

September 8, 2023



Norton Rose Fulbright US LLP
1301 Avenue of the Americas
New York, New York 10019-6022
United States of America

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

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

Direct line +1 212 318 3382
david.kessler@nortonrosefulbright.com

Tel +1 212 318 3000
Fax +1 212 318 3400

Re: Legal Notice of Information Security Incident

Dear Sir or Madam:

I am writing on behalf of my client, Continental Casualty Company and its subsidiaries ("CCC"), to inform you of a fourth-party security incident impacting a subcontractor of one of CCC's vendors that involves the personal information of three (3) Maryland residents. Note, CCC's systems were not impacted by this incident.

On May 31, 2023, Progress Software Corporation ("Progress") announced a previously unknown (zero-day) vulnerability affecting its MOVEit Transfer application. Many organizations globally were affected by this vulnerability because of the wide use of the MOVEit Transfer application for business purposes.

On August 3, 2023 one of CCC's vendors, Enlyte, notified CCC that the MOVEit incident impacted one of Enlyte's third party subcontractors, Ricoh USA ("Rico"). Rico represented to Enlyte that on or around June 1, 2023, an unauthorized actor accessed its MOVEit Transfer server and exfiltrated data (the "Exfiltrated Data"). Rico also represented that upon discovering the incident, it disabled access to its MOVEit Transfer application, implemented Progress' recommended patch within hours of release, and engaged a third party cybersecurity firm to investigate the impact of the vulnerability. Rico's investigation revealed that some of the Exfiltrated Data was associated with Enlyte customers. Rico provided notice to its impacted customers, including Enlyte, on or around July 14, 2023. Enlyte, in turn, provided notice to CCC.

CCC conducted a review of the Exfiltrated Data and determined the data related to CCC claimants and included names, dates of birth, diagnostic or treatment codes, health insurance policy information, and other health information.

Today, CCC will begin mailing notification letters to the affected residents by US mail. A copy of that notification is attached. CCC is also providing 24 months of complimentary credit monitoring services to all affected individuals as well as a toll-free hotline number for them to call with any questions regarding the incident.

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If you have any additional questions, please do not hesitate to contact me.

Respectfully submitted,

David Kessler

David Kessler



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

September 8, 2023

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SAMPLE A SAMPLE - L01



APT ABC
123 ANY STREET
ANYTOWN, FC 1A2 B3C
COUNTRY



Re: Notice of Data Breach

Dear Sample A. Sample:

[Extra1] (the “Company”) is providing you notice of a cybersecurity incident that affected a sub-contractor of one of our vendors. We wanted to make you aware of what happened, the measures we have taken in response, and provide details on proactive steps you may consider taking to help protect your information.

What Happened?

On August 3, 2023 the Company was notified by one of our vendor that one of its sub-contractors used an application called MOVEit, which had a previously unknown software vulnerability. The sub-contractor that was affected by the software vulnerability provides printing services to the Company’s vendor, which the Company engaged to provide claims-related services to you. The vulnerability affected many other organizations around the world. Upon becoming aware of this vulnerability, the sub-contractor undertook an investigation to determine what information was impacted. The investigation found that an unauthorized third party may have exploited the software vulnerability to steal certain files from the sub-contractor that contained personal information related to some Company claimants. Note, the Company’s systems were not affected by this incident.

What Information Was Involved?

The Company determined the files contained information related to your workers’ compensation claims and included your name, date of birth, health insurance policy number, and other medical information [Extra2].

What We Are Doing.

The Company is continuing to work with our vendor and the sub-contractor and is receiving updates related to the investigation. The Company has confirmed with the sub-contractor that it has remediated the incident and is no longer using the MOVEit software.

0000001



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B103782

What You Can Do.

We encourage you to remain vigilant by reviewing account statements and monitoring free credit reports. Because your trust is important to us, and as an additional precaution, we are offering you a complimentary 24-month membership of Experian's® IdentityWorksSM. This product helps detect possible misuse of your personal information and provides you with identity protection support focused on immediate identification and resolution of identity theft. IdentityWorksSM is completely free to you and enrolling in this program will not hurt your credit score. **For more information on IdentityWorks Credit 3B, including instructions on how to activate your complimentary 24-month membership, as well as information on additional steps you can take in response to this incident, please see the pages that follow this letter.**

For More Information

The security of your personal information is important to us, and we sincerely regret that this incident occurred. If you have any questions regarding this service, or if you have questions or need additional information, please contact the dedicated helpline at 877.890.9332,* Monday through Friday, 6 a.m. to 8 a.m. Pacific and Saturday through Sunday, 8 a.m. to 5 p.m. Pacific. Be prepared to provide your engagement number B103782.

Sincerely,

A handwritten signature in black ink, appearing to read 'Jeffrey J. Neuenschwander', with a long horizontal line extending to the right.

Jeffrey J. Neuenschwander
SVP, Corporate Litigation

ADDITIONAL DETAILS REGARDING YOUR 24-MONTH EXPERIAN IDENTITYWORKS MEMBERSHIP

To start monitoring your personal information, please follow the steps below:

- Ensure that you **enroll by December 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**: ABCDEFGHI

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 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.

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 877.890.9332 by December 31, 2023. Be prepared to provide engagement number **B103782** 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, Equifax and Transunion files 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.

If you believe there was fraudulent use of your information as a result of this incident and would like to discuss how you may be able to resolve those issues, please reach out to an Experian agent. 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 from the date of the incident (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 Identity Restoration 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.

* 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 STEPS YOU CAN TAKE

Free Credit Report. Regardless of whether you choose to take advantage of the complimentary identity monitoring, it is always advisable to be vigilant for incidents of fraud or identity theft by reviewing your account statements and free credit reports for any unauthorized activity. If you identify any unauthorized charges on your financial account statements, you should immediately report any such charges to your financial institution. You may obtain a copy of your credit report, free of charge, once every 12 months from each of the three nationwide credit reporting companies. To order your annual free credit report, please visit www.annualcreditreport.com or call toll free at 1-877-322-8228. You can also order your annual free credit report by mailing a completed Annual Credit Report Request Form (available from the U.S. Federal Trade Commission's ("FTC") website at www.consumer.ftc.gov) to: Annual Credit Report Request Service, P.O. Box 105281, Atlanta, GA 30348-5281. Contact information for the three nationwide credit reporting companies is as follows

Equifax	Experian	TransUnion
Phone: 1-800-685-1111 P.O. Box 740256 Atlanta, Georgia 30348 www.equifax.com	Phone: 1-888-397-3742 P.O. Box 9554 Allen, Texas 75013 www.experian.com	Phone: 1-888-909-8872 P.O. Box 105281 Atlanta, GA 30348-5281 www.transunion.com

Security Freeze. Security freezes, also known as credit freezes, restrict access to your credit file, making it harder for identity thieves to open new accounts in your name. You can freeze and unfreeze your credit file for free. You also can get a free freeze for your children who are under 16. And if you are someone's guardian, conservator or have a valid power of attorney, you can get a free freeze for that person, too.

How will these freezes work? Contact all three of the nationwide credit reporting agencies – Equifax, Experian, and TransUnion. If you request a freeze online or by phone, the agency must place the freeze within one business day. If you request a lift of the freeze, the agency must lift it within one hour. If you make your request by mail, the agency must place or lift the freeze within three business days after it gets your request. You also can lift the freeze temporarily without a fee.

Don't confuse freezes with locks. They work in a similar way, but locks may have monthly fees. If you want a free freeze guaranteed by federal law, then opt for a freeze, not a lock.

The following information must be included when requesting a security freeze (note that if you are requesting a credit report for your spouse, this information must be provided for him/her as well): (1) full name, with middle initial and any suffixes; (2) Social Security number; (3) date of birth; (4) current address and any previous addresses for the past five years; and (5) any applicable incident report or complaint with a law enforcement agency or the Registry of Motor Vehicles. The request must also include a copy of a government-issued identification card and a copy of a recent utility bill or bank or insurance statement. It is essential that each copy be legible, display your name and current mailing address, and the date of issue. You may obtain information from the credit reporting agencies and the FTC about security freezes.

For New Mexico residents: 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 may submit a declaration of removal to remove information placed in your credit report as a result of being a victim of identity theft. You have a right to place a security freeze on your credit report or submit a declaration of removal pursuant to the Fair Credit Reporting and Identity Security Act. For more information, including information about additional rights, go to www.consumerfinance.gov/learnmore or write to: Consumer Financial Protection Bureau, 1700 G Street N.W., Washington, DC 20552.

Fraud Alerts. A fraud alert tells businesses that check your credit that they should check with you before opening a new account. An initial fraud alert stays on your credit report for one year. You may have an extended alert placed on your credit report if you have already been a victim of identity theft with the appropriate documentary proof. An extended fraud alert stays on your credit report for seven years. To place a fraud alert on your credit reports, contact one of the nationwide credit bureaus. A fraud alert is free. The credit bureau you contact must tell the other two, and all three will place an alert on their versions of your report. You may obtain additional information from the credit reporting agencies and the FTC about fraud alerts.

Federal Trade Commission and State Attorneys General Offices. If you believe you are the victim of identity theft or have reason to believe your personal information has been misused, you should immediately contact the Federal Trade Commission and/or the Attorney General's office in your home state. You may also contact these agencies for information on how to prevent or avoid identity theft. You may contact the Federal Trade Commission, Consumer Response Center,

600 Pennsylvania Avenue, NW, Washington, DC 20580, www.ftc.gov/bcp/edu/microsites/idtheft/, 1-877-IDTHEFT (438-4338).

For Connecticut Residents: You may contact and obtain information from your state attorney general at: Connecticut Attorney General's Office, 55 Elm Street, Hartford, CT 06106, 1-860-808-5318, www.ct.gov/ag

For District of Columbia Residents: You may contact the Office of the Attorney General for the District of Columbia, 441 4th Street NW, Suite 1100 South, Washington, D.C. 20001, <https://oag.dc.gov>, 202-442-9828.

For Maryland Residents: You may contact the Maryland Office of the Attorney General, Consumer Protection Division, 200 St. Paul Place, Baltimore, MD 21202, www.oag.state.md.us, 1-888-743-0023. LPL Financial LLC is located at 1055 LPL Way, Fort Mill, SC 29715.

For New York Residents: You may contact the New York Department of State Division of Consumer Protection, One Commerce Plaza, 99 Washington Ave., Albany, NY 12231-0001, 518-474-8583 / 1-800-697-1220, <http://www.dos.ny.gov/consumerprotection>; and New York State Office of the Attorney General, The Capitol, Albany, NY 12224-0341, 1-800-771-7755, <https://ag.ny.gov>

For North Carolina residents: You may contact the North Carolina Office of the Attorney General, Consumer Protection Division, 9001 Mail Service Center, Raleigh, NC 27699-9001, www.ncdoj.gov, 1-877-566-7226.

For Rhode Island Residents: You may contact the Rhode Island Office of the Attorney General, 150 South Main Street, Providence, RI 02903, <http://www.riag.ri.gov>, 401-274-4400.

Reporting of identity theft and obtaining a police report.

You have the right to obtain any police report filed in the United States in regard to this incident. If you are the victim of fraud or identity theft, you also have the right to file a police report.



