



SCOT GANOW  
937.641.2041  
[sganow@taftlaw.com](mailto:sganow@taftlaw.com)

**VIA EMAIL**  
**CONFIDENTIAL**

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

***Re: Notification of a Potential Data Security Incident***

Dear Madam/Sir:

The Vitality Group, LLC (“Vitality”) 120 Riverside Plaza, Suite 400, Chicago, IL 60606, in connection with an incident that may have involved the personal information of fifteen (15) Maryland residents. Vitality is reporting the incident pursuant to MARYLAND CODE ANN. COM. LAW §14-3501, ET. SEQ. This notice will be supplemented, if necessary, with any new significant facts discovered subsequent to this submission. While Vitality is notifying you of this incident, Vitality does not waive any rights or defenses relating to the incident, this notice, or the applicability of Maryland law on personal jurisdiction.

**NATURE OF THE INCIDENT**

Vitality assists AptarGroup, Inc (“Aptar”) in connection with Aptar’s employee wellness program. In connection with that program, Vitality utilized the MOVEit file transfer software. MOVEit experienced a zero-day security vulnerability at the end of May 2023.

Vitality’s internal security personnel identified this risk with the MOVEit software at approximately 11:30 a.m. Central Standard Time on June 1. Within minutes of 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 took immediate action and temporarily disabled access to MOVEit to protect Vitality’s members’ data privacy and 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



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implemented a password reset on every account that accesses the server, along with additional security measures.

The investigation determined that an unknown third party accessed the server, that utilizes the MOVEit software, on or about 30 May 2023 for a 2 hour period, and that certain personal information may have been accessed and/or acquired from its system as a part of the incident. Vitality conducted a comprehensive review of the involved data to determine if it contained any personal information. Thereafter, Vitality determined that the data contained the names and Social Security numbers of fifteen (15) Maryland employees who are Maryland residents. At this point, Vitality is not aware of any fraud or identity theft to any individual as a result of this incident.

### **NOTICE TO MARYLAND RESIDENTS**

Vitality is notifying the fifteen (15) Maryland residents of the incident by letter in the week of 26 June 2023. The notification letter will include an offer for twenty-four (24) months of complimentary credit monitoring and identity theft protection. Enclosed is a copy of the notice that is being sent to the Maryland residents via first-class United States mail.

### **STEPS TAKEN RELATING TO THE INCIDENT**

Within minutes of becoming aware of the vulnerability, Vitality disconnected its server that utilizes the MOVEit software and initiated a thorough forensic analysis to ensure that no other servers or systems were impacted. It then applied all available security patches provided by MOVEit, after the incident, which fixed the vulnerability, as well as followed all recommendations published by MOVEit. As an extra precaution, Vitality implemented a password reset on every authorized user account that accesses the server, along with additional security measures.

Vitality is continuing to monitor the situation carefully to ensure that its network and server is well protected. For instance, Vitality is currently only permitting whitelisted static source corporate IP addresses of verified clients and partners to connect to the server, which means that all access will need to be via the corporate whitelisted IP addresses using a virtual private network ("VPN") or a corporate network public Internet gateway IP address which is provided to Vitality.

Finally, as discussed above, Vitality is notifying the potentially involved individuals, providing free credit monitoring services to the Maryland residents, and providing individuals with information on how they can protect themselves against fraudulent activity and identity theft.



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## CONTACT INFORMATION

Please contact me if you have any questions or if I can provide you with any further information concerning this matter.

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



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: NOTICE OF DATA BREACH  
PLEASE READ THIS ENTIRE LETTER.**

Dear [Original First Name] [Original Last Name]

We are contacting you regarding a data security incident that has occurred on May 30, 2023 at The Vitality Group, LLC ("Vitality"). Vitality assists AptarGroup, Inc. in connection with its employee wellness program. This incident involved your first and last name, address, Social Security Number and date of birth. As a result, your personal information may have been potentially exposed to others. Please be assured that we have taken every step necessary to address the incident. This letter explains the incident, the steps we have taken in response, and provides information on steps you may take to help protect your information, should you feel it is appropriate to do so.

**What Happened**

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

Vitality's internal security personnel identified this risk with the MOVEit software at approximately 11:30 a.m. Central Standard Time on June 1. Within minutes of 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 took immediate action and temporarily disabled access to MOVEit to protect our members' data privacy and began forensic investigations to evaluate any impact.

**What Information Was Involved**

We reviewed the files contained on the server that utilized the MOVEit software to determine if they contained any personal information. Thereafter, Vitality determined that the files contained your first and last name, address, Social Security number and date of birth.

**What We Are Doing**

Although we are not aware of any instances of fraud or identity theft involving your information, we are also offering a complimentary two-year membership of Experian IdentityWorks<sup>SM</sup> Credit 3B. This product helps detect possible misuse of your personal information and provides you with identity protection services focused on prompt identification and resolution of identity theft. IdentityWorks Credit 3B is completely free to you, and enrolling in this program will not hurt your credit score. **For more information on identity theft prevention and IdentityWorks Credit 3B, including instructions on how to activate your complimentary, two-year membership, please see the additional information attached to this letter.**

**What You Can Do**

While we have no evidence that your personal information has been misused, we encourage you to take advantage of the complimentary credit monitoring offer discussed above. You can also find more information on steps to protect yourself against possible identity theft or fraud in the enclosed Additional Important Information sheet.

**For More Information**

Again, we sincerely regret that this incident has occurred. If you have any questions, please contact us at (800) 828-9572.

Sincerely,

**Lauren Prorok**

SVP, General Counsel  
Vitality Group

### YOUR 24 MONTH EXPERIAN IDENTITYWORKS MEMBERSHIP

To help protect your identity, we are offering a complimentary 24-month membership of Experian's® IdentityWorks<sup>SM</sup>. 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<sup>TM</sup>:** 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<sup>\*\*</sup>:** 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](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.

### Additional Important Information

As a precautionary measure, we recommend that you remain vigilant to protect against potential fraud and/or identity theft by, among other things, reviewing your account statements and monitoring 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 should also promptly report any fraudulent activity or any suspected incidents of identity theft to proper law enforcement authorities, including the police and your state's attorney general, as well as the Federal Trade Commission ("FTC").

You may wish to review the tips provided by the FTC on fraud alerts, security/credit freezes and steps you can take to avoid identity theft. For more information and to contact the FTC, please visit [www.ftc.gov/idtheft](http://www.ftc.gov/idtheft) or call 1-877-ID-THEFT (1-877-438-4338). You may also contact the FTC at Federal Trade Commission, 600 Pennsylvania Avenue, NW, Washington, DC 20580.

**Credit Reports:** You may obtain a free copy of your credit report once every 12 months from each of the three national credit reporting agencies by visiting [www.annualcreditreport.com](http://www.annualcreditreport.com), by 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 can print a copy of the request form at <https://www.annualcreditreport.com/manualRequestForm.action>.

Alternatively, you may elect to purchase a copy of your credit report by contacting one of the three national credit reporting agencies. Contact information for the three national credit reporting agencies for the purpose of requesting a copy of your credit report or for general inquiries is as follows:

Equifax  
1-866-349-5191  
[www.equifax.com](http://www.equifax.com)  
P.O. Box 740241  
Atlanta, GA 30374

Experian  
1-888-397-3742  
[www.experian.com](http://www.experian.com)  
P.O. Box 2002  
Allen, TX 75013

TransUnion  
1-800-888-4213  
[www.transunion.com](http://www.transunion.com)  
P.O. Box 2000  
Chester, PA 19016

**Fraud Alerts:** You may want to consider placing a fraud alert on your credit report. A fraud alert is free and will stay on your credit report for one (1) year. The alert informs creditors of possible fraudulent activity within your report and requests that the creditor contact you prior to establishing any new accounts in your name. To place a fraud alert on your credit report, contact any of the three national credit reporting agencies using the contact information listed above. Additional information is available at [www.annualcreditreport.com](http://www.annualcreditreport.com).

**Credit and Security Freezes:** You may have the right to place a credit freeze, also known as a security freeze, on your credit file, so that no new credit can be opened in your name without the use of a PIN number that is issued to you when you initiate the freeze. A credit freeze can be placed without any charge and 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 get access to your credit report unless you temporarily lift the freeze. Therefore, using a credit freeze may delay your ability to obtain credit. Unlike a fraud alert, you must separately place a credit freeze on your credit file at each credit reporting company. Since the instructions for how to establish a credit freeze differ from state to state, please contact the three major credit reporting companies as specified below to find out more information:

Equifax Security Freeze  
1-888-298-0045  
[www.equifax.com](http://www.equifax.com)  
P.O. Box 105788  
Atlanta, GA 30348

Experian Security Freeze  
1-888-397-3742  
[www.experian.com](http://www.experian.com)  
P.O. Box 9554  
Allen, TX 75013

TransUnion Security Freeze  
1-888-909-8872  
[www.transunion.com](http://www.transunion.com)  
P.O. Box 160  
Woodlyn, PA 19094

This notification was not delayed by law enforcement.

Individuals interacting with credit reporting agencies have rights under the Fair Credit Reporting Act. We encourage you to review your rights under the Fair Credit Reporting Act by visiting [https://files.consumerfinance.gov/f/documents/bcfrp\\_consumer-rights-summary\\_2018-09.pdf](https://files.consumerfinance.gov/f/documents/bcfrp_consumer-rights-summary_2018-09.pdf), or by requesting information in writing from the Consumer Financial Protection Bureau, 1700 G Street N.W., Washington, DC 20552.

**Maryland Residents:** Maryland residents can contact the Office of the Attorney General to obtain information about steps you can take to avoid identity theft from the Maryland Attorney General's office at: Office of the Attorney General, 200 St. Paul Place, Baltimore, MD 21202, (888) 743-0023, <http://www.marylandattorneygeneral.gov/>.

**Massachusetts Residents:** Under Massachusetts 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. Massachusetts law also allows consumers to place a security freeze on their credit reports. A security freeze can be placed without any charge. A security freeze prohibits a credit reporting agency from releasing any information from a consumer's credit report without written authorization. However, please be aware 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.

To place a security freeze on your credit report, you must send a written request to each of the three major consumer reporting agencies by regular, certified or overnight mail at the addresses below or, if available, comply with the consumer reporting agencies' online security freeze request procedures:

Equifax Security Freeze  
1-888-298-0045  
[www.equifax.com](http://www.equifax.com)  
P.O. Box 105788  
Atlanta, GA 30348

Experian Security Freeze  
1-888-397-3742  
[www.experian.com](http://www.experian.com)  
P.O. Box 9554  
Allen, TX 75013

Trans Union Security Freeze  
1-888-909-8872  
[www.transunion.com](http://www.transunion.com)  
P.O. Box 160  
Woodlyn, PA 19094

In order to request a security freeze, you may need to provide the following information:

1. Your full name (including middle initial as well as Jr., Sr., II, III, etc.);
2. Social Security Number;
3. Date of birth;
4. If you have moved in the past five (5) years, provide the addresses where you have lived over the prior five years;
5. Proof of current address such as a current utility bill or telephone bill;
6. A legible photocopy of a government issued identification card (state driver's license or ID card, military identification, etc.); and
7. If you are a victim of identity theft, include a copy of either the police report, investigative report, or complaint to a law enforcement agency concerning identity theft.

The credit reporting agencies have three (3) business days after receiving your request to place a security freeze on your credit report. The credit bureaus must also send written confirmation to you within five (5) business days and provide you with a unique personal identification number (PIN) or password, or both that can be used by you

to authorize the removal or lifting of the security freeze.

**New York State Residents:** New York residents can obtain information about preventing identity theft from the New York Attorney General's Office at: Office of the Attorney General for the State of New York, Bureau of Consumer Frauds & Protection, The Capitol, Albany, New York 12224-0341; <https://ag.ny.gov/consumer-frauds/identity-theft>; (800) 771-7755.

**North Carolina Residents:** North Carolina residents can obtain information about preventing identity theft from the North Carolina Attorney General's Office at: North Carolina Attorney General's Office, Consumer Protection Division, 9001 Mail Service Center, Raleigh, NC 27699-9001; 877-5-NO-SCAM (Toll-free within North Carolina); 919-716-6000; [www.ncdoj.gov](http://www.ncdoj.gov).