



Alight Solutions
Legal / Privacy

CONFIDENTIAL

alight.com

May 2, 2024

Via E-Mail -ldtheft@oag.state.md.us

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

Re: Notification of Privacy Incident

Dear Attorney General Brown,

I am writing to inform you of a privacy incident that could potentially impact 7 Maryland residents. Alight is the retirement services record keeper for Highmark Health.

On April 3, 2024, during the course of an internal investigation, Alight discovered a contracted employee with authorized access to participant personal information may have taken an unauthorized photograph(s) of some participant personal information. It is unknown whether the photos were further retained or shared at this time. The data involved may have included participant name, address, hire date, separation date, birth year, email address phone number, social security number, the direct deposit bank account number and routing number associated with a retirement account.

The incident was contained, and Alight has taken additional steps to help prevent future incidents. The contracted employee was removed from all Alight accounts and system access was terminated. We thoroughly reviewed the participant retirement plans and found no suspicious or malicious account activity. We have reported the incident to law enforcement and are cooperating with their investigation.

To date, Alight has seen no evidence of misuse of the personal information of the Maryland residents impacted in the incident. In an abundance of caution, however, Alight is offering a complimentary one-year membership to Experian IdentityWorks to the impacted Maryland residents. Additionally, Alight is providing the impacted individuals with guidance on how to protect against identity theft, including information on placing a fraud alert or credit freeze on their credit files, a reminder to remain vigilant for incidents of fraud and identity theft by reviewing account statements and monitoring credit reports, and contact information for the Federal Trade Commission and the three major credit bureaus.

A copy of a representative template that will be used to mail notices to the impacted Maryland residents is attached as Exhibit A.

If you have any questions or concerns regarding this incident, please contact me at lisa.waggoner@alight.com.

Regards,

Lisa A. Waggoner
Head of Privacy, Alight Solutions



EXHIBIT A

Re: Notification of Privacy Incident

Dear [REDACTED],

Alight is the retirement services record keeper for Highmark Health. As a trusted steward of your personal information, Alight is committed to the privacy and security of your data. We regret to inform you of a privacy incident that may have involved some of your personal information and wish to explain the incident, steps we took in response, and measures you can take as well.

What happened?

On April 3, 2024, during the course of an internal investigation, Alight discovered a contracted employee with authorized access to your personal information may have taken an unauthorized photograph(s) of some of your personal information. It is unknown whether the photos were further retained or shared at this time.

What information was involved?

The data involved may have included your name, address, hire date, separation date, birth year, email address phone number, social security number, the direct deposit bank account number and routing number associated with your retirement account.

What are we doing in response?

Upon discovery, we started an immediate security investigation. The contracted employee was removed from all Alight accounts and system access was terminated. We thoroughly reviewed your retirement plan and found no suspicious or malicious account activity. We have reported the incident to law enforcement and are cooperating with their investigation. To prevent future occurrences, we are thoroughly reviewing and enhancing our processes and procedures.

To help relieve any concerns and restore confidence following this incident, we are offering 12 months of complimentary credit monitoring and identity restoration services through Experian. To take advantage of these free credit monitoring and identity theft protection services, please follow the instructions in Attachment A. **You must enroll by XXXXXXXX**, to receive these services.

What can you do?

We recommend vigilance in monitoring your personal and financial accounts for any unusual activity. If you notice anything suspicious, you should contact the company that maintains the account on your behalf. For more information on how to protect your identity, and to claim our credit monitoring, refer to the attached guide.

For more information:

If you have any questions or concerns regarding this incident, please contact Experian's customer care team at 1-XXX-XXX-XXXX toll-free Monday through Friday from 8 am – 10 pm Central, or Saturday and Sunday from 10 am – 7 pm Central (excluding major U.S. holidays). We sincerely apologize for this incident and any inconvenience it may cause.

Regards,

Lisa A. Waggoner

Head of Privacy, Alight Solutions

ATTACHMENT A - IDENTITY MONITORING SERVICES

We have secured the services of Experian to provide identity monitoring at no cost to you. Experian is a global leader in risk mitigation and response, and their team has extensive experience helping people who have sustained an unintentional exposure of confidential data.

How to Activate Your Identity Monitoring Services:

- Visit the Experian IdentityWorks website via the following link to enroll:
 - <https://www.experianidworks.com/credit>
- Click on "Get Started".
- Provide the activation code: XXXXXXXXX along with your personal details.

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 is (877) 890-9332 by XXXXXXXX. Be prepared to provide engagement number XXXXXXXX as proof of eligibility for the identity restoration services by Experian

ADDITIONAL DETAILS REGARDING YOUR 12-MONTH IDENTITY MONITORING SERVICE:

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 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. 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.

More Information about Identity Protection

Below are additional helpful tips you may want to consider protecting your personal information.

Review Your Credit Reports and Account Statements & Notify Law Enforcement of Suspicious Activity

As a precautionary measure, we recommend that you remain vigilant by reviewing your credit reports and account statements closely. If you detect any suspicious activity on an account, you should promptly notify the financial institution or other company with which the account is maintained. You also should promptly report any fraudulent activity or any suspected incidents of identity theft to proper law enforcement authorities. 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 law enforcement, the Federal Trade Commission ("FTC") and/or the Attorney General's office in your home state. You can also contact these agencies for information on how to prevent or avoid identity theft, and you can contact the FTC at:

Federal Trade Commission
Consumer Response Center
600 Pennsylvania Avenue, NW
Washington, DC 20580
<http://www.identitytheft.gov/>
1-877-IDTHEFT (438-4338)

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 <https://www.annualcreditreport.com>, calling toll-free 877-322-8228, or by completing an Annual Credit Report Request Form and mailing it to the Annual Credit Report Request Service, P.O. Box 105281, Atlanta, GA 30348- 5281. You can print this form at <https://www.annualcreditreport.com/manualRequestForm.action>. Credit reporting agency contact details are provided below.

Equifax:

equifax.com
equifax.com/personal/credit-report-services
P.O. Box 740241
Atlanta, GA 30374
800-685-1111

Experian: experian.com

experian.com/help
P.O. Box 2002
Allen, TX 75013
888-397-3742

TransUnion:

transunion.com
transunion.com/credit-help
P.O. Box 1000
Chester, PA 19016
888-909-8872

When you receive your credit reports, review them carefully. Look for accounts or credit inquiries that you did not initiate or do not recognize. Look for information, such as home address and Social Security number, that is inaccurate. If you see anything you do not understand, call the credit reporting agency at the telephone number on the report.

Fraud Alert

You may want to consider placing a fraud alert on your credit file. An initial fraud alert is free and will stay on your credit file for at least 90 days. 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. If you have already been a victim of identity theft, you may have an extended alert placed on your report if you

provide the appropriate documentary proof. An extended fraud alert stays on your credit report for seven years. To place a fraud alert on your credit report, contact any of the three credit reporting agencies identified above.

Security Freeze

You have the right to place a security freeze on your credit file free of charge. 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 credit, loans, and services from being approved in your name without your consent. As a result, using a security freeze may delay your ability to obtain credit. In order to place a security freeze, you may be required to provide the consumer reporting agency with 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 telephone bill.

Federal Fair Credit Reporting Act Rights

The Fair Credit Reporting Act ("FCRA") is federal legislation that regulates how consumer reporting agencies use your information. It promotes the accuracy, fairness, and privacy of consumer information in the files of consumer reporting agencies. As a consumer, you have certain rights under the FCRA, which the FTC has summarized as follows: you must be told if information in your file has been used against you; you have the right to know what is in your file; you have the right to ask for a credit score; you have the right to dispute incomplete or inaccurate information; consumer reporting agencies must correct or delete inaccurate, incomplete, or unverifiable information; consumer reporting agencies may not report outdated negative information; access to your file is limited; you must give your consent for reports to be provided to employers; you may limit "prescreened" offers of credit and insurance you get based on information in your credit report; and you may seek damages from violators. Identity theft victims and active-duty military personnel have additional rights.

For more information about these rights, you may go to www.ftc.gov/credit or write to: Consumer Response Center, Room 13-A, Federal Trade Commission, 600 Pennsylvania Avenue NW, Washington, DC 20580.

Additional Resources

If you are the victim of fraud or identity theft, you also have the right to file a police report.

You may consider starting a file with copies of your credit reports, any police report, any correspondence, and copies of disputed bills. It is also useful to keep a log of your conversations with creditors, law enforcement officials, and other relevant parties.

For Colorado and Illinois residents: You may obtain information from the Federal Trade Commission and the credit reporting agencies about fraud alerts and security freezes.

For District of Columbia residents: You may contact the Office of the Attorney General for the District of Columbia, 441 4th Street NW, Suite 110 South, Washington D.C. 20001, <https://www.oag.dc.gov/>, 1-202-727-3400.

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

For Maryland residents: You may contact the Office of the Maryland Attorney General, 200 St. Paul Place, Baltimore, MD 21202, <http://www.marylandattorneygeneral.gov>, 1-888-743-0023. The Office of the Maryland Attorney General may be able to provide you with information about the steps you can take to avoid identity theft.

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

For New York residents: For more information on identity theft, you can contact the following: New York Department of State Division of Consumer Protection at <http://www.dos.ny.gov/consumerprotection> or (800) 697-1220 or NYS Attorney General at <http://www.ag.ny.gov/home.html> or (800) 771-7755.

For North Carolina residents: You may contact the North Carolina Office of the Attorney General, 9001 Mail Service Center, Raleigh, NC 27699-9001, <http://www.ncdoj.gov>, 1-877-566-7226. You are also advised to report any suspected identity theft to law enforcement or to the North Carolina Attorney General.

For Oregon residents: You are advised to report any suspected identity theft to law enforcement, including the FTC and the Oregon Attorney General. For more information on security locks, you can visit the Oregon Department of Consumer and Commercial Services website at www.dfcs.oregon.gov/id_theft.html and click "How to get a security freeze."

For Rhode Island residents: The Rhode Island Attorney General may be reached at: 150 South Main Street, Providence, RI 02903; www.riag.ri.gov; and 1-401-274-4400. Under Rhode Island law, you have the right to obtain any police report filed regarding this event. There are 70 Rhode Island residents impacted by this event.

For Arizona, California, Iowa, Montana, New York, North Carolina, Oregon, Washington,

Washington, D.C., and West Virginia 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 bureaus directly to obtain such additional report(s).