

Holland & Knight

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Kristen N. Ricci | Kristen.Ricci@hklaw.com

August 31, 2023

Via Email: idtheft@oag.state.md.us

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

To Whom It May Concern:

We represent Imperial Dade and are writing to provide you with notice of an incident that may impact the personal information of two (2) residents of Maryland.

By providing this notice, Imperial Dade does not waive any rights or defenses regarding the applicability of Maryland law or personal jurisdiction. The investigation into this incident is ongoing and this notice will be supplemented, if necessary, with any materials facts learned subsequent to its submission. We respectfully submit that this letter and its contents constitute confidential and proprietary information and, therefore, are exempt from public disclosure.

Background

On July 19, 2023, an unauthorized third party accessed a system at the Eastern Bag division of Imperial Dade to execute ransomware. This system housed records, which included some employment application data. Once Imperial Dade learned of the incident, Imperial Dade promptly isolated the affected system and removed it from the network. Imperial Dade also engaged a third party forensic investigation firm to investigate the nature and scope of the incident. This investigation showed that the unauthorized third party may have accessed and acquired certain information about job applicants and employees contained in the records, including name, physical address, date of birth, and Social Security number.

Remediation

In addition to taking the steps detailed above, Imperial Dade is implementing additional safeguards to better protect against a similar incident from occurring in the future. Imperial Dade is also offering potentially impacted individuals with two (2) years of complimentary credit monitoring and identity restoration services with Experian, as well as additional information on how to protect against identity theft and fraud.

Notice

Notice of this incident was mailed on September 1, 2023, in substantially the same form as the letter attached as *Attachment 1*.

Atlanta | Austin | Birmingham | Boston | Century City | Charlotte | Chattanooga | Chicago | Dallas | Denver | Fort Lauderdale
Fort Worth | Houston | Jacksonville | Los Angeles | Miami | Nashville | New York | Orange County | Orlando | Philadelphia
Portland | Richmond | San Francisco | Stamford | Tallahassee | Tampa | Tysons | Washington, D.C. | West Palm Beach
Algiers | Bogotá | London | Mexico City | Monterrey

Contact

Should you have any questions regarding this notification or other aspects of this incident, please contact the undersigned at Kristen.Ricci@hklaw.com or 215.252.9590.

Sincerely,

Holland & Knight LLP

A handwritten signature in black ink, appearing to read 'KRICCI', followed by a long horizontal flourish.

Kristen N. Ricci

Attachment 1



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

September 1, 2023

J9274-L01-0000001 T00001 P001 *****SCH 5-DIGIT 12345



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



Re: Notice of Data Incident

Dear Sample A. Sample:

Imperial Dade is writing to notify you of a recent incident that may impact your personal information. Please read this letter.

What Happened? On July 19, 2023, an unauthorized third party accessed a system at the Eastern Bag division of Imperial Dade to execute ransomware. This system housed records, which included some employment application data. Once Imperial Dade learned of the incident, Imperial Dade promptly isolated the affected system and removed it from the network. Imperial Dade also engaged a third party forensic investigation firm to investigate the nature and scope of the incident.

What Information Was Involved? Our investigation showed that the unauthorized third party may have accessed and acquired certain information about you contained in the records, including name, physical address, date of birth, and Social Security number.

What We Are Doing. We take this incident and the security of your information seriously. In addition to taking the steps detailed above, we implemented additional security measures to reduce the risk of a similar incident occurring in the future. We are also offering you complimentary credit monitoring and identity restoration services through Experian at no charge to you.

What You Can Do. We recommend you review the guidance included with this letter, which includes instructions on how to enroll in the credit monitoring services, as well as additional information on how to protect your information. While we will cover the cost of the credit monitoring services, you need to complete the enrollment process.

More Information. We understand you may have additional questions. To ensure your questions are answered in a timely manner, please contact our dedicated assistance line at 888-451-6562 (toll-free), Monday – Friday, 9:00 a.m. to 11:00 p.m. Eastern Time, and Saturday – Sunday, 11:00 a.m. to 8:00 p.m. Eastern Time. This line will remain open until November 30, 2023. Be prepared to provide your engagement number B103220.

We regret this incident and apologize for any concern it may cause you.

Sincerely,

Paul M Cervino

Paul M. Cervino
Chief Administrative Officer
Imperial Dade

B103220

0000001



J9274_L01

Steps You Can Take To Protect Your Information

Enroll in credit monitoring: We are providing you with a 24-month membership of Experian's IdentityWorks at no cost to you. To start monitoring your information, please follow the steps below:

1. Visit the Experian IdentityWorks website to enroll at <https://www.experianidworks.com/credit>
2. Provide your activation code: **ABCDEFGHI**
3. Ensure that you enroll by: November 30, 2023 (Your code will not work after this date)

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. Offline members will be eligible to call for additional reports quarterly after enrollment.
- **Credit Monitoring:** Actively monitors Experian file for indicators of fraud.
- **Identity Restoration:** Identity Restoration specialists are immediately available to help you address credit and non-credit related fraud.
- **Experian IdentityWorks ExtendCARE™:** You receive the same high-level of Identity Restoration support even after your Experian IdentityWorks membership has expired.
- **\$1 Million Identity Theft Insurance:** Provides coverage for certain costs and unauthorized electronic fund transfers. 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.

Please note that Identity Restoration is available to you for 24 months from the date of this letter and does not require any action on your part. The Terms and Conditions for this offer are located at www.ExperianIDWorks.com/restoration. 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 888-451-6562 by November 30, 2023. Be prepared to provide engagement number B103220 as proof of eligibility for the identity restoration services by Experian.

Review account statements: We encourage you to remain vigilant against incidents of identity theft and fraud by reviewing your account statements and monitoring your free credit reports for suspicious activity or errors.

Check your credit report: Under United States 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, call toll-free 1-877-322-8228, or complete the Annual Credit Report Request Form and mail it to Annual Credit Report Request Service, P.O. Box 105281, Atlanta, GA 30348-5281.

Place a security freeze: You may place a security freeze on your credit reports, free of 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. You will need to place a security freeze separately with each of the three major credit bureaus if you wish to place a freeze on all of your credit files. In order to request a security freeze, you will need to supply your full name, address, date of birth, Social Security number, current address, all addresses for up to five previous years, email address, a copy of your state identification card or driver's license, and a copy of a utility bill, bank or insurance statement, or other statement proving residence. To find out more on how to place a security freeze, contact the credit reporting agencies:

Equifax: P.O. Box 105788, Atlanta, GA 30348; 1-888-298-0045; www.equifax.com/personal/help/place-lift-remove-security-freeze

Experian: P.O. Box 9554, Allen, TX 75013; 1-888-397-3742; www.experian.com/freeze/center.html

TransUnion: P.O. Box 160, Woodlyn, PA 19094; 1-800-916-8800; www.transunion.com/credit-freeze

Place a fraud alert: At no charge, you can also have the three major 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 the credit reporting agencies:

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

Experian: P.O. Box 9554, Allen, TX 75013; 1-888-397-3742; www.experian.com

TransUnion: P.O. Box 2000, Chester, PA 19106; 1-800-916-8800; www.transunion.com

Contact additional resources: If you believe you are the victim of identity theft or have reason to believe that your personal information has been misused, you should contact the Federal Trade Commission and/or your state Attorney General. You can obtain information from these sources about additional steps you can take to protect yourself against identity theft and fraud, as well as information on security freezes and fraud alerts. You can contact the Federal Trade Commission at: 600 Pennsylvania Avenue NW, Washington, DC 20580; www.identitytheft.gov; and 1-877-ID-THEFT (1-877-438-4338). Instances of known or suspected identity theft should be promptly reported to law enforcement and you have the right to file a police report if you ever experience identity theft or fraud. *For Maryland residents*, the Maryland Attorney General can be contacted at 200 St. Paul Place, Baltimore, MD 21202, oag.state.md.us, or 410-528-8662. *For New York residents*, the New York Office of the Attorney General can be contacted at The Capital, Albany, NY, 12224, ag.ny.gov, or 1-800-771-7755. *For North Carolina residents*, the North Carolina Attorney General can be contacted at 9001 Mail Service Center, Raleigh, NC 27699, ncdoj.gov, or 919-716-6000. *For Rhode Island residents*, the Rhode Island Attorney General can be contacted at 150 South Main Street, Providence, RI 02903, riag.ri.gov, or 401-274-4400. A total of 3 Rhode Island residents may be impacted by this incident.



