



2049 Century Park East Suite 2900 Los Angeles, CA 90067 • 310-229-1335

May 22, 2024

Pasha A. Sternberg
310-229-1335
psterberg@polsinelli.com

VIA E-MAIL (IDTheft@oag.state.md.us)

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

Re: Notification of Data Security Incident

To Whom It May Concern:

We represent Trionfo Solutions, LLC (“Trionfo”), which has a mailing address of 333 W. Pierce Road, Suite 190, Itasca, IL 60143, in connection with a recent incident that involved the personal information of one thousand seven hundred forty-six (1,746) Maryland residents. We provide this notice on behalf of Trionfo pursuant to MD. Code. Ann., Com. Law §14-3504 (h).

This notice will be supplemented, if necessary, with any new, significant facts discovered subsequent to its submission. While Trionfo is notifying you of this incident, Trionfo does not waive any rights or defenses relating to the incident, this notice, or the applicability of Maryland law on personal jurisdiction.

BACKGROUND OF THE INCIDENT

On December 6, 2023, Trionfo discovered that an unauthorized party had encrypted certain Trionfo systems with ransomware. Upon discovering the incident, Trionfo promptly took steps to contain the situation and (through legal counsel) engaged a third-party forensic investigation firm to further investigate and to confirm the security of the Trionfo environment. The investigation determined that the unauthorized party had access to certain Trionfo systems between December 4, 2023 and December 6, 2023 and may have acquired copies of certain files during that time.

Based on the findings of the forensic investigation, Trionfo undertook a comprehensive review of the files that may have been acquired by the unauthorized party. On January 2, 2024, through this review, Trionfo determined that the files contained personal information about some individuals. Through further analysis, Trionfo determined that it had received this personal information through certain business customers. The information is associated with a number of corporate entities including Reliance Standard Life Insurance Company and others.

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Polsinelli PC, Polsinelli LLP in California



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On January 9, 2024, Trionfo notified the involved business customers that the incident potentially involved personal information that Trionfo had collected through them. Since then, Trionfo has been coordinating with those business customers to – at their direction – complete appropriate notifications of the incident to individuals and regulatory bodies. This notification is being submitted as part of that work and on behalf of some of Trionfo’s business customers.

The personal information involved in this incident consists of the following data elements for a total of one thousand seven hundred forty-six (1,746) Maryland residents: name, address, date of birth, Social Security number, phone number and/or email address.

NUMBER OF MARYLAND RESIDENTS NOTIFIED

Trionfo is notifying Maryland residents whose personal information was involved in the incident via letters mailed USPS First-Class Mail beginning May 22, 2024. The notification letter includes information on ways the notified individuals can protect themselves against potential fraud and identity theft, as well as a telephone number they can call if they have any questions regarding the incident. The letter also includes an offer for complimentary credit monitoring and identity theft protection services for all individuals whose Social Security numbers were involved. Enclosed is a template copy of the notice letter.

STEPS TAKEN RELATING TO THE INCIDENT

Trionfo regularly evaluates available technical, administrative, and physical safeguards to assess if they are appropriate in response to the ever-evolving cyber threat landscape. In response to this particular incident, Trionfo has already taken or plans to take a number of steps, including resetting user account passwords and deploying an endpoint detection and monitoring tool designed to detect and prevent any malicious activity in our environment.

CONTACT INFORMATION

Please contact me if you have any questions or if I can provide you with any further information concerning this matter.

Very truly yours,

A handwritten signature in cursive script, appearing to read 'Pasha A. Sternberg'.

Pasha A. Sternberg

Enclosure



<<Date>> (Format: Month Day, Year)

<<first_name>> <<middle_name>> <<last_name>> <<suffix>>
<<address_1>>
<<address_2>>
<<city>>, <<state_province>> <<postal_code>>
<<country>>

Dear <<first_name>> <<middle_name>> <<last_name>> <<suffix>>:

RE: NOTICE OF DATA BREACH

Trionfo Solutions, LLC ("Trionfo" or "we") respects the privacy of the information it maintains, which is why we are writing to advise you of a recent incident that may have involved some of your personal information. Trionfo maintains this information in connection with certain insurance related services that we provide to [REDACTED] in connection with employer sponsored benefits. **We have no evidence that your personal information has been misused for the purpose of committing fraud or identity theft.** Nonetheless, we are writing to advise you about the incident and to provide you with guidance on what you can do to protect yourself, should you feel it is appropriate to do so.

What Happened? Trionfo learned that an unauthorized party gained access to certain Trionfo systems between December 4, 2023 and December 6, 2023. Upon discovering the incident, we promptly secured those systems and initiated an investigation. Based on the results of the investigation, we believe the unauthorized party may have acquired certain files from our systems.

What Information Was Involved? Trionfo reviewed the contents of the files that may have been acquired and determined that they contained your name, address, date of birth, Social Security number, phone number, and/or email address.

What We Are Doing. We are taking steps to reduce the risk of this type of incident occurring in the future, including reviewing our technical and administrative safeguards. Additionally, while we are not aware of any misuse of your personal information, we are offering a complimentary one-year membership of Experian IdentityWorksSM Credit 3B. This product helps detect possible misuse of your personal information and provides you with identity protection services focused on immediate identification and resolution of identity theft. IdentityWorks Credit 3B is completely free to you, and enrolling in this program will not hurt your credit score. For more information on identity theft prevention and IdentityWorks Credit 3B, including instructions on how to activate your complimentary one-year membership, please see the additional information provided in this letter.

What You Can Do. While we have no evidence that your personal information has been misused, we encourage you to take advantage of the complimentary credit monitoring included in this letter. Additionally, you can find more information on steps to protect yourself against possible identity theft or fraud in the enclosed Additional Important Information sheet.

For More Information. We take our responsibility to safeguard personal information seriously and apologize for any inconvenience this incident might cause. If you need further assistance, please call toll free at 1-866-528-3898, between 6:00 a.m. and 3:30 p.m. PST, Monday through Friday excluding major holidays.

Sincerely,

Trionfo Solutions, LLC

ACTIVATING YOUR COMPLIMENTARY CREDIT MONITORING

To help protect your identity, we are offering a **complimentary** one-year membership of Experian IdentityWorksSM Credit 3B. This product helps detect possible misuse of your personal information and provides you with superior identity protection support focused on immediate identification and resolution of identity theft.

Activate IdentityWorks Credit 3B Now in Three Easy Steps

1. ENROLL by: <<b2b_text_6 (activation date)>> (Your code will not work after this date.)
2. VISIT the **Experian IdentityWorks website** to enroll: <https://www.experianidworks.com/3bcredit>
3. PROVIDE the **Activation Code**: <<Activation Code s_n>>

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 877-288-8057. Be prepared to provide engagement number <<b2b_text_2 (engagement number)>> as proof of eligibility for the identity restoration services by Experian.

ADDITIONAL DETAILS REGARDING YOUR 12-MONTH EXPERIAN IDENTITYWORKS CREDIT 3B MEMBERSHIP:

A credit card is **not** required for enrollment in Experian IdentityWorks Credit 3B.

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, Equifax and Transunion files 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.
- **Up to \$1 Million Identity Theft Insurance^{**}:** Provides coverage for certain costs and unauthorized electronic fund transfers.

Activate your membership today at <https://www.experianidworks.com/3bcredit> or call 877-288-8057 to register with the activation code above.

What you can do to protect your information: There are additional actions you can consider taking to reduce the chances of identity theft or fraud on your account(s). Please refer to www.ExperianIDWorks.com/restoration for this information. If you have any questions about IdentityWorks, need help understanding something on your credit report or suspect that an item on your credit report may be fraudulent, please contact Experian's customer care team at 877-288-8057.

* 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.

Additional Important Information

As a precautionary measure, we recommend that you remain vigilant to protect against potential fraud and/or identity theft by, among other things, reviewing your account statements and monitoring 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 should also promptly report any fraudulent activity or any suspected incidents of identity theft to proper law enforcement authorities, including the police and your state's attorney general, as well as the Federal Trade Commission ("FTC").

You may wish to review the tips provided by the FTC on fraud alerts, security/credit freezes and steps you can take to avoid identity theft. For more information and to contact the FTC, please visit www.ftc.gov/idtheft or call 1-877-ID-THEFT (1-877-438-4338). You may also contact the FTC at Federal Trade Commission, 600 Pennsylvania Avenue, NW, Washington, DC 20580.

Credit Reports: By law, you may obtain a free copy of your credit report once every 12 months from each of the three national credit reporting agencies. The three national credit reporting agencies have also agreed to provide free weekly online credit reports. You can obtain your free credit report by visiting www.annualcreditreport.com, by calling toll-free 1-877-322-8228, 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>. Alternatively, you may elect to purchase a copy of your credit report by contacting the three national credit reporting agencies. Contact information for the three national credit reporting agencies for the purpose of requesting a copy of your credit report or for general inquiries is as follows:

Equifax
1-866-349-5191
www.equifax.com
P.O. Box 740241
Atlanta, GA 30374

Experian
1-888-397-3742
www.experian.com
P.O. Box 2002
Allen, TX 75013

TransUnion
1-800-888-4213
www.transunion.com
P.O. Box 2000
Chester, PA 19016

Fraud Alerts: By law, you have the right to place a fraud alert on your credit report if you believe you have been, or are about to become, a victim of fraud or related crime. . A fraud alert is free and will stay on your credit report for one (1) year. The alert informs creditors of possible fraudulent activity within your report and requests that the creditor contact you prior to establishing any new accounts in your name. To place a fraud alert on your credit report, contact any of the three national credit reporting agencies using the contact information listed above. Additional information is available at www.annualcreditreport.com/protectYourIdentity.action.

Credit and Security Freezes: By law, you have the right to place a credit freeze, also known as a security freeze, on your credit file, so that no new credit can be opened in your name without the use of a PIN number that is issued to you when you initiate the 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 get access to your credit report unless you temporarily lift the freeze. Therefore, using a credit freeze may delay your ability to obtain credit. Unlike a fraud alert, you must separately place a credit freeze on your credit file at each credit reporting company. Since the instructions for how to establish a credit freeze differ from state to state, please contact the three major credit reporting companies as specified below to find out more information:

Equifax Security Freeze
1-888-298-0045
<https://www.equifax.com/personal/credit-report-services/credit-freeze/>
P.O. Box 105788
Atlanta, GA 30348

Experian Security Freeze
1-888-397-3742
<https://www.experian.com/freeze/center.html>
P.O. Box 9554
Allen, TX 75013

TransUnion Security Freeze
1-888-909-8872
<https://www.transunion.com/credit-freeze>
P.O. Box 160
Woodlyn, PA 19094

This notification was not delayed by law enforcement.

Iowa Residents: Iowa residents can contact the Office of the Attorney general to obtain information about steps to take to avoid identity theft from the Iowa Attorney General's office at: Office of the Attorney General of Iowa, Hoover State Office Building, 1305 E. Walnut Street, Des Moines IA 50319, 515-281-5164.

Maryland Residents: Maryland residents can contact the Office of the Attorney General to obtain information about steps you can take to avoid identity theft from the Maryland Attorney General's office at: Office of the Attorney General, 200 St. Paul Place, Baltimore, MD 21202, (888) 743-0023, <http://www.marylandattorneygeneral.gov/>.

New Mexico Residents: Individuals have rights under the Fair Credit Reporting Act. We encourage you to review your rights under the Fair Credit Reporting Act by visiting https://files.consumerfinance.gov/f/documents/bcftp_consumer-rights-summary_2018-09.pdf, or by requesting information in writing from the Consumer Financial Protection Bureau, 1700 G Street N.W., Washington, DC 20552.

New York State Residents: New York residents can obtain information about preventing identity theft from the New York Attorney General's Office at: Office of the Attorney General for the State of New York, Bureau of Consumer Frauds & Protection, The Capitol, Albany, New York 12224-0341; <https://ag.ny.gov/consumer-frauds/identity-theft>; (800) 771-7755.

North Carolina Residents: North Carolina residents can obtain information about preventing identity theft from the North Carolina Attorney General's Office at: North Carolina Attorney General's Office, Consumer Protection Division, 9001 Mail Service Center, Raleigh, NC 27699-9001; 877-5-NO-SCAM (Toll-free within North Carolina); 919-716-6000; www.ncdoj.gov.

Oregon Residents: Oregon residents are advised to report any suspected identity theft to law enforcement, including the Federal Trade Commission and the Oregon Attorney General. Oregon residents can contact the Oregon Attorney General at 1162 Court St. NE, Salem, OR 97301-4096; 503-378-4400; <https://www.doj.state.or.us/>.

Rhode Island Residents: We believe that this incident affected ____ Rhode Island residents. Rhode Island residents can contact the Office of the Attorney general at: Rhode Island Office of the Attorney General, 150 South Main Street, Providence, RI 02903, (401) 274-4400, www.riag.ri.gov. You have the right to obtain any police report filed in regard to 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.

Vermont Residents: If you do not have internet access but would like to learn more about how to place a security freeze on your credit report, contact the Vermont Attorney General's Office at 802-656-3183 (800-649-2424 toll free in Vermont only).



2049 Century Park East Suite 2900 Los Angeles, CA 90067 • 310-229-1335

August 26, 2024

Pasha A. Sternberg
310-229-1335
psternberg@polsinelli.com

VIA E-MAIL (IDTheft@oag.state.md.us)

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

Re: Notification of Data Security Incident

To Whom It May Concern:

We represent Trionfo Solutions, LLC (“Trionfo”), which has a mailing address of 333 W. Pierce Road, Suite 190, Itasca, IL 60143, in connection with a recent incident that involved the personal information of Maryland residents. This notification is a supplement to the notification that Trionfo filed with this office on May 22, 2024 (the “Original Notice”), and this notification relates to the same incident described in that Original Notice (the “Incident”).

Trionfo is providing this supplement at the direction of its business customer, Metropolitan Life Insurance Company (“MetLife”). The purpose of this supplement is to inform your office that, at the direction of MetLife, Trionfo is notifying additional Maryland residents of the Incident. These notifications will be made on August 26, 2024. Once these notifications are complete, the total number of Maryland residents notified of the Incident will be one thousand eight hundred twenty-two (1,822).

This notice will be further supplemented, if necessary, with any new, significant facts discovered subsequent to its submission. While Trionfo is notifying you of this incident, Trionfo does not waive any rights or defenses relating to the incident, this notice, or the applicability of Maryland law on personal jurisdiction.

Please contact me if you have any questions or if I can provide you with any further information concerning this matter.

Very truly yours,

A handwritten signature in cursive script, appearing to read 'Pasha A. Sternberg'.

Pasha A. Sternberg

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Atlanta Boston Chicago Dallas Denver Houston Kansas City Los Angeles Nashville New York Phoenix
St. Louis San Francisco Seattle Washington, D.C. Wilmington
Polsinelli PC, Polsinelli LLP in California