



MULLEN
COUGHLIN^{LLC}
ATTORNEYS AT LAW

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426 W. Lancaster Avenue, Suite 200
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April 9, 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 Integrity Consulting Group, LLC (“Integrity”), located at 104 Interchange Plaza, Suite 202, Monroe Twp, New Jersey 08831, and write to notify your office of a matter that may affect the security of certain personal information relating to one (1) Maryland resident. This notice may be supplemented with any new significant facts learned subsequent to its submission. By providing this notice, Integrity 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

Integrity Consulting Group, LLC (“Integrity”) is a third-party consulting and brokerage firm that provides insurance-related services to certain entities.

After being alerted by a client to suspicious activity involving one Integrity employee’s email account, Integrity promptly took steps to confirm the security of its email environment and initiated a comprehensive investigation into this matter. The investigation confirmed that a single Integrity employee email account was intermittently accessed without authorization in the summer of 2023. Although the investigation did not confirm that any particular information was accessed, because Integrity could not rule out access to information in the one email account, Integrity undertook a thorough review of the contents of the one email account to identify what information was present and to whom such information related. Due to the nature of service Integrity performs for its

clients, the data review and customer correlation was a time-intensive process, but the team worked diligently to confirm the totality of information.

The preliminary results of this review were completed on January 17, 2024, after which we worked to review our files and, where possible, enrich necessary address information for identified individuals. We completed the identified of individuals affiliated with the involved client on February 8, 2024, and completed address enrichment efforts related to client-affiliated individuals on February 13, 2024. On February 23, 2024, we provided written notification to the involved client regarding this matter. Thereafter, we worked with the involved client to obtain additional necessary information related to identified individuals and authorization to proceed with notification, which was provided on April 2, 2024. We thereafter worked to notify potentially impacted individuals. You are receiving this notification because we determined that certain information related to you was present in the one impacted email account and therefore accessible in connection with this matter.

The potentially impacted information related to Maryland resident is the individual's name, and medical information.

Notice to Maryland Resident

On or about April 9, 2024 Integrity began providing written notice of this incident to one (1) Maryland resident. Written notice is being provided in substantially the same form as the letter attached here as ***Exhibit A***.

Other Steps Taken and To Be Taken

Integrity promptly took steps to confirm the security of its email environment, including changing the account password, and initiated a comprehensive investigation to determine the nature and scope of this matter to identify potentially impacted individuals. Further, as part of its ongoing commitment to the privacy and security of information in its care, Integrity is reviewing and, where necessary, enhancing its policies and procedures related to data security to reduce the likelihood of something similar reoccurring in the future.

As an added measure, Integrity is providing access to free credit monitoring services for twelve (12) months, through Experian, to individuals whose personal information was potentially impacted by this matter. Additionally, in its communication, Integrity provided 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. Integrity also provided 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. Moreover, Integrity is notifying relevant state regulators, as required.

Office of the Attorney General

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Contact Information

Should you have any questions regarding this notification or other aspects of the data event, please contact us at (267) 930-4005.

Very truly yours,

A handwritten signature in black ink, appearing to read "Julie Siebert-Johnson".

Julie Siebert-Johnson of
MULLEN COUGHLIN LLC

JSJ/bxn

Enclosure

EXHIBIT A



INTEGRITY CONSULTING GROUP

Employee Benefits Specialists

Return Mail Processing
PO Box 999
Suwanee, GA 30024

111 *****SINGLP

SAMPLE A. SAMPLE - L01

APT ABC



123 ANY ST

ANYTOWN, US 12345-6789



April 9, 2024

Dear Sample A. Sample:

Integrity Consulting Group, LLC ("Integrity") is a third-party consulting and brokerage firm that provides insurance-related services to certain entities, including [REDACTED]. Integrity is writing on behalf of [REDACTED] to inform you about a matter that may affect certain information related to you. This letter provides you with information about this matter, our response, and steps you may take to help protect your information, should you feel it appropriate to do so.

What Happened? After being alerted by [REDACTED] to suspicious activity involving an Integrity employee's email account, we promptly took steps to confirm the security of our email environment and initiated a comprehensive investigation into this matter. The investigation confirmed that a single employee email account was intermittently accessed without authorization between June 20 and August 8, 2023. Although the investigation did not confirm that any particular information was accessed, because we could not rule out access to information in the one email account, we then undertook a thorough review of the contents of the one email account to identify what information was present and to whom such information related. Due to the nature of service Integrity performs for its clients, the data review and customer correlation was a time-intensive process, but the team worked diligently to confirm the information related to [REDACTED].

The preliminary results of this review were completed on January 17, 2024, after which we worked to review our files and, where possible, enrich necessary address information for identified individuals. We completed the identification of individuals affiliated with [REDACTED] on February 8, 2024, and completed address enrichment efforts related to [REDACTED]-affiliated individuals on February 13, 2024. On February 23, 2024, we provided written notification to [REDACTED] regarding this matter. Thereafter, we worked with [REDACTED] to obtain additional necessary information related to identified individuals and authorization to proceed with notification, which was provided on April 2, 2024. We thereafter worked to notify potentially impacted individuals. You are receiving this notification because we determined that certain information related to you was present in the one impacted email account and therefore accessible in connection with this matter.

What Information Was Affected? Our investigation identified the following information related to you: name, [Extra1].

What We Are Doing. Maintaining the confidentiality, privacy, and security of the information in our care is one of our highest priorities. Upon becoming aware of this matter, we promptly took steps to secure the involved email account including changing the account password and conducted a comprehensive investigation to confirm the full nature and scope of this matter. Further, as part of our ongoing commitment to the privacy and security of information in our care, we are reviewing and, where necessary, enhancing our policies and procedures related to data security to reduce the likelihood of something similar reoccurring in the future. We are also notifying requisite regulatory authorities regarding this matter.

As an added precaution, we are offering you access to twelve (12) months of credit monitoring and identity theft protection services through Experian at no cost to you. If you wish to activate these services, you may follow the instructions included in the attached *Steps You Can Take to Help Protect Personal Information*. Please note, due to privacy restrictions, we are unable to enroll you in these services on your behalf.

What You Can Do. 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 and to detect errors. You should report any suspicious charges on your credit or debit card to the bank that issued the card or to the card company, as appropriate. You can also enroll to receive the complimentary monitoring services that we are offering to you. Please also review the attached *Steps You Can Take to Help Protect Personal Information* for additional information and resources.

For More Information. We recognize you may have additional questions not addressed by this letter. If you have questions or concerns, please call our dedicated assistance line at [REDACTED], which is available from 9:00 a.m. to 9:00 p.m. Eastern Time, Monday through Friday (excluding major U.S. holidays). Please be prepared to provide engagement number **B117156**.

Sincerely,

Integrity Consulting Group, LLC

STEPS YOU CAN TAKE TO HELP PROTECT PERSONAL INFORMATION

Enroll in Offered Monitoring Services

To help protect your identity, we are offering complimentary access to Experian IdentityWorksSM for twelve (12) months.

If you believe there was fraudulent use of your information as a result of this event 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 twelve (12) 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 twelve (12)-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 July 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 [REDACTED] by **July 31, 2024**. Please be prepared to provide engagement number **B117156** as proof of eligibility for the Identity Restoration services by Experian.

ADDITIONAL DETAILS REGARDING YOUR TWELVE (12) 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 ExtendCARETM:** 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.

Monitor Your Accounts

Under U.S. law, a consumer is entitled to one free credit report annually from each of the three (3) major credit reporting bureaus, Equifax, Experian, and TransUnion. To order a free credit report, visit www.annualcreditreport.com or call, toll-free, 1-877-322-8228. Consumers may also directly contact the three major credit reporting bureaus listed below to request a free copy of their credit report.

Consumers have the right to place an initial or extended “fraud alert” on a credit file at no cost. An initial fraud alert is a 1-year alert that is placed on a consumer’s credit file. Upon seeing a fraud alert display on a consumer’s credit file, a business is required to take steps to verify the consumer’s identity before extending new credit. If consumers are the victim of identity theft, they are entitled to an extended fraud alert, which is a fraud alert lasting seven (7) years. Should consumers wish to place a fraud alert, please contact any of the three major credit reporting bureaus listed below.

As an alternative to a fraud alert, consumers have the right to place a “credit freeze” on a credit report, which will prohibit a credit bureau from releasing information in the credit report without the consumer’s express authorization. The credit freeze is designed to prevent credit, loans, and services from being approved in a consumer’s name without consent. However, consumers should be aware that using a credit freeze to take control over who gets access to the personal and financial information in their credit report may delay, interfere with, or prohibit the timely approval of any subsequent request or application they make regarding a new loan, credit, mortgage, or any other account involving the extension of credit. Pursuant to federal law, consumers cannot be charged to place or lift a credit freeze on their credit report. To request a credit freeze, individuals may need to provide some or all of the following information:

1. Full name (including middle initial as well as Jr., Sr., II, III, etc.);
2. Social Security number;
3. Date of birth;
4. Addresses for the prior two (2) to five (5) years;
5. Proof of current address, such as a current utility bill or telephone bill;
6. A legible photocopy of a government-issued identification card (state driver’s license or ID card, etc.); and
7. A copy of either the police report, investigative report, or complaint to a law enforcement agency concerning identity theft if they are a victim of identity theft.

Should consumers wish to place a credit freeze or fraud alert, please contact the three major credit reporting bureaus listed below:

Equifax	Experian	TransUnion
https://www.equifax.com/personal/credit-report-services/	https://www.experian.com/help/	https://www.transunion.com/credit-help
1-888-298-0045	1-888-397-3742	1-800-916-8800
Equifax Fraud Alert, P.O. Box 105069 Atlanta, GA 30348	Experian Fraud Alert, P.O. Box 9554, Allen, TX 75013	TransUnion Fraud Alert, P.O. Box 2000, Chester, PA 19016
Equifax Credit Freeze, P.O. Box 105788 Atlanta, GA 30348	Experian Credit Freeze, P.O. Box 9554, Allen, TX 75013	TransUnion Credit Freeze, P.O. Box 160, Woodlyn, PA 19094

Additional Information

Consumers may further educate themselves regarding identity theft, fraud alerts, credit freezes, and the steps they can take to protect your personal information by contacting the consumer reporting bureaus, the Federal Trade Commission, or their state Attorney General. The Federal Trade Commission may be reached at: 600 Pennsylvania Avenue NW, Washington, DC 20580; www.identitytheft.gov; 1-877-ID-THEFT (1-877-438-4338); and TTY: 1-866-653-4261. The Federal Trade Commission also encourages those who discover that their information has been misused to file a complaint with them. Consumers can obtain further information on how to file such a complaint by way of the contact information listed above.

Consumers have the right to file a police report if they ever experience identity theft or fraud. Please note that in order to file a report with law enforcement for identity theft, consumers will likely need to provide some proof that they have been a victim. Instances of known or suspected identity theft should also be reported to law enforcement and the relevant state Attorney General. This notice has not been delayed by law enforcement.

For Maryland residents, the Maryland Attorney General may be contacted at: 200 St. Paul Place, 16th Floor, Baltimore, MD 21202; 1-410-576-6300 or 1-888-743-0023; and <https://www.marylandattorneygeneral.gov/>. Integrity Consulting Group, LLC is located at 104 Interchange Plaza, Suite 202, Monroe Township, NJ 08831.