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March 8, 2023

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

Anthony G. Brown
Attorney General
Office of the Attorney General
Attn: Security Breach Notification
200 St. Paul Place
Baltimore, MD 21202

Re: Incident Notification

Dear Attorney General Brown:

We are writing on behalf of our client, Benefit Link LLC (“Benefit Link”), to notify you of a data security incident. Benefit Link is a health insurance broker for employers and health insurance plans and is located in New York.

Benefit Link recently concluded its investigation of a data security incident that involved one of its computer systems. After identifying the incident, Benefit Link immediately secured the system and commenced a comprehensive investigation, with the assistance of outside forensic investigators. Through the investigation, Benefit Link determined that an unauthorized party accessed the system on February 15, 2022. While the analysis of the available evidence did not find any indication that any information maintained on the system was actually viewed, accessed or acquired, Benefit Link could not definitively rule out that possibility. Importantly, the incident did not result in the loss of any customer data, the incident did not involve data stored on any other systems within Benefit Link’s environment, and it did not disrupt Benefit Link’s ability to provide services.

Subsequently, Benefit Link conducted a comprehensive review of the data maintained on the system to identify the type of information that may have been involved and the individuals to whom the information relates. Benefit Link then correlated the results of its data review with its files to identify the particular organizations associated with the information. Based on this review, Benefit Link determined that files on the system contained information about individuals, including their names and Social Security numbers. Benefit Link provided written notification to the clients whose members’ information may have been involved in the incident and offered to provide notice to those individuals and applicable regulatory agencies on their behalf.

March 8, 2023

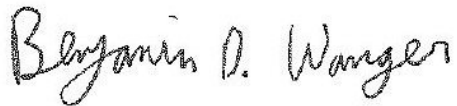
Page 2

Beginning on March 8, 2023, Benefit Link will mail notification letters via United States Postal Service First-Class mail to four Maryland residents, in accordance with Md. Code Ann., Com. Law § 14-3504. A copy of the notification letter is enclosed. Benefit Link has established a dedicated, toll-free incident response line to answer questions that individuals may have. Benefit Link is also offering complimentary credit monitoring and identity theft protection services to notified individuals.

To help prevent a similar incident from occurring in the future, Benefit Link evaluated and reconfigured its network environment, and is continuing to enhance its existing security protocols.

Should you have any questions, please do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink that reads "Benjamin D. Wanger". The signature is written in a cursive, slightly slanted style.

Benjamin D. Wanger
Counsel

Enclosure



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

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

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

Benefit Link LLC ("Benefit Link") is the insurance broker for your current or former employer. We are committed to protecting the security and confidentiality of the information we maintain. We are writing to inform you about an incident that may have involved some of your information. This notice explains the incident, measures we have taken, and some steps you can take in response.

We recently completed our investigation of a data security incident which involved one of our computer systems. After identifying the incident, we immediately secured the system and commenced a comprehensive investigation. Through our investigation, we determined that an unauthorized party accessed the system on February 15, 2022. While our analysis of the available evidence did not indicate that any files on the system were actually viewed, accessed or acquired, we could not definitively rule out that possibility. Therefore, we conducted a comprehensive review of the files that resided on the system. Based on this review, we determined that one or more files contained your name in combination with your <<b2b_text_1 (data elements)>>.

We are offering you one year of complimentary identity monitoring services through Kroll. Your identity monitoring services include Credit Monitoring, Fraud Consultation, and Identity Theft Restoration.

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

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

Membership Number: <<Membership Number s_n>>

This product helps detect possible misuse of your personal information and provides you with identity protection services focused on identification and resolution of identity theft. The Kroll membership is completely free to you and enrolling in this program will not hurt your credit score.

We sincerely regret any inconvenience or concern this may cause you. Benefit Link takes this incident very seriously and, as part of our ongoing efforts to help prevent something like this from happening in the future, we discontinued using our network environment, moved to the Cloud and are using enhanced security protocols offered by our Cloud vendor. If you have any questions, please reach out to our dedicated assistance line at (866) 674-6015, Monday through Friday, 9:00 a.m. and 6:30 p.m., Eastern Time.

Sincerely,

Robin Flaherty
President
Benefit Link LLC



TAKE ADVANTAGE OF YOUR IDENTITY MONITORING SERVICES

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

Triple Bureau Credit Monitoring

You will receive alerts when there are changes to your credit data at any of the three national credit bureaus—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 will be able to help you determine if it is 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 will be able to 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.

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 1000, 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), identitytheft.gov

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 160, Woodlyn, PA 19094, 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.

Benefit Link can be reached by mail at 2152 Ridgeway Avenue, Rochester, NY 14626 or by phone at 585-349-8000.

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

New York: You may contact and obtain information from these state agencies: *New York Department of State Division of Consumer Protection*, One Commerce Plaza, 99 Washington Ave., Albany, NY 12231-0001, 518-474-8583 / 1-800-697-1220, <http://www.dos.ny.gov/consumerprotection>; and *New York State Office of the Attorney General*, The Capitol, Albany, NY 12224-0341, 1-800-771-7755, <https://ag.ny.gov>

North Carolina: You may contact and obtain information from your state attorney general at: *North Carolina Attorney General's Office*, 9001 Mail Service Centre, Raleigh, NC 27699, 1-919-716-6000 / 1-877-566-7226, www.ncdoj.gov

Rhode Island: [This incident involves XXX individuals in Rhode Island](#). Under Rhode Island law, you have the right to file and obtain a copy of a police report. You also have the right to request a security freeze, as described above. You may contact and obtain information from your state attorney general at: *Rhode Island Attorney General's Office*, 150 South Main Street, Providence, RI 02903, 1-401-274-4400, www.riag.ri.gov

West Virginia: You have the right to ask that nationwide consumer reporting agencies place "fraud alerts" in your file to let potential creditors and others know that you may be a victim of identity theft, as described above. You also have a right to place a security freeze on your credit report, as described above.