



Lauren Godfrey
322 North Shore Drive
Building 1B, Suite 200
Pittsburgh, Pennsylvania 15212
lgodfrey@constangy.com
Direct: 973.462.9521

March 17, 2023

VIA E-MAIL

Attorney General Brian E. Frosh
Office of the Attorney General
St. Paul Plaza
Attn: Security Breach Notification
200 St. Paul Place
Baltimore, MD 21202
Fax: (410) 576-6566
Idtheft@oag.state.md.us

Re: Notice of Data Security Incident

To Whom It May Concern:

Constangy, Brooks, Smith & Prophete, LLP (“Constangy”) represents American Humane Association (“American Humane”) in connection with a recent data security incident described in greater detail below. American Humane is a nonprofit committed to ensuring the safety, welfare and care of animals and is headquartered in Washington, D.C. American Humane takes the protection of all personal information within its possession very seriously and has taken significant steps to help prevent a similar incident from occurring in the future.

1. Nature of the Security Incident.

On November 16, 2022, someone attempted to interfere with American Humane’s cyber operations. American Humane immediately shut down its network and took steps to secure its environment. American Humane also engaged a leading, independent cybersecurity firm to assist American Humane with safely restoring its operations, investigating the incident, and determining if any personal information was affected as quickly as possible. The investigation revealed that an unknown actor gained access to certain data on American Humane’s network. On February 10, 2023, American Humane determined that certain personal information may have been impacted.

2. Number of Maryland Residents Affected.

On February 10, 2023, American Humane learned that the personal information of one (1) resident of Maryland was potentially accessed without authorization. The impacted information varies by individual but may include: Social Security numbers, health insurance information, and tax ID numbers.

On March 17, 2023, a notification letter was mailed to one (1) Maryland resident. The letter advised the recipient about steps they can take to help protect their information. In addition, American Humane offered complimentary credit monitoring and identity protection services for 12 months through Kroll. The identity monitoring services include Credit Monitoring, Fraud Consultation, and Identity Theft Restoration.

A sample copy of the notification letter is included with this correspondence.

3. Steps Taken Relating to the Incident.

American Humane has taken steps in response to this incident to help prevent similar incidents from occurring in the future. American Humane has worked since discovering this incident with leading cybersecurity experts to enhance the security of its network environment.

4. Contact Information.

American Humane remains dedicated to protecting the personal information in its control. If you have any questions or need additional information, please do not hesitate to contact me at (973) 462-9521 or via email at lgodfrey@constangy.com.

Very truly yours,

/s/ Lauren D. Godfrey

Lauren D. Godfrey of
CONSTANGY, BROOKS, SMITH &
PROPHETE LLP

Encl.: Sample Consumer Notification Letter

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

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

<<b2b_text_1 (Re: Notice of Data Security -)>>

Dear <<first_name>> <<middle_name>> <<last_name>> <<suffix>>:

We are writing to inform you of a data security incident experienced by American Humane Association (“American Humane”) that may have involved your personal information. At American Humane, we take the privacy and security of personal information very seriously. As such, we are notifying you of the incident, offering you complimentary identity monitoring services, and informing you about steps you can take to help protect your personal information.

What Happened? On November 16, 2022, someone attempted to interfere with American Humane’s cyber operations. We immediately shut down our network and took steps to secure our environment. We also engaged a leading cybersecurity firm to assist with safely restoring our operations, to investigate the incident, and to determine if any personal information was affected. The investigation revealed that an unknown actor gained access to certain data from the American Humane network. On February 10, 2023, we determined that your personal information may have been impacted. We have no reason to believe that your personal information has been misused as a result of this incident.

What Information Was Involved? The following information may have been impacted: <<b2b_text_2 (“name” and data elements)>>.

What Are We Doing? As soon as we discovered the incident, we took the steps described above. We also notified law enforcement and are cooperating with the resulting investigation. We are providing you with information about steps you can take to help protect your personal information. In addition, we are offering you complimentary identity monitoring services for 12 months through Kroll as described below. Kroll is a global leader in risk mitigation and response.

What You Can Do: We recommend that you review the guidance included with this letter about how to help protect your personal information. We also encourage you to activate the complimentary identity monitoring services, which are free to you upon activation. These 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>>

For more information about Kroll and your Identity Monitoring services, you can visit info.krollmonitoring.com.

Additional information describing your services is included with this letter.

You will need to reference the Membership Number in this letter, so please do not discard this letter.

For More Information: If you have any questions about the complimentary services or need assistance, please contact customer service for Kroll at (866) 869-1806. Kroll representatives are available Monday through Friday from 9:00 a.m. to 6:30 p.m. Eastern Time, excluding major U.S. holidays. Kroll representatives have been fully versed on the incident and can answer questions or concerns you may have.

We want to emphasize that we are taking this situation extremely seriously as the privacy and protection of personal information is a top priority for American Humane. We have taken and continue to take steps to protect against a similar incident from occurring in the future.

Sincerely,

A handwritten signature in black ink, appearing to read "Stephanie Carmody". The signature is fluid and cursive, with the first name and last name clearly distinguishable.

Stephanie Carmody
General Counsel
American Humane Association

STEPS YOU CAN TAKE TO PROTECT YOUR PERSONAL 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, your state attorney general, and/or the Federal Trade Commission (FTC).

Copy of Credit Report: You may 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 1-877-322-8228, 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 also can contact one of the following three national credit reporting agencies:

Equifax

P.O. Box 740256
Atlanta, GA 30348
1-800-525-6285
www.equifax.com

Experian

P.O. Box 4500
Allen, TX 75013
1-888-397-3742
www.experian.com

TransUnion

P.O. Box 2000
Chester, PA 19016
1-800-916-8800
www.transunion.com

Fraud Alert: 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 one year. 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>.

Security Freeze: You have the right to put a security freeze on your credit file for up to one year at no cost. This will prevent new credit from being opened in your name without the use of a PIN number that is issued to you when you initiate the freeze. A security freeze is designed to prevent potential creditors from accessing your credit report without your consent. As a result, using a security freeze may interfere with or delay your ability to obtain credit. You must separately place a security freeze on your credit file with each credit reporting agency. In order to place a security freeze, you may be required to provide the consumer reporting agency with information that identifies you including your full name, Social Security number, date of birth, current and previous addresses, a copy of your state-issued identification card, and a recent utility bill, bank statement or insurance statement.

Additional Free Resources: You can obtain information from the consumer reporting agencies, the FTC, or from your respective state Attorney General about fraud alerts, security freezes, and steps you can take toward preventing identity theft. You may report suspected identity theft to local law enforcement, including to the FTC or to the Attorney General in your state.

Federal Trade Commission

600 Pennsylvania Ave, NW
Washington, DC 20580
consumer.ftc.gov, and
www.ftc.gov/idtheft
1-877-438-4338

Maryland Attorney General

200 St. Paul Place
Baltimore, MD 21202
marylandattorneygeneral.gov
1-888-743-0023

New York Attorney General

Bureau of Internet and Technology Resources
28 Liberty Street
New York, NY 10005
1-212-416-8433

North Carolina Attorney General

9001 Mail Service Center
Raleigh, NC 27699
ncdoj.gov
1-877-566-7226

Rhode Island Attorney General

150 South Main Street
Providence, RI 02903
<http://www.riag.ri.gov>
1-401-274-4400

Washington D.C. Attorney General

400 6th Street, NW
Washington, DC 20001
oag.dc.gov
1-202-727-3400

You also have certain rights under the Fair Credit Reporting Act (FCRA): These rights include to know what is in your file; to dispute incomplete or inaccurate information; to have consumer reporting agencies correct or delete inaccurate, incomplete, or unverifiable information; as well as other rights. For more information about the FCRA, and your rights pursuant to the FCRA, please visit https://files.consumerfinance.gov/f/documents/bcftp_consumer-rights-summary_2018-09.pdf.



TAKE ADVANTAGE OF YOUR IDENTITY MONITORING SERVICES

You have 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 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.