

November 16th, 2022

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

NOTICE OF DATA BREACH

To Whom it May Concern,

We are writing to inform your office of a potential data breach identified by our company, CommuteAir, LLC.

Description of the Nature of the Breach: CommuteAir believes the initial compromise took place on 11/8/22 at about 11pm EST. CommuteAir detected the compromise when we were alerted on 11/9/22 by a vendor that our data was being posted/sold on a data leak website. CommuteAir had two service accounts that were compromised. The means of how they were compromised is still under investigation. The threat actor used those accounts to pivot and eventually gain access, via an API, to CommuteAir's HRIS system. It is believed that the threat actor downloaded data from the HRIS system, but the exact nature and amount of the data exfiltrated is still under investigation. CommuteAir reset passwords for those accounts once being made aware of the compromise by the vendor and engaged a third-party security firm to assist with the incident response and forensic investigation. CommuteAir also whitelisted known IPs accessing the HRIS system. The third-party security firm deployed SentinelOne XDR to contain the environment and began gathering the necessary forensic evidence for the investigation on 11/9 and 11/10. The forensic investigation to determine root cause and extent of the breach is ongoing.

What Information Was Compromised: CommuteAir believes that employee information was compromised via the HRIS system. This comprised of the last four digits of SSNs, employment status, jobs title, hire and/or termination date, full name, full address, date of birth, and city of birth.

Additional Steps Taken: CommuteAir has reset all passwords associated with the accounts that may have been effected by the breach. Additionally, CommuteAir continues to work with a third-party cybersecurity firm that was retained to gather and analyze forensic data related to the breach, as well as assist CommuteAir with the implementation of additional security standards.

Number of Maryland Residents To Be Notified: 29

Additionally, a Sample Notice to be sent to affected individuals is attached hereto as Exhibit A. If any further information is necessary, please contact our legal counsel at Meyers, Roman, Friedberg & Lewis, 28601 Chagrin Blvd., Suite 600, Cleveland, Ohio 44122, 216-831-0042, Attn: David V. Croft Esq. and Elizabeth S. McCrea Esq.

Sincerely,

Rick Hoefling

President & Chief Executive Officer

EXHIBIT A

SAMPLE NOTICE

[Attached]

[DATE]

[EMAIL ADDRESS]

NOTICE OF DATA BREACH

Dear [INDIVIDUAL NAME]:

We respect the privacy of your information, which is why, as a precautionary measure, we are writing to let you know about a data security incident that may involve your personal information.

WHAT HAPPENED.

On November 9, 2022, CommuteAir LLC discovered that an unauthorized individual or entity gained unauthorized access through an application programming interface to a third-party Human Resource Information System (HRIS).

WHAT INFORMATION WAS INVOLVED.

The data accessed included personal information such as names, dates of birth, and the last four digits of social security numbers. To our knowledge, the data accessed did not include any credit card information, payment information, or health-related information.

WHAT WE ARE DOING.

We value your privacy and deeply regret that this incident occurred. We are conducting a thorough review of the potentially affected records and will notify you if there are any significant developments that involve any employee privacy concerns. We have engaged outside cybersecurity consultants and implemented additional security measures designed to prevent a recurrence of such an attack and to protect our employees' privacy.

We have also notified the appropriate authorities and are working closely with law enforcement to ensure the incident is properly addressed.

In addition, you will receive by separate email an offer for one year of free identity theft protection through the LifeLock Defender™ Choice plan. Instructions to activate the service by February 28, 2023 will be included in that email.

WHAT YOU CAN DO.

Please also review the attachment to this letter (Steps You Can Take to Further Protect Your Information) for further information on steps you can take to protect your information.

FOR MORE INFORMATION.

For questions or assistance with your IT security, please contact my team at c5it@commuteair.com or 440-462-0240. For other concerns, please reach out to your supervisor or to Human Resources.

Sincerely,

Radha Iyer

Chief Technology Officer

Steps You Can Take to Further Protect Your Information

- **Review Your Account Statements and Notify Law Enforcement of Suspicious Activity**

As a precautionary measure, we recommend that you remain vigilant by reviewing your account statements and credit reports closely. If you detect any suspicious activity on an account, you should promptly notify the financial institution or company with which the account is maintained. You also should promptly report any fraudulent activity or any suspected incidence of identity theft to proper law enforcement authorities, including the Attorney General's Office in your state and/or the Federal Trade Commission (FTC). A matrix displaying the Attorney General's Office in each state is attached to this letter below.

To file a complaint with the FTC, go to IdentityTheft.gov or call 1-877-ID-THEFT (877-438-4338). Complaints filed with the FTC will be added to the FTC's Identity Theft Data Clearinghouse, which is a database made available to law enforcement agencies.

- **Obtain and Monitor Your Credit Report**

We recommend that you obtain a free copy of your credit report from each of the three major credit reporting agencies once every 12 months by visiting <http://www.annualcreditreport.com>, calling toll-free 877-322-8228, or by completing an Annual Credit Report Request Form and mailing it to Annual Credit Report Request Service, P.O. Box 105281, Atlanta, GA 30348. You can access the request form at <https://www.annualcreditreport.com/requestReport/requestForm.action>. Or you can elect to purchase a copy of your credit report by contacting one of the three national credit reporting agencies. Contact information for the three national credit reporting agencies for the purpose of requesting a copy of your credit report or for general inquiries is provided below:

Equifax
(866) 349-5191
www.equifax.com
P.O. Box 740241
Atlanta, GA 30374

Experian
(888) 397-3742
www.experian.com
P.O. Box 2002
Allen, TX 75013

TransUnion
(800) 888-4213
www.transunion.com
2 Baldwin Place
P.O. Box 1000
Chester, PA 19016

- **Consider Placing a Fraud Alert on Your Credit Report**

You may want to consider placing a fraud alert on your credit report. 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. To place a fraud alert on your credit report, contact any of the three credit reporting agencies identified above. Additional information is available at <http://www.annualcreditreport.com>.

- **Take Advantage of Additional Free Resources on Identity Theft**

We recommend that you review the tips provided by the FTC's Consumer Information website, a valuable resource with some helpful tips on how to protect your information. Additional information is available at <https://www.consumer.ftc.gov/topics/privacy-identity-online-security>.

For more information, please visit IdentityTheft.gov or call 1-877-ID-THEFT (877-438-4338). A copy of Identity Theft – A Recovery Plan, a comprehensive guide from the FTC to help you guard against and deal with identity theft, can be found on the FTC's website at https://www.consumer.ftc.gov/articles/pdf-0009_identitytheft_a_recovery_plan.pdf.

ATTORNEY GENERAL CONTACT INFORMATION

ALABAMA Alabama Attorney General Steve Marshall (334) 242-7300 State House 11 S. Union St. Montgomery, AL 36130 consumerinterest@Alabamaag.gov	ALASKA Alaska Attorney General Kevin Clarkson (907) 465-3600 P.O. Box 110300 Diamond Courthouse Juneau, AK 99811-0300 attorney.general@alaska.gov	ARIZONA Arizona Attorney General Mark Brnovich (602) 542-4266 1275 W. Washington St. Phoenix, AZ 85007 aginfo@azag.gov	ARKANSAS Arkansas Attorney General Leslie Rutledge (800) 482-8982 200 Tower Bldg. 323 Center St. Little Rock, AR 72201-2610 oag@ArkansasAG.gov	CALIFORNIA California Attorney General Xavier Becerra (916) 445-9555 1300 I St., Ste. 1740 Sacramento, CA 95814 xavier.becerra@doj.ca.gov
COLORADO Colorado Attorney General Phil Weiser (303) 866-4500 1525 Sherman Street Denver, CO 80203 cora.request@coag.gov	CONNECTICUT Connecticut Attorney General William Tong (860) 808-5318 55 Elm St. Hartford, CT 06141-0120 attorney.general@ct.gov	DELAWARE Delaware Attorney General Kathy Jennings (302) 577-8338 Carvel State Office Bldg. 820 N. French St. Wilmington, DE 19801 attorney.general@state.de.us	DISTRICT OF COLOMBIA District of Columbia, Karl Racine (202) 724-1305 John A. Wilson Building 1350 PA Ave, NW Suite 409 Washington, DC 20009 karl.racine@dc.gov	FLORIDA Florida Attorney General Ashley Moody (850) 414-3300 The Capitol PL 01 Tallahassee, FL 32399-1050 ashley.moody@myfloridalegal.com
GEORGIA Georgia Attorney General Chris Carr (404) 656-3300 40 Capitol Square, SW Atlanta, GA 30334-1300 https://gbp.georgia.gov/contact-us	HAWAII Hawaii Attorney General Clare Connors (808) 586-1500 425 Queen St. Honolulu, HI 96813 hawaiiag@hawaii.gov	IDAHO Idaho Attorney General Lawrence Wasden (208) 334-2400 Statehouse Boise, ID 83720-1000 lawrence.wasden@ag.idaho.gov	ILLINOIS Illinois Attorney General Kwame Raoul (312) 814-3000 James R. Thompson Ctr. 100 W. Randolph St. Chicago, IL 60601 info@lisamadigan.org	INDIANA Indiana Attorney General Curtis Hill (317) 232-6201 Indiana Government Center South - 5th Floor 402 West Washington Street Indianapolis, IN 46204 https://www.in.gov/attorneygeneral/3063.htm
IOWA Iowa Attorney General Tom Miller (515) 281-5164 Hoover State Office Bldg. 1305 E. Walnut Des Moines, IA 50319 consumer@ag.iowa.gov	KANSAS Kansas Attorney General Derek Schmidt (785) 296-2215 120 S.W. 10th Ave., 2nd Fl. Topeka, KS 66612-1597 derek.schmidt@ag.ks.gov	KENTUCKY Kentucky Attorney General Daniel Cameron (502) 696-5300 State Capitol Rm. 116 Frankfort, KY 40601 KyOAGOR@ky.gov	LOUISIANA Louisiana Attorney General Jeff Landry (225) 326-6000 P.O. Box 94095 Baton Rouge, LA 70804 executive@ag.state.la.us	MAINE Maine Attorney General Aaron Frey (207) 626-8800 State House Station 6 Augusta, ME 04333 https://www.maine.gov/ag/contact.html
MARYLAND Maryland Attorney General Brian Frosh (410) 576-6300 200 St. Paul Place Baltimore, MD 21202-2202 oag@oag.state.md.us	MASSACHUSETTS Massachusetts Attorney General Maura Healey (617) 727-2200 1 Ashburton Place Boston, MA 02108-1698 ago@state.ma.us	MICHIGAN Michigan Attorney General Dana Nessel (517) 373-1110 P.O. Box 30212 525 W. Ottawa St. Lansing, MI 48909-0212 miag@michigan.gov	MINNESOTA Minnesota Attorney General Keith Ellison (651) 296-3353 State Capitol Ste. 102 St. Paul, MN 55155 Attorney.General@ag.state.mn.us	MISSISSIPPI Mississippi Attorney General Lynn Fitch (601) 359-3680 Department of Justice P.O. Box 220 Jackson, MS 37205-0220 http://www.ago.state.ms.us/contact/
MISSOURI Missouri Attorney General Eric Schmitt (573) 751-3321 Supreme Ct. Bldg. 207 W. High St. Jefferson City, MO 65101 consumer.help@ago.mo.gov	MONTANA Montana Attorney General Tim Fox (406) 444-2026 Justice Bldg. 215 N. Sanders Helena, MT 59620-1401 contactdoj@mt.gov	NEBRASKA Nebraska Attorney General Doug Peterson (402) 471-2682 State Capitol P.O. Box 98920 Lincoln, NE 68509-8920 ago.info.help@nebraska.gov	NEVADA Nevada Attorney General Aaron Ford (775) 684-1100 Old Supreme Ct. Bldg. 100 N. Carson St. Carson City, NV 89701 aginfo@ag.nv.gov	NEW HAMPSHIRE New Hampshire Attorney General Gordon MacDonald (603) 271-3658 State House Annex 25 Capitol St. Concord, NH 03301-6397 attorneygeneral@doj.nh.gov

ATTORNEY GENERAL CONTACT INFORMATION

NEW JERSEY New Jersey Attorney General Gurbir Grewal (609) 292-8740 Richard J. Hughes Justice Complex 25 Market St., CN 080 Trenton, NJ 08625 gurbir.grewal@njoag.gov	NEW MEXICO New Mexico Attorney General Hector Balderas (505) 827-6000 P.O. Drawer 1508 Sante Fe, NM 87504-1508 hbalderas@nmag.gov	NEW YORK New York Attorney General Letitia James (518) 474-7330 Dept. of Law The Capitol, 2nd fl. Albany, NY 12224 https://ag.ny.gov/questions-comments-to-attorney-general	NORTH CAROLINA North Carolina Attorney General Josh Stein (919) 716-6400 Dept. of Justice P.O. Box 629 Raleigh, NC 27602-0629 http://www.ncdoj.gov/Home/ContactUs.aspx	NORTH DAKOTA North Dakota Attorney General Wayne Stenehjem (701) 328-2210 State Capitol 600 E. Boulevard Ave. Bismarck, ND 58505-0040 https://attorneygeneral.nd.gov/attorney-generals-office/email-attorney-general-0
OHIO Ohio Attorney General Dave Yost (614) 466-4320 State Office Tower 30 E. Broad St. Columbus, OH 43266-0410 https://www.ohioattorneygeneral.gov/About-AG/Contact	OKLAHOMA Oklahoma Attorney General Mike Hunter (405) 521-3921 State Capitol, Rm. 112 2300 N. Lincoln Blvd. Oklahoma City, OK 73105 questions@oag.ok.gov	OREGON Oregon Attorney General Ellen Rosenblum (503) 378-4732 Justice Bldg. 1162 Court St., NE Salem, OR 97301 ellen.rosenblum@doj.state.or.us	PENNSYLVANIA Pennsylvania Attorney General Josh Shapiro (717) 787-3391 1600 Strawberry Square Harrisburg, PA 17120 https://www.attorneygeneral.gov/contact/	PUERTO RICO Puerto Rico Secretary of Justice Domingo Emanuelli Hernández (787) 721-2900 PO Box 9020192 San Juan, PR, 00902-0192 ayudaalciudadano@justicia.pr.gov
RHODE ISLAND Rhode Island Attorney General Peter Neronha (401) 274-4400 150 S. Main St. Providence, RI 02903 https://riag.wufoo.com/forms/m1r8yoc71voil6i	SOUTH CAROLINA South Carolina Attorney General Alan Wilson (803) 734-3970 Rembert C. Dennis Office Bldg. P.O. Box 11549 Columbia, SC 29211-1549 http://www.scag.gov/contact-us/contact-us	SOUTH DAKOTA South Dakota Attorney General Jason Ravnsborg (605) 773-3215 500 E. Capitol Pierre, SD 57501-5070 https://atg.sd.gov/Contact.aspx	TENNESSEE Tennessee Attorney General Herbert Slatery (615) 741-5860 500 Charlotte Ave. Nashville, TN 37243 https://atg.sd.gov/Contact.aspx	TEXAS Texas Attorney General Ken Paxton (512) 463-2100 Capitol Station P.O. Box 12548 Austin, TX 78711-2548 https://texasattorneygeneral.gov/contact-form/
UTAH Utah Attorney General Sean Reyes (801) 538-9600 State Capitol Rm. 236 Salt Lake City, UT 84114 uag@agutah.gov	VERMONT Vermont Attorney General T.J. Donovan (802) 828-3173 109 State St. Montpelier, VT 05609-1001 ago.info@vermont.gov	VIRGINIA Virginia Attorney General Mark Herring (804) 786-2071 900 E. Main St. Richmond, VA 23219 mail@oag.state.va.us	WASHINGTON Washington Attorney General Bob Ferguson (360) 753-6200 900 Fourth Street Suite 2000 Olympia, WA 98504-0100 https://fortress.wa.gov/atg/formhandler/ago/ContactForm.aspx	WEST VIRGINIA West Virginia Attorney General Patrick Morrissey (304) 558-2021 State Capitol 1900 Kanawha Blvd. E. Charleston, WV 25305
WISCONSIN Wisconsin Attorney General Josh Kaul (608) 266-1221 State Capitol Ste. 114 E. P.O. Box 7857 Madison, WI 53707-7857 https://www.doj.state.wi.us/ag/contact	WYOMING Wyoming Attorney General Bridget Hill (307) 777-7841 State Capitol Bldg. Cheyenne, WY 82002 http://ag.wyo.gov/contact-us			