



A business advisory and advocacy law firm®

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July 5, 2023

VIA EMAIL (Idtheft@oag.state.md.us)

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

Re: Summit Consolidated Group – Incident Notification

Dear Mr. Frosh:

McDonald Hopkins PLC represents Summit Consolidated Group (hereinafter, “Summit”). Summit provides third party benefits to employers, including insurance and investment solutions. Summit is writing to provide notification of an incident at Summit that may affect the security of personal information of two Maryland residents who are past/current employees of employer, Olympia Street, LLC (hereinafter, “Olympia Street”). Summit’s investigation is ongoing, and this notification will be supplemented with any new or significant facts or findings subsequent to this submission, if any. By providing this notice, Summit does not waive any rights or defenses regarding the applicability of Maryland law or personal jurisdiction.

On November 7, 2022, Summit detected unauthorized access within their network environment. Summit contained the threat and immediately commenced a prompt and thorough investigation with external cybersecurity professionals experienced in handling these types of incidents. At the conclusion of an extensive forensic investigation and thorough manual review, Summit discovered on May 30, 2023, that personal information of two Maryland residents’ personal information may have been accessed and acquired in connection with this incident, including Social Security number.

To date, Summit is not aware of any reports of identity fraud or improper use of any information as a direct result of this incident. Nevertheless, out of an abundance of caution, Summit notified the residents commencing on or about July 3, 2023 in substantially the same form as the letter attached hereto. The residents will be provided with twelve months of complimentary credit monitoring services. The notification letter will advise affected residents about the process for placing fraud alerts and/or security freezes on their credit files and obtaining free credit reports. The affected residents are also being provided with the contact information for the consumer reporting agencies and the Federal Trade Commission.

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July 5, 2023

Page 2

At Summit, protecting the privacy of personal information is a top priority. Summit is committed to maintaining the privacy of personal information in its possession and has taken many precautions to safeguard it. Summit continually evaluates and modifies its practices and internal controls to enhance the security and privacy of personal information.

Should you have any questions regarding this notification, please contact me at (248) 593-2952 or cbattersby@mcdonaldhopkins.com. Thank you for your cooperation.

Very truly yours,



Colin M. Battersby

Encl.



Return Mail Processing Center
P.O. Box 6336
Portland, OR 97228-6336



Dear [REDACTED]

The privacy and security of the personal information we maintain is of the utmost importance to Summit Consolidated Group ("Summit"). We are writing with important information regarding a recent security incident that may have involved some of your information that we received from your employer while providing benefits, insurance, and investment solutions. We want to provide you with information about the incident, tell you about the services that we are providing to you, and let you know that we continue to take significant measures to protect your information.

What Happened?

On November 7, 2022, Summit detected unauthorized access within our network environment.

What We Are Doing.

Upon learning of this issue, Summit contained the threat and immediately commenced a prompt and thorough investigation with external cybersecurity professionals experienced in handling these types of incidents. At the conclusion of an extensive forensic investigation and thorough manual review, Summit discovered on May 30, 2023 that some of your personal information may have been accessed and acquired in connection with this incident.

What Information Was Involved?

The potentially accessed and acquired information included your personal information, specifically your [REDACTED].

What You Can Do.

We have no evidence that any of your information has been misused. Nevertheless, out of an abundance of caution, we want to make you aware of the incident. To protect you from potential misuse of your information, we are offering a complimentary online credit monitoring service (*myTrueIdentity*) for one year provided by TransUnion Interactive, a subsidiary of TransUnion®, one of the three nationwide credit reporting companies. For more information on identity theft prevention and *myTrueIdentity*, including instructions on how to activate your complimentary one-year membership, please see the additional information provided in this letter.

This letter also provides other precautionary measures you can take to protect your personal information, including placing a Fraud Alert and/or Security Freeze on your credit files, and/or obtaining a free credit report. Additionally, you should always remain vigilant in reviewing your financial account statements and credit reports for fraudulent or irregular activity on a regular basis. To the extent that it is helpful, we have included information about protecting you against medical identity theft.

For More Information.

Please accept our apologies that this incident occurred. We are committed to maintaining the privacy of personal information in our possession and have taken many precautions to safeguard it. We continually evaluate and modify our practices and internal controls to enhance the security and privacy of your personal information.

If you have any further questions regarding this incident, please call our dedicated and confidential toll-free response line that we have set up to respond to questions at [REDACTED]. This response line is staffed with professionals familiar with this incident and knowledgeable on what you can do to help protect against potential misuse of your information. The response line is available Monday through Friday 8 am – 8 pm CST (excluding major U.S. holidays).

Sincerely,

Summit Consolidated Group

- OTHER IMPORTANT INFORMATION -

1. Enrolling in Complimentary 12-Month Credit Monitoring.



Activation Code: [REDACTED]

1-Bureau TransUnion Credit Monitoring Product Offering: (Online and Offline)

As a safeguard, we have arranged for you to enroll, at no cost to you, in an online credit monitoring service (*myTrueIdentity*) for [REDACTED] months provided by TransUnion Interactive, a subsidiary of TransUnion®, one of the three nationwide credit reporting companies.

To enroll in this service, go directly to the *myTrueIdentity* website at [www myTrueIdentity.com](http://www.myTrueIdentity.com) and in the space referenced as “Enter Activation Code”, enter the following unique 12-letter Activation Code [REDACTED] and follow the three steps to receive your credit monitoring service online within minutes.

If you do not have access to the internet and wish to enroll in a similar offline, paper-based credit monitoring service, via U.S. Mail delivery, please call the TransUnion Fraud Response Services toll-free hotline at [REDACTED]. When prompted, enter the following 6-digit telephone pass code [REDACTED] and follow the steps to enroll in the offline credit monitoring service, add an initial fraud alert to your credit file, or to speak to a TransUnion representative if you believe you may be a victim of identity theft.

Once you are enrolled, you will be able to obtain [REDACTED] months of unlimited access to your TransUnion credit report and VantageScore® credit score by TransUnion. The daily credit monitoring service will notify you if there are any critical changes to your credit file at TransUnion®, including fraud alerts, new inquiries, new accounts, new public records, late payments, change of address, and more. The service also includes the ability to lock and unlock your TransUnion credit report online, access to identity restoration services that provide assistance in the event your identity is compromised to help you restore your identity and up to \$1,000,000 in identity theft insurance with no deductible. (Policy limitations and exclusions may apply.)

You can sign up for the *myTrueIdentity* online credit monitoring service anytime between now and [REDACTED]. Due to privacy laws, we cannot register you directly. Please note that credit monitoring services might not be available for individuals who do not have credit file at TransUnion®, or an address in the United States (or its territories) and a valid Social Security number, or who are under the age of 18. Enrolling in this service will not affect your credit score.

If you have questions about your *myTrueIdentity* online credit monitoring benefits or need help with your online enrollment, accessing your credit report, or passing identity verification, please contact the *myTrueIdentity* Customer Service Team toll-free at 1-844-787-4607, Monday–Friday: 8 a.m.–9 p.m., Saturday–Sunday: 8 a.m.–5 p.m. Eastern time.

2. Placing a Fraud Alert on Your Credit File.

Whether or not you choose to use the complimentary 12 month credit monitoring services, we recommend that you place an initial one-year “Fraud Alert” on your credit files, at no charge. A fraud alert tells creditors to contact you personally before they open any new accounts. To place a fraud alert, call any one of the three major credit bureaus at the numbers listed below. As soon as one credit bureau confirms your fraud alert, they will notify the others.

Equifax

P.O. Box 105788
Atlanta, GA 30348
<https://www.equifax.com/personal/credit-report-services/credit-fraud-alerts/>
(800) 525-6285

Experian

P.O. Box 9554
Allen, TX 75013
<https://www.experian.com/fraud/center.html>
(888) 397-3742

TransUnion

Fraud Victim Assistance Department
P.O. Box 6790
Fullerton, PA 92834-6790
<https://www.transunion.com/fraud-alerts>
(800) 680-7289

3. Consider Placing a Security Freeze on Your Credit File.

If you are very concerned about becoming a victim of fraud or identity theft, you may request a “Security Freeze” be placed on your credit file, at no charge. A security freeze prohibits, with certain specific exceptions, the consumer reporting agencies from releasing your credit report or any information from it without your express authorization. You may place a security freeze on your credit report by contacting all three nationwide credit reporting companies at the numbers below and following the stated directions or by sending a request in writing, by mail, to all three credit reporting companies:

Equifax

P.O. Box 105069
Atlanta, GA 30348-5069
<https://www.equifax.com/personal/credit-report-services/credit-freeze/>
(888)-298-0045

Experian

P.O. Box 9554
Allen, TX 75013
<http://experian.com/freeze>
(888) 397-3742

TransUnion

Fraud Victim Assistance Department
P.O. Box 160
Woodlyn, PA 19094
<https://www.transunion.com/credit-freeze>
(888) 909-8872

In order to place the security freeze, you’ll need to supply your name, address, date of birth, Social Security number and other personal information. After receiving your freeze request, each credit reporting company will send you a confirmation letter containing a unique PIN (personal identification number) or password. Keep the PIN or password in a safe place. You will need it if you choose to lift the freeze.

If your personal information has been used to file a false tax return, to open an account or to attempt to open an account in your name or to commit fraud or other crimes against you, you may file a police report in the City in which you currently reside.

If you do place a security freeze *prior* to enrolling in the credit monitoring service as described above, you will need to remove the freeze in order to sign up for the credit monitoring service. After you sign up for the credit monitoring service, you may refreeze your credit file.

4. Obtaining a Free Credit Report.

Under federal law, you are entitled to one free credit report every 12 months from each of the above three major nationwide credit reporting companies. Call **1-877-322-8228** or request your free credit reports online at **www.annualcreditreport.com**. Once you receive your credit reports, review them for discrepancies. Identify any accounts you did not open or inquiries from creditors that you did not authorize. Verify all information is correct. If you have questions or notice incorrect information, contact the credit reporting company.

5. Additional Helpful Resources.

Even if you do not find any suspicious activity on your initial credit reports, the Federal Trade Commission (FTC) recommends that you check your credit reports periodically. Checking your credit report periodically can help you spot problems and address them quickly.

If you find suspicious activity on your credit reports or have reason to believe your information is being misused, call your local law enforcement agency and file a police report. Be sure to obtain a copy of the police report, as many creditors will want the information it contains to absolve you of the fraudulent debts. You may also file a complaint with the FTC by contacting them on the web at www.ftc.gov/idtheft, by phone at 1-877-IDTHEFT (1-877-438-4338), or by mail at Federal Trade Commission, Consumer Response Center, 600 Pennsylvania Avenue, NW, Washington, DC 20580. Your complaint will be added to the FTC’s Identity Theft Data Clearinghouse, where it will be accessible to law enforcement for their investigations. In addition, you may obtain information from the FTC about fraud alerts and security freezes.

6. Protecting Your Medical Information.

The following practices can help to protect you from medical identity theft.

- Only share your health insurance cards with your health care providers and other family members who are covered under your insurance plan or who help you with your medical care.

- Review your “explanation of benefits statement” which you receive from your health insurance company. Follow up with your insurance company or care provider for any items you do not recognize. If necessary, contact the care provider on the explanation of benefits statement and ask for copies of medical records from the date of the potential access (noted above) to current date.
- Ask your insurance company for a current year-to-date report of all services paid for you as a beneficiary. Follow up with your insurance company or the care provider for any items you do not recognize.

Rhode Island Residents: You may contact law enforcement, such as the Rhode Island Attorney General’s Office, to report incidents of identity theft or to learn about steps you can take to protect yourself from identity theft. You can contact the Rhode Island Attorney General at: Rhode Island Office of the Attorney General, 150 South Main Street, Providence, RI 02903, www.riag.ri.gov, 401-274-4400.

As noted above, you may obtain a security freeze on your credit report to protect your privacy and ensure that credit is not granted in your name without your knowledge. You have a right to place a “security freeze” on your credit report pursuant to chapter 48 of title 6 of the Identity Theft Prevention Act of 2006.

The security freeze is designed to prevent credit, loans, and services from being approved in your name without your consent. When you place a security freeze on your credit report, within five (5) business days you will be provided a personal identification number or password to use if you choose to remove the freeze on your credit report or to temporarily authorize the release of your credit report for a specific period of time after the freeze is in place. To provide that authorization, you must contact the consumer reporting agency and provide all of the following:

1. The unique personal identification number or password provided by the consumer reporting agency.
2. Proper identification to verify your identity.
3. The proper information regarding the period of time for which the report shall be available to users of the credit report.

A consumer reporting agency that receives a request from a consumer to temporarily lift a freeze on a credit report shall comply with the request no later than three (3) business days after receiving the request.

A security freeze does not apply to circumstances where you have an existing account relationship and a copy of your report is requested by your existing creditor or its agents or affiliates for certain types of an account review, collection, fraud control, or similar activities.

If you are actively seeking a new credit, loan, utility, telephone, or insurance account, you should understand that the procedures involved in lifting a security freeze may slow your own applications for credit. You should plan ahead and lift a freeze -- either completely, if you are shopping around, or specifically for a certain creditor -- with enough advance notice before you apply for new credit for the lifting to take effect.

You have a right to bring a civil action against someone who violates your rights under the credit reporting laws. The action can be brought against a consumer reporting agency or a user of your credit report.

To place a security freeze on your credit report, you must send a request to each of the three major consumer reporting agencies: Equifax, Experian, and TransUnion. These agencies can be contacted using the contact information provided above.

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. Complete address;
5. Prior addresses;
6. Proof(s) of identification (state driver’s license or ID card, military identification, birth certificate, etc.);
7. If you are a victim of identity theft, a copy of either the police report, investigative report, or complaint to a law enforcement agency concerning identity theft.

There was/were <<#>> Rhode Island resident(s) impacted by this incident.