



MULLEN
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March 5, 2025

VIA E-MAIL

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

Re: Notice of Data Event

To Whom It May Concern:

We represent FlexCare, LLC (“FlexCare”) located at 1075 Creekside Ridge Dr, Suite 100, Roseville, CA 95678, and are writing to notify your office of an incident that may affect the security of certain personal information relating to nine (9) Maryland residents. This notice will be supplemented with any new significant facts learned subsequent to its submission. By providing this notice, FlexCare 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 around October 9, 2024, FlexCare identified suspicious activity in an employee’s email account. FlexCare immediately took steps to secure the account and initiated an investigation into the nature and scope of the event. The investigation determined that the impacted email account was subject to unauthorized access and possible acquisition. In response, FlexCare conducted a detailed review of the files determined to be at risk by this event to identify the type of information stored therein and to whom that information related. The information that could have been impacted includes name, Social Security number, system access information, and health insurance information.

Notice to Maryland Residents

On or about March 5, 2025, FlexCare provided written notice of this incident to nine (9) Maryland residents. 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, FlexCare moved quickly to investigate and respond to the incident, assess the security of FlexCare systems, and identify potentially affected individuals. FlexCare is also working to implement additional safeguards and training to its employees. FlexCare is providing access to credit monitoring services for two (2) years through IDX, to individuals whose personal information was potentially affected by this incident, at no cost to these individuals.

Additionally, FlexCare is providing impacted individuals with guidance on how to better protect against identity theft and fraud. FlexCare 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.

FlexCare is providing written notice of this incident to relevant state 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) 930-4784.

Very truly yours,

Jeffrey J. Boogay of
MULLEN COUGHLIN LLC

JJB/mls
Enclosure

EXHIBIT A



P.O. Box 989728
West Sacramento, CA 95798-9728

<<Name 1>> <<Name 2>>
<<Address 1>>
<<Address 2>>
<<City>>, <<State>> <<Zip>>

Enrollment Code: <<XXXXXXXX>>

To Enroll, Scan the QR Code Below:



Or Visit:

<https://app.idx.us/account-creation/protect>

March 5, 2025

NOTICE OF <<SECURITY INCIDENT/DATA BREACH>>

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

FlexCare, LLC (“FlexCare”) writes to notify you of an incident that may affect the privacy of some of your information. Although we have no evidence of any identify theft or fraud occurring as a result of this incident, this letter provides details of the incident, our response, and resources available to you to help protect your information from possible misuse, should you feel it is appropriate to do so.

What Happened? On or around October 9, 2024, FlexCare identified suspicious activity in an employee’s email account. We immediately took steps to secure the account and initiated an investigation into the nature and scope of the event. The investigation determined that the impacted email account was subject to unauthorized access and possible acquisition. In response, we conducted a detailed review of the files determined to be at risk by this event to identify the type of information stored therein and to whom that information related. We are notifying you because our review determined your information was present in the impacted email account.

What Information Was Involved? The investigation determined that the information impacted by this event includes your name, <<data elements impacted>>. While we are unaware of any actual or attempted fraudulent misuse of your information as a result of this incident, we are notifying you out of an abundance of caution.

What We Are Doing. We take this incident and the security of personal information in our care seriously. Upon discovering the unauthorized activity, we took steps to further increase the security of our systems and investigated the activity. As part of our ongoing commitment to the privacy of information in our care, we implemented additional technical security measures designed to prevent similar future incidents. We are also reviewing and enhancing existing policies and procedures. As an added precaution, FlexCare is offering you complimentary access to 24 months of credit monitoring through IDX identity protection services, which includes credit and CyberScan monitoring, a \$1,000,000 insurance reimbursement policy, and fully managed id theft recovery services. With this protection, IDX will help you resolve issues if your identity is compromised. Details of this offer and instructions on how to enroll in the services may be found in the attached *Steps You Can Take to Help Protect Your Personal Information*. Please note that, due to privacy restrictions, we are unable to automatically enroll you in the offered identity monitoring services. The deadline to enroll is June 5, 2025.

What You Can Do. We encourage you to remain vigilant against events 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 enclosed *Steps You Can Take to Help Protect Personal Information*.

For More Information. If you have additional questions or need assistance, please contact 1-800-939-4170. IDX representatives are available Monday through Friday from 6 am - 6 pm Pacific Time.

Sincerely,

FlexCare, LLC

STEPS YOU CAN TAKE TO HELP PROTECT PERSONAL INFORMATION

Enroll in Monitoring Services

- 1. Website and Enrollment.** Scan the QR image or go to <https://app.idx.us/account-creation/protect> and follow the instructions for enrollment using your Enrollment Code provided at the top of the letter.
- 2. Activate the credit monitoring** provided as part of your IDX identity protection membership. The monitoring included in the membership must be activated to be effective. Note: You must have established credit and access to a computer and the internet to use this service. If you need assistance, IDX will be able to assist you.
- 3. Telephone.** Contact IDX at 1-800-939-4170 to gain additional information about this event and speak with knowledgeable representatives about the appropriate steps to take to protect your credit identity.

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. 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.