



April 6, 2022

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CONSULT

Via Certified Mail; Return Receipt Requested:

Attorney General John Formella
Office of the Attorney General
33 Capitol Street
Concord, NH 03301

Re: Cybersecurity Incident Involving Advantage Benefits Group

Dear Attorney General Formella:

Wilson Elser Moskowitz Edelman and Dicker LLP (“Wilson Elser”) represents Advantage Benefits Group (“ABG”), an insurance brokerage company located at 1 Ionia Ave SW Suite 300, Grand Rapids, MI 49503, with respect to a recent cybersecurity incident that was first discovered by ABG on June 30, 2021 (hereinafter, the “Incident”). ABG takes the security and privacy of the information in its control very seriously, and has taken steps to prevent a similar incident from occurring in the future.

This letter will serve to inform you of the nature of the Incident, what information may have been compromised, the number of residents being notified, and the steps that ABG has taken in response to the Incident. We have also enclosed hereto a sample of the notification made to the potentially impacted individuals, which includes an offer of free credit monitoring services.

1. Nature of the Incident

On June 30, 2021, ABG became aware of a potential business email compromise when one of its employee’s emails sent numerous emails to individuals. ABG quickly engaged a third-party professional cybersecurity forensics team to conduct a thorough investigation into our entire email tenant. On August 30, 2021, the investigation determined that an unknown party did gain unauthorized access to two ABG employees’ email accounts. From September to November 2021, ABG engaged an automated term searching vendor and a manual review vendor to perform the necessary review of the impacted accounts. The review was completed on or around December 13, 2021, at which time ABG confirmed that some information was present in the relevant files. From December to February 2022, ABG identified all individuals with missing addresses and drafted notice letters for all impacted individuals.

On February 23, 2022, ABG engaged a mailing services vendor to set up a dedicated call center, perform the mailing process, and establish credit monitoring for the affected individuals.

Although ABG is unaware of any fraudulent misuse of information, it is possible that individuals’ full name, address, Social Security Number, Driver’s License or State ID Number, limited medical

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information, and/or health insurance group and/or ID number may have been exposed as a result of this unauthorized activity.

As of this writing, ABG has not received any reports of related identity theft since the date of the incident (June 30, 2021 to present).

2. Number of New Hampshire residents affected.

A total of one (1) New Hampshire resident may have been potentially affected by this incident. A notification letter to this individual was mailed on April 6, 2022, by first class mail. A sample copy of the notification letter is included with this letter under **Exhibit A**.

3. Steps taken in response to the Incident.

ABG is committed to ensuring the security and privacy of all personal information in its control, and is taking steps to prevent a similar incident from occurring in the future. Upon discovery of the Incident, ABG moved quickly to investigate and respond to the Incident, assessed the security of its systems, and notified the potentially affected individuals. Specifically, ABG engaged a specialized cybersecurity firm to conduct a forensic investigation to determine the nature and scope of the Incident. ABG also informed our law firm and began identifying the potentially affected individuals in preparation for notice. Further, in order to prevent this Incident from occurring again in the future, ABG took mitigating steps, including, but not limited to, continuing to enhance security measures and continuing to provide cyber security training for our staff; Multi Factor Authentication enhancement to our existing MFA; consistent penetration testing; and, applying CISA best practices across ABG's data and all platforms ABG uses to administer plans for its clients.

Although ABG is not aware of any actual or attempted misuse of the affected personal information, ABG offered three (3) years of complimentary credit monitoring and identity theft restoration services through IDX to all individuals to help protect their identity. Additionally, ABG provided guidance on how to better protect against identity theft and fraud, including providing 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 the contact details for the Federal Trade Commission.

4. Contact information

ABG remains dedicated to protecting the sensitive information in its control. If you have any questions or need additional information, please do not hesitate to contact me at Anjali.Das@WilsonElser.com or 312-821-6164.

Very truly yours,

Wilson Elser Moskowitz Edelman & Dicker LLP



A handwritten signature in black ink, appearing to read 'Anjali C. Das'.

Anjali C. Das

EXHIBIT A



P.O. Box 1907
Suwanee, GA 30024

To Enroll, Please Call:
1-833-774-2188
Or Visit:
<https://app.idx.us/account-creation/protect>
Enrollment Code: [XXXXXXXXXX]

<<First Name>> <<Last Name>>
<<Address1>> <<Address2>>
<<City>>, <<State>> <<Zip>>

April 6, 2022

Notice of Data Security Incident - <<Associated Entity>>

**YOUR DEADLINE TO ENROLL FOR 3 YEARS OF FREE IDENTITY PROTECTION SERVICES:
July 6, 2022**

Dear <<First Name>> <<Last Name>>,

Advantage Benefits Group (“ABG”) is an insurance brokerage company that provided a service to <<Associated Entity>> connected with a benefits plan that covered or currently covers you.

ABG is writing to notify you of a data security incident at ABG that may have resulted in the unauthorized access to some of your personal information.

ABG takes the security of personal information very seriously, and we sincerely apologize for any inconvenience this incident may cause. This letter contains information about the incident and steps you can take to protect your information.

What Happened:

Sometime in June 2021, ABG became aware of a potential business email compromise when one of our employee’s emails sent numerous emails to individuals. ABG quickly engaged a third-party professional cybersecurity forensics team to conduct a thorough investigation into our entire email tenant. On August 30, 2021, the investigation determined that an unknown party did gain unauthorized access to two ABG employees’ email accounts.

ABG immediately began a thorough review to determine the specific emails accessed and whether sensitive information was present within those emails at the time of the incident. From September to November 2021, ABG engaged an automated term searching vendor and a manual review vendor to perform the necessary review of the impacted accounts. The review was completed on or around December 13, 2021, at which time ABG confirmed that some of your information was present in the relevant files. From December to February 2022, ABG identified all individuals with missing addresses and drafted notice letters for all impacted individuals.

On February 23, 2022, ABG engaged a mailing services vendor to set up a dedicated call center, perform the mailing process, and establish credit monitoring for the affected individuals.

What Information Was Involved:

Based on the investigation, it appears that some of your information may have been impacted, including your name, address, date of birth, Social Security number, health insurance information, and/or limited health information.

While we do not have any evidence of the access of or misuse of your information, we are nonetheless notifying you out of an abundance of caution and encourage you to take full advantage of the services offered.

What We Are Doing:

Data privacy and security are among ABG's highest priorities, and there are extensive measures in place to protect information in ABG's care. We are taking steps to prevent a similar event from occurring in the future, including but not limited to: continuing to enhance security measures and continuing to provide cyber security training for our staff; Multi Factor Authentication enhancement to our existing MFA; consistent penetration testing; and, applying CISA best practices across our data and all platforms we use to administer plans for our clients.

In addition, we are offering identity theft protection services through IDX, the data breach and recovery services expert. IDX identity protection services include: 3 years of 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.

What You Can Do:

We encourage you to contact IDX with any questions and to enroll in the free identity protection services by calling 1-833-774-2188 or going to <https://app.idx.us/account-creation/protect> and using the Enrollment Code provided above. IDX representatives are available Monday through Friday from 9 am - 9 pm Eastern Time. Please note the deadline to enroll is July 6, 2022.

Again, at this time, there is no evidence that your information has been misused. However, we encourage you to take full advantage of this service offering. IDX representatives have been fully versed on the incident and can answer questions or concerns you may have regarding protection of your personal information.

For More Information:

We sincerely regret any inconvenience that this matter may cause you and remain dedicated to maintaining the security and protection of your information. We encourage you to remain vigilant and review the enclosed addendum outlining additional steps you can take to protect your personal information.

You will find detailed instructions for enrollment on the enclosed Recommended Steps document. Also, you will need to reference the enrollment code at the top of this letter when calling or enrolling online, so please do not discard this letter.

Please call 1-833-774-2188 or go to <https://app.idx.us/account-creation/protect> for assistance or for any additional questions you may have.

Sincerely,

Advantage Benefits Group



Recommended Steps to help Protect your Information

1. Website and Enrollment. 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 1-833-774-2188 to gain additional information about this event and speak with knowledgeable representatives about the appropriate steps to take to protect your credit identity.

4. 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. You may wish to stagger your requests so that you receive a free report by one of the three credit bureaus every four months.

If you discover any suspicious items and have enrolled in IDX identity protection, notify them immediately by calling or by logging into the IDX website and filing a request for help.

If you file a request for help or report suspicious activity, you will be contacted by a member of our ID Care team who will help you determine the cause of the suspicious items. In the unlikely event that you fall victim to identity theft as a consequence of this incident, you will be assigned an ID Care Specialist who will work on your behalf to identify, stop and reverse the damage quickly.

Additional Important Information

For residents of Hawaii, Michigan, Missouri, Virginia, Vermont, and North Carolina: It is recommended by state law that you remain vigilant for incidents of fraud and identity theft by reviewing credit card account statements and monitoring your credit report for unauthorized activity.

For residents of Illinois, Iowa, Maryland, Missouri, North Carolina, Oregon, and West Virginia:

It is required by state laws to inform you that you may obtain a copy of your credit report, free of charge, whether or not you suspect any unauthorized activity on your account. You may obtain a free copy of your credit report from each of the three nationwide credit reporting agencies. To order your 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 at <https://www.consumer.ftc.gov/articles/0155-free-credit-reports>) to: Annual Credit Report Request Service, P.O. Box 105281, Atlanta, GA, 30348-5281.

For residents of Iowa:

State law advises you to report any suspected identity theft to law enforcement or to the Attorney General.

For residents of Oregon:

State laws advise you to report any suspected identity theft to law enforcement, including the Attorney General, and the Federal Trade Commission.

For residents of Arizona, Colorado, Maryland, Rhode Island, Illinois, New York, and North Carolina:

You can obtain information from the Offices of the Attorney General and the Federal Trade Commission about fraud alerts, security freezes, and steps you can take toward preventing identity theft.

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

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

North Carolina Office of the Attorney General Consumer Protection Division, 9001 Mail Service Center Raleigh, NC 27699-9001 1-877-566-7226 www.ncdoj.com

Federal Trade Commission Consumer Response Center, 600 Pennsylvania Ave, NW Washington, DC 20580 1-877-IDTHEFT (438-4338) www.ftc.gov/idtheft

New York Office of Attorney General Consumer Frauds & Protection, The Capitol Albany, NY 12224 1-800-771-7755
<https://ag.ny.gov/consumer-frauds/identity-theft>

Colorado Office of the Attorney General Consumer Protection 1300 Broadway, 9th Floor, Denver, CO 80203 1-720-508-6000
www.coag.gov

Arizona Office of the Attorney General Consumer Protection & Advocacy Section, 2005 North Central Avenue, Phoenix, AZ 85004 1-602-542-5025

Illinois Office of the Attorney General Consumer Protection Division 100 W Randolph St., Chicago, IL 60601 1-800-243-0618
www.illinoisattorneygeneral.gov

For residents of Massachusetts: It is required by state law that you are informed of your right to obtain a police report if you are a victim of identity theft

For residents of all states:

Fraud Alerts: You can place fraud alerts with the three credit bureaus by phone and online with Equifax (https://assets.equifax.com/assets/personal/Fraud_Alert_Request_Form.pdf); TransUnion (<https://www.transunion.com/fraud-alerts>); or Experian (<https://www.experian.com/fraud/center.html>). 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. As of September 21, 2018, initial fraud alerts last for one year. Victims of identity theft can also get an extended fraud alert for seven years. The phone numbers for all three credit bureaus are at the bottom of this page.

Monitoring: You should always remain vigilant and monitor your accounts for suspicious or unusual activity.

Security Freeze: You also have the right to place a security freeze on your credit report. A security freeze is intended to prevent credit, loans, and services from being approved in your name without your consent. To place a security freeze on your credit report, you need to make a request to each consumer reporting agency. You may make that request by certified mail, overnight mail, regular stamped mail, or by following the instructions found at the websites listed below. The following information must be included when requesting a security freeze (note that if you are requesting a credit report for your spouse or a minor under the age of 16, 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 five 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. As of September 21, 2018, it is free to place, lift, or remove a security freeze. You may also place a security freeze for children under the age of 16. You may obtain a free security freeze by contacting any one or more of the following national consumer reporting agencies:

Equifax Security Freeze

P.O. Box 105788
Atlanta, GA 30348
800-525-6285

Experian Security Freeze

P.O. Box 9554
Allen, TX 75013
888-397-3742

TransUnion (FVAD)

P.O. Box 2000
Chester, PA 19022
800-680-7289

More information can also be obtained by contacting the Federal Trade Commission listed above.