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March 22, 2023

Via Email

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

Email: idtheft@oag.state.md.us

Re: Notice of Data Security Incident

Dear Attorney General Brown:

Constangy, Brooks, Smith & Prophete LLP (“Constangy”) represents US Wellness Inc. (“US Wellness”) in connection with a recent data security incident described in greater detail below.

1. Nature of the security incident.

On January 31, 2023, US Wellness’ vendor experienced a data security incident that disrupted access to certain US Wellness systems. US Wellness’ vendor discovered the incident that same day. In response, US Wellness took immediate steps to secure its systems and promptly launched an investigation. US Wellness’ vendor engaged independent digital forensics and incident response experts to determine what happened and to identify any information that may have been accessed or acquired without authorization as a result.

On February 9, 2023, US Wellness learned that personal information may have been impacted in connection with the incident. US Wellness finalized its review on March 1, 2023. Please note that US Wellness has no evidence of the misuse or attempted misuse of the potentially impacted information. However, out of an abundance of caution, US Wellness has worked to identify all potentially impacted individuals in order to provide notice of the incident and resources to help with credit and identity protection.

The information potentially impacted in connection with this incident includes name, address, date of birth, member ID number, where the service originated, and address of the service location.

2. Number of Maryland residents affected.

US Wellness notified fourteen (14) Maryland residents of this incident via first class U.S. mail on March 22, 2023. A sample copy of the notification letter is included with this correspondence.

3. Steps taken relating to the incident.

As soon as US Wellness discovered this incident, US Wellness launched an investigation to determine what happened and the scope of personal information potentially impacted. In addition, US Wellness implemented measures to enhance the security of its environment in an effort to minimize the risk of a similar incident occurring in the future.

US Wellness has established a toll-free call center through Experian, a leader in risk mitigation and response, to answer any questions about the incident and address related concerns. The call center is available at 1-800-773-1925 from 8:00 A.M. to 10:00 P.M. CST on Monday through Friday, and from 10:00 A.M. to 7:00 P.M. CST on Saturday and Sunday (excluding holidays). In addition, while US Wellness is not aware of the misuse of any information as a result of this incident, out of an abundance of caution, US Wellness is also providing complimentary credit and identity protection services to notified individuals.

4. Contact information.

US Wellness 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 Constangy.

Best regards,

A handwritten signature in black ink, appearing to read 'ME', with a stylized flourish extending to the right.

Maria Efaplatidis
CONSTANGY, BROOKS, SMITH & PROPHETE LLP

Enclosure: Sample Notification Letter



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

March 22, 2023

J1837-L01-0000001 T00001 P001 *****SCH 5-DIGIT 12345



SAMPLE A SAMPLE - L01 INDIVIDUAL
APT ABC
123 ANY STREET
ANYTOWN, ST 12345-6789



Subject: Notice of Data Security Incident

Dear Sample A. Sample:

I am writing to inform you of a data security incident experienced by a vendor of US Wellness that may have affected your personal information. You are receiving this letter because US Wellness is a vendor of Blue Cross Blue Shield of Arizona (BCBSAZ) and may have provided health screenings or flu shots to you.

What Happened? On January 31, 2023, our vendor experienced a security incident that disrupted access to certain of our systems. Our vendor discovered the incident that same day. In response, we took immediate steps to secure our systems and promptly launched an investigation. Our vendor engaged independent digital forensics and incident response experts to determine what happened and to identify any information that may have been accessed or acquired without authorization as a result.

On February 9, 2023, we learned that your personal information may have been impacted in connection with this incident. Please note that we have no evidence of the misuse or attempted misuse of any potentially impacted information. However, out of an abundance of caution, US Wellness has worked to identify all potentially affected individuals in order to provide notice of the incident and resources to help with credit and identity protection.

What Information Was Involved? The information potentially impacted in connection with this incident included your name, address, date of birth, member ID number, where the service originated, and address of the service location.

What Are We Doing? As soon as we discovered this incident, we took the steps described above. In addition, we implemented measures to enhance the security of our environment in an effort to minimize the risk of a similar incident occurring in the future.

Although we have no evidence of the misuse of your information, we are offering you 24-month complimentary credit and identity protection services through Experian's IdentityWorks.

This service provides you with superior identity detection and resolution of identity theft. To activate your membership and start monitoring your personal information please follow the steps below:

- Ensure that you **enroll by**: 6/30/23. (Your code will not work after this date.)
- **Visit** the Experian IdentityWorks website to enroll: <https://www.experianidworks.com/credit>
- Provide your **activation code**: **ABCDEFGHI**

If you have questions about the service, need assistance with identity restoration or would like an alternative to enrolling in Experian IdentityWorks online, please contact Experian's customer care team at **(800) 773-1925**, Monday through Friday 8 am – 10 pm CST, Saturday and Sunday 10 am – 7 pm CST (excluding major U.S. holidays) by **June 30, 2023**. Be prepared to provide engagement number **B087456** as proof of eligibility for the identity restoration services by Experian.

B087456

209 Perry Parkway, Suite 6, Gaithersburg, MD 20877

0000001



J1837-L01

ADDITIONAL DETAILS REGARDING YOUR 24-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 agents 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.
- **Up to \$1 Million Identity Theft Insurance**:** Provides coverage for certain costs and unauthorized electronic fund transfers.

If you believe there was fraudulent use of your information and would like to discuss how you may be able to resolve those issues, please reach out to an Experian agent at **(800) 773-1925**. 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 (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 this Identity Restoration support is available to you for 24 months from the date of this letter even if you do not sign up now for credit monitoring services. The Terms and Conditions for this offer are located at www.ExperianIDWorks.com/restoration. You will also find self-help tips and information about identity protection at this site.

You also have the right to file a privacy complaint directly with the U.S. Department of Health and Human Services (DHHS). You can learn more about this option by going to the DHHS Website: www.hhs.gov/ocr/privacy.

The security of your information is a top priority at US Wellness. Please accept our sincere apologies and know that we take this matter very seriously and deeply regret any worry or inconvenience this may cause you.

Sincerely,



Alyssa Williamson
President
US Wellness

* 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.

STEPS YOU CAN TAKE TO HELP 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, 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 105851
Atlanta, GA 30348
1-800-525-6285
www.equifax.com

Experian

P.O. Box 9532
Allen, TX 75013
1-888-397-3742
www.experian.com

TransUnion

P.O. Box 1000
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
1-877-438-4338

Maryland Attorney General

St. Paul Plaza
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
ag.ny.gov
1-212-416-8433 / 1-800-771-7755

**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**

441 4th 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://www.consumer.ftc.gov/articles/pdf-0096-fair-credit-reporting-act.pdf>.



Maria Efaplatidis
Partner
175 Pearl Street
Suite C-402
Brooklyn, New York 11201
mefaplatidis@constangy.com
Direct: 917.414.8991

April 26, 2023

Via Email

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

Email: idtheft@oag.state.md.us

Re: Notice of Data Security Incident

Dear Attorney General Brown:

Constangy, Brooks, Smith & Prophete, LLP (“Constangy”) represents US Wellness Inc. (“US Wellness”) in connection with a recent data security incident that Constangy previously notified this office of on March 22, 2023. Please accept this letter as a supplement to that initial notice.

1. Nature of the security incident.

As previously mentioned, on January 31, 2023, US Wellness’ vendor experienced a data security incident that disrupted access to certain US Wellness systems. US Wellness’ vendor discovered the incident that same day. In response, US Wellness took immediate steps to secure its systems and promptly launched an investigation. US Wellness’ vendor engaged independent digital forensics and incident response experts to determine what happened and to identify any information that may have been accessed or acquired without authorization as a result.

On February 9, 2023, US Wellness learned that personal information may have been impacted in connection with the incident. US Wellness finalized its review on April 5, 2023. Out of an abundance of caution, US Wellness has worked to identify all potentially impacted individuals in order to provide notice of the incident and resources to help with credit and identity protection.

The information potentially impacted in connection with this incident includes name, address, date of birth, and Social Security number.

2. Number of Maryland residents affected.

US Wellness previously notified fourteen (14) Maryland residents of this incident via first class U.S. mail on March 22, 2023. A sample copy of that notification letter was included in the previous March 22, 2023, correspondence to this office.

April 26, 2023

Page 2

US Wellness notified 194 additional Maryland residents of this incident via first class U.S. Mail on April 26, 2023. A sample copy of the notification letter is included with this correspondence.

3. Steps taken relating to the incident.

As soon as US Wellness discovered this incident, US Wellness launched an investigation to determine what happened and the scope of personal information potentially impacted. In addition, US Wellness implemented measures to enhance the security of its environment in an effort to minimize the risk of a similar incident occurring in the future.

US Wellness has established a toll-free call center through Experian, a leader in risk mitigation and response, to answer any questions about the incident and address related concerns. The call center is available at 1-800-773-1925 from 8:00 A.M. to 10:00 P.M. CST on Monday through Friday, and from 10:00 A.M. to 7:00 P.M. CST on Saturday and Sunday (excluding holidays). In addition, while US Wellness is not aware of the misuse of any information as a result of this incident, out of an abundance of caution, US Wellness is also providing complimentary credit and identity protection services to notified individuals for a period of twenty-four (24) months.

4. Contact information.

US Wellness 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 Constangy.

Best regards,

A handwritten signature in brown ink, appearing to read 'MEF', with a stylized flourish extending to the right.

Maria Efaplatidis
CONSTANGY, BROOKS, SMITH & PROPHETE, LLP

Enclosure: Sample Notification Letter



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

April 26, 2023



J3338-L01-0000001 T00001 P001 *****SCH 5-DIGIT 12345
SAMPLE A SAMPLE - L01 CONSUMER NOTIFICATION
APT ABC
123 ANY STREET
ANYTOWN, ST 12345-6789



Subject: Notice of Data Security Incident

Dear Sample A. Sample,

I am writing to inform you of a data security incident experienced by a vendor of US Wellness that involved your personal information. You are receiving this letter because US Wellness is a vendor of WebMD and may have provided biometric screenings to you, as a Volvo Group employee or covered spouse.

What Happened? On January 31, 2023, the vendor that provides secure file transfer software to US Wellness experienced a security incident that resulted in unauthorized third-party access to its systems. On February 4, 2023, our vendor informed us of the incident. Upon notice, we took immediate steps to review and secure the hosted systems and promptly launched an investigation. Our vendor initiated a separate investigation led by a team of independent digital forensics and incident response experts to determine what happened and to identify any information that may have been accessed or acquired without authorization as a result.

On February 9, 2023, we learned that your personal information was impacted in connection with this incident. Please note that we have no evidence of identity theft as a result of the incident. However, out of an abundance of caution, US Wellness has worked to identify all affected individuals in order to provide notice of the incident. WebMD informed your health plan on March 30, 2023, and in turn, we finalized the identification process on April 6, 2023.

What Information Was Involved? The incident involved certain invoices US Wellness used to bill for the services we provided with respect to your employer's plan. The invoices may have included your name, address, date of birth, and Social Security Number. However, the invoices did not include any specific medical information about the nature of the medical services you received, or your medical condition or screening results. They also did not include any financial account information.

What Are We Doing? As soon as we discovered this incident, we implemented measures to enhance the security of our environment in an effort to generally enhance the security of our hosted environment.

We are offering you 24-month complimentary credit and identity protection services through Experian's IdentityWorks.



This service provides you with superior identity detection and resolution of identity theft. To activate your membership and start monitoring your personal information please follow the steps below:

- Ensure that you **enroll by**: July 31, 2023. (Your code will not work after this date.)
- **Visit** the Experian IdentityWorks website to enroll: <https://www.experianidworks.com/3bplus>
- Provide your **activation code**: **ABCDEFGHI**

If you have questions about the service, need assistance with identity restoration or would like an alternative to enrolling in Experian IdentityWorks online, please contact Experian's customer care team at **800-773-1925** by **July 31, 2023**. Be prepared to provide engagement number **B090378** as proof of eligibility for the identity restoration services by Experian.

ADDITIONAL DETAILS REGARDING YOUR 24-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, Equifax and Transunion files for indicators of fraud.
- **Internet Surveillance:** Technology searches the web, chat rooms & bulletin boards 24/7 to identify trading or selling of your personal information on the Dark Web.
- **Identity Restoration:** Identity Restoration agents 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.
- **Up to \$1 Million Identity Theft Insurance**:** Provides coverage for certain costs and unauthorized electronic fund transfers.

If you believe there was fraudulent use of your information and would like to discuss how you may be able to resolve those issues, please reach out to an Experian agent at **800-773-1925**. 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 (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 this Identity Restoration support is available to you for 24 months from the date of this letter even if you do not sign up now for credit monitoring services. The Terms and Conditions for this offer are located at www.ExperianIDWorks.com/restoration. You will also find self-help tips and information about identity protection at this site.

For More Information. If you have questions about this letter or need assistance, please call Experian at **800-773-1925**. Experian representatives are Monday through Friday 9 am – 11 pm EST, Saturday, and Sunday 11 am – 8 pm EST (excluding major U.S. holidays). Experian representatives have been fully versed on the incident and can answer questions or concerns you may have regarding protection of your personal information.

The security of your information is a top priority at US Wellness. Please accept our sincere apologies and know that we take this matter very seriously and deeply regret any worry or inconvenience this may cause you.

Sincerely,



Alyssa Williamson
President
US Wellness

* 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.

STEPS YOU CAN TAKE TO HELP 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, 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 105851
Atlanta, GA 30348
1-800-525-6285
www.equifax.com

Experian

P.O. Box 9532
Allen, TX 75013
1-888-397-3742
www.experian.com

TransUnion

P.O. Box 1000
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
1-877-438-4338

Maryland Attorney General

St. Paul Plaza
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
ag.ny.gov
1-212-416-8433 / 1-800-771-7755

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

441 4th 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://www.consumer.ftc.gov/articles/pdf-0096-fair-credit-reporting-act.pdf>.