

November 25, 2024

VIA E-MAIL: Idtheft@oag.state.md.us

Office of the Attorney General
Attn: Security Breach Notification
200 St. Paul Place
Baltimore, MD 21202

Re: Notification Pursuant to Md. Code Com. Law § 14-3501 *et seq.*

Dear Attorney General Brown:

We are writing on behalf of our client, Zane Benefits, LLC. ("Zane Benefits"), to notify you of a security incident involving the personal information of nine (9) Maryland residents.

NATURE OF THE UNAUTHORIZED DISCLOSURE

On November 2, 2024, Zane Benefits became aware of a security incident impacting its database associated with its benefits solution. Upon discovering the issue, Zane Benefits took immediate steps to contain and remediate the incident, including taking the affected application offline and remediating the exploited vulnerability. Zane Benefits also initiated an investigation to determine the nature and scope of the incident. Through the investigation, Zane Benefits determined that an unauthorized third party gained access to files within the database.

As part of its response, Zane Benefits engaged a leading cybersecurity law firm to oversee and audit the incident response process. In addition, Zane Benefits conducted a comprehensive review of all software code and infrastructure involved with the affected service to ensure data integrity and security. To further bolster security, Zane Benefits has implemented new third-party security audit software as an added measure.

Zane Benefits conducted a thorough review to determine whether any personal information was involved. The investigation revealed that an unauthorized third party may have accessed certain Maryland residents' personal information, including full name, Social Security number, email address, phone number, and mailing address.

STEPS TAKEN RELATED TO THE INCIDENT

To date, Zane Benefits is not aware of any reports of identity fraud or misuse of information as a direct result of this incident. Nevertheless, on November 25, 2024, Zane Benefits emailed notifications to the affected Maryland residents. Zane Benefits is providing the potentially affected residents with 24 months of credit monitoring at no charge and has provided an email address to answer any questions the affected residents may have about the incident or the services available to them. Within the letter, Zane Benefits also advises the affected residents on general best practices and safeguards to protect themselves from identity theft, including to always remain vigilant in reviewing account statements and credit reports for unauthorized activity on a



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regular basis, as well as the process for placing a fraud alert and/or security freeze on their credit files and obtaining free credit reports.

At Zane Benefits, protecting the privacy of personal information is a top priority. Zane Benefits remains fully committed to maintaining the privacy of personal information in its possession and has taken numerous precautions to safeguard it. Zane Benefits continually evaluates and modifies its practices to enhance the security and privacy of the personal information it maintains.

If you have any inquiries concerning this notification, please do not hesitate to contact me.

Sincerely,

A handwritten signature in blue ink, appearing to read 'A. Tantleff', with a stylized flourish extending from the end.

Aaron K. Tantleff
Foley & Lardner LLP

Enclosure: Sample Notification



<<First Name>> <<Last Name>>
<<Address 1>>
<<City>>, <<State>> <<Zip>>
United States

<<Date>>

Dear <<First Name>>:

WHAT HAPPENED?

At Zane Benefits, Inc. Inc. ("Zane Benefits"), we strive to ensure the security of your information. We are writing to let you know about a recent security incident that may have involved some of your personal information. This letter contains information about what happened, the measures taken in response, and steps you can take to help protect your information.

On November 2, 2024, we became aware of a security incident impacting our database associated with the Zane Benefits ZaneHealth solution. As soon as we identified the issue, we took immediate action to investigate and remediate it, including taking the affected application offline and addressing the security gap that was exploited by an unauthorized third party. Our investigation determined that an unauthorized third party gained access to our database associated with the Zane Benefits ZaneHealth solution. We then conducted a detailed review to determine whether any personal information belonging to individuals was affected during the incident.

WHAT INFORMATION WAS INVOLVED?

Our investigation determined that an unauthorized third party may have accessed some of your personal information stored in our Zane Benefits ZaneHealth solution database, including your full name, Social Security number, email address, phone number, and mailing address.

WHAT WE ARE DOING.

Upon learning of the security incident, we moved quickly to initiate a response to investigate, contain, and remediate the incident, and to confirm the security of our network environment. In addition to these immediate steps, our security engineering team also completed a comprehensive review of all software code and infrastructure involved with the service to ensure its integrity. Additionally, we engaged a leading law firm specializing in cybersecurity to oversee and audit the response process. To further strengthen our security measures, we have implemented new third-party security audit software to uphold the highest standards.

Although we have no evidence to suggest that your information has been or will be misused, we are notifying you out of an abundance of caution. To help address any concerns you may have, we have arranged for you to enroll, at no cost to you, in comprehensive credit monitoring and identity protection services for 24 months through Norton LifeLock®. A description of this service, along with enrollment instructions, can be found within the enclosed "Other Important Information" document.

WHAT YOU CAN DO.

Please review the enclosed "Other Important Information" document for further steps you can take to protect your information, including recommendations by the Federal Trade Commission regarding identity theft protection and details on how to place a fraud alert or a security freeze on your credit file. It is also recommended that you remain vigilant for incidents of fraud and identity theft by reviewing your account statements and monitoring your credit reports for unauthorized activity. If you discover any suspicious or unusual activity on your accounts, you should promptly notify the financial institution or company with which your account is maintained.

FOR MORE INFORMATION.

If you have further questions or need assistance, please contact us at support@zanebenefits.com.

Sincerely,
Jon Whitmer
Jon Whitmer
Senior Vice President
Zane Benefits, Inc.

OTHER IMPORTANT INFORMATION

Enrolling in Complimentary Credit Monitoring.

Zane Benefits, Inc. has retained **NortonLifeLock** to provide 2 years of complimentary **LifeLock Standard™** identity theft protection.

To activate your membership online and get protection at no cost to you:

1. You will need the following **Promo Code: ZANE2411** and **Member ID: <<MEMBER ID>>**, which have been assigned specifically to you, for one-time use.
2. To begin, please click on the following **URL: <https://lifelock.norton.com/offers?expid=LLSTDGUC&promocode=ZANE2411>**
3. Enter The enrollment ID from Above and click Apply.
4. Once enrollment is completed, you will receive a confirmation email (*be sure to follow ALL directions in this email*).

Alternatively, to activate your membership over the phone, please call: 1-800-899-0180

You will have until **01-24-2025** to enroll in this service.

Once you have completed the LifeLock enrollment process, the service will be in effect. Your **LifeLock Standard™** membership includes:

- ✓ LifeLock Identity Alert™ System[†]
- ✓ 24/7 Live Member Support
- ✓ Dark Web Monitoring**
- ✓ LifeLock Privacy Monitor™
- ✓ Lost Wallet Protection
- ✓ Stolen Funds Reimbursement up to \$25,000 ^{†††}
- ✓ Personal Expense Compensation up to \$25,000 ^{†††}
- ✓ Coverage for Lawyers and Experts up to \$1 million ^{†††}
- ✓ U.S.-Based Identity Restoration Team
- ✓ One-Bureau Credit Monitoring^{†**}
- ✓ Reduced Pre-Approved Credit Card Offers
- ✓ USPS Address Change Verification

[†] If your plan includes credit reports, scores, and/or credit monitoring features ("Credit Features"), two requirements must be met to receive said features: (i) your identity must be successfully verified with Equifax; and (ii) Equifax must be able to locate your credit file and it must contain sufficient credit history information. IF EITHER OF THE FOREGOING REQUIREMENTS ARE NOT MET YOU WILL NOT RECEIVE CREDIT FEATURES FROM ANY BUREAU. If your plan also includes Credit Features from Experian and/or TransUnion, the above verification process must also be successfully completed with Experian and/or TransUnion, as applicable. If verification is successfully completed with Equifax, but not with Experian and/or TransUnion, as applicable, you will not receive Credit Features from such bureau(s) until the verification process is successfully completed and until then you will only receive Credit Features from Equifax. Any credit monitoring from Experian and TransUnion will take several days to begin after your successful plan enrollment.

No one can prevent all identity theft or cybercrime. [†] LifeLock does not monitor all transactions at all businesses.

** These features are not enabled upon enrollment. Member must take action to get their protection.

^{†††} Reimbursement and Expense Compensation, each with limits of up to \$25,000 for Standard. And up to \$1 million for coverage for lawyers and experts if needed. Benefits under the Master Policy are issued and covered by United Specialty Insurance Company (State National Insurance Company, Inc. for NY State members). Policy terms, conditions and exclusions at: LifeLock.com/legal.

Free Credit Report. You may obtain a copy of your credit report, free of charge, once every 12 months from each of the nationwide credit reporting agencies. To order your annual free credit report please visit www.annualcreditreport.com or call toll free at 1-877-322-8228. You can also order your annual free credit report by mailing a completed Annual Credit Report Request Form (available from the U.S. Federal Trade Commission's (FTC) website at www.consumer.ftc.gov) to: Annual Credit Report Request Service, P.O. Box 105281, Atlanta, GA 30348-5281. Contact information for the national credit reporting agencies for the purpose of requesting a copy of your credit report and other general inquiries is provided below:

- **Equifax**, PO Box 740241, Atlanta, GA 30374, www.equifax.com, 1-800-685-1111
- **Experian**, PO Box 9554, Allen, TX 75013, www.experian.com, 1-888-397-3742
- **TransUnion**, PO Box 2000, Chester, PA 19016, www.transunion.com, 1-800-888-4213
- **Innovis**, PO Box 530088, Atlanta, GA 30353-0088, www.innovis.com, 1-800-540-2505

Fraud Alert. You have the right to place an initial or extended “fraud alert” on your file at no cost by contacting any of the nationwide credit reporting agencies. Contact information for the national credit reporting agencies for the purposes of placing a fraud alert on your file is provided below. An initial fraud alert is a 1-year alert that is placed on a consumer’s credit file. Upon seeing a fraud alert displayed on a consumer’s credit file, a business is required to take steps to verify the consumer’s identity before extending new credit. For this reason, placing a fraud alert can protect you, but also may delay you when you seek to obtain credit. If you are a victim of identity theft and have filed an identity theft report with law enforcement, you may want to consider placing an extended fraud alert, which lasts for 7 years, on your credit file.

- **Equifax**, PO Box 105069, Atlanta, GA 30348-5069, www.equifax.com/personal/credit-report-services/credit-fraud-alerts, 1-800-525-6285
- **Experian**, PO Box 9554, Allen, TX 75013, www.experian.com/fraud/center.html, 1-888-397-3742
- **TransUnion**, P.O. Box 160, Woodlyn, PA 19094, www.transunion.com/fraud-alerts, 1-800-916-8800
- **Innovis Consumer Assistance**, PO Box 530088 Atlanta, GA 30353-0088, <https://www.innovis.com/personal/fraudActiveDutyAlerts>, 1-866-712-0021

Security Freeze. You have the right to place, lift, or remove a “security freeze” on your credit report, free of charge. A security freeze prohibits a credit reporting agency from releasing any information from a consumer’s credit report without written authorization. However, please be aware that placing a security freeze on your credit report may delay, interfere with, or prevent the timely approval of any requests you make for new loans, credit mortgages, employment, housing or other services. Under federal law, you cannot be charged to place, lift, or remove a security freeze. You must place your request for a freeze separately with each of the consumer reporting agencies. To place a security freeze on your credit report, you may do so by contacting each of the consumer reporting agencies through the contact information below:

- **Equifax**, PO Box 105788, Atlanta, GA 30348-5788, www.equifax.com/personal/credit-report-services/credit-freeze, 1-800-298-0045
- **Experian**, PO Box 9554, Allen, TX 75013, www.experian.com/freeze/center.html, 1-888-397-3742
- **TransUnion**, PO Box 160, Woodlyn, PA 19094, www.transunion.com/credit-freeze, 1-888-909-8872
- **Innovis**, PO Box 530088 Atlanta, GA 30353-0088, www.innovis.com/personal/securityFreeze, 1-866-712-4546

In order to request a security freeze, you will need to provide some or all of the following information to the credit reporting agency, depending on whether you do so online, by phone, or by mail (note that if you are requesting a credit report for your spouse, this information must be provided for him/her as well): (1) full name, with middle initial and any suffixes; (2) Social Security number; (3) date of birth; (4) current address and any previous addresses for the past 5 years; and (5) any applicable incident report or complaint with a law enforcement agency or the Registry of Motor Vehicles. The request must also include a copy of a government-issued identification card and a copy of a recent utility bill or bank or insurance statement. It is essential that each copy be legible, display your name and current mailing address, and the date of issue. If you are a victim of identity theft, include a copy of either the police report, investigative report, or complaint to a law enforcement agency concerning identity theft.

The credit reporting agencies have 1 business day after receiving your request by toll-free telephone or secure electronic means, or up to 3 business days after receiving your request by mail, to place a security freeze on your credit report. The credit bureaus must also send written confirmation to you within 5 business days and may provide you with a unique personal identification number (PIN) or password (or both) that can be used by you to authorize the removal or lifting of the security freeze. It is important to maintain this PIN/password in a secure place, as you will need it to lift or remove the security freeze.

To lift the security freeze in order to allow a specific entity or individual access to your credit report, or to lift a security freeze for a specified period of time, you must submit a request through a toll-free telephone number, a secure electronic means maintained by a credit reporting agency, or by sending a written request via regular, certified, or overnight mail to the credit reporting agencies and include proper identification (name, address, and Social Security number) and the PIN or password provided to you when you placed the security freeze as well as the identity of those entities or individuals you would like to receive your credit report or the specific period of time you want the credit report available. The credit reporting agencies have 1 business day after receiving your request by toll-free telephone or secure electronic means, or 3 business days after receiving your request by mail, to lift the security freeze for those identified entities or for the specified period of time.

To remove the security freeze, you must submit a request through a toll-free telephone number, a secure electronic means maintained by a credit reporting agency, or by sending a written request via regular, certified, or overnight mail to each of the credit bureaus and include proper identification (name, address, and Social Security number) and the PIN number or password provided to you when you placed the security freeze. The credit bureaus have 1 business day after receiving your request by toll-free telephone or secure electronic means, or 3 business days after receiving your request by mail, to remove the security freeze.

Federal Trade Commission and State Attorneys General Offices. If you believe you are the victim of identity theft or have reason to believe your personal information has been misused, you should immediately contact the FTC, proper law enforcement authorities and/or your state attorney general. You may also contact these agencies for information on how to prevent or avoid identity theft and to obtain additional information about fraud alerts and security freezes. You may contact the **Federal Trade Commission**, Consumer Response Center, 600 Pennsylvania Avenue, NW, Washington, DC 20580, www.identitytheft.gov, 1-877-ID-THEFT (438-4338). This notice has not been delayed by law enforcement.

- ***For Iowa Residents***, you are advised to report suspected incidents of identity theft to law enforcement or the Iowa Attorney General's Office at Office of the Attorney General of Iowa, Consumer Protection Division, Hoover State Office Building, 1305 East Walnut Street, Des Moines, IA 50319, www.iowaattorneygeneral.gov, telephone: 1-515-281-5926 or 1-888-777-4590.
- ***For Maryland residents***, you may obtain information about avoiding identity theft from the Maryland Office of the Attorney General 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 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***, you may obtain additional information about security breach response and identity theft prevention and protection from the New York State Office of the Attorney General by calling 1-800-771-7755 or visiting <https://ag.ny.gov>; the New York State Police by calling 1-518-457-6721 or visiting <https://troopers.ny.gov/>; and/or the New York Department of State by calling 1-800-697-1220 or visiting <https://www.dos.ny.gov>.
- ***For North Carolina residents***, you may obtain additional information about preventing identity theft provided by the North Carolina Attorney General at: 9001 Mail Service Center, Raleigh, NC 27699-9001; 1-877-566-7226 or 1-919-716-6000; and www.ncdoj.gov.
- ***For Oregon Residents***, you are advised to report any suspected incidents of identity theft to law enforcement, the Federal Trade Commission, and the Oregon Attorney General at <https://doj.state.or.us>, by calling (877) 877-9392, or writing to Oregon Department of Justice, 1162 Court Street NE, Salem, OR 97301-4096.