



SCOT GANOW  
937.641.2041  
sganow@taftlaw.com

June 26, 2023

**CONFIDENTIAL**

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

RE: Vitality Group International, Inc.

To Whom It May Concern:

In accordance with Maryland Code Ann. Com. Law §14-3501, et. seq., I am providing the following notice of a security incident on behalf of our client, Vitality Group International, Inc. ("Vitality").

**NAME AND CONTACT INFORMATION OF THE PERSON REPORTING THE BREACH**

|                                 |                                                       |
|---------------------------------|-------------------------------------------------------|
| <b><u>Name:</u></b>             | Scot Ganow, Esq., CIPP/US                             |
| <b><u>Company:</u></b>          | Taft Stettinius & Hollister, LLP                      |
| <b><u>Position:</u></b>         | Outside Counsel to Vitality                           |
| <b><u>E-mail:</u></b>           | sganow@taftlaw.com                                    |
| <b><u>Address:</u></b>          | 40 North Main Street, Suite 900<br>Dayton, Ohio 45423 |
| <b><u>Telephone number:</u></b> | 937-641-2041                                          |

**NAME AND ADDRESS OF THE BUSINESS THAT EXPERIENCED THE BREACH,  
AND THE TYPE OF BUSINESS;**

|                           |                                                               |
|---------------------------|---------------------------------------------------------------|
| <b><u>Legal Name:</u></b> | Vitality Group International, Inc.                            |
| <b><u>Address:</u></b>    | 120 S. Riverside Plaza, Suite 400, Chicago,<br>Illinois 60606 |

**A GENERAL DESCRIPTION OF THE BREACH, INCLUDING THE DATE(S) OF THE BREACH, WHEN AND HOW THE BREACH WAS DISCOVERED, AND ANY REMEDIAL STEPS TAKEN IN RESPONSE TO THE BREACH;**

Vitality uses a third-party file transfer program called MOVEit to transfer data necessary to conducting business. MOVEit experienced a security vulnerability on May 30, 2023. The zero-day vulnerability was identified by its internal security personnel on June 1, 2023.

Vitality took immediate action to secure its systems. Vitality conducted a review to determine the nature and scope of the vulnerability. In addition, Vitality implemented additional security measures. After conducting a review, Vitality determined that certain data files may have been accessed and/or exfiltrated by the unauthorized third party during a two-hour period. Vitality subsequently performed an assessment of these data files and determined that some of the files contained personal information at the time that the unauthorized third party had access to them.

**THE NUMBER OF STATE RESIDENTS AFFECTED BY THE BREACH;**

Vitality's investigation identified 43 individuals with a Maryland address that may have been impacted.

**A DETAILED LIST OF CATEGORIES OF PERSONAL INFORMATION SUBJECT OF THE BREACH;**

The personal information at issue includes: name, date of birth, and limited health information (cholesterol readings, fasting glucose level, blood pressure levels, and hemoglobin A1c test reading).

**THE DATE(S) THAT NOTIFICATION WAS/WILL BE SENT TO THE AFFECTED STATE RESIDENTS;**

Consumer notifications will be sent, via mail, in the week of 26 June 2023.

**A TEMPLATE COPY OF THE NOTIFICATION SENT TO THE AFFECTED STATE RESIDENTS**

A template copy of the notification letter Vitality is sending to the affected residents is attached to this notice.

**WHETHER CREDIT MONITORING OR IDENTITY THEFT PROTECTION SERVICES HAS BEEN OR WILL BE OFFERED TO AFFECTED STATE RESIDENTS, AS WELL AS A DESCRIPTION AND LENGTH OF SUCH SERVICES; AND**

Vitality is taking action to provide assistance to potentially affected individuals, even though it currently has no evidence of any misuse of or fraudulent activity relating to anyone's personal information as a result of this vulnerability. Vitality is notifying affected individuals by mail and will provide 24 months of identity theft monitoring services from Experian. Vitality has also provided information about steps that individuals can take to protect themselves, such as regularly monitoring financial statements and credit reports.

**WHETHER THE NOTIFICATION WAS DELAYED DUE TO A LAW ENFORCEMENT INVESTIGATION (IF APPLICABLE).**

No



VITALITY GROUP, INC. © 2023

22 June 2023

[MEMBER NAME]

[MEMBER ADDRESS]

## NOTICE OF DATA BREACH

Dear [MEMBER NAME],

We are reaching out to make you aware of a recent incident that may affect some of your personal information.

### What Happened

Vitality Group International, Inc ("Vitality") recently identified an intrusion of a file transfer software we use called MOVEit by an unauthorized third party. MOVEit contained a critical zero-date vulnerability. Our review determined that certain data files were accessible to and exfiltrated by the unauthorized third party. We subsequently performed an assessment of these data files and determined that some of the files contained certain personal information. Our review to date indicates that the unauthorized access to and exfiltration of certain files containing personal information may have begun on May 30, 2023 and was terminated on that same date.

### What Information Was Involved

From the review, we have determined that the personal information affected may include your name, date of birth, and limited health information (such as cholesterol readings, fasting glucose level, blood pressure levels, and hemoglobin A1c test reading). While we do not know whether the third party actually viewed your information, we are sending you this notice as a precaution and to encourage you to take steps to monitor your personal information. At this time, we are not aware of any misuse of or fraudulent activity relating to anyone's personal information as a result of this incident.

### What We are Doing

After becoming aware of the incident, we undertook a review to determine the nature and scope of the unauthorized access and ensure it was contained. After we shut down access to the impacted server, we implemented additional security measures to help further protect against this type of incident going forward.

As an added precaution we are offering complimentary credit monitoring and identity theft prevention services through Experian, at no cost to you. To activate your membership and start monitoring your personal information, please follow the instructions provided in Appendix A. The deadline to sign up for this complimentary monitoring and protection service is October 31, 2023.

### What you can do

As always, we recommend that you remain vigilant for incidents of fraud and identity theft, including by regularly viewing your account statements and monitoring your free credit reports. For more information on how you can help protect yourself, please see "Other Important Information."

### Other Important Information

**VitalityGroup.com** • [wellness@powerofvitality.com](mailto:wellness@powerofvitality.com) • +1 (312) 224 7100 • 120 S Riverside Plaza • Floor 4 • Chicago, IL, 60606

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If you are concerned about identity theft, you can place an identity theft/fraud alert, get credit freeze information for your state, or order a free credit report by calling any of the following credit bureaus at one of the phone numbers listed below or by visiting their respective websites.

Equifax  
1- 888-548-7878  
P.O. Box 740256  
Atlanta, GA 30348

<https://www.equifax.com/personal/credit-report-services/>

Experian  
1-888-397-3742  
P.O. Box 4500  
Allen, TX 75013

<https://www.experian.com/help/>

TransUnion  
1-800-916-8800  
P.O. Box 2000  
Chester, PA 19022

<https://www.transunion.com/credit-help>

**Credit Reports.** We recommend that you regularly review statements from your accounts and periodically obtain your credit report from one or more of the national credit bureaus. You may obtain a free copy of your credit report online at [www.annualcreditreport.com](http://www.annualcreditreport.com), by calling toll-free 1-877-322-8228, or by mailing an Annual Credit Report Request Form (available at [www.annualcreditreport.com](http://www.annualcreditreport.com)) to Annual Credit Report Request Service, P.O. Box 105281, Atlanta, GA, 30348-5281. You may also purchase a copy of your credit report by contacting one or more of the three national credit bureaus listed above. When you receive your credit reports, review them carefully. Look for accounts or creditor inquiries that you did not initiate or do not recognize. Look for information, such as home address and Social Security number that is not accurate. If you see anything you do not understand, call the credit bureau at the telephone number on the report.

**Fraud Alerts.** You also have the right to place an initial or extended fraud alert on your file at no cost. An initial fraud alert lasts 1 year and 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 7 years. Should you wish to place a fraud alert, please contact any one of the agencies listed below. The agency you contact will then contact the other two credit agencies.

**Security Freeze.** You have the right to put a security freeze, also known as a credit freeze, on your credit file, so that no new credit can be opened in your name without the use of a Personal Identification Number (PIN) that is issued to you when you initiate a freeze. A credit freeze is designed to prevent potential credit grantors from accessing your credit report without your consent. If you place a credit freeze, potential creditors and other third parties will not be able to access your credit report unless you temporarily lift the freeze. Therefore, using a credit freeze may delay your ability to obtain credit. Pursuant to federal law, you cannot be charged to place or lift a credit freeze on your credit report. Should you wish to place a credit freeze, please contact all three major credit bureaus listed above. You must contact each credit bureau individually to freeze your credit with each bureau. To place a security freeze, you may need to provide the following information:

|                |               |                                                  |
|----------------|---------------|--------------------------------------------------|
| Your full name | Date of Birth | Social Security number                           |
| Postal address | Email address | Other information the Credit Bureau may require. |

The credit bureaus have one (1) business day after your request to place a security freeze if made by telephone or secure electronic means. If the request is made by mail, the credit bureaus have three (3) business days. The credit bureaus must also send written confirmation to you within five (5) business days.

To lift the security freeze, in order to allow a specific entity or individual access to your credit report, you must apply online, call, or send a written request to the credit bureaus by mail. When you contact a credit bureau to lift the security freeze, you will need to include proper identification (name, address, and Social Security number) and the PIN number or password that was provided to you (if provided) when you placed the security freeze as well as the identities of those entities or individuals you would like to receive your credit report or the specific period of time you want the credit report available. If you request a lift of the credit freeze online or by phone, the credit bureaus are required by law to complete the request within one (1) hour. If you request the thaw by regular mail, the credit bureaus have three (3) business days after receiving your request to lift the security freeze for those identified entities or for the specified period of time.

#### Additional Information.

You can further educate yourself regarding identity theft and the steps you can take to protect yourself, by contacting your state Attorney General or the Federal Trade Commission ("FTC"). Instances of known or suspected identity theft should be reported to law enforcement, your Attorney General, and the FTC.

The FTC provides more information about how to protect your identity at either <https://www.ftc.gov/> or <https://www.identitytheft.gov/>. You may also find additional information on any applicable rights under the Fair Credit Reporting Act. You can also contact the FTC by using the information below.

Federal Trade Commission  
1-202-326-2222  
Bureau of Consumer Protection  
600 Pennsylvania Avenue, NW  
Washington, DC 20580

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|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p><u>For Maryland Residents:</u> You may also contact the Maryland Attorney General's Office for more information about how to protect your identity by using the information below:</p> <p>Attorney General Brian E. Frosh<br/>200 St. Paul Place<br/>Baltimore, MD 21202<br/>Phone: 410-528-8662<br/>Website: <a href="https://www.marylandattorneygeneral.gov/">https://www.marylandattorneygeneral.gov/</a></p> |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| <p><u>For Oregon Residents:</u> You can contact the Oregon Attorney General at:</p> <p>Oregon Department of Justice<br/>1162 Court Street NE, Salem, OR<br/>97301-4096, (877) 877- 9392<br/><a href="http://www.doj.state.or.us">www.doj.state.or.us</a>.</p>                                                                                                                                                        | <p><u>For Rhode Island Residents:</u> 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. You may also contact the Rhode Island Attorney General's Office for more information about how to protect your identity by using the information below:</p> <p>Attorney General Peter F. Neronha<br/>Toll Free Phone Number: (401) 274-4400<br/>Website: <a href="http://www.riag.ri.gov/">http://www.riag.ri.gov/</a></p> |

#### For More Information

We regret any concern or inconvenience caused by this incident. If you have further questions or concerns, please call 1-833-901-4630 Monday through Friday from 8:00 a.m. to 10:00 p.m. Central Time and Saturday to Sunday 10:00 am to 7:00 pm Central Time, excluding major US holidays. Please use engagement code B096642 when contacting the call center.

Sincerely,



**Lauren Prorok**  
Senior Vice President, General Counsel

## Appendix A

### ADDITIONAL DETAILS REGARDING YOUR 24-MONTH EXPERIAN IDENTITYWORKS MEMBERSHIP:

Experian's® IdentityWorks<sup>SM</sup> 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: October 31, 2023** (Your code will not work after this date.)
- **Visit** the Experian IdentityWorks website to enroll: <https://www.experianidworks.com/credit>
- Provide your **activation code**: [code]

A credit card is **not** required for enrollment in Experian IdentityWorks.

You can contact Experian **post June 16<sup>th</sup>** 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 using the customer service number mentioned above. 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 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](http://www.ExperianIDWorks.com/restoration). You will also find self-help tips and information about identity protection at this site.

\* 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