



MULLEN
COUGHLIN^{LLC}
ATTORNEYS AT LAW

Jeffrey J. Boogay
Office: (267) 930-4784
Fax: (267) 930-4771
Email: jboogay@mullen.law

426 W. Lancaster Avenue, Suite 200
Devon, PA 19333

February 21, 2023

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

To Whom It May Concern:

We represent Advantage Benefit Solutions (“Advantage”), a division of Patriot Growth Insurance Services, LLC, located at 1800 W Loop S, Suite 2115, Houston, TX 77027, and are writing to notify your office of an incident that may affect the security of certain personal information relating to five (5) Maryland residents. Advantage received the information in connection with insurance consulting and brokerage services on behalf of Precision for Medicine. The investigation into this matter is ongoing, and this notice may be supplemented with any new significant facts learned subsequent to its submission. By providing this notice, Advantage 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

On or around April 21, 2022, Advantage discovered suspicious activity related to an employee email account. Advantage immediately took steps to secure the email account and launched an investigation which included working with third-party forensic specialists to determine the nature and scope of the activity. Advantage’s investigation determined that there was unauthorized access to the affected email account from April 21, 2022, to April 22, 2022. However, the forensic investigation was unable to determine whether specific emails and attachments within the account were “previewed”. In an abundance of caution, a programmatic and manual review of the contents of the email account was completed to determine whether sensitive information was present in the emails at the time of the incident. Advantage then worked to identify contact information for the impacted individuals. That process completed on November 18, 2022. Through this process, Advantage determined that certain information related to certain individuals was accessible, although not necessarily actually accessed or viewed by unauthorized individuals, within the account.

The information that could have been subject to unauthorized access includes name, Social Security number, medical information, and health insurance information.

Notice to Maryland Residents

On or about February 21, 2023, Advantage began providing written notice of this incident to five (5) Maryland residents. Written notice is being provided in substantially the same form as the letter attached here as **Exhibit A**. Advantage's investigation into this incident is ongoing and this notification may be supplemented if it is determined that a significant number of additional Maryland residents were impacted by this event.

Other Steps Taken and To Be Taken

Upon discovering the event, Advantage moved quickly to investigate and respond to the incident, assess the security of Advantage systems, and identify potentially affected individuals. Advantage is also working to implement additional safeguards and training to its employees. Advantage is providing access to credit monitoring services for twelve (12) months, through Experian, to individuals whose personal information was potentially affected by this incident, at no cost to these individuals.

Additionally, Advantage is providing impacted individuals with guidance on how to better protect against identity theft and fraud. Advantage 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.

Advantage is also notifying the U.S. Department of Health and Human Services pursuant to the Health Insurance Portability and Accountability Act (HIPAA).

Contact Information

Should you have any questions regarding this notification or other aspects of the data security event, please contact us at (267) 930-4784.

Very truly yours,

Jeffrey J. Boogay of
MULLEN COUGHLIN LLC

JJB/jlm
Enclosure

EXHIBIT A



Return Mail Processing
PO Box 589
Claysburg, PA 16625-0589

February 21, 2023

J0462-L01-0000001 T00001 P001 *****SCH 5-DIGIT 12345



SAMPLE A SAMPLE - L01 INDIVIDUAL

APT ABC

123 ANY STREET

ANYTOWN, ST 12345-6789



NOTICE OF [Extra1]

Dear Sample A. Sample:

Advantage Benefit Solutions (“Advantage”), a division of Patriot Growth Insurance Services, LLC (“Patriot Growth”) writes to inform you of a recent incident that may impact the privacy of some of your information. Advantage received your information in connection with insurance consulting and brokerage services on behalf of [Extra2]. While we are unaware of any attempted or actual misuse of your information at this time, we are providing you with this notice in an abundance of caution, to inform you of the incident, our response, and steps you may take to help protect your information, should you feel it is necessary to do so.

What Happened? Advantage recently discovered suspicious activity related to an employee email account. We immediately took steps to secure the email account and launched an investigation which included working with a third-party forensic investigator to determine the nature and scope of the activity. Advantage’s investigation determined that there was unauthorized access to the affected email account from April 21, 2022 to April 22, 2022. Although **we have no evidence to indicate that any information related to you was actually opened or viewed**, we are providing you this notice out of an abundance of caution. Advantage then began a diligent and comprehensive review process to identify sensitive information that may have been contained within the impacted email account, and to identify the individuals whose information may have been impacted. Advantage then worked to identify contact information for the impacted individuals. That process completed on November 18, 2022. We are notifying you because that investigation determined certain information related to you was contained within the email account.

What Information Was Involved? The review determined the following information related to you was present in the impacted emails and attachments: your name and [Extra4]. At this time, we have **no evidence that your information was subject to actual or attempted misuse** as a result of this incident.

What We Are Doing. The confidentiality, privacy, and security of information within our care is among Advantage’s highest priorities. Upon learning of the incident, we took immediate steps to secure our email environment and investigate the activity. We commenced an investigation that included working with third-party forensic specialists to understand the nature and scope of the incident. As part of our ongoing commitment to the privacy of information in our care, we are reviewing our policies, procedures, and processes related to the storage and access of sensitive information to reduce the likelihood of a similar future incident.

As an added precaution, we are also offering ## months of complimentary access to credit monitoring services through Experian. Individuals who wish to receive these services must enroll by following the below enrollment instructions, as we are unable to activate them on your behalf.

ENGAGE#

0000001



J0462-L01

What You Can Do. We encourage you to remain vigilant against incidents of identity theft and fraud and to review your account statements and credit reports for suspicious activity and to detect errors. You can review the enclosed *Steps You Can Take to Help Protect Your Information* to learn helpful tips on steps you can take to protect against possible information misuse, should you feel it appropriate to do so. You may also enroll in the complimentary credit monitoring services we are offering to you.

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, or need assistance, please call our dedicated assistance line at (877) 736-4493, toll-free Monday through Friday from 8 am – 10 pm Central, or Saturday and Sunday from 10 am – 7 pm Central (excluding major U.S. holidays). You may also write to Advantage at 1800 West Loop South, Suite 2115, Houston, TX 77027.

Advantage takes the privacy and security of the information in our care seriously. We sincerely regret any inconvenience or concern this incident may cause you.

Sincerely,

Alexandra Baker
Chief Operating Officer
Advantage Benefit Solutions

STEPS YOU CAN TAKE TO HELP PROTECT YOUR INFORMATION

Enroll in Credit Monitoring

To help protect your identity, we are offering complimentary access to Experian IdentityWorksSM for ## months.

If you believe there was fraudulent use of your information as a result of this incident and would like to discuss how you may be able to resolve those issues, please reach out to an Experian agent. If, after discussing your situation with an agent, it is determined that identity restoration support is needed then an Experian Identity Restoration agent is available to work with you to investigate and resolve each incident of fraud that occurred from the date of the incident (including, as appropriate, helping you with contacting credit grantors to dispute charges and close accounts; assisting you in placing a freeze on your credit file with the three major credit bureaus; and assisting you with contacting government agencies to help restore your identity to its proper condition).

Please note that Identity Restoration is available to you for ## months from the date of this letter and does not require any action on your part at this time. The Terms and Conditions for this offer are located at www.ExperianIDWorks.com/restoration.

While identity restoration assistance is immediately available to you, we also encourage you to activate the fraud detection tools available through Experian IdentityWorks as a complimentary ##-month membership. This product provides you with superior identity detection and resolution of identity theft. To start monitoring your personal information, please follow the steps below:

- Ensure that you **enroll by May 31, 2023** (Your code will not work after this date.)
- **Visit** the Experian IdentityWorks website to enroll: www.experianidworks.com/credit
- Provide your **activation code: ABCDEFGHI**

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) 736-4493 by May 31, 2023. Be prepared to provide engagement number **ENGAGE#** as proof of eligibility for the Identity Restoration services by Experian.

ADDITIONAL DETAILS REGARDING YOUR ##-MONTH EXPERIAN IDENTITYWORKS MEMBERSHIP

A credit card is not required for enrollment in Experian IdentityWorks. You can contact Experian immediately regarding any fraud issues, and have access to the following features once you enroll in Experian IdentityWorks:

- **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 file 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.

* 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.

ENGAGE#

0000001



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 one-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 credit 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	888-397-3742	800-916-8800
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.

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. Advantage is located at 1800 West Loop South, Suite 2115, Houston, TX 77027.

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 0 Rhode Island residents impacted by this incident.

