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August 11, 2023

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

By Email

To Whom It May Concern:

I am writing on behalf of BCD Travel USA LLC and its affiliates and subsidiaries ("BCD Travel" or "the Company") to notify you that BCD Travel recently experienced a cybersecurity incident impacting the personal information of Maryland residents.

BCD Travel and many other organizations use the third-party vendor Progress Software Corporation's MOVEit Transfer application for securely transferring files internally and with external organizations. On June 1, 2023, BCD Travel became aware that Progress Software had discovered a previously unknown critical security vulnerability (often referred to as a zero-day vulnerability) in a third-party software application, the MOVEit Transfer application, used by the Company.

The joint CISA/FBI advisory issued on June 7, 2023, associates the widespread exploitation of this MOVEit vulnerability with the CL0P Ransomware Gang, also known as TA505.

After identifying signs of unauthorized activity, BCD Travel promptly launched an investigation. Based on the investigation, the earliest evidence of the threat actor exploiting this vulnerability to access the BCD Travel MOVEit servers occurred on May 29, 2023.

A leading e-discovery firm was engaged to help analyze the data identified in the investigation as potentially exfiltrated. On August 2, 2023, the Company determined that the exfiltrated data contained personal information of Maryland residents. As of the date of this letter, 15 Maryland residents have been identified as potentially impacted. The information involved varied by individual and may have included name, date of birth, email address, telephone number, emergency contact details, credit card details, frequent flyer number, loyalty program number, TSA or Trusted Traveler number, passport or ID number, and/or travel itinerary.

As discussed above, this incident involved a critical security vulnerability in a third-party software application. After becoming aware of the MOVEit incident, BCD Travel took several steps to quickly respond to and investigate the situation, including, but not limited to: activating its cybersecurity incident response team; taking the MOVEit Transfer application offline; initiating an in-depth

investigation with assistance of leading third-party cybersecurity experts; implementing the actions recommended by Progress Software; and notifying law enforcement.

BCD Travel continues to monitor the recommendations published by Progress Software and plans to evaluate and implement any further recommended actions as appropriate. To date, BCD Travel has not identified any impact from the MOVEit incident on other parts of its network and systems and BCD Travel remains fully operational.

BCD Travel plans to provide notice by mail to affected Maryland residents, and a sample copy of such notice is attached. In addition to providing information regarding credit reporting agencies, government resources, security freezes, fraud alerts, and other identity protection tools, BCD is offering credit monitoring and identity protection services for one year through Experian, at no cost to the impacted individuals.

Please feel free to contact me if you have any questions or require additional information.

Sincerely,

/s/ Paul Otto

Paul Otto
paul.otto@hoganlovells.com
(202) 637-5887



Return Mail Processing
PO Box 589
Claysburg, PA 16625-0589

[date]

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SAMPLE A SAMPLE - L01
APT ABC
123 ANY STREET
ANYTOWN, ST 12345-6789



Dear Sample A. Sample,

We, BCD Travel Services B.V. ("**BCD Travel**"), are reaching out to inform you of an incident involving a third-party vulnerability that has impacted your personal information. This notice informs you of what happened, what we are doing to address the incident and what steps you can take to protect your personal information.

Who is BCD Travel

BCD Travel provides business travel management, consulting and related services to the company you work for or on whose behalf you may have traveled ("**Company**") and its travelers, including you. Your Company has shared certain of your personal information with us in the past and we have collected additional personal information from you to handle and administer your travel for you. To learn more about how and why we process your personal information for the services we provide, please read our [Privacy Policy](#).

What happened

BCD Travel and many other organizations use the third-party vendor Progress Software Corporation's MOVEit Transfer application for securely transferring files internally and with external organizations. On 1 June 2023, BCD Travel became aware that the MOVEit Transfer application was impacted by a critical vulnerability announced by Progress Software. The vulnerability was used by a malicious actor to extract records from many organizations globally that use MOVEit Transfer, including BCD Travel.

What personal information was involved

Based on the findings of our in-depth investigation, BCD Travel confirmed that your personal information was impacted by the MOVEit incident. Such information may have included your name, date of birth, email address, telephone number, emergency contact details, credit card details, frequent flyer number, loyalty program number, TSA or Trusted Traveler number, driver's license or ID, passport or ID number, and/or travel itinerary.

To date, we have not identified evidence of personal information or credit cards included in impacted BCD Travel records being misused.

What are we doing

We take the privacy and security of personal information of our clients and travelers seriously. BCD Travel has robust measures in place to protect confidential information, including personal information, which measures are monitored and updated on a regular basis.

After becoming aware of the MOVEit incident, BCD Travel took several steps to quickly respond to and investigate the situation, including, but not limited to:

- activated its cybersecurity incident response team;
- took the MOVEit Transfer application offline;
- initiated an in-depth investigation, with assistance of leading third-party cybersecurity experts, including leading forensic experts Kroll;
- implemented the actions recommended by Progress Software; and
- notified law enforcement.

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BCD Travel continues to monitor the recommendations published by Progress Software and plans to evaluate and implement any further recommended actions as appropriate. To date, BCD Travel has not identified any impact from the MOVEit incident on other parts of our network and systems and BCD Travel remains fully operational.

While we have not identified evidence that your personal information has been misused, as an added precaution we are providing for one or two years, based on applicable laws, of access to credit monitoring and identity fraud monitoring services at no cost to you, through third-party vendor Experian.

Credit and identity fraud monitoring support

To enroll in Experian's® IdentityWorksSM membership and start monitoring your personal information, please follow the steps below:

- ensure that you enroll by November 30, 2023 (Please note that your activation code will not work after this date)
- visit the Experian IdentityWorks website to enroll: <https://www.experianidworks.com/3bcredit>
- provide your activation code: [code]

If you have questions about the Experian support services that are available to you, need assistance with identity restoration or would like an alternative to enrolling in Experian IdentityWorks online, please contact Experian's customer care team at [phone number] by November 30, 2023. Please note that you will have to provide engagement number ENGAGE# as proof of eligibility for the identity restoration services by Experian.

What you can do

While we have not identified evidence that your personal information has been misused, we recommend that you enroll in Experian's® IdentityWorksSM membership.

Even if you choose not to enroll in these services, we recommend that you remain vigilant about your personal information by reviewing account statements you have with other companies and by checking your credit report from one or more of the national credit reporting companies periodically. Following such reviews, you should promptly report any suspicious activity or suspected identity theft to the proper law enforcement authorities.

We also recommend that you remain on the lookout for any suspicious activity, including phishing emails. Be careful not to click on any suspicious links or attachments (including password-protected attachments) that you may receive by email or text message and be vigilant about any phone calls you may receive requesting further information about you, as these may be attempts by malicious actors to obtain further personal information about you in order to commit identity theft or other offenses. We encourage you to review your payment card statements carefully and contact your bank or card issuer if you notice any suspicious transactions.

For more information

If you have any questions or concerns about this incident, please reach out to [phone number] toll-free Monday through Friday from 8 am – 10 pm Central, or Saturday and Sunday from 10 am – 7 pm Central (excluding major U.S. holidays). Be prepared to provide your engagement number ENGAGE#. We are here to support you.

We sincerely regret any inconvenience or concern this incident may cause.

Regards,

Mike Janssen
COO and CCO

Steps You Can Take to Protect Against Identity Theft and Fraud

We encourage you to remain vigilant against incidents of identity theft and fraud, to review your account statements, and to monitor your credit reports for suspicious activity. Under U.S. law, you are entitled to one free credit report annually from each of the three major credit reporting bureaus. To order your free credit report, visit www.annualcreditreport.com or call, toll-free, 1-877-322-8228. You may also contact the three major credit bureaus directly to request a free copy of your credit report.

At no charge, you can also have these credit bureaus place a "fraud alert" on your file that alerts creditors to take additional steps to verify your identity prior to granting credit in your name. Note, however, that because it tells creditors to follow certain procedures to protect you, it may also delay your ability to obtain credit while the agency verifies your identity. As soon as one credit bureau confirms your fraud alert, the others are notified to place fraud alerts on your file. Should you wish to place a fraud alert, or should you have any questions regarding your credit report, please contact any one of the agencies listed below.

Equifax
P.O. Box 105069
Atlanta, GA 30348
1-800-525-6285
www.equifax.com

TransUnion
P.O. Box 2000
Chester, PA 19022-2000
1-800-680-7289
www.transunion.com

Experian
P.O. Box 2002
Allen, TX 75013
1-888-397-3742
www.experian.com

It is necessary to contact only ONE of these bureaus and use only ONE of these methods. As soon as one of the three bureaus confirms your fraud alert, the others are notified to place alerts on their records as well. You will receive confirmation letters in the mail and will then be able to order all three credit reports, free of charge, for your review. An initial fraud alert will last for one year.

You may also place a security freeze on your credit reports. A security freeze prohibits a credit bureau from releasing any information from a consumer's credit report without the consumer's written authorization. However, please be advised 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. Under federal law, you cannot be charged to place, lift or remove a security freeze. You will need to place a security freeze separately with each of the three major credit bureaus listed above if you wish to place a freeze on all of your credit files. To find out more on how to place a security freeze, you can use the following contact information:

Equifax Security Freeze
PO Box 105788
Atlanta, GA 30348
<http://www.equifax.com/personal/credit-report-services/credit-freeze/>
1-800-349-9960

TransUnion Security Freeze PO
Box 2000
Chester, PA 19016
<https://www.transunion.com/credit-freeze>
1-888-909-8872

Experian Security Freeze
PO Box 9554
Allen, TX 75013
www.experian.com/freeze
1-888-397-3742

The following information should be included when requesting a credit freeze:

- 1) Full name, with middle initial and any suffixes;
- 2) Social Security Number;
- 3) Date of birth (month, day, and year);
- 4) Current address and previous addresses for the past five (5) years;
- 5) Proof of current address, such as a current utility bill or telephone bill;
- 6) Other personal information as required by the applicable credit reporting agency;

The credit reporting agencies have one (1) to three (3) business days after receiving your request to place a security freeze on your credit report, based upon the method of your request. 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. It is important to maintain this PIN/password in a secure place, as you will need it to lift or remove the security freeze.

To lift the security freeze in order to allow a specific entity or individual access to your credit report, you must make a request to each of the credit reporting agencies by mail, through their website, or by phone (using the contact information above). You must provide proper identification (including name, address, and social security number) and the PIN number or password provided to you when you placed the security freeze, as well as the identities of those entities or individuals you would like to receive your credit report. You may also temporarily lift a security freeze for a specified period of time rather than for a specific entity or individual, using the same contact information above. The credit bureaus have between one (1) hour (for requests made online) and three (3) business days (for request made by mail) after receiving your request to lift the security freeze for those identified entities or for the specified period of time.

You should also know that you have the right to file a police report if you ever experience identity fraud. Please note that in order to file a crime report or incident report with law enforcement for identity theft, you will likely need to provide some kind of proof that you have been a victim. A police report is often required to dispute fraudulent items. You can report suspected incidents of identity theft to local law enforcement, your state Attorney General, or the Federal Trade Commission. This notice has not been delayed by law enforcement.

If you are a resident of the District of Columbia, Iowa, Maryland, North Carolina, New York, Rhode Island, or Oregon, you can also reach out to your respective state's Attorney General's office at the contact information below to obtain information about preventing and avoiding identity theft and fraud. All other residents can find information on how to contact your state attorney general at <https://www.naag.org/find-my-ag/>.

Federal Trade Commission

Consumer Response Center
600 Pennsylvania Avenue NW
Washington, DC 20580
1.877.FTC.HELP
(382.4357) / <https://www.consumer.ftc.gov/identity-theft-and-online-security>

Oregon Department of Justice

1162 Court Street NE
Salem, OR 97301
1-877-877-9392 / <https://justice.oregon.gov>

New York Attorney General's Office

The Capitol
Albany, NY 12224-0341
1-800-771-7755 / <https://ag.ny.gov/consumer-frauds-bureau/identity-theft>

North Carolina Department of Justice

114 West Edenton Street
Raleigh, NC 27603
1-919-716-6400 / <https://ncdoj.gov/protecting-consumers/identity-theft/>

Office of the Attorney General for the District of Columbia

400 6th Street NW
Washington, DC 20001
1-202-727-3400 / oag.dc.gov

Maryland Attorney General's Office

200 St. Paul Place
Baltimore, MD 21202
1-888-743-0023 / www.marylandattorneygeneral.gov

Consumer Protection Division

Office of the Attorney General of Iowa

1305 E. Walnut Street
Des Moines, IA 50319
1-515-281-5926 / www.iowaattorneygeneral.gov

Rhode Island Office of the Attorney General

150 South Main Street
Providence, RI 02903
1-401-274-4400 / <https://riag.ri.gov/>