

May 10, 2023

Privileged and Confidential
VIA EMAIL

Attorney General Anthony G. Brown
Office of the Attorney General
Attn: Security Breach Notification
200 St. Paul Place
Baltimore, MD 21202
Email: IDTheft@oag.state.md.us

Dear Attorney General Brown:

We are writing you to of a data security incident involving one (1) Maryland resident.¹

Nature

On April 10, 2023, Trustmark Voluntary Benefits ("Trustmark") was notified of a potential incident involving internal billing reports being uploaded to the wrong accounts within our customer portal. We immediately began investigating the root cause and took measures to contain the event by taking the portal offline and removing the report. In our investigation, we discovered a staff member uploaded this report into the wrong location on or around December 5, 2022. On May 8, 2023, Trustmark determined this incident may constitute a breach of the security of a system under Md. Code. Com. Law § 14-3504 and impacted (1) one Maryland resident.

What information was involved?

The data elements involved included the Maryland resident's name, Social Security number, policy number, and group number.

What we are doing

Trustmark took the customer portal offline to stop additional access, investigate the incident, and ensure the issue was resolved. We were able to identify which of our customers viewed the report and to the best of our ability trying to obtain written assurances from them that the information in the report was not used nor shared and that no copies were made or retained.

By May 22, 2023, Trustmark will mail a written notification to the potentially affected Maryland residents, Md. Code Ann., Com. Law § 14-3504, in a substantially similar form as the enclosed letter (attached as Exhibit A). The enclosed letter will include:

- Free access to credit monitoring services for one year, through Experian;
- Guidance on ways to protect against identity theft and fraud, including steps to report any suspected activities or events of identity theft or fraud to their credit card company and/or bank;
- The appropriate contact information for the consumer reporting agencies along with information on how to obtain a free credit report and place a fraud alert and security freeze on their credit file;
- A reminder to remain vigilant for incidents of fraud and identity theft by reviewing account statements and monitoring free credit reports;

Contact Information

Should you have questions or concerns regarding this matter, please contact me at (847) 283-3442 or email me at mflynnbickel@trustmarkbenefits.com.

Sincerely,

Megan Flynn Bickel
Executive Director, Privacy Officer

¹ By providing this notice, Trustmark Voluntary Benefits does not waive any rights or defenses regarding the applicability of Maryland law, the applicability of the Maryland's data event notification statute, or personal jurisdiction.

Exhibit A: Individual Notification

ADDRESS SERVICE REQUESTED

Recipient Name

Address

City, ST 00000

May 10, 2023

RE: Important Security Notification. Please read this entire letter.

Dear **Name**:

Trustmark Voluntary Benefits ("Trustmark") values your privacy which is why, as a precautionary measure, we are writing to let you know about a data security incident that involves your personal information. We are not aware of any attempted or actual misuse of your information, however, it is possible that your information may have been exposed to others.

What happened?

On April 10, 2023, Trustmark was notified of a potential incident involving an internal billing report with personal information being uploaded to the wrong accounts within our customer portal. We immediately began investigating the root cause and took measures to contain the event by taking the portal offline and removing the report. During our investigation, we discovered a staff member uploaded a billing report into the wrong location on or around **[DATE]**. On May 8, 2023, Trustmark concluded that this may constitute a breach under the laws of your state.

What information was involved?

The data elements involved included your name, Social Security number, policy number, and group number.

What we are doing

Trustmark took the customer portal offline to stop additional access, investigate the incident, and ensure the issue was resolved. We were able to identify which of our customers viewed the report and are working to obtain written assurances from them that the information in the report was not used nor shared and that no copies were made or retained.

Please be assured that we have taken every step necessary to address the incident, and that we are committed to fully protecting all of the information that you have entrusted to us.

What you can do to protect your information?

To help protect your identity, we are offering a complimentary 12-month membership of Experian's® IdentityWorksSM. This product 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 DATE** (Your code will not work after this date.)
- **Visit** the Experian IdentityWorks website to enroll: <https://www.experianidworks.com/3bcredit>
- Provide your **activation code**: **[Activation Code]**

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 1-877-890-9332 by **DATE**. Be prepared to provide engagement number **CODE** 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 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.
- **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.

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 877-890-9332. 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 one year 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. You will also find self-help tips and information about identity protection at this site.

We sincerely apologize for this incident, regret any inconvenience it may cause you and encourage you to take advantage of the product outlined herein. Should you have questions or concerns regarding this matter and/or the protections available to you, please contact our Customer Care professionals at 800.918.8877.

Sincerely,

Lisa Rizzolo Bopp

Lisa Rizzolo Bopp
Privacy Analyst

* 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 Protect Against Identity Theft and Fraud

We encourage you to remain vigilant against incidents of identity theft and fraud, to review your account statements, and to monitor your credit reports for suspicious activity. Under U.S. law you are entitled to one free credit report annually from each of the three major credit reporting bureaus. To order your free credit report, visit www.annualcreditreport.com or call, toll-free, 1-877-322-8228. You may also contact the three major credit bureaus directly to request a free copy of your credit report.

At no charge, you can also have these credit bureaus place a "fraud alert" on your file that alerts creditors to take additional steps to verify your identity prior to granting credit in your name. Note, however, that because it tells creditors to follow certain procedures to protect you, it may also delay your ability to obtain credit while the agency verifies your identity. As soon as one credit bureau confirms your fraud alert, the others are notified to place fraud alerts on your file. Should you wish to place a fraud alert, or should you have any questions regarding your credit report, please contact any one of the agencies listed below.

Equifax
P.O. Box 105069
Atlanta, GA 30348
800-525-6285
www.equifax.com

Experian
P.O. Box 2002
Allen, TX 75013
888-397-3742
www.experian.com

TransUnion
P.O. Box 2000
Chester, PA 19022-2000
800-680-7289
www.transunion.com

You may also place a security freeze on your credit reports. A security freeze prohibits a credit bureau from releasing any information from a consumer's credit report without the consumer's written authorization. However, please be advised that placing a security freeze on your credit report may delay, interfere with, or prevent the timely approval of any requests you make for new loans, credit mortgages, employment, housing, or other services. If you have been a victim of identity theft, and you provide the credit bureau with a valid police report, it cannot charge you to place, lift or remove a security freeze. In all other cases, a credit bureau may charge you a fee to place, temporarily lift, or permanently remove a security freeze. You will need to place a security freeze separately with each of the three major credit bureaus listed above if you wish to place a freeze on all of your credit files. To find out more on how to place a security freeze, you can use the following contact information:

Equifax Security Freeze
P.O. Box 105788
Atlanta, GA 30348
1-800-685-1111
(NY residents please call
1-800-349-9960)
<https://www.freeze.equifax.com>

Experian Security Freeze
P.O. Box 9554
Allen, TX 75013
1-888-397-3742
www.experian.com/freeze/center.html

TransUnion
P.O. Box 2000
Chester, PA 19022-2000
1-888-909-8872
www.transunion.com/credit-freeze

Although we have no reason to believe that your personal information has been used to file fraudulent tax returns, you can contact the IRS at <https://www.irs.gov/Individuals/Identity-Protection> for helpful information and guidance on steps you can take to address a fraudulent tax return filed in your name and what to do if you become the victim of such fraud. You can also visit <https://www.irs.gov/uac/Taxpayer-Guide-to-Identity-Theft> for more information.

You can further educate yourself regarding identity theft, fraud alerts, and the steps you can take to protect yourself, by contacting the Federal Trade Commission or your state Attorney General. The Federal Trade Commission's fraud website is www.identitytheft.gov.

The Federal Trade Commission can be reached at: 600 Pennsylvania Avenue NW, Washington, DC 20580, www.identitytheft.gov, 1-877-ID-THEFT (1-877-438-4338); 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 crime report or incident report with law enforcement for identity theft, you will likely need to provide some kind of proof that you have been a victim. Instances of known or suspected identity theft should also be reported to law enforcement. This notice has not been delayed by law enforcement.

You can further educate yourself regarding identity theft, fraud alerts, and the steps you can take to protect yourself, by contacting the Federal Trade Commission or your state Attorney General. **For North Carolina residents**, the Attorney General can be contacted at 9001 Mail Service Center, Raleigh, NC 27699-9001, 1-919-716-6400, www.ncdoj.gov. **For Maryland residents**, the Attorney General can be contacted at 200 St. Paul Place, 16th Floor, Baltimore, MD 21202, 1-888-743-0023, www.oag.state.md.us. The Federal Trade Commission can be reached at: 600 Pennsylvania Avenue NW, Washington, D.C. 20580, www.ftc.gov/idtheft/, 1-877-ID-THEFT (1-877-438-4338); 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. A guest can obtain further information on how to file such a complaint by way of the contact information listed above. Instances of known or suspected identity theft should also be reported to law enforcement. This notice has not been delayed by law enforcement. **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 agencies 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 Rhode Island Residents**: The Rhode Island Attorney General can be reached at: 150 South Main Street, Providence, Rhode Island 02903, www.riag.ri.gov, (401)247-4400. Under Rhode Island law, you have the right to obtain any police report filed in regard to this incident. If you are the victim of identity theft, you also have the right to file a police report and obtain a copy of it. This notice has not been delayed as a result of a law enforcement investigation.