



101 CALIFORNIA ST.
SUITE 3200
SAN FRANCISCO, CALIFORNIA
94111

TEL +1.415.291.6200
FAX +1.415.291.6300
BakerBotts.com

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March 1, 2024

VIA E-MAIL (IDTHEFT@OAG.STATE.MD.US)

Office of the Attorney General
200 St. Paul Place
Baltimore, MD 21202

Matthew R. Baker
Partner
TEL: 4152916213
FAX: 4152916313
matthew.baker@bakerbotts.com

Re: Notice of Security Incident

Dear Attorney General:

On behalf of our client, Oceaneering International, Inc. (“Oceaneering”), this letter serves to notify you of an incident involving the personal information of 295 Maryland residents.

In early January 2024, Oceaneering mailed Form W-2s to company employees at the mailing address on record. In early February 2024, Oceaneering discovered that the envelope in which such Form W-2s were mailed contained a small transparent window that, under certain limited circumstances, revealed the unredacted social security number of that employee. Currently, there is no evidence of unauthorized access or misuse of personal information, including these social security numbers, as a result of the incident.

Upon discovery of the incident, Oceaneering immediately engaged legal counsel, launched an investigation into the incident, and took steps to mitigate any potential harm to impacted individuals. This includes the provision of complementary credit monitoring and identity protection services through Experian IdentityWorks for 24 months. Oceaneering has also taken steps to minimize the risk of similar incidents occurring in the future. These steps include, but are not limited to, assessing and updating relevant administrative policies and procedures; training and/or retraining certain personnel; and updating procedures on the protection of personal information in future mailings.

Oceaneering is notifying impacted individuals consistent with its legal obligations. Specifically, Oceaneering will begin mailing notices to impacted individuals, including the 295 Maryland residents, via U.S. Mail on March 1, 2024. This notice will include factual details regarding the incident, guidance on how the individual can protect their own personal information, and a unique enrollment code for the 24-month membership to Experian IdentityWorks. A copy of the individual notice template is attached to this letter as Appendix A.

BAKER BOTTS_{LLP}

Oceaneering is committed to safeguarding the personal information and interests of its employees. If you have any questions or require further information regarding the incident, please feel free to contact me at matthew.baker@bakerbotts.com or (415) 291-6213.

Sincerely,

Matthew R. Baker

Enclosure

APPENDIX A:
Individual Notice Template



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

March 1, 2024

K9206-L01-0000001 T00001 P001 *****SCH 5-DIGIT 12345
SAMPLE A SAMPLE - L01 INDIVIDUAL
APT ABC
123 ANY STREET
ANYTOWN, FC 1A2 B3C
COUNTRY



RE: Important Security Notification
Please read this entire letter.

Dear Sample A. Sample:

We are writing to inform you of an incident that may have impacted some of your personal information and how you can minimize risk to yourself.

What Happened?

In late January 2024, Oceaneering International, Inc. (“**Oceaneering**”, “**we**”, or “**our**”) mailed W-2 tax forms to company employees at the mailing address on record, per standard protocol. In early February 2024, it was discovered that the envelope in which such W-2 forms were mailed contained a small transparent window that, under certain limited circumstances, permitted a third party to see unredacted personal information relating to that employee.

Currently, there is no evidence that any third party has actually viewed or misused any such personal information as a result of this incident. We are, of course, continuing to monitor the situation with vigilance.

What Information Was Involved?

The types of personal information impacted include: social security number.

What Are We Doing?

Oceaneering takes the privacy and security of your personal information very seriously. Upon discovery of the incident, we immediately launched an investigation to understand the reasons that led to the incident and took steps to mitigate further disclosure of such personal information. We have also reviewed our administrative processes and taken other measures to minimize the risk of similar incidents occurring in the future.



Out of an abundance of caution and to help protect your identity, we are offering a complimentary 24-month membership of Experian 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: May 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**

The enrollment process is safe, simple, and efficient, and we encourage you to activate your membership as soon as possible. More information about the membership is included in the attached handout titled **ADDITIONAL DETAILS REGARDING YOUR 24-MONTH EXPERIAN IDENTITYWORKS MEMBERSHIP**.

What Else Can You Do?

In addition to enrolling in the complimentary Experian IdentityWorks membership as outlined above, we invite you to review the attached handout titled **STEPS YOU CAN TAKE TO FURTHER PROTECT YOUR INFORMATION** as well as the U.S. Federal Trade Commission's safety tips for protecting against identity theft available at <https://www.identitytheft.gov>.

Moreover, we encourage you to carefully review your accounts and your credit reports to ensure that all of your account activity is valid. You should promptly report any questionable charges to the organization with which the account is maintained.

For More Information.

If you have further questions related to this notice or the incident, you may contact Oceaneering's Employee Solutions Center (ESC) at hrcamericasteam@oceaneering.com or 844-999-6947.

If you have questions about your Experian IdentityWorks membership, need assistance with identity restoration, or would like an alternative to enrolling in Experian IdentityWorks online, please contact Experian's customer care team at 877-890-9332 by **May 31, 2024**. Be prepared to provide engagement number **B117226** as proof of eligibility for the identity restoration services.

We sincerely apologize that this incident happened and regret any inconvenience it may cause you. Oceaneering is committed to taking all steps necessary to fully safeguard its employees and their personal information.

Sincerely,

Holly Kriendler
Sr. Vice President and Chief Human Resources Officer
Oceaneering International, Inc.

ADDITIONAL DETAILS REGARDING YOUR 24-MONTH EXPERIAN IDENTITYWORKS MEMBERSHIP

A credit card is **not** required for enrollment in Experian IdentityWorks.

You can contact Experian **immediately** regarding any fraud issues, and have access to the following features once you enroll in Experian IdentityWorks:

- **Experian credit report at signup:** See what information is associated with your credit file. Daily credit reports are available for online members only.*
- **Credit Monitoring:** Actively monitors Experian file for indicators of fraud.
- **Identity Restoration:** Identity Restoration agents are immediately available to help you address credit and non-credit related fraud.
- **Experian IdentityWorks 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 **877-890-9332**. If, after discussing your situation with an agent, it is determined that Identity Restoration support is needed, then an Experian Identity Restoration agent is available to work with you to investigate and resolve each incident of fraud that occurred (including, as appropriate, helping you with contacting credit grantors to dispute charges and close accounts; assisting you in placing a freeze on your credit file with the three major credit bureaus; and assisting you with contacting government agencies to help restore your identity to its proper condition).

Please note that this Identity Restoration support is available to you for 24 months from the date of this letter and does not require any action on your part at this time. The Terms and Conditions for this offer are located at www.ExperianIDWorks.com/restoration. You will also find self-help tips and information about identity protection at this site.

* Offline members will be eligible to call for additional reports quarterly after enrolling

** The Identity Theft Insurance is underwritten and administered by American Bankers Insurance Company of Florida, an Assurant company. Please refer to the actual policies for terms, conditions, and exclusions of coverage. Coverage may not be available in all jurisdictions.



STEPS YOU CAN TAKE TO FURTHER PROTECT YOUR INFORMATION

Review Your Account Statements and Notify Law Enforcement of Suspicious Activity

As a precautionary measure, we recommend that you remain vigilant by reviewing your account statements and credit reports closely. If you detect any suspicious activity on an account, you should promptly notify the financial institution or company with which the account is maintained. You also should promptly report any fraudulent activity or any suspected incidence of identity theft to proper law enforcement authorities, your state attorney general, and/or the Federal Trade Commission.

To file a complaint with the FTC, go to www.ftc.gov/idtheft or call 1-877-ID-THEFT (877-438-4338). Complaints filed with the FTC will be added to the FTC's Identity Theft Data Clearinghouse, which is a database made available to law enforcement agencies.

Copy of Credit Report

You may obtain a free copy of your credit report from each of the three major credit reporting agencies once every 12 months by visiting <http://www.annualcreditreport.com>, calling toll-free 877-322-8228, or by completing an Annual Credit Report Request Form and mailing it to Annual Credit Report Request Service, P.O. Box 105281, Atlanta, GA 30348. You can print a copy of the request form at <https://www.annualcreditreport.com/manualRequestForm.action>. Or you can elect to purchase a copy of your credit report by contacting one of the three national credit reporting agencies. Contact information for each is provided below:

Equifax
(800) 685-1111
www.equifax.com
P.O. Box 740241
Atlanta, GA 30374

Experian
(888) 397-3742
www.experian.com
535 Anton Blvd., Suite 100
Costa Mesa, CA 92626

TransUnion
(800) 916-8800
www.transunion.com
P.O. Box 6790
Fullerton, CA 92834

Fraud Alert

You may want to consider placing a fraud alert on your credit report. An initial fraud alert is free and will stay on your credit file for at least 12 months. The alert informs creditors of possible fraudulent activity within your report and requests that the creditor contact you prior to establishing any accounts in your name. For more information on fraud alerts, you may contact the three national credit reporting agencies, the FTC (as described, above), or visit <http://www.annualcreditreport.com>.

Security Freeze

In some U.S. states, you have the right to put a security freeze on your credit file at no cost to you. This will prevent new credit from being opened in your name without the use of a PIN number that is issued to you when you initiate the freeze. A security freeze is designed to prevent potential creditors from accessing your credit report without your consent. As a result, using a security freeze may interfere with or delay your ability to obtain credit. To place a security freeze, you may be required to provide information that identifies you, including your full name, Social Security number, date of birth, current and previous addresses, a copy of your state-issued identification card, and a recent utility bill, bank statement, or insurance statement. You must separately place a security freeze on your credit file with each credit reporting agency. For more information on security freezes in your state, you may contact the three national credit reporting agencies or the FTC (as described above).