



SCOT GANOW
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July 11, 2023

CONFIDENTIAL

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

RE: The Vitality Group, LLC

To Whom It May Concern:

I am providing notice of a security incident on behalf of my client, The Vitality Group, LLC ("Vitality"), which is writing on behalf of the Columbia Association to notify you of a recent data security incident in accordance with Maryland Code Ann. Com. Law §14-3501, et. seq.

NAME AND CONTACT INFORMATION OF THE PERSON REPORTING THE BREACH

<u>Name:</u>	Scot Ganow
<u>Position:</u>	Outside Counsel for Vitality
<u>Company:</u>	Taft Stettinius & Hollister, LLP
<u>E-mail:</u>	sganow@taftlaw.com
<u>Address:</u>	40 N. Main Street, #900 Dayton, Ohio 45423
<u>Telephone number:</u>	937.641.2041

NAME AND ADDRESS OF THE BUSINESS THAT EXPERIENCED THE BREACH, AND THE TYPE OF BUSINESS; OWNER OF THE PERSONAL INFORMATION

Vitality, 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



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security incident is the Columbia Association. Vitality is a third party vendor of the Columbia Association.

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, 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.

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 Vitality security personnel on June 1, 2023 at approximately 11:30 am CST. 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. V

[REDACTED]

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.

THE NUMBER OF STATE RESIDENTS AFFECTED BY THE BREACH;

Vitality's investigation identified 195 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.



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

The incident may have impacted the following categories of personal information: Name and Social Security number.

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

An email notification was sent to the affected individuals on 10 July 2023. Additionally, the attached notification will be mailed to the affected individuals via U.S. Mail on 17 July 2023.

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

Please see attached a substantially similar template copy of the notification sent to the residents.

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

Credit monitoring and identity theft prevention services have been offered via Experian for 24 months.

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

No



[INSERT] July 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 at Vitality. As you know, Vitality administers Columbia Association's wellness program. [Extra1] Please be assured that Vitality has taken steps necessary 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.

Vitality's internal security personnel identified this risk 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 forensics investigations to evaluate any impact.

What information was involved

The information potentially at risk could have included [Extra2]

What we are doing

We are partnering with Experian to offer 2 years of credit monitoring to affected members. [Extra3]

What you can do

Please be vigilant about monitoring your personally identifiable information, in particular your credit report information and financial account statements, to protect against fraudulent activity. Please also take care and attention when submitting tax returns to protect against possible fraudulent submissions made on your behalf.

To assist you in this effort, we are providing you with complimentary credit monitoring and identity theft prevention services through Experian. 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.

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. Please visit vitalitygroup.com/IDProtection

ADDITIONAL ACTIONS TO HELP REDUCE YOUR CHANCES OF IDENTITY THEFT

Place a 90-day fraud alert on your credit file

An initial 90-day security alert indicates to anyone requesting your credit file that you suspect you are a victim of fraud. When you or someone else attempts to open a credit account in your name, increase the credit limit on an existing account, or obtain a new card on an existing account, the lender should take steps to verify that you have authorized the request. If the creditor cannot verify this, the request should not be satisfied. You may contact one of the credit reporting companies below for assistance.

Equifax
1-800-525-6285
P.O. Box 105788
Atlanta, Ga 30348
www.equifax.com

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

TransUnion
1-800-680-7289
P.O. Box 200
Chester, PA 19022
www.transunion.com

Place a security freeze on your credit file

Although we have no reason to believe that your Social Security number was compromised, if you are concerned about becoming a victim of fraud or identity theft, a security freeze might be right for you. Placing a freeze on your credit report will prevent lenders and others from accessing your credit report entirely, which will prevent them from extending credit. With a security freeze in place, you will be required to take special steps when you wish to apply for any type of credit. This process is also completed through each of the credit reporting companies.

Order your free annual credit reports

Visit www.annualcreditreport.com or call 877-322-8228. 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.

Manage your personal information

Take steps such as: carrying only essential documents with you; being aware of whom you are sharing your personal information with and shredding receipts, statements, and other sensitive information.

Use tools from credit providers

Carefully review your credit reports and bank, credit card and other account statements. Be proactive and create alerts on credit cards and bank accounts to notify you of activity. If you discover unauthorized or suspicious activity on your credit report or by any other means, file an identity theft report with your local police and contact a credit reporting company.

Obtain more information about identity theft and ways to protect yourself

1. Visit <http://www.experian.com/credit-advice/topic-fraud-and-identity-theft.html> for general information regarding protecting your identity.
2. The Federal Trade Commission has an identity theft hotline: 877-438-4338; TTY: 1-866-653-4261. They also provide information on-line at www.ftc.gov/idtheft. The FTC's mailing address is: 600 Pennsylvania Avenue, NW, Washington DC 20580.

For More Information

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

Contact: The Vitality Group, LLC
Email: Wellness@powerofvitality.com
Telephone: 1-877-224-7117 & 1-800-828-9572
Address: Vitality Group
120 S Riverside Plaza
Suite 400
Chicago, IL 60606

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® 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: 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: [Extra4]**

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 ExtendCARETM:** 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.

For D.C. Residents, you may contact your state's Attorney General at Office of the Attorney General for the District of Columbia, 400 6th Street, NW, Washington, DC 20001, www.oag.dc.gov, (202) 727-3400.

For Maryland Residents, you may contact your state's Attorney General at Maryland Attorney General's Office, 200 St. Paul Place, Baltimore, MD 21202, www.oag.state.md.us, 1-888-743-0023.

For North Carolina Residents, you may contact your state's Attorney General at Office of the Attorney General for North Carolina, 114 West Edenton Street Raleigh, NC 27603, (877)-5-NO-SCAM, <https://www.ncdoj.gov/> as well as the Federal Trade Commission (contact information above) to obtain information about preventing identity theft.

For West Virginia Residents, please call our toll-free number listed above if you wish to obtain additional information about the types of information maintained about you or others in general. If you are receiving this letter, Vitality maintained some information about you.