



Stacy A. Cole

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December 9, 2024

BY EMAIL ONLY TO IDTHEFT@OAG.STATE.MD.US

Attorney General Anthony G. Brown
Office of the Attorney General
200 St. Paul Place
Baltimore, MD 21202

Re: Security Incident Notification

Dear Attorney General Brown:

We are writing on behalf of our client, Rumpke Consolidated Companies, Inc. (“**Rumpke**”) located at 3990 Generation Drive, Cincinnati, OH 45251, to notify your office of a recently discovered security incident that affects six (6) Maryland residents.

On October 11, 2024, Rumpke was alerted by the Department of Homeland Security (“**DHS**”) concerning a dark web posting by an attacker, believed to be Hunters International, claiming to have accessed and removed data from its IT systems. Rumpke immediately began its investigation with the help of legal and computer forensics teams and engaged in network-wide threat hunting. Rumpke learned the attacker accessed its systems starting on July 20, 2024, as a result of a compromised user account. The last indication of malicious activity occurred in August 2024. Rumpke is not aware of any subsequent successful attempts to infiltrate the network.

Because certain types of protected health information for some current and former employees and their spouses and dependents was believed to be in the documents accessed and/or exfiltrated, Rumpke decided to notify all health plan participants enrolled in Rumpke’s health plan from 2015 through July 27, 2024 out of an abundance of caution.

The information that *may* have been viewed or taken includes contact information, such as names, addresses, dates of birth, phone numbers, and emails, plus one or more of the following:

- Health insurance data, such as health plan enrollment and account information;
- Health data, such as diagnosis information and codes;
- Health billing and payment data, such as claim numbers, account numbers, billing codes, payment amounts, and balance information; and
- Other personal data such as Social Security numbers, driver’s license or state or other ID numbers, and financial account information.

Keating Muething & Klekamp PLL

Attorneys at Law

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The incident also impacted the personally identifying information of additional individuals, and comprehensive data mining work is ongoing for purposes of identifying other individuals to be notified. Rumpke will supplement this notice following the identification of the remainder of the population impacted by the incident to the extent additional residents of this state are identified. As of the date of this letter, Rumpke does not have evidence that any personal information has been misused for identity theft or fraud.

Rumpke has fully investigated this incident with its forensic service provider and legal team, and has made immediate enhancements to its systems, security, and practices. Rumpke has engaged appropriate experts to assist it in conducting a full review of its security practices and systems to ensure that enhanced security protocols are in place going forward. Rumpke is also enhancing its employee training to increase awareness and reduce risk.

Additionally, Rumpke is offering 24 months of single-bureau credit monitoring and proactive fraud assistance services at no charge to impacted individuals. Rumpke has sent the enclosed notices to affected individuals, notifying them of the incident, the free credit services, and additional steps they can take to protect themselves. Help line representatives are available for at least 90 days from the date of the notification letters to assist affected individuals with questions regarding the incident. Rumpke is also offering escalation support through a direct contact telephone number for Rumpke. Rumpke is also providing written notice of this event to appropriate state privacy regulators, and to the three major consumer reporting agencies, Equifax, Experian, and TransUnion.

Please do not hesitate to contact us should you have any questions regarding this notification or the incident.

Sincerely,

KEATING MUETHING & KLEKAMP PLL

By:



Stacy A. Cole

Enclosures



Secure Processing Center
25 Route 111, P.O. Box 1048
Smithtown, NY 11787

Postal Endorsement Line

Parent or Guardian of

<<Full Name>>

<<Address 1>>

<<Address 2>>

<<Address 3>>

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

<<Country>>

***Postal IMB Barcode

<<Date>>

Re: Notification of data breach at Rumpke. Please read this letter in its entirety.

Dear Parent or Guardian of <<Full Name>>:

Rumpke Waste & Recycling is committed to protecting the privacy of our employees' information. We take privacy very seriously, and it is important to us that you are made fully aware of a privacy issue involving your child's information.

What happened?

Rumpke, on its own behalf and on behalf of the Rumpke Consolidated Companies, Inc. & Affiliates Benefits Plan, are writing to notify you of a security incident. On October 11, 2024, we were alerted to a dark web posting by an attacker claiming to have accessed and removed data from our IT systems. We immediately worked to successfully contain the intrusion and began our investigation with the help of legal and computer forensics teams. We also contacted law enforcement. We learned the attackers accessed our systems starting on July 20, 2024, through a compromised user account. As a result, the attacker was able to gain access to parts of our network and view and take certain files relating to our employees, their dependents, and our health plan, among other types of information.

While we have no evidence that any of your child's personal information has been misused for identity theft or fraud, we are exercising an abundance of caution to help protect their personal information and financial security, and alleviate any concerns you may have.

What information was involved?

The information that may have been viewed or taken includes contact information, such as your child's name, address, date of birth, phone number, and email, plus one or more of the following:

- Health insurance data, such as health plan enrollment and account information;
- Health data, such as diagnosis information and codes;
- Health billing and payment data, such as claim numbers, account numbers, billing codes, payment amounts, and balance information;
- Other personal data such as Social Security number, driver's license or state or other ID number, and financial account information.

The data that may have been seen or taken may differ from person to person, and some or all of your child's information may not have been impacted.

What are we doing to address this situation?

Rumpke fully investigated this incident with its forensic service provider and legal team, and has made immediate enhancements to our systems, security, and practices. Additionally, we are conducting a full review of our security practices and systems to ensure that enhanced security protocols are in place going forward so an incident like this does not happen again. We are also enhancing our employee training to increase awareness and prevent future security incidents.

We are committed to helping those who may have been impacted by this situation, and are providing you with access to **Minor Defense** identity monitoring services at no charge for **24 months** from the date of enrollment. Finally, we are providing you with proactive fraud assistance to help with any questions that you might have or in event that your child becomes a victim of fraud.

How do I enroll for the free services?

To enroll your child in Minor Defense services at no charge, please see the instructions on the following page.

What can I do to protect myself?

Please review the enclosed information at the end of this letter entitled “Other Steps You Can Take to Protect Yourself and Your Child.”

What if I want to talk to someone about this incident?

Representatives are available for 90 days from the date of this letter, to assist you with questions regarding this incident, between the hours of 9:00 am to 9:00 pm Eastern Time, Monday through Friday, excluding holidays. Please call the help line 888-458-9787 and be prepared to supply your child’s Activation Code included on the next page of this letter.

While representatives should be able to provide thorough assistance and answer most of your questions, you may still feel the need to speak with Rumpke regarding this incident. If so, please call us at 866-237-0379 from 9:00 am to 5:00 pm Eastern Time, Monday through Friday.

In today’s world, technology and cyber security threats are ever-evolving, please know that Rumpke is staying abreast of trends and is constantly using and adapting best practices and technology to protect our team and customers from attack. We appreciate your prompt attention to this matter and sincerely apologize for the inconvenience.

Sincerely,

A handwritten signature in blue ink that reads "Rachel Mitchell". The signature is written in a cursive, flowing style.

Rachel Mitchell
Senior Vice President of Human Resources



Key Features

- Synthetic Identity Monitoring
- Public Record Trace
- Dark Web Monitoring
- Parent/Custodial Adult Controls
- Victim Assistance

Enrollment Instructions

To enroll in Minor Defense, visit <<URL>>

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

The deadline to enroll is <<Enrollment Deadline>>. After <<Enrollment Deadline>>, the enrollment process will close, and your Minor Defense code will no longer be active. If you do not enroll by <<Enrollment Deadline>>, you will not be able to take advantage of Minor Defense, so please enroll before the deadline.

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

Other Steps You Can Take to Protect Yourself and Your Child

Review Credit Reports and Account Statements. We recommend that you remain vigilant by reviewing account statements and monitoring credit reports. Under federal law, you also are entitled every 12 months to one free copy of your credit report from each of the three major credit reporting companies. To obtain a free annual credit report, go to www.annualcreditreport.com or call 1-877-322-8228. Hearing impaired consumers can access their TDD service at 1-877-730-4204. You may wish to stagger your requests so that you receive a free report by one of the three credit bureaus every four months.

Upon receipt of your credit report, we recommend that you review it carefully for any suspicious activity. Be sure to promptly report any suspicious activity by calling the help line number included above and providing your unique code listed in this letter.

Police Report. You also have the right to file a police report if you ever suspect or experience identity fraud. Please note that in order to file a crime report or incident report with law enforcement for identity theft, you will likely need to provide evidence that you have been a victim. A police report is often required to dispute fraudulent items. You can report suspected incidents of identity theft to local law enforcement or to the Attorney General.

Fraud Alerts. You can also place fraud alerts with the three credit bureaus. If you choose to place a fraud alert, we recommend you do this after activating your credit monitoring. You can place a fraud alert at one of the three major credit bureaus by phone and also via Experian's or Equifax's website. A fraud alert tells creditors to follow certain procedures, including contacting you, before they open any new accounts or change your existing accounts. For that reason, placing a fraud alert can protect you, but also may delay you when you seek to obtain credit. The contact information for all three bureaus is as follows:

Experian (1-888-397-3742)
P.O. Box 4500
Allen, TX 75013
www.experian.com

Equifax (1-800-525-6285)
P.O. Box 740241
Atlanta, GA 30374
www.equifax.com

TransUnion (1-800-680-7289)
P.O. Box 2000
Chester, PA 19016
www.transunion.com

No one can place a fraud alert on your credit report except you.

Credit Freeze. By placing a security freeze, someone who fraudulently acquires your personal identifying information will not be able to use that information to open new accounts or borrow money in your name. You will need to contact the three national credit reporting bureaus listed above to place the freeze. Keep in mind that when you place the freeze, you will not be able to borrow money, obtain instant credit, or get a new credit card until you temporarily lift or permanently remove the freeze. There is no cost to freeze or unfreeze your credit files.

Additional Information. You can obtain additional information about how to avoid identity theft from the following agencies. The Federal Trade Commission also encourages those who discover that their information has been misused to file a complaint with them. You can contact the FTC at <https://consumer.ftc.gov>; 1-877-IDTHEFT (438-4338); TTY 1-866-653-4261; or Attn: Identity Theft Clearinghouse, Federal Trade Commission, 600 Pennsylvania Avenue, NW, Washington, DC 20580.

California Residents: Visit the California Office of Privacy Protection (www.oag.ca.gov/privacy) for additional information on protection against identity theft. Office of the Attorney General of California, 1300 I Street, Sacramento, CA 95814, Telephone: 1-800-952-5225.

Kentucky Residents: Office of the Attorney General of Kentucky, 700 Capitol Avenue, Suite 118 Frankfort, Kentucky 40601, www.ag.ky.gov, Telephone: 1-502-696-5300.

Maryland Residents: Office of the Attorney General of Maryland, Consumer Protection Division 200 St. Paul Place Baltimore, MD 21202, www.oag.state.md.us/Consumer, Telephone: 1-888-743-0023.

New Mexico Residents: You have rights pursuant to the Fair Credit Reporting Act, such as the right to be told if information in your credit file has been used against you, the right to know what is in your credit file, the right to ask for your credit score, and the right to dispute incomplete or inaccurate information. Further, pursuant to the Fair Credit Reporting Act, the consumer reporting agencies must correct or delete inaccurate, incomplete, or unverifiable information; consumer reporting agencies may not report outdated negative information; access to your file is limited; you must give your consent for credit reports to be provided to employers; you may limit “prescreened” offers of credit and insurance you get based on information in your credit report; and you may seek damages from a violator. You 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. You can review your 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.

New York Residents: the Attorney General may be contacted at: Office of the Attorney General, The Capitol, Albany, NY 12224-0341; 1-800-771-7755; <https://ag.ny.gov/>.

North Carolina Residents: Office of the Attorney General of North Carolina, 9001 Mail Service Center Raleigh, NC 27699-9001, www.ncdoj.gov, Telephone: 1-919-716-6400.

Oregon Residents: Oregon Department of Justice, 1162 Court Street NE, Salem, OR 97301-4096, www.doj.state.or.us/, Telephone: 1-877-877-9392.

Rhode Island Residents: Office of the Attorney General, 150 South Main Street, Providence, Rhode Island 02903, www.riag.ri.gov, Telephone: 1-401-274-4400.



Secure Processing Center
25 Route 111, P.O. Box 1048
Smithtown, NY 11787

Postal Endorsement Line

<<Full Name>>

<<Address 1>>

<<Address 2>>

<<Address 3>>

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

<<Country>>

***Postal IMB Barcode

<<Date>>

Re: Notification of data breach at Rumpke. Please read this letter in its entirety.

Dear <<Full Name>>:

Rumpke Waste & Recycling is committed to protecting the privacy of our employees' information. We take privacy very seriously, and it is important to us that you are made fully aware of a privacy issue involving your information.

What happened?

Rumpke, on its own behalf and on behalf of the Rumpke Consolidated Companies, Inc. & Affiliates Benefits Plan, are writing to notify you of a security incident. On October 11, 2024, we were alerted to a dark web posting by an attacker claiming to have accessed and removed data from our IT systems. We immediately worked to successfully contain the intrusion and began our investigation with the help of legal and computer forensics teams. We also contacted law enforcement. We learned the attackers accessed our systems starting on July 20, 2024, through a compromised user account. As a result, the attacker was able to gain access to parts of our network and view and take certain files relating to our employees, their dependents, and our health plan, among other types of information.

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- Health data, such as diagnosis information and codes;
- Health billing and payment data, such as claim numbers, account numbers, billing codes, payment amounts, and balance information;
- Other personal data such as Social Security number, driver's license or state or other ID number, and financial account information.

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What are we doing to address this situation?

Rumpke fully investigated this incident with its forensic service provider and legal team, and has made immediate enhancements to our systems, security, and practices. Additionally, we are conducting a full review of our security practices and systems to ensure that enhanced security protocols are in place going forward so an incident like this does not happen again. We are also enhancing our employee training to increase awareness and prevent future security incidents.

We are committed to helping those who may have been impacted by this situation, and are providing you with access to **Single Bureau Credit Monitoring** services at no charge. These services provide you with alerts for **24 months** from the date of enrollment. Finally, we are providing you with proactive fraud assistance to help with any questions that you might have or in event that you become a victim of fraud.

How do I enroll for the free services?

To enroll in Credit Monitoring services at no charge, please see the instructions on the following page.

What can I do to protect myself?

Please review the enclosed information at the end of this letter entitled “Other Steps You Can Take to Protect Yourself.”

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In today’s world, technology and cyber security threats are ever-evolving, please know that Rumpke is staying abreast of trends and is constantly using and adapting best practices and technology to protect our team and customers from attack. We appreciate your prompt attention to this matter and sincerely apologize for the inconvenience.

Sincerely,

A handwritten signature in blue ink that reads "Rachel Mitchell". The signature is fluid and cursive, with the first name "Rachel" and last name "Mitchell" clearly distinguishable.

Rachel Mitchell
Senior Vice President of Human Resources

Identity Defense Complete

Key Features

- 1-Bureau Credit Monitoring
- Monthly Credit Score and Tracker (VantageScore 3.0)
- Real-Time Authentication Alerts
- High-Risk Transaction Monitoring
- Address Change Monitoring
- Dark Web Monitoring
- Wallet Protection
- Security Freeze Assist
- \$1 Million Identity Theft Insurance**

Enrollment Instructions

To enroll in Identity Defense, visit <<URL>>

Enter your unique Activation Code <<Activation Code>>

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 <<Enrollment Deadline>>. After <<Enrollment Deadline>>, the enrollment process will close, and your Identity Defense code will no longer be active. If you do not enroll by <<Enrollment Deadline>>, 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.

*Service Term begins on the date of enrollment, provided that the enrollment takes place during the approved enrollment period.

**Identity Theft Insurance is underwritten by insurance company subsidiaries or affiliates of American International Group, Inc. The description herein is a summary and intended for informational purposes only and does not include all terms, conditions, and exclusions of the policies described. Please refer to the actual policies for terms, conditions, and exclusions of coverage. Coverage may not be available in all jurisdictions.

Other Steps You Can Take to Protect Yourself

Review Your Credit Reports. We recommend that you remain vigilant by reviewing account statements and monitoring credit reports. Under federal law, you also are entitled every 12 months to one free copy of your credit report from each of the three major credit reporting companies. To obtain a free annual credit report, go to www.annualcreditreport.com or call 1-877-322-8228. Hearing impaired consumers can access their TDD service at 1-877-730-4204. You may wish to stagger your requests so that you receive a free report by one of the three credit bureaus every four months.

Upon receipt of your credit report, we recommend that you review it carefully for any suspicious activity. Be sure to promptly report any suspicious activity by calling the help line number included above and providing your unique code listed in this letter.

Police Report. You also have the right to file a police report if you ever suspect or experience identity fraud. Please note that in order to file a crime report or incident report with law enforcement for identity theft, you will likely need to provide evidence that you have been a victim. A police report is often required to dispute fraudulent items. You can report suspected incidents of identity theft to local law enforcement or to the Attorney General.

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www.experian.com

Equifax (1-800-525-6285)
P.O. Box 740241
Atlanta, GA 30374
www.equifax.com

TransUnion (1-800-680-7289)
P.O. Box 2000
Chester, PA 19016
www.transunion.com

No one can place a fraud alert on your credit report except you.

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New Mexico Residents: You have rights pursuant to the Fair Credit Reporting Act, such as the right to be told if information in your credit file has been used against you, the right to know what is in your credit file, the right to ask for your credit score, and the right to dispute incomplete or inaccurate information. Further, pursuant to the Fair Credit Reporting Act, the consumer reporting agencies must correct or delete inaccurate, incomplete, or unverifiable information; consumer reporting agencies may not report outdated negative information; access to your file is limited; you must give your consent for credit reports to be provided to employers; you may limit “prescreened” offers of credit and insurance you get based on information in your credit report; and you may seek damages from a violator. You 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. You can review your 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.

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