



December 11, 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

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

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

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

Re: Legal Notice of Data Security Incident

Dear Sir or Madam:

I am writing on behalf of my client, Keenan & Associates ("Keenan"), to notify your office of a ransomware incident that involved the personal information of 1 Maryland resident.

On Sunday, August 27, 2023, Keenan discovered certain disruptions occurring on some Keenan network servers. Keenan immediately began investigating the issue and discovered suspicious activity on a limited number of servers. As a precaution, Keenan disconnected the entire network to contain the suspicious activity. Keenan engaged leading third-party cybersecurity and forensic experts to assist in the investigation, and law enforcement has been notified.

Keenan's investigation determined that an unauthorized party gained access to certain Keenan internal systems at various times between approximately August 21, 2023 and August 27, 2023, and that the unauthorized party obtained some data from certain Keenan systems during this period ("Affected Data"). Keenan was able retrieve the data involved from the unauthorized party and Keenan has no reason to believe this data was further copied or retained by the unauthorized party.

A thorough review of the affected data was conducted to identify what personal information it contained and identify individuals to whom the information related. On December 8, 2023 Keenan completed its review of the data and identified personal information belonging both to Keenan's current and former employees and their dependents, as well as individuals associated with Keenan's clients. The personal information included names, Social Security numbers, passport numbers, driver's license numbers, health insurance information, general health information, and other employment-related information.

On December 11, 2023, Keenan began notifying clients of any client-related personal information included in these files. Keenan will supplement this notice to include the number of residents associated with its clients; however, Keenan is providing notice to you at this time specifically related to its current and former employees and their dependents whose personal information was identified in the Affected Data.

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Keenan is not aware of any fraud or misuse of any personal information as a result of this incident. Keenan does not believe personal information was targeted by the unauthorized party for identity theft purposes, but rather, such information happened to be included in documents taken by the unauthorized party as part of a ransomware attack to extort the company.

Keenan will begin sending notification letters via First Class Mail to the affected Keenan employees whose personal information was involved on December 12, 2023. A copy of the notice letter is attached. Keenan is offering 24 months of complimentary credit monitoring and fraud protection services to these individuals. Keenan is also providing a toll-free hotline for the individuals to call with any questions regarding the incident.

To help prevent a similar type of incident from occurring in the future, Keenan implemented additional security protocols designed to enhance the security of its network, internal systems and applications. Keenan also continues to evaluate additional steps that may be taken to further increase its defenses.

If you have any questions or need further information regarding this incident, please do not hesitate to contact me.

Respectfully submitted,



David Kessler

Keenan®

Return Mail Processing
PO Box 999
Suwanee, GA 30024

21 1 4628 *****SNGLP

SAMPLE A. SAMPLE - L01

APT ABC



123 ANY ST

ANYTOWN, US 12345-6789



December 12, 2023

Re: Notice of Data Security Incident

Dear **Sample A. Sample**:

Keenan & Associates ("Keenan") recently discovered it was the target of a ransomware incident. We are writing to inform you that some of your personal information was exfiltrated during the incident that we collected during the course of your employment. We have no evidence that any of your personal information has been or will be misused, but we wanted to make you aware of the incident, steps we have taken in response, and additional information on steps you may take to help protect your information.

What Happened

On Sunday, August 27, 2023 we discovered certain disruptions occurring on some Keenan network servers. We immediately began an investigation and engaged leading third-party cybersecurity and forensic experts to assist. Upon detection, we took prompt action to contain it. We also notified law enforcement.

The investigation determined that an unauthorized party gained access to certain internal systems at various times between approximately August 21, 2023, and August 27, 2023, and that the unauthorized party obtained some data from Keenan systems. A thorough review of that data was conducted to identify what information was involved and identify individuals to whom the data related.

What Information Was Involved

The review determined that the data involved contained some of your personal information, including your name, and one or more of the following: Social Security number, driver's license number, passport number, general health information, health insurance information, and other employment-related information.

What We Are Doing

To help prevent a similar type of incident from occurring in the future, we implemented additional security protocols designed to enhance the security of our network, internal systems and applications. We will also continue to evaluate additional steps that may be taken to further increase our defenses. In addition, we are continuing to support federal law enforcement's investigation.

What You Can Do

While we are not aware of any evidence that your personal information has been misused, but we wanted to make you aware of the incident and provide you with additional information on steps you may consider taking. As a precaution, Keenan is offering you a complimentary 24-month membership to Experian IdentityWorksSM. This product helps detect possible misuse of your personal information and provides you with identity protection services focused on immediate identification and resolution of identity theft. IdentityWorks is completely free to you and enrolling in this program will not hurt your credit score. **For more information on IdentityWorks, including instructions on how to activate your complimentary one-year membership, as well as additional steps you may take to help protect your information, please see the additional information provided in the following pages.**

For More Information

Keenan takes the security of your personal information seriously, and sincerely regrets that this incident occurred. For more information, or if you have any questions or need additional information, please call the dedicated call center at **833-804-0859**, Monday through Friday 9:00 a.m. to 9:00 p.m. Eastern Time, closed Saturday and Sunday (excluding major U.S. holidays).

Sincerely,

A handwritten signature in black ink, appearing to read "David A. Seres", with a stylized flourish at the end.

David A. Seres
Chief Operating Officer
Keenan & Associates

Experian Enrollment Information

To help protect your identity, we are offering complimentary access to Experian IdentityWorksSM for 24 months.

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.

While identity restoration assistance is immediately available to you, we also encourage you to activate the fraud detection tools available through Experian IdentityWorks as a complimentary 24-month membership. This product provides you with superior identity detection and resolution of identity theft. To start monitoring your personal information, please follow the steps below:

- Ensure that you **enroll by** March 31, 2024 (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

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 833-804-0859 by March 31, 2024. Be prepared to provide engagement number B110504 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 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.

* 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.

Information About Identity Theft Protection Guide

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

Free Credit Report. We remind you 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.

For Colorado, Georgia, Maine, Maryland, Massachusetts, New Jersey, Puerto Rico, and Vermont residents:

You may obtain one or more (depending on the state) additional copies of your credit report, free of charge. You must contact each of the credit reporting agencies directly to obtain such additional report(s).

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.

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.

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.

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.

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.

For Iowa residents: You are advised to report any suspected identity theft to law enforcement or to the Iowa Attorney General.

For Massachusetts residents: You have the right to obtain a police report if you are a victim of identity theft. You also have a right to file a police report and obtain a copy of it.

For Oregon residents: You are advised to report any suspected identity theft to law enforcement, the Federal Trade Commission, and the Oregon Attorney General.

January 26, 2024

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

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



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

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

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

Re: Supplemental Legal Notice of Data Security Incident

Dear Sir or Madam:

I am writing on behalf of my client, Keenan & Associates, ("Keenan") to supplement Keenan's December 11, 2023 data incident notification submission to your office. Today, January 26, 2024, Keenan is providing notice to an additional 880 Maryland residents. A copy of that notice letter is attached. Keenan's review of the exfiltrated data to identify individuals who had personal information in the data set is now substantially complete. We are awaiting final approval from certain Keenan customers to provide notice. If any Maryland residents are implicated, we will supplement this notice.

Keenan is offering 24-months of complimentary credit monitoring and fraud protection services to all Maryland residents receiving notice, regardless of data elements impacted, and is providing a toll-free hotline for individuals to call with any questions regarding the incident. We are also providing substitute notice as well as media notice to pertinent publications.

We are also writing to provide a list of customers who have directed Keenan to provide notice to your office on their behalf. A list of the customers who authorized us to provide their names to you is attached as Appendix A.

If you have any questions or need further information regarding this event, please do not hesitate to contact me.

Very truly yours,

A handwritten signature in dark ink that reads "David Kessler".

David Kessler

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Appendix A

1		Sentara Health Plans	Tonya Simpson, Compliance Manager TXSIMPSO@sentara.com (757)-227-2813
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Return Mail Processing
PO Box 589
Claysburg, PA 16625-0589

January 26, 2024

K7150-L07-0000002 T00001 P001 *****SCH 5-DIGIT 12345

SAMPLE A SAMPLE - L07



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



Re: Notice of Data Security Incident

Dear Sample A. Sample:

Keenan & Associates ("Keenan") is an insurance brokerage company that provides insurance-related risk management and claims services throughout California and to clients across the country. Keenan services companies and organizations across a variety of industries, and, in the course of its work on behalf of clients, is at times provided access to personal information as a part of the client engagement. We receive and utilize this data for the purposes of performing services for our clients.

We are writing to inform you that we experienced a cybersecurity incident that involved some of your personal information. Keenan was in possession of that information due to its work on behalf of one of its customers. This notice explains the incident, steps we have taken in response, and additional information on steps you may take to help protect your information.

What Happened

On Sunday, August 27, 2023, we discovered certain disruptions occurring on some Keenan network servers. We immediately began an investigation and engaged leading third-party cybersecurity and forensic experts to assist. Upon detection, we took prompt action to contain it. Keenan also notified law enforcement.

The investigation determined that an unauthorized party gained access to certain Keenan internal systems at various times between approximately August 21, 2023 and August 27, 2023, and that the unauthorized party obtained some data from Keenan systems. A thorough review of that data was conducted to identify what information was involved and identify individuals to whom the data related.

What Information Was Involved

The review determined that the data involved contained some of your personal information, including your name and one or more of the following: date of birth, Social Security number, passport number, driver's license number, health insurance information, and general health information.

What We Are Doing

To help prevent a similar type of incident from occurring in the future, we implemented additional security protocols designed to enhance the security of our network, internal systems and applications. Keenan will also continue to evaluate additional steps that may be taken to further increase our defenses. In addition, we are continuing to support federal law enforcement's investigation.

B112732

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K7150-L07

What You Can Do

While we are not aware of any evidence that your personal information has been misused, we wanted to make you aware of the incident and provide you with additional information on steps you may consider taking. As a precaution, **Keenan is offering you a complimentary 24-month membership in Experian® IdentityWorksSM Credit 1B.** This product helps detect possible misuse of your personal information and provides you with identity protection services focused on immediate identification and resolution of identity theft. IdentityWorks is completely free to you and enrolling in this program will not hurt your credit score. **For more information on IdentityWorks, including instructions on how to activate your complimentary two-year membership, as well as additional steps you may take to help protect your information, please see the additional information provided in the following pages.**

For More Information

Keenan takes the security of your personal information seriously and sincerely regrets that this incident occurred. For more information or if you have any questions or need additional information, please call 800-459-6125, Monday through Friday, between 6:00 a.m. and 6:00 p.m. Pacific Time. Please be prepared to provide engagement number B112732. If you have a speech or hearing impairment and use a TTY, call 1-800-648-6056.

Sincerely,

A handwritten signature in black ink, appearing to read "D. Seres", with a stylized flourish extending to the right.

David A. Seres
Chief Operating Officer
Keenan & Associates

Experian Enrollment Information

To help protect your identity, we are offering a complimentary two-year 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: April 30, 2024 (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**

If you have questions about the product, need assistance with identity restoration or would like an alternative to enrolling in Experian IdentityWorks online, please contact Experian's customer care team at **800-459-6125** by **April 30, 2024**. Be prepared to provide engagement number **B112732** 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 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.
- **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 (855) 414-6050. 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 two years 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.

0000002



Information About Identity Theft Protection Guide

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

Free Credit Report. We remind you 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.

For Colorado, Georgia, Maine, Maryland, Massachusetts, New Jersey, Puerto Rico, and Vermont residents:

You may obtain one or more (depending on the state) additional copies of your credit report, free of charge. You must contact each of the credit reporting agencies directly to obtain such additional report(s).

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.

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.

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.

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.

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.

For Texas residents: You may contact and obtain information from your state attorney general at: Office of the Texas Attorney General www.texasattorneygeneral.gov/consumer-protection/identity-theft or contact the Identity Theft Hotline at 800-621-0508 (toll-free)

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.

For Iowa residents: You are advised to report any suspected identity theft to law enforcement or to the Iowa Attorney General.

For Massachusetts residents: You have the right to obtain a police report if you are a victim of identity theft. You also have a right to file a police report and obtain a copy of it.

For Oregon residents: You are advised to report any suspected identity theft to law enforcement, the Federal Trade Commission, and the Oregon Attorney General.

For Rhode Island residents: You have the right to file or obtain a police report regarding this incident. 612 Rhode Island residents were impacted by this incident.



March 29, 2024

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

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



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

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

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

Re: Supplemental Legal Notice of Data Security Incident

Dear Sir or Madam:

I am writing on behalf of my client, Keenan & Associates, ("Keenan") to supplement Keenan's December 11, 2023 data incident notification submission to your office. Per our initial notification, Keenan received final approval from certain additional Keenan customers to provide notice. Those individual notices have been sent and, on behalf of these customers, Keenan has provided notice to an additional 97 Maryland residents. These notices are effectively identical to the letters Keenan has used before. At this juncture, Keenan believes that all individual notices have gone out and it does not expect to notify any additional people.

Keenan continues to offer 24-months of complimentary credit monitoring and fraud protection services to all Maryland residents receiving notice, regardless of data elements impacted, and is providing a toll-free hotline for individuals to call with any questions regarding the incident. We have also provided substitute notice as well as media notice to pertinent publications.

Additionally, a list of customers who have directed Keenan to provide notice to your office on their behalf is attached as Appendix A.

If you have any questions or need further information regarding this event, please do not hesitate to contact me.

Respectfully submitted,

A handwritten signature in cursive script that reads "David Kessler".

David Kessler

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Appendix A

1	Sentara Health Plans	Tonya Simpson, Compliance Manager txsimpso@sentara.com , (757)-227-2813	The personal information that was exfiltrated related to Sentara includes only: • Date of Birth • Social Security Number • Health Insurance Information • General Health Information
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April 17, 2024

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

Maryland Attorney General
200 St. Paul Place
Baltimore, Maryland 21202

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

Tel +1 212 318 3000
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Re: Supplemental Legal Notice of Data Security Incident

Dear Sir or Madam:

I am writing on behalf of my client, Keenan & Associates ("Keenan"), to amend our supplement to your office that we provided on March 29, 2024. We previously inadvertently double counted certain individuals who were notified, which inflated the number that we reported on March 29. The correct number of additional impacted Maryland residents is 87, for a revised total of 968. As we stated on March 29, Keenan has completed its investigation and believes all notices have been sent at this stage.

We apologize for any inconvenience. If you have any questions or need further information regarding this event, please do not hesitate to contact me.

Respectfully submitted,

A handwritten signature in cursive script that reads "David Kessler".

David Kessler



MULLEN
COUGHLIN^{LLC}
ATTORNEYS AT LAW

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426 W. Lancaster Avenue, Suite 200
Devon, PA 19333

October 15, 2024

VIA E-MAIL

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

Re: Notice of Data Event

To Whom It May Concern:

We represent Save Mart Supermarkets, LLC (“Save Mart”) located at 1800 Standiford Avenue Modesto, CA 95350, and are writing to supplement notice from Save Mart’s third-party service provider Keenan and Associates (“Keenan”) about an incident at Keenan that may involve certain personal information relating to one (1) Maryland residents. By providing this notice, Save Mart does not waive any rights or defenses regarding the applicability of Maryland law, the applicability of the Maryland data event notification statute, or personal jurisdiction.

Nature of the Data Event

On December 11, 2023, Save Mart was notified by its third-party vendor, Keenan, regarding an event causing disruptions on some Keenan servers. Keenan provides benefit insurance services to Save Mart.

Keenan’s investigation determined there was unauthorized access to Keenan internal systems at various times between August 21 to 27, 2023. During that time, unauthorized actors obtained certain data held by Keenan. On December 11, 2023, following an internal review of the impacted data, Keenan provided Save Mart with a list of the impacted individuals as a result of the event. Following receipt of this event, Save Mart worked to verify Keenan’s findings and provide notification to impacted individuals. On September 20, 2024 representatives for Keenan confirmed that while Save Mart affiliated individuals were notified as outlined below, Kennan’s previously submitted regulatory notices did not include Save Mart. Save Mart then worked to update these notices.

The personal information involved includes name, medical information, and Social Security number.

Notice to Maryland Resident

On or about January 26, 2024, Keenan, on behalf of Save Mart, provided written notice of this incident to one (1) Maryland resident. Written notice was provided in substantially the same form as the letter attached here as *Exhibit A*.

Other Steps Taken and To Be Taken

Upon discovering the event, Save Mart moved to investigate and respond to the incident, assess Keenan's findings, and verify the potentially affected individuals. Keenan, on behalf of Save Mart, provided access to credit monitoring services for 24 months, through Experian, to individuals whose personal information was potentially affected by this incident, at no cost to these individuals.

Additionally, Keenan, on behalf of Save Mart, provided impacted individuals with guidance on how to better protect against identity theft and fraud, including advising individuals to report any suspected incidents of identity theft or fraud to their credit card company and/or bank. Keenan, on behalf of Save Mart, provided individuals with information on how to place a fraud alert and security freeze on one's credit file, the contact details for the national consumer reporting agencies, information on how to obtain a free credit report, a reminder to remain vigilant for incidents of fraud and identity theft by reviewing account statements and monitoring free credit reports, and encouragement to contact the Federal Trade Commission, their state Attorney General, and law enforcement to report attempted or actual identity theft and fraud.

Save Mart is providing written notice of this incident to relevant state regulators, as necessary, and to the three major credit reporting agencies, Equifax, Experian, and TransUnion.

Contact Information

Should you have any questions regarding this notification or other aspects of the data security event, please contact us at (267) 930-4786.

Very truly yours,

Ryan C. Loughlin of
MULLEN COUGHLIN LLC

RCL/kgf
Enclosure

EXHIBIT A



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

January 26, 2024

K7150-L07-0000002 T00001 P001 *****SCH 5-DIGIT 12345

SAMPLE A SAMPLE - L07



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



Re: Notice of Data Security Incident

Dear Sample A. Sample:

Keenan & Associates ("Keenan") is an insurance brokerage company that provides insurance-related risk management and claims services throughout California and to clients across the country. Keenan services companies and organizations across a variety of industries, and, in the course of its work on behalf of clients, is at times provided access to personal information as a part of the client engagement. We receive and utilize this data for the purposes of performing services for our clients.

We are writing to inform you that we experienced a cybersecurity incident that involved some of your personal information. Keenan was in possession of that information due to its work on behalf of one of its customers. This notice explains the incident, steps we have taken in response, and additional information on steps you may take to help protect your information.

What Happened

On Sunday, August 27, 2023, we discovered certain disruptions occurring on some Keenan network servers. We immediately began an investigation and engaged leading third-party cybersecurity and forensic experts to assist. Upon detection, we took prompt action to contain it. Keenan also notified law enforcement.

The investigation determined that an unauthorized party gained access to certain Keenan internal systems at various times between approximately August 21, 2023 and August 27, 2023, and that the unauthorized party obtained some data from Keenan systems. A thorough review of that data was conducted to identify what information was involved and identify individuals to whom the data related.

What Information Was Involved

The review determined that the data involved contained some of your personal information, including your name and one or more of the following: date of birth, Social Security number, passport number, driver's license number, health insurance information, and general health information.

What We Are Doing

To help prevent a similar type of incident from occurring in the future, we implemented additional security protocols designed to enhance the security of our network, internal systems and applications. Keenan will also continue to evaluate additional steps that may be taken to further increase our defenses. In addition, we are continuing to support federal law enforcement's investigation.

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K7150-L07

What You Can Do

While we are not aware of any evidence that your personal information has been misused, we wanted to make you aware of the incident and provide you with additional information on steps you may consider taking. As a precaution, **Keenan is offering you a complimentary 24-month membership in Experian® IdentityWorksSM Credit 1B.** This product helps detect possible misuse of your personal information and provides you with identity protection services focused on immediate identification and resolution of identity theft. IdentityWorks is completely free to you and enrolling in this program will not hurt your credit score. **For more information on IdentityWorks, including instructions on how to activate your complimentary two-year membership, as well as additional steps you may take to help protect your information, please see the additional information provided in the following pages.**

For More Information

Keenan takes the security of your personal information seriously and sincerely regrets that this incident occurred. For more information or if you have any questions or need additional information, please call 800-459-6125, Monday through Friday, between 6:00 a.m. and 6:00 p.m. Pacific Time. Please be prepared to provide engagement number B112732. If you have a speech or hearing impairment and use a TTY, call 1-800-648-6056.

Sincerely,

A handwritten signature in black ink, appearing to read "D. Seres", with a stylized flourish extending to the right.

David A. Seres
Chief Operating Officer
Keenan & Associates

Experian Enrollment Information

To help protect your identity, we are offering a complimentary two-year 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: April 30, 2024 (Your code will not work after this date.)
- Visit the Experian IdentityWorks website to enroll: <https://www.experianidworks.com/credit>
- Provide your activation code: [REDACTED]

If you have questions about the product, need assistance with identity restoration or would like an alternative to enrolling in Experian IdentityWorks online, please contact Experian's customer care team at **800-459-6125** by **April 30, 2024**. Be prepared to provide engagement number **B112732** 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 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.
- **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 (855) 414-6050. 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 two years 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.

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Information About Identity Theft Protection Guide

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

Free Credit Report. We remind you 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.

For Colorado, Georgia, Maine, Maryland, Massachusetts, New Jersey, Puerto Rico, and Vermont residents:

You may obtain one or more (depending on the state) additional copies of your credit report, free of charge. You must contact each of the credit reporting agencies directly to obtain such additional report(s).

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.

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.

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.

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.

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.

For Texas residents: You may contact and obtain information from your state attorney general at: Office of the Texas Attorney General www.texasattorneygeneral.gov/consumer-protection/identity-theft or contact the Identity Theft Hotline at 800-621-0508 (toll-free)

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.

For Iowa residents: You are advised to report any suspected identity theft to law enforcement or to the Iowa Attorney General.

For Massachusetts residents: You have the right to obtain a police report if you are a victim of identity theft. You also have a right to file a police report and obtain a copy of it.

For Oregon residents: You are advised to report any suspected identity theft to law enforcement, the Federal Trade Commission, and the Oregon Attorney General.

For Rhode Island residents: You have the right to file or obtain a police report regarding this incident. 612 Rhode Island residents were impacted by this incident.

