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July 30, 2024

VIA ELECTRONIC MAIL

Attorney General Anthony G. Brown
Office of the Attorney General
St. Paul Plaza
Attn: Security Breach Notification
200 St. Paul Place
Baltimore, MD 21202
Telephone: 410-576-6491
Email: idtheft@oag.state.md.us

Re: Safeguard Medical Holdco LLC - Notice of Data Event

To Attorney General Anthony G. Brown:

We represent Safeguard Medical Holdco LLC ("Safeguard Medical"), located at 13359 Reese Boulevard East Huntersville, North Carolina 28078, and are writing to notify your office of an incident that may affect the security of certain personal information relating to approximately six (6) Maryland residents. This notice may be supplemented with any new significant facts learned subsequent to its submission. By providing this notice, Safeguard Medical 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.

1. Nature of the Data Event

On May 31, 2024, Safeguard Medical identified suspicious activity associated with one employee email account. In response, Safeguard Medical took immediate steps to secure its email environment and promptly launched an investigation. In so doing, Safeguard Medical engaged digital forensics and incident response specialists to determine the nature and scope of the activity and to identify any information that may have been accessed or acquired without authorization as a result. On July 11, 2024, Safeguard Medical learned that personal information may have been impacted in connection with the incident. Safeguard Medical has no evidence of the misuse or attempted misuse of any potentially impacted information.

The information that could have been subject to unauthorized access includes first and last name, as well as Social Security number.

2. Notice to Maryland Residents

On or about July 29, 2024, Safeguard Medical provided written notice of this incident to approximately six (6) Maryland residents. Written notice is being provided in substantially the same form as the letter attached here as ***Exhibit A***.

3. Other Steps Taken and To Be Taken

Upon discovering the event, Safeguard Medical moved quickly to investigate and respond to the incident, assess the security of Safeguard Medical systems, and identify potentially affected individuals. Safeguard Medical is also working to implement additional safeguards and training to its employees. Safeguard Medical is providing access to credit monitoring services for twelve (12) months, through IDX, to individuals whose personal information was potentially affected by this incident, at no cost to these individuals.

Additionally, Safeguard Medical is providing impacted individuals with guidance on how to better protect against identity theft and fraud. Safeguard Medical is providing individuals 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.

4. Contact Information

Should you have any questions regarding this notification or other aspects of the data security event, please contact us at 336.448.8552.

Very truly yours,

A handwritten signature in black ink that reads "Matthew Toldero". The signature is written in a cursive, flowing style.

Matthew Toldero of
Constangy, Brooks, Smith & Prophete LLP

Exhibit A



<<First Name>> <<Last Name>>
<<Address1>> <<Address2>>
<<City>>, <<State>> <<Zip>>

To Enroll, Please Call:
1-800-939-4170

Or Visit:

<https://app.idx.us/account-creation/protect>

Enrollment Code: <<XXXXXXXX>>

July 24, 2024

Subject: Notice of Data Security Incident

Dear <<First Name>> <<Last Name>>,

Safeguard Medical Holdco LLC ("Safeguard Medical") is writing to inform you of a recent data security incident that may have affected your personal information. Safeguard Medical takes the privacy and security of all personal information within its possession very seriously. Please read this letter carefully as it contains information regarding the incident and steps that you can take to help protect your personal information, if you feel it necessary.

What Happened? On May 31, 2024, Safeguard Medical identified suspicious activity associated with one employee email account. In response, Safeguard Medical took immediate steps to secure its email environment and promptly launched an investigation. In so doing, Safeguard Medical engaged digital forensics and incident response specialists to determine what happened and to identify any information that may have been accessed as a result. On July 11, 2024, Safeguard Medical learned that your personal information may have been impacted in connection with the incident. Please note that Safeguard Medical has no evidence of the misuse or attempted misuse of any potentially impacted information.

What Information Was Involved? The information potentially impacted in connection with this incident included your name and Social Security number.

What Are We Doing? As soon as Safeguard Medical discovered this incident, Safeguard Medical took the steps described above. In addition, Safeguard Medical implemented measures to enhance the security of its email environment in an effort to minimize the risk of a similar incident occurring in the future.

Although Safeguard Medical has no evidence of the misuse of any potentially impacted information, Safeguard Medical is providing you with information about steps that you can take to help protect your personal information and is offering you complimentary identity protection services through IDX – a data breach and recovery services expert. These services include 12 months of credit¹ and dark web monitoring, a \$1 million identity fraud loss reimbursement policy, and fully managed identity theft recovery services.

¹ To receive credit monitoring 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.



The deadline to enroll in these services is March 1, 2025. With this protection, IDX will help to resolve issues if your identity is compromised.

What You Can Do: You can follow the recommendations on the following page to help protect your personal information. Safeguard Medical also encourages you to enroll in the complementary services being offered to you through IDX by using the enrollment code provided above.

For More Information: Further information about how to protect your personal information appears on the following page. If you need assistance, please call IDX at 1-800-939-4170 from 8:00 A.M. to 8:00 P.M. Central Time, Monday through Friday (excluding holidays). If you have any questions related to this event, please contact Kathie Lenzen, CFO at 704.412.4331 or kathiel@safeguardmedical.com.

Please accept my sincere apologies and know that Safeguard Medical takes this matter very seriously and deeply regrets any worry or inconvenience that this may cause you.

Sincerely,

A handwritten signature in black ink that reads "Kathie J. Lenzen".

Kathie J Lenzen
CFO
Safeguard Medical Holdco LLC

STEPS YOU CAN TAKE TO HELP PROTECT YOUR INFORMATION

Review Your Account Statements and Notify Law Enforcement of Suspicious Activity: As a precautionary measure, we recommend that you remain vigilant by reviewing your account statements and 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 also should promptly report any fraudulent activity or any suspected incidence of identity theft to proper law enforcement authorities, your state attorney general, and/or the Federal Trade Commission (FTC).

Copy of Credit Report: You may obtain a free copy of your credit report from each of the three major credit reporting agencies once every 12 months by visiting <http://www.annualcreditreport.com/>, calling toll-free 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 also can contact one of the following three national credit reporting agencies:

Equifax

P.O. Box 105851
Atlanta, GA 30348
1-800-525-6285
www.equifax.com

Experian

P.O. Box 9532
Allen, TX 75013
1-888-397-3742
www.experian.com

TransUnion

P.O. Box 1000
Chester, PA 19016
1-800-916-8800
www.transunion.com

Fraud Alert: You may want to consider placing a fraud alert on your credit report. An initial fraud alert is free and will stay on your credit file for at least one year. The alert informs creditors of possible fraudulent activity within your report and requests that the creditor contact you prior to establishing any accounts in your name. To place a fraud alert on your credit report, contact any of the three credit reporting agencies identified above. Additional information is available at <http://www.annualcreditreport.com>.

Security Freeze: You have the right to put a security freeze on your credit file for up to one year at no cost. This will prevent new credit from being opened in your name without the use of a PIN number that is issued to you when you initiate the freeze. A security freeze is designed to prevent potential creditors from accessing your credit report without your consent. As a result, using a security freeze may interfere with or delay your ability to obtain credit. You must separately place a security freeze on your credit file with each credit reporting agency. In order to place a security freeze, you may be required to provide the consumer reporting agency with information that identifies you including your full name, Social Security number, date of birth, current and previous addresses, a copy of your state-issued identification card, and a recent utility bill, bank statement or insurance statement.

Additional Free Resources: You can obtain information from the consumer reporting agencies, the FTC, or from your respective state Attorney General about fraud alerts, security freezes, and steps you can take toward preventing identity theft. You may report



suspected identity theft to local law enforcement, including to the FTC or to the Attorney General in your state.

**Federal Trade
Commission**

600 Pennsylvania Ave,
NW
Washington, DC 20580
consumer.ftc.gov, and
www.ftc.gov/idtheft
1-877-438-4338

**Maryland Attorney
General**

200 St. Paul Place
Baltimore, MD 21202
oag.state.md.us
1-888-743-0023

**New York Attorney
General**

Bureau of Internet and
Technology Resources
28 Liberty Street
New York, NY 10005
1-212-416-8433

**North Carolina Attorney
General**

9001 Mail Service Center
Raleigh, NC 27699
ncdoj.gov
1-877-566-7226

**Rhode Island Attorney
General**

150 South Main Street
Providence, RI 02903
<http://www.riag.ri.gov>
1-401-274-4400

**Washington D.C.
Attorney General**

441 4th Street, NW
Washington, DC 20001
oag.dc.gov
1-202-727-3400

You also have certain rights under the Fair Credit Reporting Act (FCRA): These rights include to know what is in your file; to dispute incomplete or inaccurate information; to have consumer reporting agencies correct or delete inaccurate, incomplete, or unverifiable information; as well as other rights. For more information about the FCRA, and your rights pursuant to the FCRA, please visit <https://www.consumer.ftc.gov/articles/pdf-0096-fair-credit-reporting-act.pdf>.