event that may impact the security of some of your information. This notice serves to provide information about the event, the response, and resources available to you to help protect your information, should you feel it appropriate to do so. In addition, complimentary credit monitoring services through Equifax are available to you at no cost; enrollment instructions are on the following pages.

What Happened? In July 2022, CompSource Mutual detected suspicious activity on its network. Upon learning of this activity, CompSource Mutual took immediate steps to secure systems, and to initiate a comprehensive investigation with the assistance of computer forensic specialists. CompSource Mutual worked diligently to investigate this activity and to identify any data potentially at risk. The investigation determined data contained in a limited number of network locations was accessed or acquired by an unauthorized actor between July 16, 2022, and July 19, 2022. You are being notified because on September 30, 2022, it was determined that your personal information may have been accessible to an unauthorized actor.

What Information Was Involved? Information may include name; date of birth; social security number; driver's license or state ID number; passport information; financial account and routing number(s); credit/debit card numbers; electronic or digital signature; and medical treatment or diagnosis information; and health information including insurance policy number(s), benefits, and claim history.

What's Being Done. Upon becoming aware of the event, CompSource Mutual immediately initiated a comprehensive investigation with the assistance of computer forensic specialists. CompSource Mutual will continue to assess network security and implement additional measures as appropriate. The incident has also been reported to federal law enforcement, and CompSource Mutual will cooperate with any investigation.

As an added precaution, CompSource Mutual is offering you access to complimentary credit monitoring services for <<CM Length>> months through Equifax. Enrollment instructions are enclosed with this letter.

What You Can Do. You are encouraged to remain vigilant against incidents of identity theft and fraud by reviewing your account statements and monitoring your free credit reports. You should immediately report any suspicious activity to law enforcement. You are also encouraged to review the information contained in the enclosed *Steps You Can Take To Help Protect Personal Information* and to enroll in the complimentary monitoring services.

For More Information. Should you have questions not addressed in this notice, please call our dedicated assistance line at 877-506-6230, which is available from 9:00 AM to 9:00 PM EST Monday through Friday (excluding major U.S. holidays).

CompSource Mutual Insurance Company

STEPS YOU CAN TAKE TO PROTECT PERSONAL INFORMATION

Enroll in Credit Monitoring

As a safeguard, we have arranged for you to enroll, at no cost to you, in an online credit monitoring service (**Equifax Credit Watch™ Gold**) for <<CM Length>> months through Equifax, one of the three nationwide credit reporting companies.

Enrollment Instructions

Go to www.equifax.com/activate before the expiration date: <<Enrollment Deadline>>

Enter your unique Activation Code of <<ACTIVATION CODE>> then click “Submit” and follow these 4 steps:

- 1. Register:**
Complete the form with your contact information and click “Continue”.
If you already have a myEquifax account, click the ‘Sign in here’ link under the “Let’s get started” header.
Once you have successfully signed in, you will skip to the Checkout Page in Step 4
- 2. Create Account:**
Enter your email address, create a password, and accept the terms of use.
- 3. Verify Identity:**
To enroll in your product, we will ask you to complete our identity verification process.
- 4. Checkout:**
Upon successful verification of your identity, you will see the Checkout Page.
Click ‘Sign Me Up’ to finish enrolling.

Monitor Your Accounts

Under U.S. law, a consumer is entitled to one free credit report annually from each of the three major credit reporting bureaus, Equifax, Experian, and TransUnion. To order your free credit report, visit www.annualcreditreport.com or call, toll-free, 1-877-322-8228. You may also directly contact the three major credit reporting bureaus listed below to request a free copy of your credit report.

Consumers have the right to place an initial or extended “fraud alert” on a credit file at no cost. An initial fraud alert is a 1-year alert that is placed on a consumer’s credit file. Upon seeing a fraud alert display on a consumer’s credit file, a business is required to take steps to verify the consumer’s identity before extending new credit. If you are a victim of identity theft, you are entitled to an extended fraud alert, which is a fraud alert lasting seven years. Should you wish to place a fraud alert, please contact any one of the three major credit reporting bureaus listed below.

As an alternative to a fraud alert, consumers have the right to place a “credit freeze” on a credit report, which will prohibit a credit bureau from releasing information in the credit report without the consumer’s express authorization. The credit freeze is designed to prevent credit, loans, and services from being approved in your name without your consent. However, you should be aware that using a credit freeze to take control over who gets access to the personal and financial information in your credit report may delay, interfere with, or prohibit the timely approval of any subsequent request or application you make regarding a new loan, credit, mortgage, or any other account involving the extension of credit. Pursuant to federal law, you cannot be charged to place or lift a credit freeze on your credit report. To request a security freeze, you will need to provide the following information:

1. Full name (including middle initial as well as Jr., Sr., II, III, etc.);
2. Social Security number;
3. Date of birth;
4. Addresses for the prior two to 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, etc.); and
7. A copy of either the police report, investigative report, or complaint to a law enforcement agency concerning identity theft if you are a victim of identity theft.

Should you wish to place a credit freeze, please contact the three major credit reporting bureaus listed below:

Equifax	Experian	TransUnion
https://www.equifax.com/personal/credit-report-services/	https://www.experian.com/help/	https://www.transunion.com/credit-help
888-298-0045	1-888-397-3742	833-395-6938
Equifax Fraud Alert, P.O. Box 105069 Atlanta, GA 30348-5069	Experian Fraud Alert, P.O. Box 9554, Allen, TX 75013	TransUnion Fraud Alert, P.O. Box 2000, Chester, PA 19016
Equifax Credit Freeze, P.O. Box 105788 Atlanta, GA 30348-5788	Experian Credit Freeze, P.O. Box 9554, Allen, TX 75013	TransUnion Credit Freeze, P.O. Box 160, Woodlyn, PA 19094

Internal Revenue Service Identity Protection PIN (IP PIN)

You may also obtain an Identity Protection PIN (IP PIN) from the Internal Revenue Service, a six-digit number that prevents someone else from filing a tax return using your Social Security number or Individual Taxpayer Identification Number. The IP PIN is known only to you and the IRS, and helps the IRS verify your identity when you file your electronic or paper tax return. Even though you may not have a filing requirement, an IP PIN still protects your account. If you do not already have an IP PIN, you may get an IP PIN as a proactive step to protect yourself from tax-related identity theft either online, by paper application or in-person. Information about the IP PIN program can be found here: <https://www.irs.gov/identity-theft-fraud-scams/get-an-identity-protection-pin>.

Additional Information

You may further educate yourself regarding identity theft, fraud alerts, credit freezes, and the steps you can take to protect your personal information by contacting the consumer reporting bureaus, the Federal Trade Commission, or your state Attorney General. The Federal Trade Commission may be reached at: 600 Pennsylvania Avenue NW, Washington, DC 20580; www.identitytheft.gov; 1-877-ID-THEFT (1-877-438-4338); and TTY: 1-866-653-4261. The Federal Trade Commission also encourages those who discover that their information has been misused to file a complaint with them. You can obtain further information on how to file such a complaint by way of the contact information listed above. You have the right to file a police report if you ever experience identity theft or fraud. Please note that in order to file a report with law enforcement for identity theft, you will likely need to provide some proof that you have been a victim. Instances of known or suspected identity theft should also be reported to law enforcement and your state Attorney General. This notice has not been delayed by law enforcement.

For District of Columbia residents, the District of Columbia Attorney General may be contacted at: 400 6th Street, NW, Washington, DC 20001; 202-727-3400; and oag.dc.gov. *For Maryland residents*, the Maryland Attorney General may be contacted at: 200 St. Paul Place, 16th Floor, Baltimore, MD 21202; 1-410-528-8662 or 1-888-743-0023; and www.oag.state.md.us. CompSource Mutual Insurance Company is located at 1901 N. Walnut Avenue, Oklahoma City, OK 73105. *For New Mexico residents*, you have rights pursuant to the Fair Credit Reporting Act, such as the right to be told if information in your credit file has been used against you, the right to know what is in your credit file, the right to ask for your credit score, and the right to dispute incomplete or inaccurate information. Further, pursuant to the Fair Credit Reporting Act, the consumer reporting bureaus 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 credit reports to be provided to employers; you may limit "prescreened" offers of credit and insurance you get based on information in your credit report; and you may seek damages from violator. You may have additional rights under the Fair Credit Reporting Act not summarized here. Identity theft victims and active duty military personnel have specific additional rights pursuant to the Fair Credit Reporting Act. We encourage you to review your rights pursuant to the Fair Credit Reporting Act by visiting www.consumerfinance.gov/f/201504_cfpb_summary_your-rights-under-fcra.pdf, or by writing Consumer Response Center, Room 130-A, Federal Trade Commission, 600 Pennsylvania Ave. N.W., Washington, D.C. 20580. *For New York residents*, the New York Attorney General may be contacted at: Office of the Attorney General, The Capitol, Albany, NY 12224-0341; 1-800-771-7755; or <https://ag.ny.gov/>. *For North Carolina residents*, the North Carolina Attorney General may be contacted at: 9001 Mail Service Center, Raleigh, NC 27699-9001; 1-877-566-7226 or 1-919-716-6000; and www.ncdoj.gov. *For Rhode Island residents*, the Rhode Island Attorney General may be reached at: 150 South Main Street, Providence, RI 02903; www.riag.ri.gov; and 1-401-274-4400. Under Rhode Island law, you have the right to obtain any police report filed in regard to this incident. There are approximately <<RI Count>> Rhode Island residents impacted by this incident.