



October 9, 2024

**Via E-Mail**

[ldtheft@oag.state.md.us](mailto:ldtheft@oag.state.md.us)

**Orrick, Herrington & Sutcliffe LLP**

222 Berkeley Street  
Suite 2000  
Boston, MA 02116-3740

+1 617 880 1800

**orrick.com**

**Heather Helen Egan**

**E** [hegan@orrick.com](mailto:hegan@orrick.com)

**D** +1 617 880 1830

**F** +1 617 880 1801

RE: Fidelity Investments – Notice of Data Security Incident

Dear Attorney General,

I am writing to notify you of a data security incident on behalf of Fidelity Investments ("Fidelity").

Between August 17 and August 19, 2024, an unauthorized third party accessed and retrieved certain documents related to Fidelity customers and other individuals by submitting fraudulent requests to an internal database that housed images of documents pertaining to Fidelity customers. Fidelity detected the unauthorized activity on August 19 and immediately disabled the two accounts used to make the requests and terminated the access. An investigation was promptly launched with assistance from external security experts and remedial actions were taken to prevent a recurrence of this type of activity. The unauthorized access was limited to the single internal database and since August 19, there have been no new instances of this unauthorized activity. The unauthorized third party did not gain access to any Fidelity customer accounts or funds.

Once Fidelity was able to identify the documents obtained by the unauthorized third party, Fidelity began a process to review the documents to determine what types of information were involved and to identify the individuals to whom the information belonged. Through this review, Fidelity determined that the information obtained by the unauthorized third party related to a small subset of Fidelity's customers.

On October 3, 2024, Fidelity completed its review and determined that 1214 Maryland residents required notification. Depending on the individual, the types of personal information that were in the affected documents include one or more of the following: birth date, driver's license number, Fidelity account number, Fidelity routing number, Non-Fidelity account number, Non-Fidelity routing number, other government ID, passport number, and Social Security number.

Starting October 9, 2024, Fidelity began notifying these individuals, including Maryland residents, via U.S. Mail. A copy of the notification template is attached as Attachment A to this letter. Fidelity has also established a toll-free call center for notified individuals to address any questions related to this incident and is offering each of these individuals two years of free credit monitoring and identity protection services from TransUnion.



Prior to the incident, Fidelity had a number of cybersecurity measures in place, including endpoint detection and response tools across the environment. As noted above, after becoming aware of this incident, Fidelity promptly took remedial actions to prevent this type of activity from occurring in the future.

If your office requires any further information in this matter, please contact me at (617) 880-1830 or [hegan@orrick.com](mailto:hegan@orrick.com).

Sincerely,

A handwritten signature in blue ink, appearing to read "HEG", with a stylized flourish at the end.

Heather Egan  
Partner, Orrick Herrington & Sutcliffe LLP



October 9, 2024

[Name]

[Address1] [Address2]

[City], [State] [Zip] [Country]

## Notice of Data Breach

Dear [Name],

We, Fidelity Investments (“Fidelity”), are contacting you to notify you of a data security incident that involved some of your personal information. We take the protection of your information very seriously and are reaching out to let you know what happened and the steps we have taken, and to provide you with additional information and services that may be helpful to you.

**What Happened?** Between August 17 and August 19, a third party accessed and obtained certain information without authorization using two customer accounts that they had recently established. We detected this activity on August 19 and immediately took steps to terminate the access. An investigation was promptly launched with assistance from external security experts. The information obtained by the third party related to a small subset of our customers. Please note that this incident did not involve any access to your Fidelity account(s).

**What Information Was Involved?** We recently completed our review of the impacted information and determined that the following personal information related to you was among the information retrieved: [Breach Elements].

**What We Are Doing.** We take this incident and the security of your information very seriously. As noted above, upon detecting this activity, we promptly took steps to terminate the activity and address this incident.

Although we are not aware of any misuse of your personal information obtained because of this incident, we have arranged for you to enroll, at your option, in a credit monitoring and identity restoration service for 24 months at no cost to you. This service allows you to monitor your credit reports and to detect any unusual activity that may affect your personal financial situation. The service is provided by TransUnion Interactive, a subsidiary of TransUnion®, one of the three nationwide credit reporting companies. If you decide to enroll, please refer to the enclosed Credit Monitoring Instruction Sheet.

**What You Can Do.** In addition to enrolling in the credit monitoring and identity restoration services it is always a good idea to remain vigilant for fraudulent activity or identity theft by regularly reviewing your statements for your financial and other accounts, monitoring your credit reports, and promptly reporting any suspicious activity to your financial institution (if applicable), local law enforcement, or your appropriate state authority. For additional information about ways to protect yourself, please refer to the enclosed “Additional Steps to Protect Yourself”.

**For More Information.** If you have any questions regarding this incident, please feel free to call us at the following dedicated number 1-844-528-1265 Monday through Friday from 8:30 am to 8:00 pm ET.

If you need assistance with the credit monitoring and identity restoration services offered through TransUnion, please call TransUnion at 1-844-787-4607, Monday through Friday from 8:00 am to 9:00 pm ET, and Saturday and Sunday from 8:00 am to 5:00 pm ET.

Sincerely,

*Fidelity Investments Privacy Office*

## CREDIT MONITORING INSTRUCTION SHEET

### Complimentary Credit Monitoring and Identity Theft Restoration Services

We have arranged for you to enroll, at no cost to you, in an online three-bureau credit monitoring service (My TrueIdentity) for 24-months provided by TransUnion Interactive, a subsidiary of TransUnion®, one of the three nationwide credit reporting companies.

To enroll in this service, go directly to the My TrueIdentity website at **www.mytrueidentity.com** and in the space referenced as “Enter Activation Code”, enter the following 12-letter Activation Code **[Credit Monitoring Code]** and follow the three steps to receive your credit monitoring service online within minutes.

If you do not have access to the internet and wish to enroll in a similar offline, paper based, three-bureau credit monitoring service, via U.S. Mail delivery, please call the TransUnion Fraud Response Services toll-free hotline at **1-855-288-5422**. When prompted, enter the following 6-digit telephone pass code **697234** and follow the steps to enroll in the offline credit monitoring service, add an initial fraud alert to your credit file, or to speak to a TransUnion representative if you believe you may be a victim of identity theft.

You can sign up for the online or offline credit monitoring service anytime between now and January 31, 2025. Due to privacy laws, we cannot register you directly. Please note that credit monitoring services might not be available for individuals who do not have a credit file with TransUnion®, Experian® and Equifax®, or an address in the United States (or its territories) and a valid Social Security number or are under the age of 18. Enrolling in this service will not affect your credit score.

Once you are enrolled, you will be able to obtain 24-months of unlimited access to your TransUnion credit report and credit score. The daily three-bureau credit monitoring service will notify you if there are any critical changes to your credit files at TransUnion, Experian and Equifax, including fraud alerts, new inquiries, new accounts, new public records, late payments, change of address and more. The subscription also includes access to identity restoration services that provides assistance in the event that your identity is compromised to help you restore your identity and up to \$1,000,000 in identity theft insurance with no deductible. (Certain policy limitations and exclusions may apply.)

If you have questions about your online credit monitoring benefits, need help with your enrollment, or need help accessing your credit report, or passing identity verification, please contact the My TrueIdentity Customer Service Team toll-free at: **1-844-787-4607**, Monday-Friday: 8am-9pm, Saturday-Sunday: 8am-5pm Eastern time.

## ADDITIONAL STEPS TO PROTECT YOURSELF

### Directions for Placing a Fraud Alert

You may want to consider placing an initial fraud alert on your credit file. A fraud alert tells creditors to contact you before they open any new accounts or change your existing accounts. You may place a fraud alert in your file by calling one of the three nationwide credit reporting agencies. The agency that processes your fraud alert will notify the other two credit reporting agencies on your behalf. An initial fraud alert stays on your credit report for 90 days. When you place this alert on your credit report, you will receive information about ordering one free credit report from each of the credit reporting companies. Once you receive your reports, review them carefully for inquiries from companies you did not contact, accounts you did not open, and debts on your accounts that you cannot explain. Verify the accuracy of your Social Security number, address(es), full name and employer(s). Notify the credit reporting companies if any information is incorrect.

Equifax: 877-478-7625 [www.equifax.com](http://www.equifax.com); PO Box 740241, Atlanta GA, 30374-0241

Experian: 888-397-3742 [www.experian.com](http://www.experian.com); PO Box 9532, Allen TX 75013

TransUnion LLC: 800-680-7289 [www.transunion.com](http://www.transunion.com); PO Box 6790, Fullerton CA 92834

### Directions for Obtaining a Credit Report

Please remember that while this matter may not involve significant risk, it is always good practice to take sensible steps to protect yourself by regularly reviewing your account statements and your credit report. As you may know, under federal law, you are entitled to one free copy of your credit report every 12 months from each of the major credit reporting agencies. You may obtain a free copy of your credit report by calling 1-877-FACT ACT (1-877-322-8228) or by visiting [www.annualcreditreport.com](http://www.annualcreditreport.com).

### Resources

Additional information on identity theft is available from the Federal Trade Commission (FTC). You may contact the FTC to report any incidents of identity theft and to obtain guidance about protecting against identity theft.

Federal Trade Commission  
Consumer Response Center  
600 Pennsylvania Avenue,  
NW Washington, DC 20580

Toll-free Identity Theft Helpline: 1-877-ID-THEFT (1-877-438-4338); TTY: 1-866-653-4261

Website: [www.ftc.gov/bcp/edu/microsites/idtheft/](http://www.ftc.gov/bcp/edu/microsites/idtheft/)

*For District of Columbia residents*, the District of Columbia Attorney General may be contacted at: 400 6th Street, NW, Washington, D.C. 20001; 202-727-3400; and [oag.dc.gov](http://oag.dc.gov).

*For Maryland residents*, the Maryland Attorney General may be contacted at: 200 St. Paul Place, 16th Floor, Baltimore, MD 21202; 1-410-528-8662 or 1-888-743-0023; and <https://www.marylandattorneygeneral.gov/>.

*For Massachusetts residents*, you have the right to obtain any police report filed in regard to this incident. If you are the victim of identity theft, you also have the right to file a police report and obtain a copy of it.

*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](http://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](http://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](http://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 incident. Fees may be required to be paid to the consumer reporting agencies. There are approximately [X] Rhode Island residents that may be impacted by this incident.