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May 7, 2024

VIA ELECTRONIC SUBMISSION

Attorney General Anthony G. Brown
Office of the Attorney General
St. Paul Plaza
Attn: Security Breach Notification
200 St. Paul Place
Baltimore, MD 21202
Tel: 410-576-6491

Re: Notice of Data Security Incident

To Whom It May Concern:

Constangy, Brooks, Smith & Prophete LLP ("Constangy") represents Evolution Payroll Services ("EPS"), based in West Chester, Pennsylvania, in conjunction with the recent data security incident described in greater detail below. The purpose of this letter is to notify you of the incident in accordance with the Maryland data breach notification statute.

1. Nature of the Security Incident

On January 18, 2024, EPS detected suspicious activity associated with one (1) email account within its email tenant. EPS promptly launched an investigation and engaged independent cybersecurity experts to investigate. As a result of the investigation, EPS learned that an unauthorized actor may have acquired certain files and data stored within the email account.

EPS then retained experts to assist with understanding whether sensitive information was contained within the potentially impacted email messages / attachments. That process was completed on April 22, 2024, when EPS confirmed that personal information may have been involved in the incident. Since that time, EPS worked to gather contact information for individuals to all affected individuals of this incident.

2. Type of Information and Number of Maryland Residents Notified

The data sets potentially involved included individuals' names, and Social Security numbers. On May 7, 2024, EPS notified 98 Maryland residents of this data security incident via U.S. First-Class Mail. A sample copy of the notification letter sent to potentially impacted individuals is included with this correspondence.

3. Steps Taken Relating to the Incident

EPS has implemented additional security measures to prevent a similar incident from occurring in the future. Further, as referenced in the sample consumer notification letter, EPS has offered individuals whose Social Security numbers were potentially impacted 12 months of complimentary services through Epiq, which includes credit monitoring, dark web monitoring, a \$1 million identity fraud loss reimbursement policy, and fully-managed identity theft recovery services, along with access to a call center for support for 90 days.

4. Contact Information

EPS remains dedicated to protecting the personal information in its possession. If you have any questions or need additional information, please do not hesitate to contact me at lgodfrey@constangy.com.

Very truly yours,

Lauren Godfrey of
CONSTANGY, BROOKS, SMITH & PROPHETE, LLP

Encl: Sample Adult Consumer Notification Letter

Evolution Payroll Services

Secure Processing Center

P.O. Box 3826

Suwanee, GA 30024

<<Name 1>>

<<Name 2>>

<<Address1>>

<<Address2>>

<<City>>, <<State>> <<Zip>>

<<MailDate>>

Notice of Data Security Incident

Dear <<Name 1 >>,

We are writing to inform you of a recent data security incident experienced by Evolution Payroll Services (“EPS”) that may have involved your personal information. EPS provides payroll, human resource, and time & attendance solutions for various businesses across the country. Further, it is likely that EPS was provided your information due to services it provided for a current, or former, employer of yours. Please read carefully as this letter contains background information about the incident, the type of information involved, and steps you can take to protect your information.

What Happened? On January 18, 2024, EPS became aware of a possible data security incident event involving one (1) email account. Upon discovering this activity, EPS immediately took steps to secure the email account and launched an investigation, aided by independent cybersecurity experts, to determine what happened and whether sensitive information may have been affected. As a result of the investigation, EPS learned that an unauthorized actor may have acquired certain files and data stored within one (1) email account. Upon learning this, EPS launched a comprehensive review of all potentially affected information to identify any personal information that could have been acquired. Following the completion of this comprehensive review, EPS confirmed on April 22, 2024, that your personal information may have been involved in the incident. Since that time, we have been working to gather contact information for individuals to notify affected individuals of this incident.

What Information Was Involved? Following our review of the contents of the impacted data, on April 22, 2024, we determined that your name and <<Breached Elements>> were included. We emphasize that we have no evidence of any actual or attempted misuse of this information.

What Are We Doing? As soon as we discovered this incident, we took measures to further secure our email tenant and enlisted outside cybersecurity experts to conduct an investigation. We have also implemented additional security measures to help reduce the risk of a similar incident occurring in the future. In addition, we are notifying you of this event and providing resources you can utilize to help protect your information.

In addition, we are offering identity theft protection services through Identity Defense Complete, the data breach and recovery services expert. Identity Defense Complete identity protection services include <<CM Duration>> of credit monitoring, a \$1,000,000 insurance reimbursement policy, and fully managed ID theft recovery services. With this protection, Identity Defense Complete will help you resolve issues if your identity is compromised.

What You Can Do. We encourage you to contact Identity Defense Complete with any questions and to enroll in free identity protection services by calling 866.622.9303, or going to app.identitydefense.com/enrollment/activate/. Identity Defense Complete representatives are available Monday through Friday. Please note the deadline to enroll is <<Deadline>>. We also recommend that you review the guidance included with this letter about how to protect your information.

For More Information. If you have any questions about this letter, please call 888-326-0851 Monday through Friday from 9:00am – 9:00pm Eastern Time.

The privacy and protection of personal information is a top priority for EPS, which deeply regrets any inconvenience or concern this incident may cause.

Sincerely,
Evolution Payroll Services



<<Name 1>>

Enter your Activation Code: <<ActivationCode>>

Enrollment Deadline: <<Deadline>>

Service Term: <<Term Length>>*

Identity Defense Complete

Key Features

- 1-Bureau Credit Monitoring
- Monthly Credit Score and Tracker (VantageScore 3.0)
- Real-Time Authentication Alerts
- High-Risk Transaction Monitoring
- Address Change Monitoring
- Dark Web Monitoring
- Wallet Protection
- Security Freeze Assist
- \$1 Million Identity Theft Insurance**

Enrollment Instructions

To enroll in Identity Defense, visit app.identitydefense.com/enrollment/activate/

1. Enter your unique Activation Code <<IdentityDefenseID>>
Enter your Activation Code and click 'Redeem Code'.
2. Create Your Account
Enter your email address, create your password, and click 'Create Account'.
3. Register
Enter your legal name, home address, phone number, date of birth, Social Security Number, and click 'Complete Account'.
4. Complete Activation
Click 'Continue to Dashboard' to finish enrolling.

The deadline to enroll is <<Deadline>>. After {{Deadline}}, the enrollment process will close, and your Identity Defense code will no longer be active. If you do not enroll by {{Deadline}}, you will not be able to take advantage of Identity Defense, so please enroll before the deadline.

If you need assistance with the enrollment process or have questions regarding Identity Defense, please call Identity Defense directly at 866.622.9303.

*Service Term begins on the date of enrollment, provided that the enrollment takes place during the approved enrollment period.

**Identity Theft Insurance is underwritten by insurance company subsidiaries or affiliates of American International Group, Inc. The description herein is a summary and intended for informational purposes only and does not include all terms, conditions, and exclusions of the policies described. Please refer to the actual policies for terms, conditions, and exclusions of coverage. Coverage may not be available in all jurisdictions.

ADDITIONAL STEPS YOU CAN TAKE 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 monitoring free credit reports closely for errors and by taking other steps appropriate to protect accounts, including promptly changing passwords. If you detect any suspicious activity on an account, you should promptly notify the financial institution or company with which the account is maintained for remediation assistance or contact a remediation service provider. 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 (FTC). You should also contact your local law enforcement authorities and file a police report. Obtain a copy of the police report in case you are asked to provide copies to creditors to correct your records. Contact information for the Federal Trade Commission is as follows:

- *Federal Trade Commission*, Consumer Response Center, 600 Pennsylvania Ave, NW, Washington, DC 20580, 1-877-IDTHEFT (438-4338), www.consumer.ftc.gov, www.ftc.gov/idtheft.

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 this form at <https://www.annualcreditreport.com/cra/requestformfinal.pdf>. You also can contact one of the following three national credit reporting agencies:

- *Equifax*, P.O. Box 740241, Atlanta, GA 30374, 1-800-525-6285, www.equifax.com.
- *Experian*, P.O. Box 9532, Allen, TX 75013, 1-888-397-3742, www.experian.com.
- *TransUnion*, P.O. Box 1000, Chester, PA 19016, 1-800-916-8800, www.transunion.com.

Fraud Alerts: There are two kinds of general fraud alerts you can place on your credit report—an initial alert and an extended alert. You may want to consider placing either or both fraud alerts on your credit report. 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. You may have an extended alert placed on your credit report if you have already been a victim of identity theft and provide the appropriate documentary proof. An extended fraud alert is also free and will stay 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. Additional information is available at <http://www.annualcreditreport.com>. Military members may also place an Active-Duty Military Fraud Alert on their credit reports while deployed. An Active-Duty Military Fraud Alert lasts for one year and can be renewed for the length of your deployment.

Credit or Security Freezes: Under U.S. law, you have the right to put a credit freeze, also known as a security freeze, on your credit file, for up to one year at no cost. The freeze 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.

You must separately place a security freeze on your credit file with each credit reporting agency. There is no fee to place or lift a security freeze. For information and instructions on how to place a security freeze, contact any of the credit reporting agencies or the Federal Trade Commission identified above. 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 insurance statement. After receiving your freeze request, each credit bureau will provide you with a unique PIN or password. Keep the PIN or password in a safe place as you will need it if you choose to lift the freeze.

A freeze remains in place until you ask the credit bureau to temporarily lift it or remove it altogether. If the request is made online or via phone, a credit bureau must lift the credit freeze within an hour. If the request is made by mail, then the bureau must lift the freeze no later than three business days after receiving your request.

IRS Identity Protection PIN: You can obtain an identity protection PIN (IP PIN) from the IRS that prevents someone else from filing a tax return using your Social Security number. The IP PIN is known only to you and the IRS and helps the IRS verify your identity when you file your electronic or paper tax return. You can learn more and obtain your IP PIN here: <https://www.irs.gov/identity-theft-fraud-scams/get-an-identity-protection-pin>.

You also have certain rights under the Fair Credit Reporting Act (FCRA): These rights include the right to know what is in your file; to dispute incomplete or inaccurate information; to have consumer reporting agencies correct or delete inaccurate, incomplete, or unverifiable information. For more information about the FCRA, and your rights pursuant to the FCRA, please visit http://files.consumerfinance.gov/f/201504_cfpb_summary_your-rights-under-fcra.pdf.

Additional Free Resources: You can obtain information from the consumer reporting agencies, the FTC, or from your respective state attorney general about fraud alerts, security freezes, and steps you can take toward preventing identity theft. You may report suspected identity theft to local law enforcement, including to the FTC or to the attorney general in your state.

Additional information:

District of Columbia: The Office of the Attorney General for the District of Columbia can be reached at 400 6th Street, NW, Washington, DC 20001; 202-727-3400; oag@dc.gov

California: California Attorney General can be reached at: 1300 "I" Street, Sacramento, CA 95814-2919; 800-952-5225; <http://oag.ca.gov/>

Massachusetts: Massachusetts Attorney General can be reached at: 1 Ashburton PI Boston, MA 02108; 617-727-8400; <https://www.mass.gov/orgs/office-of-the-attorney-general>

Maine: Maine Attorney General can be reached at: 6 State House Station Augusta, ME 04333; 207-626-8800; <https://www.maine.gov/ag/>

Maryland: Maryland Attorney General can be reached at: 200 St. Paul Place Baltimore, MD 21202; 888-743-0023; oag@state.md.us or IDTheft@oag.state.md.us

North Carolina: North Carolina Attorney General's Office, Consumer Protection Division, can be reached at: 9001 Mail Service Center Raleigh, NC 27699-9001; 877-5-NO-SCAM (Toll-free within North Carolina); 919-716-6000; www.ncdoj.gov

New York: New York Attorney General can be reached at: Bureau of Internet and Technology Resources, 28 Liberty Street, New York, NY 10005; 212-416-8433; <https://ag.ny.gov/>

Rhode Island: Rhode Island Attorney General can be reached at: 150 South Main Street Providence, RI 02903, <http://www.riag.ri.gov>.

Texas: Texas Attorney General can be reached at: 300 W. 15th Street, Austin, Texas 78701; 800-621-0508; texasattorneygeneral.gov/consumer-protection/

Vermont: Vermont Attorney General's Office can be reached at: 109 State Street, Montpelier, VT 05609; 802-828-3171; ago.info@vermont.gov