



MULLEN
COUGHLIN^{LLC}
ATTORNEYS AT LAW

Lynda Jensen
Office: (267) 930-2303
Fax: (267) 930-4771
Email: Ljensen@mullen.law

3 Allied Drive
Suite 303
Dedham, MA 02026

July 24, 2024

VIA E-MAIL

Office of the Attorney General
Attn: Security Breach Notification
200 St. Paul Place
Baltimore, MD 21202
E-mail: idtheft@oag.state.md.us

Re: Notice of Data Event

To Whom It May Concern:

We represent Horizontal Integration, Inc. (“Horizontal”) located at 1660 MN-100 Suite 200. St Louis Park, MN 55416, and are writing to notify your office of an event that may affect the security of certain personal information relating to one (1) Maryland resident. The investigation into this matter is ongoing, and this notice will be supplemented with any new significant facts learned subsequent to its submission. By providing this notice, Horizontal does not waive any rights or defenses regarding the applicability of Maryland law, the applicability of the Maryland data event notification statute, or personal jurisdiction.

Nature of the Data Event

Horizontal identified unexpected network activity within certain systems in its network. Horizontal then worked to secure its systems and, with the assistance of third-party cybersecurity specialists, began investigating to confirm the nature and scope of the event. Although the investigation is ongoing, Horizontal received preliminary information indicating that certain files were accessed or taken from a portion of the systems without authorization between July 3, 2024, and July 11, 2024. While Horizontal’s review of these files is ongoing, Horizontal determined on July 18, 2024, that certain information related to a Maryland resident was impacted by this event. The information for the Maryland resident that could have been impacted by this event includes name, Social Security number, driver’s license number or government-issued identification number, and medical information.

Notice to Maryland Resident

On or about July 24, 2024, Horizontal began providing written notice of this event to one (1) Maryland resident. Written notice is being provided in substantially the same form as the letter attached here as ***Exhibit A***.

Other Steps Taken and To Be Taken

Upon discovering the event, Horizontal moved quickly to investigate and respond to the event, assess the security of Horizontal systems, and identify potentially affected individuals. Horizontal is reviewing and updating existing policies and procedures relating to data protection and security. Horizontal also implemented additional security measures designed to mitigate risk associated with this event. As part of the written notice, Horizontal is providing access to credit monitoring services for two (2) years, through Experian, to individuals, who may have had personal information potentially impacted by this event, at no cost to them.

Additionally, Horizontal is providing impacted individuals with guidance on how to better protect against identity theft and fraud, with information on how to place a fraud alert and security freeze on one's credit file, the contact details for the national consumer reporting agencies, information on how to obtain a free credit report, a reminder to remain vigilant for incidents of fraud and identity theft by reviewing account statements and monitoring free credit reports, and encouragement to contact the Federal Trade Commission, their state Attorney General, and law enforcement to report attempted or actual identity theft and fraud.

Contact Information

Should you have any questions regarding this notification or other aspects of the data security event, please contact us at (267) 930-2303.

Very truly yours,

A handwritten signature in blue ink, appearing to read "Lynda Jensen".

Lynda Jensen of
MULLEN COUGHLIN LLC

LRJ/jlt
Enclosure

EXHIBIT A



Return Mail Processing
PO Box 589
Claysburg, PA 16625-0589

July 24, 2024

L7400-L01-0000001 T00001 P001 *****SCH 5-DIGIT 12345



SAMPLE A SAMPLE - L01 INDIVIDUAL
APT ABC
123 ANY STREET
ANYTOWN, ST 12345-6789



[Extra1]

Dear Sample A. Sample:

Horizontal Integration, Inc. (“Horizontal”) writes to inform you of an event that may involve some of your personal information. Although Horizontal is unaware of any actual or attempted misuse of your personal information, we are providing you notice of the event, steps we are taking in response, and resources available to help you better protect your personal information, should you feel it is appropriate to do so.

What Happened? Horizontal identified unexpected network activity within certain systems in our network. We then worked to secure our systems and, with the assistance of third-party cybersecurity specialists, began investigating to confirm the nature and scope of the event. Although our investigation is ongoing, we received preliminary information indicating that certain files were accessed or taken from a portion of our systems without authorization between July 3, 2024, and July 11, 2024. While our review of these files is ongoing, we determined on July 18, 2024, that your information was present in the relevant files.

What Information Was Involved? Based on our investigation to date, your name, Social Security number, driver’s license number or government-issued identification number, and medical information may have been present in the files involved.

What We Are Doing. Horizontal treats its responsibility to safeguard information as an utmost priority. As such, we responded promptly to this incident and worked diligently to provide you with notice of the event as soon as possible. As part of our ongoing commitment to the privacy and security of personal information in our care, we are reviewing and updated existing policies and procedures relating to data protection and security. We also implemented additional security measures designed to mitigate risk associated with this incident.

Out of an abundance of caution, Horizontal is providing you with twenty-four (24) months of complimentary access to credit monitoring and identity restoration services through Experian, as well as guidance on how to protect your information, should you feel it is appropriate to do so. Although we are covering the cost of these services, due to privacy restrictions, you will need to complete the activation process yourself.

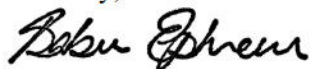
What You Can Do. We encourage you to remain vigilant against incidents of identity theft and fraud by reviewing your account statements along with monitoring your free credit reports for suspicious activity and to detect errors. We also recommend you review the *Steps You Can Take To Protect Personal Information* section of this letter and enroll in the offered complimentary identity monitoring services. Please note, due to privacy restrictions, we are unable to automatically enroll you in the complimentary monitoring services.

0000001



For More Information. If you have questions about this matter, please call our dedicated assistance line at 1-833-918-4501, Monday through Friday 8 am – 8 pm CST (excluding major U.S. holidays). Please be prepared to provide engagement number B128115 when speaking with an agent. You may also write to us directly at: 1660 MN-100 Suite 200. St Louis Park, MN 55416.

Sincerely,

A handwritten signature in black ink, appearing to read "Sabin Ephrem". The signature is fluid and cursive, with the first name "Sabin" and last name "Ephrem" clearly distinguishable.

Sabin Ephrem
Horizontal Integration, Inc.

STEPS YOU CAN TAKE TO PROTECT PERSONAL INFORMATION

Enroll in Monitoring Services

To help protect your identity, we are offering complimentary access to Experian IdentityWorksSM for 24 months.

If you believe there was fraudulent use of your information as a result of this incident and would like to discuss how you may be able to resolve those issues, please reach out to an Experian agent. 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 from the date of the incident (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 Identity Restoration is available to you for 24 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.

While identity restoration assistance is immediately available to you, we also encourage you to activate the fraud detection tools available through Experian IdentityWorks as a complimentary 24-month membership. This product provides you with superior identity detection and resolution of identity theft. To start monitoring your personal information, please follow the steps below:

- Ensure that you **enroll by** October 31, 2024 (Your code will not work after this date.)
- **Visit** the Experian IdentityWorks website to enroll: <https://www.experianidworks.com/credit>
- Provide your **activation code**: ABCDEFGHI

If you have questions about the product, need assistance with Identity Restoration that arose as a result of this incident, or would like an alternative to enrolling in Experian IdentityWorks online, please contact Experian's customer care team at 1-833-918-4501 by October 31, 2024. Be prepared to provide engagement number B128115 as proof of eligibility for the Identity Restoration services by Experian.

ADDITIONAL DETAILS REGARDING YOUR 24-MONTH EXPERIAN IDENTITYWORKS MEMBERSHIP

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 specialists 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.
- **\$1 Million Identity Theft Insurance**:** Provides coverage for certain costs and unauthorized electronic fund transfers.

* 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.



Monitor Your Accounts

Under U.S. law, a consumer has the right to one free credit report annually from each of the three major credit reporting bureaus, Equifax, Experian, and TransUnion. To order a free credit report, visit www.annualcreditreport.com or call, toll-free, 1-877-322-8228. Consumers may also directly contact the three major credit reporting bureaus listed below to request a free copy of their credit report.

Consumers have the right to place an initial or extended “fraud alert” on a credit file at no cost. An initial fraud alert is a 1-year alert placed on a consumer’s credit file. Upon seeing a fraud alert display on a consumer’s credit file, a business must take steps to verify the consumer’s identity before extending new credit. If consumers are the victim of identity theft, they have the right to an extended fraud alert, which is a fraud alert lasting seven years. Should consumers wish to place a fraud alert, please contact any of the three major credit reporting bureaus listed below.

As an alternative to a fraud alert, consumers have the right to place a “credit freeze” on a credit report, which will prohibit a credit bureau from releasing information in the credit report without the consumer’s express authorization. The credit freeze assists with preventing the approval of credit, loans, and services in a consumer’s name without consent. However, consumers should be aware that using a credit freeze to take control over who gets access to the personal and financial information in their credit report may delay, interfere with, or prohibit the timely approval of any subsequent request or application they make regarding a new loan, credit, mortgage, or any other account involving the extension of credit. Pursuant to federal law, there is no charge to consumers to place or lift a credit freeze on their credit report. To request a credit freeze, individuals may need to provide some or all of the following information:

1. Full name (including middle initial as well as Jr., Sr., II, III, etc.);
2. Social Security number;
3. Date of birth;
4. Addresses for the prior two to five years;
5. Proof of current address, such as a current utility bill or telephone bill;
6. A legible photocopy of a government-issued identification card (state driver’s license or ID card, etc.); and
7. A copy of either the police report, investigative report, or complaint to a law enforcement agency concerning identity theft if they are a victim of identity theft.

Should consumers wish to place a credit freeze or fraud alert, please contact the three major credit reporting bureaus listed below:

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

Additional Information

Consumers may further educate themselves regarding identity theft, fraud alerts, credit freezes, and the steps they can take to protect your personal information by contacting the consumer reporting bureaus, the Federal Trade Commission, or their state Attorney General. Consumers may reach the Federal Trade Commission at: 600 Pennsylvania Avenue NW, Washington, D.C. 20580; www.identitytheft.gov; 1-877-ID-THEFT (1-877-438-4338); and TTY: 1-866-653-4261. The Federal Trade Commission also encourages those who discover the misuse of their information to file a complaint with them. Consumers can obtain further information on how to file such a complaint by way of the contact information listed above. Consumers have the right to file a police report if they ever experience identity theft or fraud. Please note that in order to file a report with law enforcement for identity

theft, consumers will likely need to provide some proof that they have been a victim. Consumer should report to law enforcement and the relevant state Attorney General any instances of known or suspected identity theft. Law enforcement has not delayed this notice.

For Maryland residents, the contact information for the Maryland Attorney General is: 200 St. Paul Place, 16th Floor, Baltimore, MD 21202; 1-410-576-6300 or 1-888-743-0023; and <https://www.marylandattorneygeneral.gov/>.

For New York residents, the contact information for the New York Attorney General is: Office of the Attorney General, The Capitol, Albany, NY 12224-0341; 1-800-771-7755; or <https://ag.ny.gov>.





MULLEN
COUGHLIN^{LLC}
ATTORNEYS AT LAW

Furrah Qureshi
Office: (267) 930-4689
Fax: (267) 930-4771
Email: fqureshi@mullen.law

426 W. Lancaster Avenue, Suite 200
Devon, PA 19333

October 29, 2024

VIA E-MAIL

Office of the Attorney General
Attn: Security Breach Notification
200 St. Paul Place
Baltimore, MD 21202
E-mail: idtheft@oag.state.md.us

Re: Supplemental Notice of Data Event

To Whom It May Concern:

We continue to represent Horizontal Integration, Inc. ("Horizontal") located at 1660 MN-100 Suite 200, St Louis Park, MN 55416, and are writing to supplement our July 24, 2024 notice to your office, attached here as ***Exhibit A***. This supplemental notice is to notify your office the incident may affect the security of certain personal information relating to thirty-seven (37) additional Maryland residents. By providing this notice, Horizontal does not waive any rights or defenses regarding the applicability of Maryland law, the applicability of the Maryland data event notification statute, or personal jurisdiction.

Nature of the Data Event

On or about July 9, 2024, Horizontal identified unexpected network activity within certain systems in its network. Horizontal then worked to secure its systems and, with the assistance of third-party cybersecurity specialists, began investigating to confirm the nature and scope of the activity. As a result of the investigation, Horizontal determined that certain files were accessed or taken from a portion of the systems without authorization between July 3, 2024, and July 11, 2024. Therefore, Horizontal undertook a comprehensive review of the data at risk to assess if any sensitive information could be affected and to whom it related. On September 17, 2024, Horizontal determined information related to Maryland residents was present in the relevant files.

The information that could have been subject to unauthorized access for Maryland residents includes name, Social Security number, driver's license number or other government-issued identification number, financial account information, and medical information.

Notice to Maryland Residents

Horizontal began providing notice to individuals on July 24, 2024. On July 24, 2024, Horizontal provided notice to one (1) Maryland resident and on October 29, 2024, provided written notice of this incident to thirty-seven (37) Maryland residents. Written notice is being provided in substantially the same form as the letter attached here as ***Exhibit B***.

Other Steps Taken and To Be Taken

Upon discovering the event, Horizontal moved quickly to investigate and respond to the event, assess the security of Horizontal systems, and identify potentially affected individuals. Horizontal is reviewing and updating existing policies and procedures relating to data protection and security. Horizontal also implemented additional security measures designed to mitigate risk associated with this event. As part of the written notice, Horizontal is providing access to credit monitoring services for two (2) years, through Experian, to individuals, who may have had personal information potentially impacted by this event, at no cost to them.

Additionally, Horizontal is providing impacted individuals with guidance on how to better protect against identity theft and fraud, with information on how to place a fraud alert and security freeze on one's credit file, the contact details for the national consumer reporting agencies, information on how to obtain a free credit report, a reminder to remain vigilant for incidents of fraud and identity theft by reviewing account statements and monitoring free credit reports, and encouragement to contact the Federal Trade Commission, their state Attorney General, and law enforcement to report attempted or actual identity theft and fraud.

Contact Information

Should you have any questions regarding this notification or other aspects of the data security event, please contact us at (267) 930-4689.

Very truly yours,

Furrah Qureshi of
MULLEN COUGHLIN LLC

FJQ/lcf
Enclosure

EXHIBIT A

From: Jacqueline Bucchere
Sent: Wednesday, July 24, 2024 5:03 PM
To: idtheft@oag.state.md.us
Cc: Lynda Jensen; Furrah Qureshi; John Mullen; Corinne Menapace; Jamie Hogan
Subject: Horizontal Integration – Notice of Data Event – MD
Attachments: Horizontal Integration - Notice of Data Event - MD.pdf

Categories: zM:Horizontal Integration Inc. - July 2024--PENDING00026683

Sir or Madam,

Please see the attached for notice of data event.

Thank you,
Jackie

Jacqueline Bucchere
Attorney
Mullen Coughlin LLC
309 Fellowship Rd, Suite 200
Mt. Laurel, NJ 08054
(267) 930-1266 - Office
(609) 903-3058 - Mobile
jbucchere@mullen.law

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MULLEN
COUGHLIN^{LLC}
ATTORNEYS AT LAW

Lynda Jensen
Office: (267) 930-2303
Fax: (267) 930-4771
Email: Ljensen@mullen.law

3 Allied Drive
Suite 303
Dedham, MA 02026

July 24, 2024

VIA E-MAIL

Office of the Attorney General
Attn: Security Breach Notification
200 St. Paul Place
Baltimore, MD 21202
E-mail: idtheft@oag.state.md.us

Re: Notice of Data Event

To Whom It May Concern:

We represent Horizontal Integration, Inc. ("Horizontal") located at 1660 MN-100 Suite 200. St Louis Park, MN 55416, and are writing to notify your office of an event that may affect the security of certain personal information relating to one (1) Maryland resident. The investigation into this matter is ongoing, and this notice will be supplemented with any new significant facts learned subsequent to its submission. By providing this notice, Horizontal does not waive any rights or defenses regarding the applicability of Maryland law, the applicability of the Maryland data event notification statute, or personal jurisdiction.

Nature of the Data Event

Horizontal identified unexpected network activity within certain systems in its network. Horizontal then worked to secure its systems and, with the assistance of third-party cybersecurity specialists, began investigating to confirm the nature and scope of the event. Although the investigation is ongoing, Horizontal received preliminary information indicating that certain files were accessed or taken from a portion of the systems without authorization between July 3, 2024, and July 11, 2024. While Horizontal's review of these files is ongoing, Horizontal determined on July 18, 2024, that certain information related to a Maryland resident was impacted by this event. The information for the Maryland resident that could have been impacted by this event includes name, Social Security number, driver's license number or government-issued identification number, and medical information.

Notice to Maryland Resident

On or about July 24, 2024, Horizontal began providing written notice of this event to one (1) Maryland resident. Written notice is being provided in substantially the same form as the letter attached here as ***Exhibit A***.

Other Steps Taken and To Be Taken

Upon discovering the event, Horizontal moved quickly to investigate and respond to the event, assess the security of Horizontal systems, and identify potentially affected individuals. Horizontal is reviewing and updating existing policies and procedures relating to data protection and security. Horizontal also implemented additional security measures designed to mitigate risk associated with this event. As part of the written notice, Horizontal is providing access to credit monitoring services for two (2) years, through Experian, to individuals, who may have had personal information potentially impacted by this event, at no cost to them.

Additionally, Horizontal is providing impacted individuals with guidance on how to better protect against identity theft and fraud, with information on how to place a fraud alert and security freeze on one's credit file, the contact details for the national consumer reporting agencies, information on how to obtain a free credit report, a reminder to remain vigilant for incidents of fraud and identity theft by reviewing account statements and monitoring free credit reports, and encouragement to contact the Federal Trade Commission, their state Attorney General, and law enforcement to report attempted or actual identity theft and fraud.

Contact Information

Should you have any questions regarding this notification or other aspects of the data security event, please contact us at (267) 930-2303.

Very truly yours,

A handwritten signature in blue ink, appearing to read "Lynda Jensen".

Lynda Jensen of
MULLEN COUGHLIN LLC

LRJ/jlt
Enclosure



Return Mail Processing
PO Box 589
Claysburg, PA 16625-0589

July 24, 2024

L7400-L01-0000001 T00001 P001 *****SCH 5-DIGIT 12345



SAMPLE A SAMPLE - L01 INDIVIDUAL
APT ABC
123 ANY STREET
ANYTOWN, ST 12345-6789



[Extra1]

Dear Sample A. Sample:

Horizontal Integration, Inc. (“Horizontal”) writes to inform you of an event that may involve some of your personal information. Although Horizontal is unaware of any actual or attempted misuse of your personal information, we are providing you notice of the event, steps we are taking in response, and resources available to help you better protect your personal information, should you feel it is appropriate to do so.

What Happened? Horizontal identified unexpected network activity within certain systems in our network. We then worked to secure our systems and, with the assistance of third-party cybersecurity specialists, began investigating to confirm the nature and scope of the event. Although our investigation is ongoing, we received preliminary information indicating that certain files were accessed or taken from a portion of our systems without authorization between July 3, 2024, and July 11, 2024. While our review of these files is ongoing, we determined on July 18, 2024, that your information was present in the relevant files.

What Information Was Involved? Based on our investigation to date, your name, Social Security number, driver’s license number or government-issued identification number, and medical information may have been present in the files involved.

What We Are Doing. Horizontal treats its responsibility to safeguard information as an utmost priority. As such, we responded promptly to this incident and worked diligently to provide you with notice of the event as soon as possible. As part of our ongoing commitment to the privacy and security of personal information in our care, we are reviewing and updated existing policies and procedures relating to data protection and security. We also implemented additional security measures designed to mitigate risk associated with this incident.

Out of an abundance of caution, Horizontal is providing you with twenty-four (24) months of complimentary access to credit monitoring and identity restoration services through Experian, as well as guidance on how to protect your information, should you feel it is appropriate to do so. Although we are covering the cost of these services, due to privacy restrictions, you will need to complete the activation process yourself.

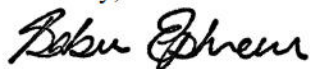
What You Can Do. We encourage you to remain vigilant against incidents of identity theft and fraud by reviewing your account statements along with monitoring your free credit reports for suspicious activity and to detect errors. We also recommend you review the *Steps You Can Take To Protect Personal Information* section of this letter and enroll in the offered complimentary identity monitoring services. Please note, due to privacy restrictions, we are unable to automatically enroll you in the complimentary monitoring services.

0000001



For More Information. If you have questions about this matter, please call our dedicated assistance line at 1-833-918-4501, Monday through Friday 8 am – 8 pm CST (excluding major U.S. holidays). Please be prepared to provide engagement number B128115 when speaking with an agent. You may also write to us directly at: 1660 MN-100 Suite 200. St Louis Park, MN 55416.

Sincerely,

A handwritten signature in black ink, appearing to read "Sabin Ephrem". The signature is fluid and cursive, with the first name "Sabin" and last name "Ephrem" clearly distinguishable.

Sabin Ephrem
Horizontal Integration, Inc.

STEPS YOU CAN TAKE TO PROTECT PERSONAL INFORMATION

Enroll in Monitoring Services

To help protect your identity, we are offering complimentary access to Experian IdentityWorksSM for 24 months.

If you believe there was fraudulent use of your information as a result of this incident and would like to discuss how you may be able to resolve those issues, please reach out to an Experian agent. 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 from the date of the incident (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 Identity Restoration is available to you for 24 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.

While identity restoration assistance is immediately available to you, we also encourage you to activate the fraud detection tools available through Experian IdentityWorks as a complimentary 24-month membership. This product provides you with superior identity detection and resolution of identity theft. To start monitoring your personal information, please follow the steps below:

- Ensure that you **enroll by** October 31, 2024 (Your code will not work after this date.)
- **Visit** the Experian IdentityWorks website to enroll: <https://www.experianidworks.com/credit>
- Provide your **activation code**: ABCDEFGHI

If you have questions about the product, need assistance with Identity Restoration that arose as a result of this incident, or would like an alternative to enrolling in Experian IdentityWorks online, please contact Experian's customer care team at 1-833-918-4501 by October 31, 2024. Be prepared to provide engagement number B128115 as proof of eligibility for the Identity Restoration services by Experian.

ADDITIONAL DETAILS REGARDING YOUR 24-MONTH EXPERIAN IDENTITYWORKS MEMBERSHIP

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 specialists 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.
- **\$1 Million Identity Theft Insurance**:** Provides coverage for certain costs and unauthorized electronic fund transfers.

* 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.



Monitor Your Accounts

Under U.S. law, a consumer has the right to one free credit report annually from each of the three major credit reporting bureaus, Equifax, Experian, and TransUnion. To order a free credit report, visit www.annualcreditreport.com or call, toll-free, 1-877-322-8228. Consumers may also directly contact the three major credit reporting bureaus listed below to request a free copy of their credit report.

Consumers have the right to place an initial or extended “fraud alert” on a credit file at no cost. An initial fraud alert is a 1-year alert placed on a consumer’s credit file. Upon seeing a fraud alert display on a consumer’s credit file, a business must take steps to verify the consumer’s identity before extending new credit. If consumers are the victim of identity theft, they have the right to an extended fraud alert, which is a fraud alert lasting seven years. Should consumers wish to place a fraud alert, please contact any of the three major credit reporting bureaus listed below.

As an alternative to a fraud alert, consumers have the right to place a “credit freeze” on a credit report, which will prohibit a credit bureau from releasing information in the credit report without the consumer’s express authorization. The credit freeze assists with preventing the approval of credit, loans, and services in a consumer’s name without consent. However, consumers should be aware that using a credit freeze to take control over who gets access to the personal and financial information in their credit report may delay, interfere with, or prohibit the timely approval of any subsequent request or application they make regarding a new loan, credit, mortgage, or any other account involving the extension of credit. Pursuant to federal law, there is no charge to consumers to place or lift a credit freeze on their credit report. To request a credit freeze, individuals may need to provide some or all of the following information:

1. Full name (including middle initial as well as Jr., Sr., II, III, etc.);
2. Social Security number;
3. Date of birth;
4. Addresses for the prior two to five years;
5. Proof of current address, such as a current utility bill or telephone bill;
6. A legible photocopy of a government-issued identification card (state driver’s license or ID card, etc.); and
7. A copy of either the police report, investigative report, or complaint to a law enforcement agency concerning identity theft if they are a victim of identity theft.

Should consumers wish to place a credit freeze or fraud alert, please contact the three major credit reporting bureaus listed below:

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

Additional Information

Consumers may further educate themselves regarding identity theft, fraud alerts, credit freezes, and the steps they can take to protect your personal information by contacting the consumer reporting bureaus, the Federal Trade Commission, or their state Attorney General. Consumers may reach the Federal Trade Commission at: 600 Pennsylvania Avenue NW, Washington, D.C. 20580; www.identitytheft.gov; 1-877-ID-THEFT (1-877-438-4338); and TTY: 1-866-653-4261. The Federal Trade Commission also encourages those who discover the misuse of their information to file a complaint with them. Consumers can obtain further information on how to file such a complaint by way of the contact information listed above. Consumers have the right to file a police report if they ever experience identity theft or fraud. Please note that in order to file a report with law enforcement for identity

theft, consumers will likely need to provide some proof that they have been a victim. Consumer should report to law enforcement and the relevant state Attorney General any instances of known or suspected identity theft. Law enforcement has not delayed this notice.

For Maryland residents, the contact information for the Maryland Attorney General is: 200 St. Paul Place, 16th Floor, Baltimore, MD 21202; 1-410-576-6300 or 1-888-743-0023; and <https://www.marylandattorneygeneral.gov/>.

For New York residents, the contact information for the New York Attorney General is: Office of the Attorney General, The Capitol, Albany, NY 12224-0341; 1-800-771-7755; or <https://ag.ny.gov>.



EXHIBIT B

EXHIBIT A



Return Mail Processing
PO Box 589
Claysburg, PA 16625-0589

October 29, 2024



M3087-L01-0000001 T00001 P001 *****SCH 5-DIGIT 12345

SAMPLE A SAMPLE - L01 ADULT

APT ABC

123 ANY STREET

ANYTOWN, ST 12345-6789



NOTICE OF [DATA EVENT] / [DATA BREACH]

Dear Sample A. Sample:

Horizontal Integration, Inc. (“Horizontal”) writes to inform you of an event that may involve some of your personal information. Although Horizontal is unaware of any actual or attempted misuse of your personal information, we are providing you notice of the event, steps we are taking in response, and resources available to help you better protect your personal information, should you feel it is appropriate to do so.

What Happened? On or about July 9, 2024, Horizontal identified unexpected network activity within certain systems in our network. We then worked to secure our systems and, with the assistance of third-party cybersecurity specialists, began investigating to confirm the nature and scope of the activity. As a result of the investigation, we determined that certain files were accessed or taken from a portion of the systems without authorization between July 3, 2024 and July 11, 2024. Therefore, Horizontal undertook a comprehensive review of the data at risk to assess if any sensitive information could be affected and to whom it related. On September 17, 2024, Horizontal determined your information was present in the relevant files.

What Information Was Involved? Horizontal determined the type of information potentially impacted by this event includes your name, [Data Elements].

What We Are Doing. Horizontal treats its responsibility to safeguard information as an utmost priority. As such, we responded promptly to this incident and worked diligently to provide you with notice of the event as soon as possible. As part of our ongoing commitment to the privacy and security of personal information in our care, we are reviewing and updating existing policies and procedures relating to data protection and security. We also implemented additional security measures designed to mitigate risk associated with this incident.

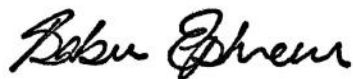
Out of an abundance of caution, Horizontal is providing you with twenty-four (24) months of complimentary access to credit monitoring and identity restoration services through Experian, as well as guidance on how to protect your information, should you feel it is appropriate to do so. Although we are covering the cost of these services, due to privacy restrictions, you will need to complete the activation process yourself.

What You Can Do. We encourage you to remain vigilant against incidents of identity theft and fraud by reviewing your account statements along with monitoring your free credit reports for suspicious activity and to detect errors. We also recommend you review the *Steps You Can Take To Protect Personal Information* section of this letter and enroll in the offered complimentary identity monitoring services. Please note, due to privacy restrictions, we are unable to automatically enroll you in the complimentary monitoring services.



For More Information. If you have questions about this matter, please call our dedicated assistance line at 833-918-5775, Monday through Friday, 8 am - 8 pm CST (excluding major US holidays). You may also write to us directly at: 1660 MN-100 Suite 200. St Louis Park, MN 55416.

Sincerely,



Sabin Ephrem
Horizontal Integration, Inc.

STEPS YOU CAN TAKE TO PROTECT PERSONAL INFORMATION

Enroll in Monitoring Services

To help protect your identity, we are offering complimentary access to Experian IdentityWorksSM for 24 months.

If you believe there was fraudulent use of your information as a result of this incident and would like to discuss how you may be able to resolve those issues, please reach out to an Experian agent. 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 from the date of the incident (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 Identity Restoration is available to you for 24 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.

While identity restoration assistance is immediately available to you, we also encourage you to activate the fraud detection tools available through Experian IdentityWorks as a complimentary 24-month membership. This product provides you with superior identity detection and resolution of identity theft. To start monitoring your personal information, please follow the steps below:

- Ensure that you **enroll by January 31, 2025** (Your code will not work after this date.)
- **Visit** the Experian IdentityWorks website to enroll: <https://www.experianidworks.com/credit>
- Provide your **activation code: ABCDEFGHI**

If you have questions about the product, need assistance with Identity Restoration that arose as a result of this incident, or would like an alternative to enrolling in Experian IdentityWorks online, please contact Experian's customer care team at 833-918-5775 by January 31, 2025 (5:59 UTC). Be prepared to provide engagement number B132674 as proof of eligibility for the Identity Restoration services by Experian.

ADDITIONAL DETAILS REGARDING YOUR 24-MONTH EXPERIAN IDENTITYWORKS MEMBERSHIP

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 specialists 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.

- **\$1 Million Identity Theft Insurance****: Provides coverage for certain costs and unauthorized electronic fund transfers.

* 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.

Monitor Your Accounts

Under U.S. law, a consumer has the right to one free credit report annually from each of the three major credit reporting bureaus, Equifax, Experian, and TransUnion. To order a free credit report, visit www.annualcreditreport.com or call, toll-free, 1-877-322-8228. Consumers may also directly contact the three major credit reporting bureaus listed below to request a free copy of their credit report.

Consumers have the right to place an initial or extended “fraud alert” on a credit file at no cost. An initial fraud alert is a 1-year alert placed on a consumer’s credit file. Upon seeing a fraud alert display on a consumer’s credit file, a business must take steps to verify the consumer’s identity before extending new credit. If consumers are the victim of identity theft, they have the right to an extended fraud alert, which is a fraud alert lasting seven years. Should consumers wish to place a fraud alert, please contact any of the three major credit reporting bureaus listed below.

As an alternative to a fraud alert, consumers have the right to place a “credit freeze” on a credit report, which will prohibit a credit bureau from releasing information in the credit report without the consumer’s express authorization. The credit freeze assists with preventing the approval of credit, loans, and services in a consumer’s name without consent. However, consumers should be aware that using a credit freeze to take control over who gets access to the personal and financial information in their credit report may delay, interfere with, or prohibit the timely approval of any subsequent request or application they make regarding a new loan, credit, mortgage, or any other account involving the extension of credit. Pursuant to federal law, there is no charge to consumers to place or lift a credit freeze on their credit report. To request a credit freeze, individuals may need to provide some or all of the following information:

1. Full name (including middle initial as well as Jr., Sr., II, III, etc.);
2. Social Security number;
3. Date of birth;
4. Addresses for the prior two to five years;
5. Proof of current address, such as a current utility bill or telephone bill;
6. A legible photocopy of a government-issued identification card (state driver’s license or ID card, etc.); and
7. A copy of either the police report, investigative report, or complaint to a law enforcement agency concerning identity theft if they are a victim of identity theft.

Should consumers wish to place a credit freeze or fraud alert, please contact the three major credit reporting bureaus listed below:

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

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For District of Columbia residents, the contact information for the District of Columbia Attorney General is: 400 6th Street, NW, Washington, D.C. 20001; 202-727-3400; and oag.dc.gov.

For Maryland residents, the contact information for the Maryland Attorney General is: 200 St. Paul Place, 16th Floor, Baltimore, MD 21202; 1-410-576-6300 or 1-888-743-0023; and <https://www.marylandattorneygeneral.gov/>.

For New Mexico residents, consumers have rights pursuant to the Fair Credit Reporting Act, such as the right to be told if information in their credit file has been used against them, the right to know what is in their credit file, the right to ask for their credit score, and the right to dispute incomplete or inaccurate information. Further, pursuant to the Fair Credit Reporting Act, the consumer reporting bureaus must correct or delete inaccurate, incomplete, or unverifiable information; consumer reporting agencies may not report outdated negative information; access to consumers' files is limited; consumers must give consent for credit reports to be provided to employers; consumers may limit "prescreened" offers of credit and insurance based on information in their credit report; and consumers may seek damages from violators. Consumers may have additional rights under the Fair Credit Reporting Act not summarized here. Identity theft victims and active-duty military personnel have specific additional rights pursuant to the Fair Credit Reporting Act. We encourage consumers to review their rights pursuant to the Fair Credit Reporting Act by visiting www.consumerfinance.gov/f/201504_cfpb_summary_your-rights-under-fcra.pdf, or by writing Consumer Response Center, Room 130-A, Federal Trade Commission, 600 Pennsylvania Ave. N.W., Washington, D.C. 20580.

For New York residents, the contact information for the New York Attorney General is: Office of the Attorney General, The Capitol, Albany, NY 12224-0341; 1-800-771-7755; or <https://ag.ny.gov>.

For North Carolina residents, the contact information for the North Carolina Attorney General is: 9001 Mail Service Center, Raleigh, NC 27699-9001; 1-877-566-7226 or 1-919-716-6000; and www.ncdoj.gov.

For Rhode Island residents, the contact information for the Rhode Island Attorney General is: 150 South Main Street, Providence, RI 02903; www.riag.ri.gov; and 1-401-274-4400. Under Rhode Island law, individuals have the right to obtain any police report filed in regard to this event. There are approximately 5 Rhode Island residents potentially impacted by this event.