

CIPRIANI & WERNER

A PROFESSIONAL CORPORATION

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March 31, 2023

Via online submission:

Office of the Maine Attorney General
6 State House Station
Augusta, ME 04333

RE: Data Breach Notification

To Whom It May Concern:

We serve as counsel for Nonstop Administration and Insurance Services, Inc., (“Nonstop”) located at 1800 Sutter Street, Suite 730, Concord, CA 94520, and provide this notification of a recent data security incident on behalf of Golden Gate University located at 536 Mission St, San Francisco, CA 94105.

Nonstop administers health insurance benefits on behalf of itself and various employer groups, including Golden Gate University.

On December 22, 2022, an unknown party contacted Nonstop and claimed to have accessed data from the company. Nonstop immediately began an investigation, which included working with third-party digital forensic specialists to determine the credibility of this allegation. The investigation determined that an unknown party accessed a cloud services platform maintained by Nonstop without authorization on December 22, 2022 for a limited time. The investigation could not rule out access to specific information in its cloud services platform during this time. Therefore, Nonstop conducted a thorough review of the information contained therein to determine the type of information and to whom the information related.

Nonstop completed its review on January 30, 2023 and determined five employees of Golden Gate University who may be a residents of Maine may have been impacted. The type of information potentially impacted may have included name, date of birth, gender, address, email address, phone number, Social Security number, medical treatment/diagnosis information, and health insurance provider, claims, and billing information.

Nonstop notified Golden Gate University of this incident on February 3, 2023. Nonstop also provided notice of this incident on its website beginning on February 3, 2023. The website notice included instructions for potentially impacted individuals to access complimentary credit monitoring and identity protection services for 24 months through IDX. At Golden Gate University’s request, Nonstop began providing written notice of this incident to the potentially impacted Maine residents on March 24, 2023 via U.S. Mail. The written

notice also included instructions to access complimentary credit monitoring and identity protection services for 24 months through IDX. A template copy of the individual notification letters sent to potentially impacted individuals in Maine is attached hereto as Exhibit A.

In response to this incident, Nonstop has changed passwords, re-designed its cloud services infrastructure, and implemented an array of additional security measures, including 24/7 third-party threat detection and intrusion monitoring of its cloud services accounts.

Thank you for your attention to this matter. Please contact me should you have any questions.

Very truly yours,

CIPRIANI & WERNER, P.C.

By:

A handwritten signature in black ink, appearing to read "D Haier", written over a horizontal line.

Daniel Haier, Esq.

Exhibit A



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

To Enroll, Please Call:
(833) 753-6756
Or Visit:
<https://response.idx.us/nonstop>
Enrollment Code: <<ENROLLMENT>>

<<FIRST NAME>> <<LAST NAME>>
<<ADDRESS1>>
<<ADDRESS2>>
<<CITY>>, <<STATE>> <<ZIP>>
<<Country>>

February 15, 2023

Dear <<FIRST NAME>> <<LAST NAME>>:

Nonstop Administration and Insurance Services (“Nonstop”) works with its partners, including <<Variable Text #1: Employer Group>> to provide health benefits administration services to employees and their family members. We write to notify you of an incident that may affect the security of your information. This letter includes information about the incident, our response, and resources we are making available to you.

What Happened: On December 22, 2022, an unknown party contacted us and claimed to have accessed data from our company. We immediately began an investigation, which included working with third-party digital forensic specialists to determine the credibility of this allegation. The investigation determined that an unknown party accessed a cloud services platform maintained by our company without authorization on December 22, 2022 for a limited time. The investigation could not rule out access to specific information in our cloud services platform during this time. Therefore, we conducted a thorough review of the information contained therein to determine the type of information and to whom the information related. We completed our review on January 30, 2023.

What Information Was Involved: The type of information in our cloud services platform included your name and the following data elements: <<Variable Text #2: Data Elements>>.

What We Are Doing: In response to this incident, we immediately began an investigation and reported this incident to law enforcement. We also implemented a redesigned cloud-services workflow to further reduce risk. Additionally, we are providing potentially impacted individuals with complimentary access to <<Variable Text #3: 12/24 months>> of credit monitoring and identity protection services.

What You Can Do: We encourage you to enroll in the complimentary credit monitoring and identity protection services we are making available to you. Information about how to enroll in these services along with additional resources available to you are included in the attached *Steps You Can Take to Help Protect Your Information*.

For More Information: We understand you may have questions about this incident. You may contact our dedicated assistance line at (833) 753-6756, Monday through Friday from 9 am - 9 pm Eastern Time (excluding major U.S. holidays), go to <https://response.idx.us/nonstop>, or write to us at 1800 Sutter St, Suite 730, Concord, CA 94520.

We sincerely regret any concern this incident may cause you. The privacy and security of information is important to us, and we will continue to take steps to protect information in our care.

Sincerely,

Nonstop

STEPS YOU CAN TAKE TO HELP PROTECT YOUR INFORMATION

Enroll in Credit Monitoring / Identity Protection

1. Website and Enrollment. Go to <https://response.idx.us/nonstop> and follow the instructions for enrollment using your Enrollment Code provided at the top of the letter. The deadline to enroll is May 15, 2023.

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. To enroll by telephone, or to gain additional information about this matter and speak with a knowledgeable representative about the appropriate steps to take to protect your credit identity, please contact IDX at (833) 753-6756.

Monitor Your Accounts

We encourage you to remain vigilant against incidents of identity theft and fraud by reviewing your credit reports/account statements and explanation of benefits forms for suspicious activity and to detect errors. Under U.S. law, you are entitled to one free credit report annually from each of the three major credit reporting bureaus, TransUnion, Experian, and Equifax. To order your free credit report, visit www.annualcreditreport.com or call 1-877-322-8228. Once you receive your credit report, review it for discrepancies and identify any accounts you did not open or inquiries from creditors that you did not authorize. If you have questions or notice incorrect information, contact the credit reporting bureau.

You have the right to place an initial or extended “fraud alert” on a credit file at no cost. An initial fraud alert is a one-year alert that is placed on a consumer’s credit file. Upon seeing a fraud alert, a business is required to take steps to verify the consumer’s identity before extending new credit. If you are a victim of identity theft, you are entitled to an extended fraud alert lasting seven years. Should you wish to place a fraud alert, please contact any of the three credit reporting bureaus listed below.

As an alternative to a fraud alert, you 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 your express authorization. The credit freeze is designed to prevent credit, loans, and services from being approved in your name without your consent. However, you should be aware that using a credit freeze may delay, interfere with, or prohibit the timely approval of any subsequent request or application you make regarding a new loan, credit, mortgage, or any other account involving the extension of credit. Pursuant to federal law, you cannot be charged to place or lift a credit freeze on your credit report. To request a credit freeze, you will need to provide the following information:

1. Full name (including middle initial as well as Jr., Sr., III, etc.);
2. Social Security number;
3. Date of birth;
4. Address for the prior two to five years;
5. Proof of current address, such as a current utility or telephone bill;
6. A legible photocopy of a government-issued identification card (e.g., state driver’s license or identification card); and
7. A copy of either the police report, investigative report, or complaint to a law enforcement agency concerning identity theft, if you are a victim of identity theft.

Should you wish to place a fraud alert or credit freeze, please contact the three major credit reporting bureaus listed below:

TransUnion 1-800-680-7289 www.transunion.com	Experian 1-888-397-3742 www.experian.com	Equifax 1-888-298-0045 www.equifax.com
TransUnion Fraud Alert P.O. Box 2000 Chester, PA 19016-2000	Experian Fraud Alert P.O. Box 9554 Allen, TX 75013	Equifax Fraud Alert P.O. Box 105069 Atlanta, GA 30348-5069
TransUnion Credit Freeze P.O. Box 160 Woodlyn, PA 19094	Experian Credit Freeze P.O. Box 9554 Allen, TX 75013	Equifax Credit Freeze P.O. Box 105788 Atlanta, GA 30348-5788

Additional Information

You can further educate yourself regarding identity theft, fraud alerts, credit freezes, and the steps you can take to protect your personal information by contacting the credit reporting bureaus, the Federal Trade Commission (FTC), or your state Attorney General. The FTC also encourages those who discover that their information has been misused to file a complaint with them. The FTC may be reached at 600 Pennsylvania Ave. NW, Washington, D.C. 20580; www.identitytheft.gov; 1-877-ID-THEFT (1-877-438-4338); and TTY: 1-866-653-4261.

You have the right to file a police report if you ever experience identity theft or fraud. Please note that in order to file a report with law enforcement for identity theft, you will likely need to provide some proof that you have been a victim. Instances of known or suspected identity theft should also be reported to law enforcement, your state Attorney General, and the FTC. This notice has not been delayed by law enforcement.

For Maryland residents, the Maryland Attorney General may be contacted at 200 St. Paul Place, 16th Floor, Baltimore, MD 21202; 1-888-743-0023; and www.oag.state.md.us. Nonstop may be contacted at 1800 Sutter St, Suite 730, Concord, CA 94520.

For 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: (i) the consumer reporting agencies must correct or delete inaccurate, incomplete, or unverifiable information; (ii) the consumer reporting agencies may not report outdated negative information; (iii) access to your file is limited; (iv) you must give consent for credit reports to be provided to employers; (v) you may limit “prescreened” offers of credit and insurance you get based on information in your credit report; (vi) and you may seek damages from violators. 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. We encourage you to review your rights pursuant to the Fair Credit Reporting Act by visiting https://files.consumerfinance.gov/f/201504_cfpb_summary_your-rights-under-fcra.pdf, or by writing Consumer Response Center, Room 130-A, FTC, 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.

For Rhode Island residents, the Rhode Island Attorney General may be contacted at 150 South Main Street, Providence, RI 02903; 1-401-274-4400; and www.riag.ri.gov. Under Rhode Island law, you have the right to obtain any police report filed in regard to this incident. There are 3 Rhode Island residents impacted by this incident.

For Washington, D.C. residents, the District of Columbia Attorney General may be contacted at 441 4th Street NW #1100, Washington, D.C. 20001; 202-727-3400, and <https://oag.dc.gov/consumer-protection>. Nonstop may be contacted at 1800 Sutter St, Suite 730, Concord, CA 94520.