



2100 Southbridge Pkwy, Suite 650, Birmingham, AL 35209

June 13, 2024

J.T. Malatesta
(205) 963-7138
jtmalatesta@polsinelli.com

VIA EMAIL ONLY

Attorney General Anthony G. Brown
Office of the Attorney General
Attn: Security Breach Notification
200 St. Paul Place
Baltimore, MD 21202
Idtheft@oag.state.md.us

Re: Notice of a Security Incident

Dear Attorney General Brown:

Pursuant to Md. Code. Ann., Com. Law § 14-3504(h), I am writing on behalf of our client, Doxim, Inc. (“Doxim” or the “Company”), regarding a security incident involving the personal information of approximately three hundred and sixty-five (365) Maryland residents. Doxim is a third-party service provider that assists credit unions with statement preparation.

On or around December 30, 2023, Doxim experienced a security incident that resulted in the temporary unavailability of some of its computer systems. Upon discovering the situation, Doxim immediately took these systems offline, contacted law enforcement, and notified its credit union customers, providing regular updates until the situation was resolved.

Over the past few months, we have been overseeing an investigation into the security incident. That process has entailed an in-depth review of files that we determined were removed from Doxim’s network between December 25 and December 30, 2023. Some of those files included the personal information of credit union members. While the exact information tended to vary by record and member, we identified documents that included member name, account number, social security number and/or tax ID number.

Doxim has been working with its credit union customers to finalize notices to members whose information was involved. Doxim began notifying affected individuals on May 31, 2024. A copy of the individual notice is enclosed. This effort will continue over the coming weeks, and we will update your office when all notices have been mailed.

Doxim has partnered with cybersecurity experts to strengthen its cybersecurity defenses and retained a third-party service to monitor online forums and marketplaces for any information relating to this

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Kansas City	Los Angeles	Miami	Nashville	New York	Phoenix	Raleigh	
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Polsinelli PC, Polsinelli LLP in California

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June 13, 2024

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event. To date, Doxim has found no evidence that any files, including those containing personal information, have been misused.

Please let us know if any additional information would be helpful to receive.

Sincerely,

A handwritten signature in blue ink, appearing to read 'J.T. Malatesta'.

J.T. Malatesta

Enclosure



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

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

Re: Notice of Security Incident

Dear <<first_name>> <<last_name>>,

You are receiving this letter because you are a current or former member of <<b2b_text_2 (Data Owner)>>.

I am writing to inform you of a recent security incident at Doxim Inc. (“Doxim,” “we,” or “our”) that resulted in unauthorized access to files containing your personal information. Doxim is a third-party service provider that has assisted <<b2b_text_3 (Data Owner Short)>> with the preparation of account statements and/or income tax forms for its members. For avoidance of doubt, <<b2b_text_3 (Data Owner Short)>>’s systems were not compromised in any way.

As required by law, this letter explains what happened, identifies the personal information involved, and provides information on how you can protect your identity.

What Happened? On December 30, 2023, Doxim detected suspicious activity within the portion of its computer network supporting its credit union services. Upon discovering the situation, we promptly took these systems offline, notified law enforcement, and engaged industry-leading cybersecurity experts to investigate. As part of our investigation, we determined that files had been removed from our network. Following an in-depth review of those files, we recently discovered that some of those files included your personal information. To date, we have found no evidence that any files, including those containing your personal information, have been misused.

What Are We Doing? We are supporting federal law enforcement’s criminal investigation. We are working with cybersecurity experts to fortify our cybersecurity defenses, and we have retained a third-party service to monitor online forums and marketplaces for information relating to this event.

What Information Was Involved? The files removed from our network that relate to you contained your name, mailing address, account number, and/or Social Security number. This information was provided to Doxim to prepare your account statements and/or income tax forms.

What You Can Do. We have enclosed an Identity Protection Reference Guide to make you aware of ways to monitor and help protect your personal information. You will also find information on how to activate the identity monitoring services we are offering you, free of charge, if you are interested in these services.

For More Information. If you have any questions or concerns, please reach out to our dedicated support team at (866) 898-2363, Monday through Friday 8:00 a.m. – 5:30 p.m. Central Time (excluding major U.S. holidays).

Sincerely,

Mike Hennessy
CEO

IDENTITY PROTECTION REFERENCE GUIDE

1. Review your Credit Reports. We recommend that you monitor your credit reports for any activity you do not recognize. Under federal law, you are entitled every 12 months to one free copy of your credit report from each of the three major credit reporting companies. To order your free annual credit report, visit www.annualcreditreport.com, call toll-free (877) 322-8228, or complete the Annual Credit Report Request Form on the U.S. Federal Trade Commission's ("FTC") website at www.ftc.gov and mail it to Annual Credit Report Request Service, P.O. Box 105281, Atlanta, GA 30348-5281. The three credit bureaus provide free annual credit reports only through the website, toll-free number or request form.

If you see anything in your credit report that you do not understand, call the credit bureau at the telephone number on the report. You should notify the credit bureaus of any inaccuracies in your report, whether due to error or fraud, as soon as possible so the information can be investigated and, if found to be in error, corrected. If there are accounts or charges you did not authorize, immediately notify the appropriate credit bureau by telephone and in writing.

2. Place Fraud Alerts. You can place a fraud alert at one of the three major credit bureaus by phone and also via Experian's or Equifax's website. A fraud alert tells creditors to follow certain procedures, including contacting you, before they open any new accounts or change your existing accounts. Please note that placing a fraud alert may delay you when seeking to obtain credit. You can learn more about fraud alerts by contacting the credit bureaus or by visiting their websites

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 30348-5069	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 30348-5788	Experian Credit Freeze, P.O. Box 9554, Allen, TX 75013	TransUnion Credit Freeze, P.O. Box 160, Woodlyn, PA 19094

It is only necessary to contact one of these bureaus and use only one of these methods. As soon as one of the three bureaus confirms your fraud alert, the others are notified to place alerts on their records as well. You should receive confirmation letters in the mail and will then be able to order all three credit reports, free of charge, for your review.

3. Place Security Freezes. By placing a security freeze, someone who fraudulently acquires your personally identifying information will not be able to use that information to open new accounts or borrow money in your name. Federal and state laws prohibit charges for placing, temporarily lifting, or removing a security freeze. Keep in mind that when you place the freeze, you will not be able to borrow money, obtain instant credit, or get a new credit card until you temporarily lift or permanently remove the freeze.

To place a security freeze, you must contact each of the three national credit reporting bureaus listed above and provide the following information: (1) your full name; (2) your social security number; (3) date of birth; (4) the addresses where you have lived over the past two years; (5) proof of current address, such as a utility bill or telephone bill; (6) a copy of a government issued identification card; and (7) if you are the victim of identity theft, include the police report, investigative report, or complaint to a law enforcement agency. If the request to place a security freeze is made by toll-free telephone or secure electronic means, the credit bureaus have one business day after receiving your request to place the security freeze on your credit report. If the request is made by mail, the credit bureaus have three business days to place the security freeze on your credit report after receiving your request. The credit bureaus must send confirmation to you within five business days and provide you with information concerning the process by which you may remove or lift the security freeze. There is no cost to place a security freeze.

4. Monitor Your Account Statements. We encourage you to carefully monitor your financial account statements for fraudulent activity and report anything suspicious to the respective institution or provider.

5. You can also further educate yourself regarding identity theft, fraud alerts, security freezes, and the steps you can take to protect yourself, by contacting the consumer reporting agencies, your state Attorney General, or the Federal Trade Commission (FTC). The Federal Trade Commission can be reached at: 600 Pennsylvania Avenue NW, Washington, DC 20580; www.identitytheft.gov; 1-877-ID-THEFT (877-438- 4338); and TTY: 866-653-4261. The Federal Trade Commission also encourages those who discover that their information has been misused to file a complaint with them.

6. Obtain an Identity Protection PIN from the IRS. You may obtain a six-digit PIN (an “Identity Protection PIN” or “IP PIN”) from the IRS to help with preventing someone else from filing a tax return using your Social Security Number or Individual Tax Identification Number. An IP PIN is known only to you and the IRS, and helps verify your identity when filing your tax return. For more information, including how to obtain an IP PIN, visit the IRS website <https://www.irs.gov/identity-theft-fraud-scams/get-an-identity-protection-pin>.

District of Columbia Residents: You can obtain additional information about identity theft prevention and protection from the Attorney General for the District of Columbia, 400 6th Street NW, Washington, D.C. 20001, (202) 727-3400, <https://oag.dc.gov/>.

Iowa Residents: You can report suspected identity theft to law enforcement, the FTC, or to the Office of the Attorney General of Iowa, Consumer Protection Division, Hoover State Office Building, 1305 E. Walnut Street, Des Moines, Iowa 50319-0106, 1-888-777-4590, <https://www.iowaattorneygeneral.gov/>.

Maryland Residents: You can obtain additional information about identity theft prevention and protection from the Maryland Attorney General, Identity Theft Unit at: 200 St. Paul Place, 25th Floor, Baltimore, MD 21202, 1-866-366-8343 or (410) 576-6491, <https://www.marylandattorneygeneral.gov>.

Massachusetts Residents: You have a right to file a police report and obtain a copy of your records. You can obtain additional information about identity theft prevention and protection from the Office of Consumer Affairs and Business Regulation, 501 Boylston Street, Suite 5100, Boston, MA 02116, (617) 973-8787, <https://www.mass.gov/service-details/identity-theft>.

New York Residents: You can obtain additional information about identity theft prevention and protection from the New York State Attorney General, The Capitol, State Street and Washington Avenue, Albany, NY 12224-0341, 1-800-771-7755, <https://ag.ny.gov/>.

North Carolina Residents: You can obtain additional information about preventing identity theft from the North Carolina Office of the Attorney General, Consumer Protection Division at: 9001 Mail Service Center, Raleigh, NC 27699-9001, (877) 566-7226 (toll-free within North Carolina) or (919) 716-6000, <https://ncdoj.gov/>.

Oregon Residents: You can report suspected identity theft to law enforcement, the FTC, or the Oregon Office of the Attorney General at: Oregon Department of Justice, 1162 Court St NE, Salem, OR 97301, 1-800-850-0228, <https://www.doj.state.or.us/>.

Rhode Island Residents: You can obtain additional information about identity theft prevention and protection from the Rhode Island Office of the Attorney General, 150 South Main Street, Providence, RI 02903, (401) 274-4400, <https://riag.ri.gov/>. As noted above, you have the right to place a security freeze on your credit report at no charge, but note that consumer reporting agencies may charge fees for other services. There are approximately 95 Rhode Island residents that may be impacted by this event.



TAKE ADVANTAGE OF YOUR IDENTITY MONITORING SERVICES

Doxim is offering you access to 12 months of complimentary credit monitoring and identity protection services through Kroll to help with detection and resolution of identity theft. To activate your membership and start monitoring your personal information, please follow the steps below:

Visit <https://enroll.krollmonitoring.com> to activate and take advantage of your identity monitoring services.

You have until <<b2b_text_6 (activation date)>> to activate your identity monitoring services.

Membership Number: <<Membership Number s_n>>

For more information about Kroll and your Identity Monitoring services, you can visit info.krollmonitoring.com.

You have been provided with access to the following services from Kroll:

Single Bureau Credit Monitoring

You will receive alerts when there are changes to your credit data—for instance, when a new line of credit is applied for in your name. If you do not recognize the activity, you'll have the option to call a Kroll fraud specialist, who will be able to help you determine if it is an indicator of identity theft.

\$1 Million Identity Fraud Loss Reimbursement

Reimburses you for out-of-pocket expenses totaling up to \$1 million in covered legal costs and expenses for any one stolen identity event. All coverage is subject to the conditions and exclusions in the policy.

Fraud Consultation

You have unlimited access to consultation with a Kroll fraud specialist. Support includes showing you the most effective ways to protect your identity, explaining your rights and protections under the law, assistance with fraud alerts, and interpreting how personal information is accessed and used, including investigating suspicious activity that could be tied to an identity theft event.

Identity Theft Restoration

If you become a victim of identity theft, an experienced Kroll licensed investigator will work on your behalf to resolve related issues. You will have access to a dedicated investigator who understands your issues and can do most of the work for you. Your investigator will be able to dig deep to uncover the scope of the identity theft, and then work to resolve it.

Kroll's activation website is only compatible with the current version or one version earlier of Chrome, Firefox, Safari and Edge.

To receive credit services, you must be over the age of 18 and have established credit in the U.S., have a Social Security number in your name, and have a U.S. residential address associated with your credit file.



2100 Southbridge Pkwy, Suite 650, Birmingham, AL 35209

December 9, 2024

J.T. Malatesta
(205) 963-7138
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VIA EMAIL ONLY

Attorney General Anthony G. Brown
Office of the Attorney General
200 St. Paul Place
Baltimore, MD 21202
Idtheft@oag.state.md.us

Re: Doxim, Inc. Notice of Security Incident -- Update

Dear Attorney General Brown:

I am following up on my prior submission to your office dated June 13, 2024 on behalf of Doxim, Inc. ("Doxim"). A copy of the Notice of Security Incident is enclosed as Exhibit A. Therein, I referenced the fact that Doxim was continuing to work with its credit union customers to finalize notices to members whose information was involved. This process recently concluded in October, 2024. Accordingly, I am writing to update your office that a total of 1,281 Maryland residents were notified about the incident.

Our investigation is now closed. Please do not hesitate to let me know if you have any questions.

Sincerely,

A handwritten signature in blue ink, appearing to read 'J.T. Malatesta'.

J.T. Malatesta

Enclosure

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St. Louis	Salt Lake City	San Francisco	Seattle	Silicon Valley	Washington, D.C.	Wilmington	

Polsinelli PC, Polsinelli LLP in California

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Exhibit A



2100 Southbridge Pkwy, Suite 650, Birmingham, AL 35209

June 13, 2024

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J.T. Malatesta

Enclosure



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

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

Re: Notice of Security Incident

Dear <<first_name>> <<last_name>>,

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As required by law, this letter explains what happened, identifies the personal information involved, and provides information on how you can protect your identity.

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What You Can Do. We have enclosed an Identity Protection Reference Guide to make you aware of ways to monitor and help protect your personal information. You will also find information on how to activate the identity monitoring services we are offering you, free of charge, if you are interested in these services.

For More Information. If you have any questions or concerns, please reach out to our dedicated support team at (866) 898-2363, Monday through Friday 8:00 a.m. – 5:30 p.m. Central Time (excluding major U.S. holidays).

Sincerely,

Mike Hennessy
CEO

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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 30348-5069	Experian Fraud Alert, P.O. Box 9554, Allen, TX 75013	TransUnion Fraud Alert, P.O. Box 2000, Chester, PA 19016
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TAKE ADVANTAGE OF YOUR IDENTITY MONITORING SERVICES

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Membership Number: <<Membership Number s_n>>

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Kroll's activation website is only compatible with the current version or one version earlier of Chrome, Firefox, Safari and Edge.

To receive credit services, you must be over the age of 18 and have established credit in the U.S., have a Social Security number in your name, and have a U.S. residential address associated with your credit file.