



MULLEN
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August 16, 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 Enroll Confidently located at 13924 E Dyer Lane, Scottsdale, AZ 85262, and write to notify your office regarding a data incident. The data that is the subject of this notification is information that Enroll Confidently holds on behalf of its business customers (the “Data Owners”) in relation to individuals associated with or employed by those customers. Enroll Confidently provides this notice on behalf of relevant Data Owners. This notice will be supplemented with any new significant facts learned subsequent to its submission. By providing this notice, Enroll Confidently 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.

On February 13, 2024, Enroll Confidently became aware of unusual system activity within its network. Enroll Confidently promptly took steps to secure its systems and began an extensive investigation to determine what happened and what information may be affected. Through this investigation, Enroll Confidently learned that an unauthorized actor gained access to its network on February 13, 2024, and during that time copied certain files from the system. Enroll Confidently subsequently began a comprehensive and time-intensive review of the affected files to identify and catalogue what information was present and to whom that information related. This included a detailed reconciliation to determine which Data Owners the information related to so that notice of the incident could be provided to those Data Owners. Notice to Data Owners was provided on July 18, 2024. Based on ongoing address determination and validation efforts, on August 1, 2024, Enroll Confidently confirmed that notice would be provided to certain Maryland residents on behalf of relevant Data Owners. On August 14, 2024, Enroll Confidently confirmed that notice will be provided to three hundred sixty-eight (368) Maryland residents on behalf of relevant Data Owners. Enroll Confidently is mailing notice to these individuals on August 16, 2024. Written notice is being provided in substantially the same form as the letter attached here as **Exhibit A**. It has been determined that the information that was present in the impacted files varies by individual but includes name, Social Security number, medical information, and health insurance information in relation to Maryland residents.

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In response to this incident, Enroll Confidently took prompt steps to secure its systems and investigate the event. Further, Enroll Confidently notified federal law enforcement regarding the event. Enroll Confidently is also working to evaluate and enhance its existing safeguards. Enroll Confidently is notifying individual on behalf of the relevant Data Owners and is providing access to credit monitoring services for twenty-four (24) months to individuals whose personal information was potentially affected by this incident, at no cost to these individuals. Additionally, Enroll Confidently is providing impacted individuals with guidance on how to better protect against identity theft and fraud, as outlined in the attached **Exhibit A**. Enroll Confidently is providing notice of this incident to relevant regulators, as necessary, and to the three major credit reporting agencies, Equifax, Experian, and TransUnion.

Should you have any questions regarding this notification or other aspects of the data security event, please contact us at (267) 930-4773.

Very truly yours,

A handwritten signature in black ink, appearing to read "Alex Belton", followed by a horizontal line.

M. Alexandra Belton of
MULLEN COUGHLIN LLC

MABB/cml
Enclosure

EXHIBIT A



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

August 16, 2024

L8478-L01-0000001 T00001 P001 *****SCH 5-DIGIT 12345



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



RE: Notice of Data [Event/Breach]

Dear Sample A. Sample:

Enroll Confidently is writing to make you aware of an incident that may affect some of your personal information. Enroll Confidently provides a benefits enrollment platform to support employers and benefits providers throughout the employee enrollment process. Employees who seek to obtain an employer-sponsored product enroll in the benefit offering via the Platform. We previously received your information for the purpose of providing employee benefit enrollment services to [Data Owner]. This notice includes information about the incident, steps we have taken in response, and resources available to help you protect your information, should you feel it is appropriate to do so.

What Happened? On February 13, 2024, we became aware of unusual system activity within our network. We promptly took steps to secure our systems and began an extensive investigation to determine what happened and what information may be affected. Through this investigation, we learned that an unauthorized actor gained access to our network on February 13, 2024, and during that time copied certain files from the system. We subsequently began a comprehensive and time-intensive review of the affected files to identify and catalogue what information was present and to whom that information was relates. Through that review, we determined that your information was present within the relevant files.

What Information Was Involved? Our investigation determined that your name and the following types of information relating to you were present within certain files at issue: [Data Elements].

What We Are Doing. We take our responsibility to safeguard the data entrusted to us very seriously. We responded promptly to this incident and have been working diligently to conduct a thorough investigation. We are also working to enhance our existing security measures to further protect our systems moving forward. Additionally, we have notified federal law enforcement of this incident. As an added precaution, we are providing you with access to twenty-four (24) months of complimentary credit monitoring services through Experian. Information on how to enroll in these services is provided in the attached ***Steps You Can Take To Protect Personal Information***. This section also includes guidance on resources available to you to protect personal information against potential misuse.

What You Can Do. We encourage you to remain vigilant against incidents of identity theft and fraud by reviewing your account statements and monitoring your free credit reports for suspicious activity and to detect errors. We also encourage you to review the attached ***Steps You Can Take To Protect Personal Information*** and enroll in the credit monitoring services we are offering. Please note, we are not permitted to enroll you in these services and so you will need to follow the instructions included below to enroll.

0000001



For More Information. We sincerely regret any inconvenience or concern caused by this event. If you have questions or concerns, please call 1-833-918-5064 toll-free from 6 am to 6 pm Pacific, Monday through Friday (excluding major U.S. holidays), or you may write to Enroll Confidently at P.O. Box 25880, Scottsdale, AZ 85255. You can also call the dedicated assistance line if you would like an alternative to enrolling in credit monitoring online. Be prepared to provide your engagement number B128531.

Sincerely,

Enroll Confidently, 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 twenty-four (24) months.

If you believe there was fraudulent use of your information 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 event (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 twenty-four (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 November 29, 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 event, or would like an alternative to enrolling in Experian IdentityWorks online, please contact Experian's customer care team at 1-833-918-5064 by November 29, 2024. Be prepared to provide engagement number B128531 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 ExtendCARETM:** 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 is entitled 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 that is placed on a consumer’s credit file. Upon seeing a fraud alert display on a consumer’s credit file, a business is required to take steps to verify the consumer’s identity before extending new credit. If consumers are the victim of identity theft, they are entitled 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 is designed to prevent credit, loans, and services from being approved 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, consumers cannot be charged 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 a consumer wish to place a credit freeze or fraud alert, 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. The Federal Trade Commission may be reached 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 that their information has been misused 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. Instances of known or suspected identity theft should also be reported to law enforcement and the relevant state Attorney General. This notice has not been delayed by law enforcement.

For District of Columbia residents, the District of Columbia Attorney General may be contacted at: 400 6th Street, NW, Washington, D.C. 20001; (202) 442-9828; and oag.dc.gov.

For Maryland residents, the Maryland Attorney General may be contacted at: 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 New York Attorney General may be contacted at: 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 North Carolina Attorney General may be contacted at: 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 Rhode Island Attorney General may be reached at: 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 597 Rhode Island residents that may be impacted by this event.

