



DLA Piper LLP (US)
701 Fifth Avenue
Suite 6900
Seattle, WA 98104-7029
www.dlapiper.com

Kate Lucente
Kate.lucente@dlapiper.com
T (206) 839-4854

VIA E-MAIL: idtheft@oag.state.md.us

The Honorable Anthony G. Brown
Office of the Attorney General
Attn: Security Breach Notification
200 St. Paul Place
Baltimore, MD 21202

May 14, 2024

Re: Security Incident Notification

Dear Attorney General Brown:

We are providing notice on behalf of SPI Pharma, Inc. ("SPI Pharma") pursuant to Md. Code Ann. Comm. Law § 14-3504, regarding an incident involving one (1) Maryland resident. By providing this notice, SPI Pharma does not waive any rights or defenses regarding the applicability of Maryland law, the applicability of Maryland's security incident notification statute, or personal jurisdiction.

On April 23, 2024, an SPI Pharma employee inadvertently disclosed the personal information of a small number of current and former SPI Pharma employees and contractors to a limited number of its vendors via an e-mail attachment. Upon learning of this incident, SPI Pharma promptly took proactive measures and requested all recipients confirm deletion of the file and that no information contained therein had been misused or further disclosed. SPI received such confirmation from all recipients.

SPI Pharma also reviewed the impacted data file to confirm the nature and scope of the incident and personal information impacted. The personal information impacted includes name, email address, address, bank account and routing number, and Social Security number.

Although there is no evidence to suggest any inadvertently disclosed personal information has been misused by recipients, in an abundance of caution, SPI Pharma is offering the impacted Maryland resident complimentary credit monitoring and identity theft protection services for twenty-four (24) months.

SPI Pharma anticipates mailing notice to the Maryland resident on or about May 15, 2024, pursuant to Md. Code Ann. Comm. Law § 14-3504. A sample notification letter is enclosed for your reference.

The information provided in this letter with respect to the security incident is based on SPI Pharma's current knowledge and may change should additional relevant information be discovered. Should you

have any questions regarding this matter, please contact me at (206) 839 4854 or Kate.Lucente@us.dlapiper.com.

Respectfully submitted,

DLA Piper LLP (US)

A handwritten signature in black ink, appearing to read "Kate Lucente", written in a cursive style.

Kate Lucente
Partner

Enclosure: Sample Notification Letter



SPI Pharma, Inc.
40 Cape Henlopen Drive
Lewes, DE 19958
USA
302-360-7200
Fax 302-360-7290

SPI Pharma, Inc.
503 Carr Road
Wilmington, DE 19809
USA
302-576-8500
Fax 302-576-8567

SPI Pharma, Inc.
1711 Tiles Court
Grand Haven, MI 49417
USA
616-935-6900
Fax 616-935-6938

SPI Pharma, SAS
845 Chemin du Vallon du Maire
13240 Septemes-Les Vallons
France
33-4-9196-3600
Fax 33-4-9165-3903

May 15, 2024

[Name]
[Address]
[City], [State] [Zip Code]

Notice of Security Incident

Dear [Name]:

SPI Pharma, Inc. (“SPI Pharma” or “we”) writes to inform you of a security incident that impacted certain of your personal information. While we are unaware of any attempted or actual misuse of your information, this notice provides you with information about what occurred and the steps you can take to help protect your information.

On April 23, 2024, an SPI Pharma employee inadvertently disclosed the personal information of a small number of current and former SPI Pharma employees and contractors to a limited number of our vendors via an e-mail attachment. Upon learning of this incident, SPI Pharma promptly took proactive measures and requested all recipients confirm deletion of the file and that no information contained therein had been misused or further disclosed. SPI received such confirmation from all recipients.

In parallel, SPI Pharma reviewed the impacted data file to confirm the nature and scope of the incident and personal information potentially impacted. The personal information impacted included your Name, Social Security number, bank account number, routing number, address, and email address.

Although we have no evidence to suggest your information has been further disclosed or misused, in an abundance of caution, SPI Pharma is providing you with a 24-month complimentary subscription to Equifax’s credit monitoring and identity protection services, Credit Watch™ Gold. Enrolling in the services will not hurt your credit score. For more information on Credit Watch™ Gold, including instructions on how to activate your membership, please see the additional information provided in this letter. Please note the deadline to enroll is August 13, 2024.

Additionally, please review the enclosed *Additional Steps to Help Protect Your Information* for information regarding other precautionary measures you can take to protect your personal information, including placing a fraud alert and/or security freeze on your credit files, and/or obtaining a free credit report. You should always remain vigilant for suspicious activity and regularly review your financial statements and credit reports.

Please email Dataprotection@abfamericas.com for assistance or for any additional questions you may have. We sincerely apologize that this incident occurred and regret any concern this incident may cause you.

Sincerely,

SPI Pharma, Inc.



An ABF Ingredients Company

SPI Pharma, Inc.
40 Cape Henlopen Drive
Lewes, DE 19958
USA
302-360-7200
Fax 302-360-7290

SPI Pharma, Inc.
503 Carr Road
Wilmington, DE 19809
USA
302-576-8500
Fax 302-576-8567

SPI Pharma, Inc.
1711 Tiles Court
Grand Haven, MI 49417
USA
616-935-6900
Fax 616-935-6938

SPI Pharma, SAS
845 Chemin du Vallon du Maire
13240 Septemes-Les Vallons
France
33-4-9196-3600
Fax 33-4-9165-3903



[Name]

Enter your Activation Code: XXXXXXXXXXXXX

Enrollment Deadline: [Date]

Equifax Credit Watch™ Gold

*Note: You must be over age 18 with a credit file to take advantage of the product

Key Features

- Credit monitoring with email notifications of key changes to your Equifax credit report
- Daily access to your Equifax credit report
- WebScan notifications¹ when your personal information, such as Social Security Number, credit/debit card or bank account numbers are found on fraudulent Internet trading sites
- Automatic fraud alerts², which encourages potential lenders to take extra steps to verify your identity before extending credit, plus blocked inquiry alerts and Equifax credit report lock³
- Identity Restoration to help restore your identity should you become a victim of identity theft, and a dedicated Identity Restoration Specialist to work on your behalf
- Up to \$1,000,000 of identity theft insurance coverage for certain out of pocket expenses resulting from identity theft⁴

Enrollment Instructions

Go to www.equifax.com/activate

Enter your unique Activation Code of XXXXXXXXXXXXX then click "Submit" and follow these 4 steps:

1. **Register:**

Complete the form with your contact information and click "Continue".

If you already have a myEquifax account, click the 'Sign in here' link under the "Let's get started" header.

Once you have successfully signed in, you will skip to the Checkout Page in Step 4

2. **Create Account:**

Enter your email address, create a password, and accept the terms of use.

3. **Verify Identity:**

To enroll in your product, we will ask you to complete our identity verification process.

4. **Checkout:**

Upon successful verification of your identity, you will see the Checkout Page.

Click 'Sign Me Up' to finish enrolling.

You're done!

The confirmation page shows your completed enrollment.

Click "View My Product" to access the product features.

¹WebScan searches for your Social Security Number, up to 5 passport numbers, up to 6 bank account numbers, up to 6 credit/debit card numbers, up to 6 email addresses, and up to 10 medical ID numbers. WebScan searches thousands of Internet sites where consumers' personal information is suspected of being bought and sold, and regularly adds new sites to the list of those it searches.



An ABF Ingredients Company

SPI Pharma, Inc.
40 Cape Henlopen Drive
Lewes, DE 19958
USA
302-360-7200
Fax 302-360-7290

SPI Pharma, Inc.
503 Carr Road
Wilmington, DE 19809
USA
302-576-8500
Fax 302-576-8567

SPI Pharma, Inc.
1711 Tiles Court
Grand Haven, MI 49417
USA
616-935-6900
Fax 616-935-6938

SPI Pharma, SAS
845 Chemin du Vallon du Maire
13240 Septemes-Les Vallons
France
33-4-9196-3600
Fax 33-4-9165-3903

However, the Internet addresses of these suspected Internet trading sites are not published and frequently change, so there is no guarantee that we are able to locate and search every possible Internet site where consumers' personal information is at risk of being traded. ²The Automatic Fraud Alert feature is made available to consumers by Equifax Information Services LLC and fulfilled on its behalf by Equifax Consumer Services LLC. ³Locking your Equifax credit report will prevent access to it by certain third parties. Locking your Equifax credit report will not prevent access to your credit report at any other credit reporting agency. Entities that may still have access to your Equifax credit report include: companies like Equifax Global Consumer Solutions, which provide you with access to your credit report or credit score, or monitor your credit report as part of a subscription or similar service; companies that provide you with a copy of your credit report or credit score, upon your request; federal, state and local government agencies and courts in certain circumstances; companies using the information in connection with the underwriting of insurance, or for employment, tenant or background screening purposes; companies that have a current account or relationship with you, and collection agencies acting on behalf of those whom you owe; companies that authenticate a consumer's identity for purposes other than granting credit, or for investigating or preventing actual or potential fraud; and companies that wish to make pre-approved offers of credit or insurance to you. To opt out of such pre-approved offers, visit www.optoutprescreen.com ⁴The Identity Theft Insurance benefit is underwritten and administered by American Bankers Insurance Company of Florida, an Assurant company, under group or blanket policies issued to Equifax, Inc., or its respective affiliates for the benefit of its Members. Please refer to the actual policies for terms, conditions, and exclusions of coverage. Coverage may not be available in all jurisdictions.\



SPI Pharma, Inc.
40 Cape Henlopen Drive
Lewes, DE 19958
USA
302-360-7200
Fax 302-360-7290

SPI Pharma, Inc.
503 Carr Road
Wilmington, DE 19809
USA
302-576-8500
Fax 302-576-8567

SPI Pharma, Inc.
1711 Tiles Court
Grand Haven, MI 49417
USA
616-935-6900
Fax 616-935-6938

SPI Pharma, SAS
845 Chemin du Vallon du Maire
13240 Septemes-Les Vallons
France
33-4-9196-3600
Fax 33-4-9165-3903

Additional Steps to Help Protect Your Information

Enroll in credit monitoring and identity protection services.

Review Your Credit Reports. We recommend that you remain vigilant by regularly reviewing statements from your accounts and periodically obtaining your credit report from one or more of the national credit reporting companies. You may obtain a free copy of your credit report online at www.annualcreditreport.com, by calling toll-free 1-877-322-8228, or by mailing an Annual Credit Report Request Form (available at www.annualcreditreport.com) to Annual Credit Report Request Service, P.O. Box 105281, Atlanta, GA, 30348-5281. You may also purchase a copy of your credit report by contacting one or more of the three national credit reporting agencies listed below.

Equifax
P.O. Box 105788
Atlanta, GA 30348-5788
1-800-685-1111
www.equifax.com

Experian
P.O. Box 9554
Allen, TX 75013-9554
1-888-397-3742
www.experian.com

TransUnion
P.O. Box 2000
Chester, PA 19016-2000
1-888-909-8872
www.transunion.com

You should also know that you have the right to file a police report if you ever experience identity fraud. A police report is often required to dispute fraudulent items. You can report suspected incidents of identity theft to local law enforcement or to the Attorney General.

Credit Freeze. You have the right to put a security freeze, also known as a credit freeze, on your credit file, so that no new credit can be opened in your name without the use of a Personal Identification Number (PIN) that is issued to you when you initiate a freeze. A credit freeze is designed to prevent potential credit grantors from accessing your credit report without your consent. If you place a credit freeze, potential creditors and other third parties will not be able to access your credit report unless you temporarily lift the freeze. Therefore, using a credit freeze may delay your ability to obtain credit. Pursuant to federal law, you cannot be charged to place or lift a credit freeze on your credit report. Should you wish to place a credit freeze, please contact all three major consumer reporting agencies listed below.

Equifax
P.O. Box 105788
Atlanta, GA 30348-5788
1-800-685-1111
www.equifax.com/personal/credit-report-services

Experian
P.O. Box 9554
Allen, TX 75013-9554
1-888-397-3742
www.experian.com/freeze/center.html

TransUnion
P.O. Box 2000
Chester, PA 19016-2000
1-888-909-8872
www.transunion.com/credit-freeze

You must separately place a credit freeze on your credit file at each credit reporting agency. The following information should be included when requesting a credit freeze:

- 1) Full name, with middle initial and any suffixes;
- 2) Social Security number;
- 3) Date of birth (month, day, and year);



An ABF Ingredients Company

SPI Pharma, Inc.
40 Cape Henlopen Drive
Lewes, DE 19958
USA
302-360-7200
Fax 302-360-7290

SPI Pharma, Inc.
503 Carr Road
Wilmington, DE 19809
USA
302-576-8500
Fax 302-576-8567

SPI Pharma, Inc.
1711 Tiles Court
Grand Haven, MI 49417
USA
616-935-6900
Fax 616-935-6938

SPI Pharma, SAS
845 Chemin du Vallon du Maire
13240 Septemes-Les Vallons
France
33-4-9196-3600
Fax 33-4-9165-3903

- 4) Current address and previous addresses for the past five (5) years;
- 5) Proof of current address, such as a current utility bill or telephone bill; and
- 6) Other personal information as required by the applicable credit reporting agency.

If you request a credit freeze online or by phone, then the credit reporting agencies have one (1) business day after receiving your request to place a credit freeze on your credit file report. If you request a lift of the credit freeze online or by phone, then the credit reporting agency must lift the freeze within one (1) hour. If you request a credit freeze or lift of a credit freeze by mail, then the credit agency must place or lift the credit freeze no later than three (3) business days after getting your request.

Fraud Alerts. You also have the right to place an initial or extended fraud alert on your file at no cost. An initial fraud alert lasts 1-year and 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 you are a victim of identity theft, you are entitled to an extended fraud alert, which is a fraud alert lasting 7 years. Should you wish to place a fraud alert on your file, please contact any one of the agencies listed below. The agency you contact will then contact the other two credit agencies.

Equifax
P.O. Box 105788
Atlanta, GA 30348-5788
1-800-685-1111
www.equifax.com/personal/credit-report-services

Experian
P.O. Box 9554
Allen, TX 75013-9554
1-888-397-3742
www.experian.com/fraud/center.html

TransUnion
P.O. Box 2000
Chester, PA 19016-2000
1-888-909-8872
www.transunion.com/fraud-victim-resource/place-fraud-alert

Additional Information. You can further educate yourself regarding identity theft and the steps you can take to protect yourself by contacting your state Attorney General or the Federal Trade Commission ("FTC"). Instances of known or suspected identity theft should be reported to law enforcement, your Attorney General, and the FTC. The Federal Trade Commission can be reached at: 600 Pennsylvania Avenue NW, Washington, DC 20580, www.ftc.gov/idtheft, 1-877-ID-THEFT (1-877-438-4338); TTY: 1-866-653-4261.

State-Specific Information. Your state Attorney General may also have advice on preventing identity theft, and you should report instances of known or suspected identity theft to law enforcement, your state attorney general, or the FTC. If you are a resident of the following states, the following information applies to you.

Colorado Residents: The Attorney General can be contacted at Office of the Attorney General Colorado Department of Law, Ralph L. Carr Judicial Building, 1300 Broadway, 10th Floor, Denver, CO 80203; +1 (720) 508-6000; www.coag.gov.

Delaware Residents: The Attorney General can be contacted at Delaware Department of Justice, Carvel State Building, 820 N. French Street, Wilmington, DE 19801; +1 (302) 683-8800; www.attorneygeneral.delaware.gov.



An ABF Ingredients Company

SPI Pharma, Inc.
40 Cape Henlopen Drive
Lewes, DE 19958
USA
302-360-7200
Fax 302-360-7290

SPI Pharma, Inc.
503 Carr Road
Wilmington, DE 19809
USA
302-576-8500
Fax 302-576-8567

SPI Pharma, Inc.
1711 Tiles Court
Grand Haven, MI 49417
USA
616-935-6900
Fax 616-935-6938

SPI Pharma, SAS
845 Chemin du Vallon du Maire
13240 Septemes-Les Vallons
France
33-4-9196-3600
Fax 33-4-9165-3903

Maryland Residents: The Attorney General can be contacted at Office of Attorney General, 200 St. Paul Place, Baltimore, Maryland 21202; +1 (888) 743-0023; www.marylandattorneygeneral.gov.

Nevada Residents: The Attorney General can be contacted at Office of Attorney General, 100 North Carson Street, Carson City, Nevada 89701; +1 (702) 486-3132; www.ag.nv.gov.

Oregon Residents: The Attorney General can be contacted at Oregon Department of Justice, 1162 Court Street NE, Salem, OR 97301-4096; +1 (877) 877-9392 (toll-free in Oregon); +1 (503) 378-4400; www.doj.state.or.us.

Pennsylvania Residents: The Attorney General can be contacted at Pennsylvania Office of Attorney General, Strawberry Square, Harrisburg, PA 17120; +1 (717) 787-3391; www.attorneygeneral.gov.