Taft/

July 14, 2023

VIA OVERNIGHT MAIL
CONFIDENTIAL

Consumer Protection & Antitrust Bureau
Office of the Attorney General
33 Capitol Street
Concord, NH 03301

RE: Vitality Group, LLC

To Whom It May Concern:

In accordance with New Hampshire Revised Code §359-C:19, et. seq., I am providing the following notice of a security incident on behalf of our client, The Vitality Group, LLC ("Vitality"), which is writing on behalf of Tavistock Health Management Company, LLC.

NAME AND CONTACT INFORMATION OF THE PERSON REPORTING THE BREACH;

Name:	Zenus Franklin
Position:	Outside Counsel for Vitality
Company:	Taft Stettinius & Hollister, LLP
E-mail:	zfranklin@taftlaw.com
Address:	40 N. Main Street, Suite 900 Dayton, Ohio 45423
Telephone number:	937.245.6864

NAME AND ADDRESS OF THE BUSINESS THAT EXPERIENCED THE BREACH, AND THE TYPE OF BUSINESS; OWNER OF THE PERSONAL INFORMATION;

Vitality, 120 S. Riverside Plaza, Suite 400, Chicago, IL, 60606 is a business-to-business vendor that provides employee benefit services, such as wellness services, to the Data Owner. Vitality experienced the security incident.

The Data Owner of the personal information subject to this security incident is Tavistock Health Management Company, LLC. Vitality is a third party vendor that provides employee benefit services to the Data Owner.

A GENERAL DESCRIPTION OF THE BREACH, INCLUDING THE DATE(S) OF THE BREACH, WHEN AND HOW THE BREACH WAS DISCOVERED, AND ANY REMEDIAL STEPS TAKEN IN RESPONSE TO THE BREACH;

Vitality uses a third-party file transfer program called MOVEit to transfer data necessary for conducting its business. MOVEit experienced a security vulnerability on May 30, 2023.

The zero-day vulnerability became known in established security networks and channels late on May 31, 2023, and was specifically picked up and identified by internal security personnel on June 1, 2023. Upon becoming aware of the vulnerability, Vitality immediately disconnected the MOVEit software server. This prevented all public access to the server and removed the known exploitable risk.

Vitality took immediate action and began forensics investigations to evaluate any impact. Vitality's security team conducted a thorough forensic analysis to ensure that no other servers or systems inside of the broader Vitality network were impacted.

After reviewing the incident, Vitality confirmed during its investigation that the Data Owner's information may have been accessed by the unauthorized third party. Vitality notified the Data Owner of the security incident. Vitality then worked with the Data Owner to understand what personal information may have been at risk and to identify any affected individuals.

Vitality maintains written privacy and security policies and procedures with respect to personal information collected. Vitality has taken steps to further strengthen and harden the security of systems in its network, including enhancing administrative and technical safeguards. Vitality has implemented additional security measures to further fortify its network's security measures and protocols which included: (i) applying all available patches provided by MOVEit and (ii) implementing a password reset on every account that accesses the server.

THE NUMBER OF STATE RESIDENTS AFFECTED BY THE BREACH;

Vitality's investigation identified 2 individuals with a New Hampshire address that may have been impacted. In the event that Vitality determines any additional New Hampshire residents are impacted, Vitality shall update this notice accordingly.

A DETAILED LIST OF CATEGORIES OF PERSONAL INFORMATION SUBJECT OF THE BREACH;

The resident information impacted included

THE DATE(S) THAT NOTIFICATION WAS/WILL BE SENT TO THE AFFECTED STATE RESIDENTS;

July 17, 2023.

A TEMPLATE COPY OF THE NOTIFICATION SENT TO THE AFFECTED STATE RESIDENTS;

Please see attached a substantially similar template copy of the notification sent to the residents.

WHETHER CREDIT MONITORING OR IDENTITY THEFT PROTECTION SERVICES HAS BEEN OR WILL BE OFFERED TO AFFECTED STATE RESIDENTS, AS WELL AS A DESCRIPTION AND LENGTH OF SUCH SERVICES; AND

Vitality established a dedicated call center service to assist affected residents with questions. Credit monitoring and identity theft prevention services have been offered via Experian for .

WHETHER THE NOTIFICATION WAS DELAYED DUE TO A LAW ENFORCEMENT INVESTIGATION (IF APPLICABLE).

No.

Please let us know if you have any further questions.

Yours faithfully

Zenus Franklin

[INSERT] July 2023

[Original First Name] [Original Last Name]
[Original Address 1]
[Original Address 2]
[Original City], [Original State]
[Original Zip Code]

Dear [Original First Name] [Original Last Name]

RE: IMPORTANT SECURITY NOTIFICATION. PLEASE READ THIS ENTIRE LETTER.

We are contacting you regarding a data security incident that has occurred on May 30, 2023 at Vitality. As a result, your personal information may have been potentially exposed to others. Please be assured that we have taken every step necessary to address the incident.

What happened
Vitality, and hundreds of global companies and state agencies use a third-party file transfer program called MOVEit to transfer data necessary to conducting business. MOVEit experienced a security vulnerability on May 30, 2023.

Vitality's internal security personnel identified this risk at approximately 11:30 a.m. Central Standard Time on June 1. Within minutes of becoming aware of the vulnerability, Vitality disconnected the MOVEit software server. This prevented all public access to the server and removed the known exploitable risk.

After reviewing the incident, Vitality identified a two-hour span in which the vulnerability allowed the unauthorized third party to access the server that utilizes the MOVEit software. Vitality took immediate action and temporarily disabled access to MOVEit to protect our members' data privacy and began forensics investigations to evaluate any impact.

What information was involved
The information potentially at risk could have included

What we are doing

What you can do
While we have received no reports or indication of such activity, the risks related to unauthorized use of a Social Security number may include identity theft, financial fraud, and tax fraud. Please be vigilant about monitoring your personally identifiable information, in particular your credit report information and financial accounts, to protect against fraudulent activity. Please also take care and attention when submitting tax returns to protect against possible fraudulent submissions made on your behalf.

To assist you in this effort, we have provided complimentary credit monitoring and identity theft prevention services through Experian. If you are concerned about identity theft, please sign up for the complimentary monitoring and protection services by following the instructions enclosed or provided below from Experian. The deadline to sign up for this complimentary monitoring and protection service is October 31, 2023.

Other important information
If you are concerned about identity theft, you can place an identity theft/fraud alert, get credit freeze information for your state, or order a free credit report. Please visit vitalitygroup.com/IDProtection

For More Information

Sincerely,

Lauren Prorok
SVP, General Counsel
Vitality Group

YOUR 24 MONTH EXPERIAN IDENTITYWORKS MEMBERSHIP

To help protect your identity, we are offering a complimentary membership of Experian's® IdentityWorks℠. This product provides you with superior identity detection and resolution of identity theft. To activate your membership and start monitoring your personal information please follow the steps below:

If you have questions about the product, need assistance with Identity Restoration that arose as a result of this incident, or would like an alternative to enrolling in Experian IdentityWorks online, please contact Experian's customer care team at . Be prepared to provide engagement number B096642 as proof of eligibility for the Identity Restoration services by Experian.

Additional details regarding your Experian IdentityWorks Membership:

A credit card is **not** required for enrollment in Experian IdentityWorks. You can contact Experian **immediately** regarding any fraud issues, and have access to the following features once you enroll in Experian IdentityWorks:

- **Experian credit report at signup:** See what information is associated with your credit file. Daily credit reports are available for online members only.*
- **Credit Monitoring:** Actively monitors Experian file for indicators of fraud.
- **Identity Restoration:** Identity Restoration agents are immediately available to help you address credit and non-credit related fraud.
- **Experian IdentityWorks ExtendCARE™:** You receive the same high-level of Identity Restoration support even after your Experian IdentityWorks membership has expired.
- **Up to $1 Million Identity Theft Insurance**:** Provides coverage for certain costs and unauthorized electronic fund transfers.

If you believe there was fraudulent use of your information and would like to discuss how you may be able to resolve those issues, please reach out to an Experian agent at 833-901-4630. If, after discussing your situation with an agent, it is determined that Identity Restoration support is needed, then an Experian Identity Restoration agent is available to work with you to investigate and resolve each incident of fraud that occurred (including, as appropriate, helping you with contacting credit grantors to dispute charges and close accounts; assisting you in placing a freeze on your credit file with the three major credit bureaus; and assisting you with contacting government agencies to help restore your identity to its proper condition).

Please note that this Identity Restoration support is available to you for 24 months from the date of this letter and does not require any action on your part at this time. The Terms and Conditions for this offer are located at www.ExperianIDWorks.com/restoration. You will also find self-help tips and information about identity protection at this site.

* Offline members will be eligible to call for additional reports quarterly after enrolling

** The Identity Theft Insurance is underwritten and administered by American Bankers Insurance Company of Florida, an Assurant company. Please refer to the actual policies for terms, conditions, and exclusions of coverage. Coverage may not be available in all jurisdictions.

Steps You Can Take to HELP Protect Your Information

Review Your Account Statements and Notify Law Enforcement of Suspicious Activity: As a precautionary measure, we recommend that you remain vigilant by reviewing your account statements and credit reports closely. If you detect any suspicious activity on an account, you should promptly notify the financial institution or company with which the account is maintained. You also should promptly report any fraudulent activity or any suspected incidence of identity theft to proper law enforcement authorities, your state attorney general, and/or the Federal Trade Commission (FTC).

Copy of Credit Report: You may obtain a free copy of your credit report from each of the three major credit reporting agencies once every 12 months by visiting http://www.annualcreditreport.com/, calling toll-free 1-877-322-8228, or by completing an Annual Credit Report Request Form and mailing it to Annual Credit Report Request Service, P.O. Box 105281, Atlanta, GA 30348. You also can contact one of the following three national credit reporting agencies:

Equifax
P.O. Box 105851
Atlanta, GA 30348
1-800-525-6285
www.equifax.com

Experian
P.O. Box 9532
Allen, TX 75013
1-888-397-3742
www.experian.com

TransUnion
P.O. Box 1000
Chester, PA 19016
1-800-916-8800
www.transunion.com

Fraud Alert: You may want to consider placing a fraud alert on your credit report. An initial fraud alert is free and will stay on your credit file for at least one year. The alert informs creditors of possible fraudulent activity within your report and requests that the creditor contact you prior to establishing any accounts in your name. To place a fraud alert on your credit report, contact any of the three credit reporting agencies identified above. Additional information is available at http://www.annualcreditreport.com.

Security Freeze: You have the right to put a security freeze on your credit file for up to one year at no cost. This will prevent new credit from being opened in your name without the use of a PIN number that is issued to you when you initiate the freeze. A security freeze is designed to prevent potential creditors from accessing your credit report without your consent. As a result, using a security freeze may interfere with or delay your ability to obtain credit. You must separately place a security freeze on your credit file with each credit reporting agency. In order to place a security freeze, you may be required to provide the consumer reporting agency with information that identifies you including your full name, Social Security number, date of birth, current and previous addresses, a copy of your state-issued identification card, and a recent utility bill, bank statement or insurance statement.

Additional Free Resources: You can obtain information from the consumer reporting agencies, the FTC, or from your respective state Attorney General about fraud alerts, security freezes, and steps you can take toward preventing identity theft. You may report suspected identity theft to local law enforcement, including to the FTC or to the Attorney General in your state.

Federal Trade Commission
600 Pennsylvania Ave, NW
Washington, DC 20580
consumer.ftc.gov, and
www.ftc.gov/idtheft
1-877-438-4338

Massachusetts Attorney General
501 Boylston Street, Suite 5100
Boston, MA 02116
https://www.mass.gov/orgs/office-of-the-attorney-general
1-617-727-8400

New York Attorney General
Bureau of Internet and Technology Resources
28 Liberty Street
New York, NY 10005
ag.ny.gov
1-212-416-8433

North Carolina Attorney General
9001 Mail Service Center
Raleigh, NC 27699
ncdoj.gov
1-877-566-7226

Florida Attorney General
PL-01, The Capitol
Tallahassee, FL 32399
http://myfloridalegal.com
1-850-414-3300

Georgia Attorney General
2 Martin Luther King Jr. Drive, Ste 356, Atlanta, GA 30334
law.georgia.gov
1-404-651-8600

You also have certain rights under the Fair Credit Reporting Act (FCRA): These rights include to know what is in your file; to dispute incomplete or inaccurate information; to have consumer reporting agencies correct or delete inaccurate, incomplete, or unverifiable information; as well as other rights. For more information about the FCRA, and your rights pursuant to the FCRA, please visit https://www.consumer.ftc.gov/articles/pdf-0096-fair-credit-reporting-act.pdf.