

Matthew H. Meade, Esq.
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November 10, 2022

Via E-mail: IDTheft@oag.state.md.us

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

Re: Notice of Data Breach

Dear Attorney General Frosh:

This notice is provided on behalf of my client, Duquesne University of the Holy Spirit (“Duquesne”), in connection with a cyber incident at one of its vendors that involved the personal information of one Maryland resident.

Duquesne is a private, faith-based university located in Pittsburgh, Pennsylvania that contracts with QM Services, Inc. (“QM”) to administer enrollment in its student health plan. On May 18, 2022, QM notified Duquesne that a misconfiguration within QM’s cloud environment had allowed QM information to be publicly available on the internet and that it was launching an investigation. QM reported that it corrected the error immediately upon its discovery and that the information was no longer publicly available as of May 14, 2022.

On July 12, 2022, QM informed Duquesne that the investigation confirmed the involvement of Duquesne students’ information. Duquesne requested that QM engage a third-party vendor to complete a comprehensive review of the potentially exposed data. On September 26, 2022, QM provided Duquesne with the results of the review, which revealed that the name, date of birth, and medical information of one (1) Maryland resident was involved in the incident. Accordingly, at Duquesne’s instruction, QM is providing written notice of a data breach to this individual today, via U.S. mail. A sample notice letter is enclosed. The letter provides general advice on how to protect one’s identity, obtain free credit reports, and place security freezes.

Since discovering this incident, QM confirmed the security of the information that it stores, reviewed its policies and procedures, and put additional measures into effect to further protect the security of information in its possession. Duquesne is committed to protecting the security and confidentiality of sensitive information and will continue to invest in the internal resources and tools necessary to help prevent something like this from happening again. Please do not hesitate to contact me if you have any questions or concerns.

Sincerely,

/s/ Matthew H. Meade, Esq.

Enclosures



<<Date>> (Format: Month Day, Year)

<<first_name>> <<middle_name>> <<last_name>> <<suffix>>
<<address_1>>
<<address_2>>
<<city>>, <<state_province>> <<postal_code>>
<<country>>

<<b2b_text_2(NOTICE OF DATA BREACH or NOTICE OF SECURITY INCIDENT)>>

Dear <<first_name>> <<middle_name>> <<last_name>> <<suffix>>,

QM Services, Inc. ("QM Services") is writing to inform you of a recent event that may impact the security of some of your personal information. QM Services contracts with Duquesne University to administer the University's student health insurance program. These services involve the collection of information provided by you. While QM Services is unaware of any actual or attempted misuse of your information, we are providing you with details about the event, our response, and steps you may take to help protect against the possibility of identity theft and fraud, should you feel it appropriate to do so.

What Happened? On or about May 13, 2022, QM Services learned of a misconfiguration of its system that inadvertently made certain information publicly available. Upon becoming aware of the misconfiguration, we immediately took steps to correct the misconfiguration and launched an investigation into the nature and scope of the incident with the assistance of third-party investigative specialists. The investigation determined that due to the misconfiguration, your information was publicly available from the date that you provided it to QM Services until May 14, 2022, when the error was corrected. Although there is no evidence that the information was actually accessed or acquired by an unauthorized party, we cannot rule out this possibility.

What Information Was Involved? QM Services conducted a review of the entire contents of the impacted system to determine if they contained information for certain current and former students. On September 26, 2022, upon request, QM Services provided Duquesne with a list of names it identified during its review. We are notifying you of this incident because the investigation confirmed that your <<b2b_text_1(name, data elements)>> were present on the impacted system at the time of the incident. We have no evidence of any actual or attempted misuse of your information resulting from this incident but are notifying you out of an abundance of caution.

What We Are Doing. The confidentiality, privacy, and security of information in our care is one of our highest priorities and we take this incident very seriously. Since discovering this incident, we corrected the misconfiguration and confirmed the security of the information, reviewed our policies and procedures, and put additional measures into effect to further protect the security of information in our possession. We will also be notifying state and federal regulators, as required.

What You Can Do. We encourage you to remain vigilant against incidents of identity theft and fraud by reviewing your account statements and monitoring your free credit reports and Explanation of Benefits for suspicious activity and to detect errors. Please also review the information contained in the enclosed *Steps You Can Take to Help Protect Your Personal Information*.

For More Information. We understand that you may have questions about this incident that are not addressed in this letter. If you have additional questions, please call our dedicated assistance line at (855) 926-0940, Monday through Friday, between the hours of 9:00 a.m. to 6:30 p.m. Eastern Time, excluding major U.S. holidays.

QM Services sincerely regrets any concern or inconvenience this incident may cause you.

Sincerely,

A handwritten signature in black ink that reads "Dona K. Norris". The signature is written in a cursive, flowing style.

Dona K. Norris
President
QM Services, Inc

STEPS YOU CAN TAKE TO HELP PROTECT YOUR PERSONAL INFORMATION

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

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. QM Services is located at 225 S. 19th St., Suite 1, Camp Hill, PA 17011. QM Services can be contacted at 1-800-273-1715 and <https://qmservicesinc.com/>.

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. QM Services is located at 225 S. 19th St., Suite 1, Camp Hill, PA 17011. QM Services can be contacted at 1-800-273-1715 and <https://qmservicesinc.com/>.

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 20 Rhode Island residents impacted by this incident.



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Pittsburgh, PA 15219

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Matthew H. Meade, Esq.
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mmeade@eckertseamans.com

November 17, 2022

Via E-mail: IDTheft@oag.state.md.us

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

Re: Supplemental Notice of Data Breach

Dear Attorney General Frosh:

This notice is provided on behalf of Duquesne University of the Holy Spirit (“Duquesne”), as a supplement to Duquesne’s notice dated November 10, 2022 (the “November 10th Notice”). The November 10th Notice reported that a vendor with whom Duquesne contracts, QM Services, Inc. (“QM”), discovered a cloud misconfiguration that involved the personal information of one (1) Maryland resident.

Because the initial information provided by QM did not contain addresses for many individuals, QM continued to work to locate addresses for the individuals whose information was involved in the incident. On October 18, 2022, QM provided Duquesne with the missing addresses for the remaining individuals, which revealed that the personal information of (31) Maryland residents was involved in the incident.

At Duquesne’s instruction, QM has agreed that it will provide these thirty-one (31) individuals written notice later today, via U.S. Mail. A sample of the notice letter is enclosed, which includes general advice on how to protect one’s identity, obtain free credit reports, and place security freezes. For the one individual whose Social Security number was impacted, the letter also contains instructions for enrolling in a one-year, complimentary membership for credit monitoring and identity theft services with Kroll.

Duquesne remains committed to protecting the security and confidentiality of sensitive information and will continue to invest in the internal resources and tools necessary to help prevent something like this from happening again. Please do not hesitate to contact me if you have any questions or concerns.

Sincerely,

/s/ Matthew H. Meade, Esq.

MHM/
Enclosure



<<Date>> (Format: Month Day, Year)

<<first_name>> <<middle_name>> <<last_name>> <<suffix>>
<<address_1>>
<<address_2>>
<<city>>, <<state_province>> <<postal_code>>
<<country>>

<<b2b_text_2(NOTICE OF DATA BREACH or NOTICE OF SECURITY INCIDENT)>>

Dear <<first_name>> <<middle_name>> <<last_name>> <<suffix>>,

QM Services, Inc. ("QM Services") is writing to inform you of a recent event that may impact the security of some of your personal information. QM Services contracts with Duquesne University ("Duquesne") to administer Duquesne's student health insurance program. These services involve the collection of information provided by you. While QM Services is unaware of any actual or attempted misuse of your information, we are providing you with details about the event, our response, and steps you may take to help protect against the possibility of identity theft and fraud, should you feel it appropriate to do so.

What Happened? On or about May 13, 2022, QM Services learned of a misconfiguration of its system that inadvertently made certain information publicly available. Upon becoming aware of the misconfiguration, we immediately took steps to correct the misconfiguration and launched an investigation into the nature and scope of the incident with the assistance of third-party investigative specialists. The investigation determined that due to the misconfiguration, your information was publicly available from the date that you provided it to QM Services until May 14, 2022, when the error was corrected. Although there is no evidence that the information was actually accessed or acquired by an unauthorized party, we cannot rule out this possibility.

What Information Was Involved? QM Services conducted a review of the entire contents of the impacted system to determine if they contained information for certain current and former students. On October 18, 2022, upon request, QM Services provided Duquesne with a list of names it identified during its review, along with mailing addresses for those individuals. We are notifying you of this incident because the investigation confirmed that your <<b2b_text_1(name, data elements)>> were present on the impacted system at the time of the incident. We have no evidence of any actual or attempted misuse of your information resulting from this incident but are notifying you out of an abundance of caution.

What We Are Doing. The confidentiality, privacy, and security of information in our care is one of our highest priorities and we take this incident very seriously. Since discovering this incident, we corrected the misconfiguration and confirmed the security of the information, reviewed our policies and procedures, and put additional measures into effect to further protect the security of information in our possession. We will also be notifying state and federal regulators, as required.

We are also offering identity monitoring services for 12 months through Kroll at no cost to you. The deadline to activate these services is <<b2b_text_6(activation deadline)>>. Information and instructions on how to activate these complimentary services can be found in the enclosed *Steps You Can Take to Help Protect Your Personal Information*. We encourage you to activate these services, as we are not able to do so on your behalf.

What You Can Do. We encourage you to remain vigilant against incidents of identity theft and fraud by reviewing your account statements and monitoring your free credit reports and Explanation of Benefits for suspicious activity and to detect errors. Please also review the information contained in the enclosed *Steps You Can Take to Help Protect Your Personal Information*.

For More Information. We understand that you may have questions about this incident that are not addressed in this letter. If you have additional questions, please call our dedicated assistance line at (855) 926-0940, Monday through Friday, between the hours of 9:00 a.m. to 6:30 p.m. Eastern Time, excluding major U.S. holidays.

QM Services sincerely regrets any concern or inconvenience this incident may cause you.

Sincerely,

A handwritten signature in black ink that reads "Dona K. Norris". The signature is written in a cursive style with a large, stylized "D" and "N".

Dona K. Norris
President
QM Services, Inc

STEPS YOU CAN TAKE TO HELP PROTECT YOUR PERSONAL INFORMATION

Activate Identity Monitoring Services

We have secured the services of Kroll to provide identity monitoring at no cost to you for one year. Kroll 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. Your identity monitoring services include Credit Monitoring, Fraud Consultation, and Identity Theft Restoration.



How to Activate Your Identity Monitoring Services

Visit <https://enroll.krollmonitoring.com> to activate and take advantage of your identity monitoring services.

You have until <<b2b_text_6(activation deadline)>> to activate your identity monitoring services.

Membership Number: <<Membership Number s_n>>

Take Advantage of Your Identity Monitoring Services

You've been provided with access to the following services from Kroll:

Single Bureau Credit Monitoring

You will receive alerts when there are changes to your credit data—for instance, when a new line of credit is applied for in your name. If you do not recognize the activity, you'll have the option to call a Kroll fraud specialist, who can help you determine if it's an indicator of identity theft.

Fraud Consultation

You have unlimited access to consultation with a Kroll fraud specialist. Support includes showing you the most effective ways to protect your identity, explaining your rights and protections under the law, assistance with fraud alerts, and interpreting how personal information is accessed and used, including investigating suspicious activity that could be tied to an identity theft event.

Identity Theft Restoration

If you become a victim of identity theft, an experienced Kroll licensed investigator will work on your behalf to resolve related issues. You will have access to a dedicated investigator who understands your issues and can do most of the work for you. Your investigator can dig deep to uncover the scope of the identity theft, and then work to resolve it.

Kroll's activation website is only compatible with the current version or one version earlier of Chrome, Firefox, Safari and Edge. To receive credit services, you must be over the age of 18 and have established credit in the U.S., have a Social Security number in your name, and have a U.S. residential address associated with your credit file.

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

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 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. QM Services is located at 225 S. 19th St., Suite 1, Camp Hill, PA 17011. QM Services can be contacted at 1-800-273-1715 and <https://qmservicesinc.com/>.