BakerHostetler

Baker&Hostetler LLP

11601 Wilshire Boulevard
Suite 1400
Los Angeles, CA 90025-0509

T 310.820.8800
F 310.820.8859
www.bakerlaw.com

M. Scott Koller
direct dial: 310.979.8427
mskoller@bakerlaw.com

December 5, 2022

VIA EMAIL (IDTHEFT@OAG.STATE.MD.US)

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

Re: Incident Notification

Dear Attorney General Frosh:

We are writing on behalf of our client, InfoCision Management Corporation ("IMC"), and their customer, Comcast, to notify your office of a cybersecurity incident that involved one Maryland resident's information. IMC is located at 325 Springside Drive, Akron, Ohio 44333.

On September 30, 2022, IMC detected unauthorized access to their corporate network involving encryption of data and systems on the network. Upon discovering the incident, IMC took steps to secure the network, notified law enforcement and launched an investigation. The investigation determined that an unauthorized party accessed IMC's network beginning on September 19, 2022. The investigation also identified certain files that were taken by the unauthorized party between September 22, 2022, and September 26, 2022.

IMC reviewed the files that were taken to determine if any of the files included personal information. On October 12, 2022, IMC determined that the files included the name, social security number, email address, mailing address, date of birth, phone number, and credit or debit card number, including CVV code and expiration date, of one Maryland resident. IMC notified Comcast of the conclusions of its investigation on October 25, 2022.

IMC is mailing a notification letter via First Class mail to the Maryland resident in accordance with Md. Code Ann., Com. Law § 14-3504.[1] A sample of the notification is enclosed. IMC has also established a dedicated, toll-free call center that individuals can call to obtain more information regarding the incident.

To reduce the risk of a similar incident from occurring in the future, IMC has changed passwords and implemented additional security measures and controls within the corporate network.

Please do not hesitate to contact me if you have any questions regarding this matter.

Sincerely,

M. Scott Koller

M. Scott Koller
Partner

Enclosure

---

[1] This report is not, and does not constitute, a waiver of IMC's objection that Maryland lacks personal jurisdiction over the company related to this matter.

COMCAST

[redacted]

December 2, 2022

Dear [redacted]:

We are writing to notify you of a data security incident that involves some of your information. This notice explains the incident, measures we have taken and some steps you can take in response.

What Happened?
On September 30, 2022, a Comcast service provider, InfoCision Management Corporation ("IMC"), identified a data security incident involving unauthorized access to their corporate network. IMC provides call center services to Comcast and spoke with you in the past. An investigation of this incident determined that an unauthorized party accessed and acquired some data stored on IMC's network between September 22 and September 26, 2022. This incident occurred entirely on IMC's network and did not involve any compromise of your Comcast account.

What Information Was Involved?
After IMC notified Comcast that data acquired by the unauthorized party included a recording of a call between you and an IMC representative containing some of your personal information, Comcast conducted its own investigation. Comcast determined that the recording included your name, email address, mailing address, phone number, Social Security number, date of birth, payment card number ending in [redacted] and the payment card's CVV code and expiration date, and information about Xfinity Mobile services with Comcast, including pricing and services provided.

What We Are Doing.
Comcast takes this issue very seriously. While IMC has informed us that it has no indication that anyone's personal information was misused by the unauthorized party, in an abundance of caution, we are offering you complimentary identity theft protection services through a one-year to Experian® IdentityWorksSM Credit 3B Plus. This product helps detect possible misuse of your personal information and provides you with identity protection services focused on immediate identification and resolution of identity theft. IdentityWorks is completely free to you and enrolling in this program will not hurt your credit score. Comcast is working closely with IMC to understand how this incident occurred and to evaluate appropriate measures to protect the personal information of our customers going forward. To help prevent a similar incident in the future, IMC has changed passwords and implemented additional security measures and controls in its network.

What You Can Do.
If you are not already enrolled, we encourage you to add another layer of security to your online Xfinity account by signing up for two-step verification.[1] We always encourage our customers to be alert for unusual or suspicious emails or telephone calls and to remain vigilant by reviewing their financial account statements and credit reports for signs of fraud. Information about common scams and how to protect yourself are available on our website.[2]

---

[1] Learn more at https://www.xfinity.com/support/articles/two-step-verification-xfinity-app-setup
[2] https://www.xfinity.com/support/articles/protect-yourself-phone-scams

For more information, as well as some additional steps you can take to help protect yourself, please see the pages that follow this letter.

For More Information.
We sincerely regret any inconvenience caused by this incident. If you have any questions, please call 888-651-2048, Monday through Friday, between 9:00 am and 5:00 pm, Eastern Time.

Sincerely,

Comcast

COMCAST

To help protect your identity, we are offering a **complimentary** one-year membership to Experian IdentityWorks℠. This product helps detect possible misuse of your personal information and provides you with superior identity protection support focused on immediate identification and resolution of identity theft.

Activate IdentityWorks In Three Easy Steps

1. ENROLL by: February 28, 2023 **(**Your code will not work after this date.)
2. VISIT the **Experian IdentityWorks website** to enroll: https://www.experianidworks.com/3bcredit
3. PROVIDE the **Activation Code**: [redacted]

If you have questions about the product, need assistance with Identity Restoration that arose as a result of this incident or would like an alternative to enrolling in Experian IdentityWorks online, please contact Experian's customer care team at **877.890.9332**. Be prepared to provide engagement number [redacted] as proof of eligibility for the identity restoration services by Experian.

ADDITIONAL DETAILS REGARDING YOUR 12 MONTH EXPERIAN IDENTITYWORKS MEMBERSHIP:

A credit card is **not** required for enrollment in Experian IdentityWorks.

You can contact Experian **immediately without needing to enroll in the product** regarding any fraud issues. Identity Restoration specialists are available to help you address credit and non-credit related fraud.

Once you enroll in Experian IdentityWorks, you will have access to the following additional features:

- **Experian credit report at signup:** See what information is associated with your credit file. Daily credit reports are available for online members only.*
- **Credit Monitoring:** Actively monitors Experian, Equifax, and Transunion files for indicators of fraud.
- **Identity Restoration:** Identity Restoration specialists are immediately available to help you address credit and non-credit related fraud.
- **Experian IdentityWorks ExtendCARE™:** You receive the same high-level of Identity Restoration support even after your Experian IdentityWorks membership has expired.
- **$1 Million Identity Theft Insurance**:** Provides coverage for certain costs and unauthorized electronic fund transfers.

Activate your membership today at https://www.experianidworks.com/3bcredit
or call 877.890.9332 to register with the activation code above.

What you can do to protect your information: There are additional actions you can consider taking to reduce the chances of identity theft or fraud on your account(s). Please refer to www.ExperianIDWorks.com/restoration for this information. If you have any questions about IdentityWorks, need help understanding something on your credit report or suspect that an item on your credit report may be fraudulent, please contact Experian's customer care team at **877.890.9332**.

* Offline members will be eligible to call for additional reports quarterly after enrolling.

** The Identity Theft Insurance is underwritten and administered by American Bankers Insurance Company of Florida, an Assurant company. Please refer to the actual policies for terms, conditions, and exclusions of coverage. Coverage may not be available in all jurisdictions.

COMCAST

ADDITIONAL STEPS YOU CAN TAKE

We remind you it is always advisable to be vigilant for incidents of fraud or identity theft by reviewing your account statements and free credit reports for any unauthorized activity. You may obtain a copy of your credit report, free of charge, once every 12 months from each of the three nationwide credit reporting companies. To order your annual free credit report, please visit www.annualcreditreport.com or call toll free at 1-877-322-8228. Contact information for the three nationwide credit reporting companies is as follows:

- *Equifax*, PO Box 740241, Atlanta, GA 30374, www.equifax.com, 1-800-685-1111
- *Experian*, PO Box 2002, Allen, TX 75013, www.experian.com, 1-888-397-3742
- *TransUnion*, PO Box 2000, Chester, PA 19016, www.transunion.com, 1-800-916-8800

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 the Federal Trade Commission and/or the Attorney General's office in your state. You can obtain information from these sources about steps an individual can take to avoid identity theft as well as information about fraud alerts and security freezes. You should also contact your local law enforcement authorities and file a police report. Obtain a copy of the police report in case you are asked to provide copies to creditors to correct your records. Contact information for the Federal Trade Commission is as follows:

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

Fraud Alerts and Credit or Security Freezes:

Fraud Alerts: There are two types of general fraud alerts you can place on your credit report to put your creditors on notice that you may be a victim of fraud—an initial alert and an extended alert. You may ask that an initial fraud alert be placed on your credit report if you suspect you have been, or are about to be, a victim of identity theft. An initial fraud alert stays on your credit report for one year. You may have an extended alert placed on your credit report if you have already been a victim of identity theft with the appropriate documentary proof. An extended fraud alert stays on your credit report for seven years.

To place a fraud alert on your credit reports, contact one of the nationwide credit bureaus. A fraud alert is free. The credit bureau you contact must tell the other two, and all three will place an alert on their versions of your report.

For those in the military who want to protect their credit while deployed, an Active Duty Military Fraud Alert lasts for one year and can be renewed for the length of your deployment. The credit bureaus will also take you off their marketing lists for pre-screened credit card offers for two years, unless you ask them not to.

Credit or Security Freezes: You have the right to put a credit freeze, also known as a security freeze, on your credit file, free of charge, which makes it more difficult for identity thieves to open new accounts in your name. That's because most creditors need to see your credit report before they approve a new account. If they can't see your report, they may not extend the credit.

How do I place a freeze on my credit reports? There is no fee to place or lift a security freeze. Unlike a fraud alert, you must separately place a security freeze on your credit file at each credit reporting company. For information and instructions to place a security freeze, contact each of the credit reporting agencies at the addresses below:

- **Experian Security Freeze**, PO Box 9554, Allen, TX 75013, www.experian.com
- **TransUnion Security Freeze**, PO Box 2000, Chester, PA 19016, www.transunion.com
- **Equifax Security Freeze**, PO Box 105788, Atlanta, GA 30348, www.equifax.com

You'll need to supply your name, address, date of birth, Social Security number and other personal information. After receiving your freeze request, each credit bureau will provide you with a unique PIN (personal identification number) or password. Keep the PIN or password in a safe place. You will need it if you choose to lift the freeze.

How do I lift a freeze? A freeze remains in place until you ask the credit bureau to temporarily lift it or remove it altogether. If the request is made online or by phone, a credit bureau must lift a freeze within one hour. If the request is made by mail, then the bureau must lift the freeze no later than three business days after getting your request.

If you opt for a temporary lift because you are applying for credit or a job, and you can find out which credit bureau the business will contact for your file, you can save some time by lifting the freeze only at that particular credit bureau. Otherwise, you need to make the request with all three credit bureaus.

Comcast Corporation, 1701 John F. Kennedy Boulevard, Philadelphia, PA 19103, 888-651-2048.

Additional information for residents of the following states:

Maryland: You may contact and obtain information from your state attorney general at: *Maryland Attorney General's Office*, 200 St. Paul Place, Baltimore, MD 21202, 1-888-743-0023 / 1-410-576-6300, www.oag.state.md.us