Taft/

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June 27, 2023

CONFIDENTIAL

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

RE: Vitality Group, LLC

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, LLC ("Vitality").

NAME AND CONTACT INFORMATION OF THE PERSON REPORTING THE BREACH

Name:	Scot Ganow
Position:	Outside Counsel to Vitality
Company:	Taft Stettinius & Hollister, LLP
E-mail:	sganow@taftlaw.com
Address:	40 North Main Street, Suite 900 Dayton, Ohio 45423
***Telephone number*:**	937-641-2041

NAME AND ADDRESS OF BUSINESS WITH DATA BREACH; NAME OF DATA OWNER

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The Vitality Group, LLC, 120 S. Riverside Plaza, Suite 400, Chicago, IL 60606, is a business-to-business vendor that provides employee benefit services, such as wellness services, to the Data Owner. Vitality experienced the security incident.

The Data Owner of the personal information subject to this security incident is Technology Services Group LLC, a wholly owned subsidiary of Brookfield Corporation. Vitality, as a third party vendor of the Data Owner, is making this report on behalf of itself and the Data Owner.

DESCRIPTION OF THE BREACH AND REMEDIAL STEPS TAKEN IN RESPONSE

Vitality, and hundreds of global companies and federal and state government agencies, use 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 became known in established security networks and channels late on May 31, 2023, and was specifically picked up and identified by internal security personnel on June 1, 2023 at approximately 11:30 am CST. Promptly after becoming aware of the vulnerability, Vitality disconnected the MOVEit software server. This prevented all public access to the server and removed the known exploitable risk.

Vitality promptly began forensics investigations to evaluate any impact. Vitality's security team conducted a thorough forensic analysis to ensure that no other servers or systems inside of the broader Vitality network were impacted. Please note that the MOVEit server is isolated on Vitality's network, which prevents any lateral movement to other Vitality systems. Vitality applied all available patches provided by MOVEit which fixed the vulnerability as well as followed all recommendations published by MOVEit. As an extra precaution, Vitality implemented a password reset on every account that accesses the server, along with additional security measures. Vitality is continuing to monitor the situation carefully.

After reviewing the incident, Vitality identified a two-hour span in which the vulnerability allowed the unauthorized third party to access the server that utilizes the MOVEit software. Vitality confirmed during its investigation that the Data Owner's information may have been accessed by the unauthorized third party. Vitality notified the Data Owner of the security incident. Vitality then worked with the Data Owner to understand what personal information may have been at risk and to identify any affected individuals.

STATE RESIDENTS AFFECTED BY THE BREACH

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Vitality's investigation identified 211 individuals with a Maryland address that may have been impacted. In the event that Vitality determines any additional Maryland residents are impacted, Vitality shall update this notice accordingly.

CATEGORIES OF PERSONAL INFORMATION SUBJECT TO THE BREACH

The incident may have impacted the following categories of personal information: social security number and first/last names.

NOTIFICATION TO AFFECTED STATE RESIDENTS

Maryland residents will be notified of the breach on 28 June 2023 via e-mail. Thereafter they will be notified via postal mail on or about 30 June 2023.

Please see attached a substantially similar template copy of the notification that will be sent to Maryland residents via postal mail.

CREDIT MONITORING

Credit monitoring and identity theft prevention services will be offered via Experian for 24 months.

NO DELAY

Vitality notes that this notice has not been delayed (due to any law enforcement investigation or for any other reason), nor is any delay to individual notifications anticipated.

VITALITY GROUP, INC. © 2023

[insert] June 2023

[Original First Name] [Original Last Name]
[Original Address 1]
[Original Address 2]
[Original City], [Original State]
[Original Zip Code]

RE: IMPORTANT SECURITY NOTIFICATION. PLEASE READ THIS ENTIRE LETTER.

Dear [Original First Name] [Original Last Name]

We are contacting you regarding a data security incident that occurred on May 30, 2023 at Vitality, Brookfield's wellness engagement vendor. The incident impacted certain U.S.-based employees of Brookfield and certain of such employees' partners or spouses. You are being notified because this incident may have involved your Social Security number, first and last name, and certain other information about you. As a result, your personal information may have been exposed to others. Please be assured that we have taken prompt steps to address the incident.

What Happened
Vitality, and hundreds of global companies and state agencies use a third-party file transfer program called MOVEit to transfer data necessary to conducting business. MOVEit experienced a security vulnerability on May 30, 2023, which allowed an unauthorized third party to access the Vitality server that utilizes the MOVEit software.

Vitality's internal security personnel identified this risk at approximately 11:30 a.m. Central Standard Time on June 1, 2023. Promptly after becoming aware of the vulnerability, Vitality disconnected the MOVEit software server. This prevented all public access to the server and removed the known exploitable risk.

After reviewing the incident, Vitality identified a two-hour span in which the vulnerability allowed the unauthorized third party to access the server that utilizes the MOVEit software. Vitality promptly began forensics investigations to evaluate any impact.

What We Are Doing
Vitality is partnering with Experian to offer 2 years of credit monitoring to affected members. If you are concerned about identity theft, please sign up for the complimentary monitoring and protection services by following the instructions enclosed or provided below from Experian. The deadline to sign up for this complimentary monitoring and protection service is October 31, 2023.

What You Can Do
While we have received no reports or indication of such activity, the risks related to unauthorized use of a Social Security number may include identity theft, financial fraud, and tax fraud. Please be vigilant about monitoring your personally identifiable information, in particular your credit report information and financial accounts, to protect against fraudulent activity. Please take care and attention when submitting tax returns to protect against possible fraudulent submissions made on your behalf. Please also report any suspected incidents of identity theft to local law enforcement or the attorney general of your state.

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Other Important Information
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 (note that you have rights under the federal Fair Credit Reporting Act with respect to the fairness, accuracy and privacy of the files of consumer reporting agencies). For more information on such matters or to contact regulators, including the attorney general of your state and consumer reporting agencies, please visit vitalitygroup.com/IDProtection.

For More Information
Again, we sincerely regret that this incident has occurred. If you have any questions, please contact Vitality at 833-901-4630.

You may also contact the Brookfield Benefits team at benefits@brookfield.com or (833) 980-1179.

Sincerely,

Lauren Prorok
SVP, General Counsel
Vitality Group

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YOUR 24 MONTH EXPERIAN IDENTITYWORKS MEMBERSHIP

To help protect your identity, we are offering a complimentary 24-month membership of Experian's® IdentityWorks[SM]. 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**: **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**: **[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 833-901-4630 by October 31, 2023. Be prepared to provide engagement number B096642 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 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[TM]**: 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 833-901-4630. 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. 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.

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