

November 7, 2022

BY EMAIL

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

To Whom It May Concern:

On behalf of Booz Allen Hamilton Holding Company (“Booz Allen”), and pursuant to the Personal Information Protection Act, Maryland Code Ann. Comm. Law 14-3504, this letter provides notice of an event involving the personal information of active employees as of March 29, 2021, potentially affecting approximately 5217 state residents.

We recently learned that a former employee, while still employed at Booz Allen and in direct contradiction of Booz Allen’s policies, obtained and downloaded a copy of an internal report containing personal information associated with certain current and former Booz Allen employees that was improperly stored on an internal SharePoint. There is no indication that this event affected the company’s network or client operations in any other way.

After becoming aware of the event, we quickly began a thorough investigation, which remains ongoing, to ascertain the extent of potential unauthorized access to the File and what, if any, measures were appropriate to mitigate risk to individuals. We also promptly relocated the report to a restricted SharePoint. We have engaged in discussions with the former employee to ensure the document is deleted securely. While those discussions were ongoing, we continued to assess whether the event was notifiable in light of the low risk of harm, the employee’s cooperation, and the lack of evidence that the former employee took the internal report with the intent to cause harm to Booz Allen employees. The former employee was cooperating with Booz Allen and in discussions to return the document and on October 26, 2022, Booz Allen again directed the former employee and her counsel to delete the document and followed up on October 30, 2022, and learned that the former employee was in the process of complying with our deletion instructions. However, as of October 31, 2022, Booz Allen had not received certification of the file’s deletion from the former employee and believed it prudent to send formal notifications to all affected individuals whose personal information appears in the report, out of an abundance of caution. On November 3, 2022, after making the determination to send formal notifications, Booz Allen received confirmation that all copies of the document were deleted. Notice to individuals was not delayed as a result of a law enforcement investigation.

To date, Booz Allen has identified 5217 Maryland residents whose personal information was affected. Based on our review, the personal information exposed included: name, social security number, compensation, gender, race, ethnicity, date of birth, and U.S. Government security clearance eligibility and status as of March 29, 2021.

Booz Allen is not aware of any instances of identity theft, fraud, or financial losses to the individuals whose information was in the report. We have no evidence suggesting that the former employee intended to cause harm to Booz Allen employees in obtaining the company internal report. We believe that this indicates that the risk of harm to any of these individuals is low. We will provide your office with any material updates if appropriate.

Booz Allen anticipates sending these individuals formal notice beginning on November 10, 2022 via physical mailing. A sample of the notification letter is enclosed. As stated in the attached sample notice, Booz Allen is offering to provide individuals two years of free identity theft and credit monitoring services through Equifax. Equifax is a global leader in risk mitigation and response, and their team has extensive experience helping people who have sustained an unintentional exposure of confidential data. We have also established a call center to respond to individuals' questions.

Upon learning of this event, the firm took immediate action, including actions to secure the file in the right location, conduct a thorough investigation and review its information handling processes for potential opportunities for improvements. At this time, we do not believe that the individual intended to cause harm to Booz Allen employees in obtaining the company internal report.

Booz Allen takes the protection of personal information of its employees and all of its stakeholders seriously and is committed to answering any questions that you may have. Please do not hesitate to contact me at (703) 377-0290 or Beadel_Brandon@bah.com.

Respectfully yours,

Brandon Beadel, Associate General Counsel – Data Privacy and Protection
Booz Allen Hamilton Holding Company
8283 Greensboro Dr.
McLean, VA 22102
(703) 377-0290
Beadel_Brandon@bah.com

November <XX>, 2022

<First Name> <Last Name>
<Street Address>
<City>, <State> <Zip Code>

**NOTICE OF EVENT INVOLVING PERSONALLY IDENTIFIABLE
INFORMATION (PII)**

Dear <First Name>,

We are writing to let you know about an event that affected Booz Allen Hamilton Holding Corporation (“Booz Allen”), involving the sensitive, Personally Identifiable Information (PII) of active employees as of March 29, 2021. There is no indication that this event affected the company’s network or operations in any way.

We want to make clear at the outset that keeping personal data safe and secure is very important to Booz Allen, and will continue to be a priority moving forward.

WHAT HAPPENED?

We recently learned that a former employee, while still employed at the Company and in direct contradiction of Booz Allen’s policies, training, purpose, and values, obtained and downloaded a copy of an internal report that was improperly stored on an internal SharePoint site. While our investigation remains ongoing, we recently learned that certain of your information was affected.

WHAT INFORMATION WAS INVOLVED?

Based on our review, there was personal information exposed including: your name, social security number, compensation, gender, race, ethnicity, date of birth, and U.S. Government security clearance eligibility and status as of March 29, 2021.

WHAT WE ARE DOING

Upon learning of this event, the firm took immediate action, including actions to secure the file in the right location, conduct a thorough investigation, and review its information handling processes for potential opportunities for improvements. At this time, we do not believe that the individual intended to misuse any of the personal information in the

Date __, 2022

Activation Code: _____

Expiration Date: _____

report to cause harm to Booz Allen employees and we believe the risk of harm to you is low.

We have also secured the services of Equifax to provide credit monitoring at no cost to you for two years. Equifax is a global leader in risk mitigation and response, and their team has extensive experience helping people who have sustained an unintentional exposure of confidential data.

Below please find information on signing up for a complimentary membership to Equifax's services.

Equifax Credit Watch Gold

*Note: You must be over age 18 with a credit file to take advantage of the product.

Key Features

- Credit monitoring with email notifications of key changes to your Equifax credit report
- Daily access to your Equifax credit report
- WebScan notifications¹ when your personal information, such as Social Security Number, credit/debit card or bank account numbers are found on fraudulent Internet trading sites
- Automatic fraud alerts², which encourages potential lenders to take extra steps to verify your identity before extending credit, plus blocked inquiry alerts and Equifax credit report lock³

¹ WebScan searches for your Social Security Number, up to 5 passport numbers, up to 6 bank account numbers, up to 6 credit/debit card numbers, up to 6 email addresses, and up to 10 medical ID numbers. WebScan searches thousands of Internet sites where consumers' personal information is suspected of being bought and sold, and regularly adds new sites to the list of those it searches. However, the Internet addresses of these suspected Internet trading sites are not published and frequently change, so there is no guarantee that we are able to locate and search every possible Internet site where consumers' personal information is at risk of being traded.

² The Automatic Fraud Alert feature is made available to consumers by Equifax Information Services LLC and fulfilled on its behalf by Equifax Consumer Services LLC.

³ Locking your Equifax credit report will prevent access to it by certain third parties. Locking your Equifax credit report will not prevent access to your credit report at any other credit reporting agency. Entities that may still have access to your Equifax credit report include: companies like Equifax Global Consumer Solutions, which provide you with access to your credit report or credit score, or monitor your credit report as part of a subscription or similar service; companies that provide you with a copy of your credit report or credit score, upon your request; federal, state and local government agencies and courts in certain circumstances; companies using the information in connection with the underwriting of insurance, or for employment, tenant or background screening purposes; companies that have a current account or relationship with you, and collection agencies acting on behalf of those whom you owe; companies that authenticate a consumer's identity for purposes other than granting credit, or for investigating or preventing actual or potential fraud; and companies that wish to make pre-approved offers of credit or insurance to you. To opt out of such pre-approved offers, visit www.optoutprescreen.com.

Date __, 2022

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- Identity Restoration to help restore your identity should you become a victim of identity theft, and a dedicated Identity Restoration Specialist to work on your behalf
- Up to \$1,000,000 of identity theft insurance coverage for certain out of pocket expenses resulting from identity theft⁴

Enrollment Instructions

To sign up online for online delivery, go to www.equifax.com/activate

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:** Complete the form with your email address, create a password, and accept the Terms of Use.
- 3. Verify Identity:** To enroll in your product, the system will ask you to complete an identity verification process.
- 4. Checkout:** Upon successful verification of your identity, you will see the Checkout Page. Click ‘Sign Me Up’ to finish enrolling. The confirmation page shows your completed enrollment. Please click the “View My Product” button to access the product features.

You need to activate your membership in order to receive your benefits, and must do so no later than [X XX, 202X]. **Your Activation Code will not work after this date.**

WHAT YOU CAN DO

We encourage you to contact Equifax and take advantage of the credit monitoring that we are providing to you free of charge. In addition, you should remain vigilant and carefully review your accounts for any suspicious activity. This is a best practice for all individuals.

As noted above, we have no evidence that your information has been misused in connection with this incident. However, as always, if you detect any suspicious activity on an account, you should change the password and security questions associated with

⁴ The Identity Theft Insurance benefit is underwritten and administered by American Bankers Insurance Company of Florida, an Assurant company, under group or blanket policies issued to Equifax, Inc., or its respective affiliates for the benefit of its Members. Please refer to the actual policies for terms, conditions, and exclusions of coverage. Coverage may not be available in all jurisdictions.

Date __, 2022

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the account, and promptly notify the financial institution or other company with which the account is maintained and any relevant government agency.

If you would like to take additional steps to protect your personal information, attached to this letter are helpful resources on how to do so, including recommendations from the Federal Trade Commission regarding identity theft protection and details on how to place a fraud alert or a security freeze on your credit file.

FOR MORE INFORMATION

We take our responsibility to protect your personal data extremely seriously. We will continue to take all appropriate steps to keep information safe and continually enhance our posture, policies, and processes. Thank you for all you do every day to safeguard information, live our values, and protect our firm and each other.

If you have any questions, please contact [call center] at [phone number], [hours].

Sincerely,

Booz Allen Hamilton

Additional Resources

Below are additional helpful tips you may want to consider to protect your personal information.

Review Your Credit Reports and Account Statements; Notify Law Enforcement of Suspicious Activity

As a precautionary measure, we recommend that you remain vigilant by reviewing your credit reports and account statements closely. If you detect any suspicious activity on an account, you should promptly notify the financial institution or other company with which the account is maintained. You also should promptly report any fraudulent activity or any suspected incidents of identity theft to proper law enforcement authorities. 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 law enforcement, the Federal Trade Commission (“FTC”) and/or the Attorney General’s office in your home state. You can also contact these agencies for information on how to prevent or avoid identity theft, and you can contact the FTC at:

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

Copy of Credit Report

You may obtain a free copy of your credit report from each of the three major credit reporting agencies once every 12 months by visiting <https://www.annualcreditreport.com>, calling toll-free 877-322-8228, or by completing an Annual Credit Report Request Form and mailing it to the Annual Credit Report Request Service, P.O. Box 105281, Atlanta, GA 30348-5281. You can print this form at <https://www.annualcreditreport.com/manualRequestForm.action>. Credit reporting agency contact details are provided below.

Equifax:

equifax.com
equifax.com/personal/credit-report-services
P.O. Box 740241
Atlanta, GA 30374
866-349-5191

Experian:

experian.com
experian.com/help
P.O. Box 2002
Allen, TX 75013
888-397-3742

TransUnion:

transunion.com
transunion.com/credit-help
P.O. Box 1000
Chester, PA 19016
888-909-8872

When you receive your credit reports, review them carefully. Look for accounts or credit inquiries that you did not initiate or do not recognize. Look for information, such as home address and Social Security number, that is inaccurate. If you see anything you do not understand, call the credit reporting agency at the telephone number on the report.

Fraud Alert

You may want to consider placing a fraud alert on your credit file. An initial fraud alert is free and will stay on your credit file for at least 90 days. The alert informs creditors of possible fraudulent activity within your report and requests that the creditor contact you prior to establishing any accounts in your name. If you have already been a victim of identity theft, you may have an extended alert placed on your report if you provide the appropriate documentary proof. An extended fraud alert stays on your credit report for seven years. To place a fraud alert on your credit report, contact any of the three credit reporting agencies identified above.

Security Freeze

You have the right to place a security freeze on your credit file free of charge. This will prevent new credit from being opened in your name without the use of a PIN number that is issued to you when you initiate the freeze. A security freeze is designed to prevent credit, loans, and services from being approved in your name without your consent. As a result, using a security freeze may delay your ability to obtain credit. In order to

place a security freeze, you may be required to provide the consumer reporting agency with information that identifies you including your full name; social security number; date of birth; current and previous addresses; a copy of your state-issued identification card; and a recent utility bill, bank statement, or telephone bill.

Federal Fair Credit Reporting Act Rights

The Fair Credit Reporting Act (FCRA) is federal legislation that regulates how consumer reporting agencies use your information. It promotes the accuracy, fairness, and privacy of consumer information in the files of consumer reporting agencies. As a consumer, you have certain rights under the FCRA, which the FTC has summarized as follows: 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; and you may seek damages from violators. Identity theft victims and active duty military personnel have additional rights.

For more information about these rights, you may go to www.ftc.gov/credit or write to: Consumer Response Center, Room 13-A, Federal Trade Commission, 600 Pennsylvania Ave. N.W., Washington, D.C. 20580.

Additional Information

You have the right to obtain any police report filed in regard to this incident. If you are the victim of fraud or identity theft, you also have the right to file a police report.

You may consider starting a file with copies of your credit reports, any police report, any correspondence, and copies of disputed bills. It is also useful to keep a log of your conversations with creditors, law enforcement officials, and other relevant parties.

For Colorado residents: You may obtain information from the Federal Trade Commission and the credit reporting agencies about fraud alerts and security freezes.

For Maryland residents: You may contact the Office of the Maryland Attorney General, 200 St. Paul Place, Baltimore, MD 21202, <http://www.marylandattorneygeneral.gov>, 1-888-743-0023. The Office of the Maryland Attorney General may be able to provide you with information about the steps you can take to avoid identity theft.

For North Carolina residents: You may contact the North Carolina Office of the Attorney General, 9001 Mail Service Center, Raleigh, NC 27699-9001, <http://www.ncdoj.gov>, 1-877-566-7226. You are also advised to report any suspected identity theft to law enforcement or to the North Carolina Attorney General.

For Connecticut, Florida, Indiana, Louisiana, Maine, Montana, Nebraska, New Jersey, New Hampshire, Puerto Rico, Texas, Vermont, and Virginia residents: You may obtain one or more (depending on the state) additional copies of your credit report, free of charge. You must contact each of the credit bureaus directly to obtain such additional report(s).

For New York residents: You may contact the New York Office of the Attorney General at: The Capitol, Albany, NY 12224-0341, <http://www.ag.ny.gov/home.html>, 1-800-771-7755, and the New York Department of State Division of Consumer Protection at: 99 Washington Avenue, Albany, New York 12231-0001, <http://www.dos.ny.gov/consumerprotection>, 1-800-697-1220.

For Washington, D.C. residents: You may contact the Office of the Attorney General for the District of Columbia, 400 6th St. NW, Washington, D.C. 20001, <http://www.oag.dc.gov>, 1-202-727-3400.