



MULLEN
COUGHLIN^{LLC}
ATTORNEYS AT LAW

Vincent F. Regan
Office: (267) 930-4842
Fax: (267) 930-4771
Email: vregan@mullen.law

309 Fellowship Road, Suite 200
Mt. Laurel, NJ 08054

August 26, 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 United Planners' Financial Services of America ("UPFSA") located at 7333 East Doubletree Ranch Rd, Suite 120, Scottsdale, AZ 85258, and are writing to notify your office of an incident that may affect the security of certain personal information relating to one (1) Maryland resident. This notice will be supplemented with any new significant facts learned subsequent to its submission. By providing this notice, UPFSA 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 November 15, 2023, UPFSA identified suspicious activity on certain limited company email accounts. UPFSA immediately took steps to secure its email environment and launched an investigation into the nature and scope of the activity. Through the investigation, it was determined that an unknown actor gained access to certain UPFSA email accounts between October 4, 2023, and November 9, 2023, and may have accessed or acquired information from these accounts. Although there is no evidence that any personal information has been misused, we are providing notice to potentially impacted individuals in an abundance of caution.

The information that could have been subject to unauthorized access includes name and Social Security number.

Notice to Maryland Resident

On or about August 26, 2024, UPFSA provided written notice of this incident 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, UPFSA moved quickly to investigate and respond to the incident, assess the security of UPFSA systems, and identify potentially affected individuals. UPFSA is also working to implement additional safeguards and training to its employees. UPFSA is providing access to credit monitoring services for twelve (12) months, through Epiq, to individuals whose personal information was potentially affected by this incident, at no cost to these individuals.

Additionally, UPFSA is providing impacted individuals with guidance on how to better protect against identity theft and fraud, including advising individuals to report any suspected incidents of identity theft or fraud to their credit card company and/or bank. UPFSA 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.

UPFSA is providing written notice of this incident to relevant state and federal regulators, as necessary.

Contact Information

Should you have any questions regarding this notification or other aspects of the data security event, please contact us at (267) 930-4842.

Very truly yours,



Vincent F. Regan of
MULLEN COUGHLIN LLC

VFR/ekw
Enclosure

EXHIBIT A

[UPFSA Logo/Letterhead]

<<Return Mail Address>>

<<Name 1>> <<Name 2>>

<<Address 1>>

<<Address 2>>

<<Date>>

<<City>>, <<State>> <<Zip>>

<<Country>>

Notice of Data Breach

Dear <<Name 1>> <<Name 2>>:

United Planners' Financial Services of America ("UPFSA") is writing to inform you of an event that may affect the security of certain information related to you. We held this information in connection with services either provided to you or someone associated with you. While we have no indications of identity theft or fraud as a result of this event, this notice provides information about the event, our response, and resources available to you to help protect your information, should you feel it appropriate to do so.

What Happened? On or about November 15, 2023, UPFSA identified suspicious activity on certain limited company email accounts. We immediately took steps to secure our email environment and launched an investigation into the nature and scope of the activity. Through the investigation, it was determined that an unknown actor gained access to certain UPFSA email accounts between October 4, 2023 and November 9, 2023 and may have accessed or acquired information from these accounts. Although there is no evidence that any personal information has been misused, we are providing notice to potentially impacted individuals in an abundance of caution.

What Information Was Involved? The information that may have been present on the impacted systems includes: <<data element 1>>, <<data element 2>>, and <<data element 3>>.

What We Are Doing. The confidentiality, privacy, and security of information in our care are among our highest priorities, and we take this event very seriously. Upon becoming aware of the activity, we immediately took steps to secure our systems and initiated a comprehensive response. We also reviewed our security policies and procedures and are implementing additional security measures to reduce the risk of similar future events.

As an added precaution, we are offering you access to credit monitoring and identity restoration services for twelve (12) months at no cost to you, through Epiq. Enrollment instructions are enclosed with this letter.

What You Can Do. We encourage you to remain vigilant against incidents of identity theft and fraud by reviewing your account and free credit reports for suspicious activity and to detect errors. Additional information and resources are included in the enclosed *Steps You Can Take to Help Protect Personal Information*. You may also enroll in the complementary credit-monitoring services available to you.

For More Information. If you have additional questions, please call our assistance line at [phone number], [call center hours of operation] (excluding U.S. holidays). You may also write to UPFSA at 7333 East Doubletree Ranch Rd, Suite 120, Scottsdale, AZ 85258.

Sincerely,

Dave Hauer
Chief Compliance Officer
United Planners' Financial Services of America

STEPS YOU CAN TAKE TO HELP PROTECT PERSONAL INFORMATION

Enroll in Monitoring Services

To enroll in Identity Defense, visit: app.identitydefense.com/enrollment/activate/upfsoa

Enter your unique Activation Code <<IdentityDefenseID>>

Enter your Activation Code and click 'Redeem Code'.

1. Create Your Account
Enter your email address, create your password, and click 'Create Account'.
2. Register
Enter your legal name, home address, phone number, date of birth, Social Security Number, and click 'Complete Account'.
3. Complete Activation
Click 'Continue to Dashboard' to finish enrolling.

The deadline to enroll is November 11, 2024. After November 11, 2024, the enrollment process will close, and your Identity Defense code will no longer be active. **If you do not enroll by November 11, 2024, you will not be able to take advantage of Identity Defense, so please enroll before the deadline.**

If you need assistance with the enrollment process or have questions regarding Identity Defense, please call Identity Defense directly at 866.622.9303.

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 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. 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. 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 [#] Rhode Island residents that may be impacted by this event.