Office of the Attorney General The State of Maine

# **RE:** Data Incident Notification

To Whom It May Concern:

We write to provide notification of a recent data security incident. By providing this notice, Pyramid Consulting Group ("PCG"), located at 110 W. 40<sup>th</sup> Street, 8<sup>th</sup> floor, New York, NY 10018, does not waive any rights or defenses under Maine law, including the data breach notification statute.

On May 4, 2022, PCG discovered that an unauthorized individual may have accessed certain portions of the PCG network. PCG immediately began an investigation, which included working with third-party computer specialists. Although the investigation was unable to confirm if specific information was actually accessed, PCG reviewed the portions of the network to determine the type of information contained therein and to whom the information related. On May 16, 2022, PCG completed its review. On May 20, 2022, PCG confirmed address information for potentially impacted individuals and began obtaining resources for notification.

In response to this incident, PCG provided written notice to the potentially impacted individuals via First Class Mail on June 3, 2022. A copy of the notice is attached as *Exhibit A*. While PCG has no reason to believe that any personal information was misused as a result of this incident, PCG is offering the potentially impacted individuals complimentary credit monitoring and identity protection services for 12 months.

PCG identified personal information related to one Maine resident who may have been impacted by this incident. The information potentially impacted included first and last name and Social Security number.

In response to this incident, PCG changed account passwords, enhanced security protocols, and is conducting additional training.

# **EXHIBIT** A

Return Mail Processing Center P.O. Box 6336 Portland, OR 97228-6336

<<Mail ID>> <<Name 1>> <<Name 2>> <<Address 1>> <<Address 3>> <<Address 4>> <<Address 5>> <<City>><<State>><<Zip>>

<<Date>>

#### Dear <<Name 1>>:

PCG is a people first company. I'd like to personally communicate a recent incident involving access to information within secure documents that may affect the privacy of certain information provided to us. PCG takes cyber security seriously and we have strong systems in place to mitigate cyber security incidents. We take this incident seriously and include information about the incident, our response, and resources available to you in this letter.

**What Happened?** On May 4, 2022, we learned that an unauthorized individual may have accessed certain portions of our network. We immediately began an investigation, which included working with third-party computer specialists. Although the investigation was unable to confirm if specific information was actually accessed, we reviewed the portions of our network to determine the type of information contained therein and to whom the information related. On May 16, 2022, we completed our review and began obtaining resources included in this letter for potentially affected individuals.

What Information Was Involved? The type of information potentially affected includes your name and Social Security number, which was compiled for an employee benefit audit.

What Are We Doing? In response to this incident, we conducted an investigation and notified law enforcement. We are also reviewing our polices related to data security and are increasing our data loss protection software for an additional layer of protection. Additionally, although we have no evidence of misuse of information, in abundance of caution, we are providing you access to 12 months of credit monitoring and identity protection services.

What Can You Do? We encourage you to enroll in the 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 enclosed *Steps You Can Take to Protect Your Information*.

**For More Information.** We understand you may have questions about this incident. We are here to answer any questions you may have. You may contact our dedicated assistance line at 888-594-3601, 9 am to 9 pm ET or write to Jennifer Goldrick, Senior Director of People and Operations, at 110 W. 40<sup>th</sup> Street, 8<sup>th</sup> floor, New York, NY 10018.

Please be assured that PCG maintains procedural safeguards to protect confidential employee information. We continually assess and invest in new technology for protecting information and upgrade our security practices and systems when appropriate. We assure you that appropriate measures have been taken to safeguard your confidential information and we will continue to take steps to protect all information in our care.

Thank you,

Allyson Goodman Founder/CEO

# **STEPS YOU CAN TAKE TO PROTECT YOUR INFORMATION**

## **Enroll in Credit Monitoring / Identity Protection**

As a safeguard, we have arranged for you to enroll, at no cost to you, in an online credit monitoring service (myTrueIdentity) for 12 months provided by TransUnion Interactive, a subsidiary of TransUnion<sup>®</sup>, one of the three nationwide credit reporting companies.

To enroll in this service, go directly to the *my*TrueIdentity website at **www.mytrueidentity.com** and in the space referenced as "Enter Activation Code", enter the following unique 12-letter Activation Code **<<Insert Unique 12-letter Activation Code>>** and follow the three steps to receive your credit monitoring service online within minutes.

If you do not have access to the Internet and wish to enroll in a similar offline, paper based, credit monitoring service, via U.S. Mail delivery, please call the TransUnion Fraud Response Services toll-free hotline at **1-855-288-5422**. When prompted, enter the following 6-digit telephone pass code << **Insertstatic 6-digit Telephone Pass Code** >> and follow the steps to enroll in the offline credit monitoring service, add an initial fraud alert to your credit file, or to speak to a TransUnion representative if you believe you may be a victim of identity theft.

Once you are enrolled, you will be able to obtain 12 months of unlimited access to your TransUnion credit report and VantageScore<sup>®</sup> credit score by TransUnion. The daily credit monitoring service will notify you if there are any critical changes to your credit file at TransUnion<sup>®</sup>, including fraud alerts, new inquiries, new accounts, new public records, late payments, change of address and more. The service also includes the ability to lock and unlock your TransUnion credit reportonline, access to identity restoration services that provides assistance in the event your identity is compromised to help you restore your identity and up to \$1,000,000 in identity theft insurance with no deductible. (Policy limitations and exclusions may apply.)

You can sign up for the *my*TrueIdentity online Credit Monitoring service anytime between now and **<<Enrollment Deadline>>**. Due to privacy laws, we cannot register you directly. Please note that credit monitoring services might not be available for individuals who do not have a credit file at TransUnion<sup>®</sup>, or an address in the United States (or its territories) and a valid Social Security number, or are under the age of 18. Enrolling in this service will not affect your credit score.

If you have questions about your *my*TrueIdentity online credit monitoring benefits, need help with your online enrollment, or need help accessing your credit report, or passing identity verification, please contact the *my*TrueIdentity Customer Service Team toll-free at: 1-844-787-4607, Monday-Friday: 8am-9pm, Saturday-Sunday: 8am-5pm Eastern time.

## **Monitor Your Accounts**

We encourage you to remain vigilant against incidents of identity theft and fraud by reviewing your credit reports/account statements 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 <u>www.annualcreditreport.com</u> 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:

<b>TransUnion</b>	<b>Experian</b>	Equifax
1-800-680-7289	1-888-397-3742	1-888-298-0045
www.transunion.com	www.experian.com	www.equifax.com
TransUnion Fraud Alert	Experian Fraud Alert	Equifax Fraud Alert
P.O. Box 2000	P.O. Box 9554	P.O. Box 105069
Chester, PA 19016-2000	Allen, TX 75013	Atlanta, GA 30348-5069
<b>TransUnion Credit Freeze</b>	Experian Credit Freeze	Equifax Credit Freeze
P.O. Box 160	P.O. Box 9554	P.O. Box 105788
Woodlyn, PA 19094	Allen, TX 75013	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; <u>www.identitytheft.gov</u>; 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, 16<sup>th</sup> Floor, Baltimore, MD 21202; 1-888-743-0023; and <u>www.oag.state.md.us</u>. Pyramid Consulting Group, LLC may be contacted at 110 W. 40<sup>th</sup> Street, 8<sup>th</sup> floor, New York, NY 10018.

*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 <u>https://files.consumerfinance.gov/f/201504\_cfpb\_summary\_your-rights-under-fcra.pdf</u>, 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 <u>https://ag.ny.gov</u>.

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 <u>www.riag.ri.gov</u>. Under Rhode Island law, you have the right to obtain any police report filed in regard to this incident. There are <<#>>> Rhode Island residents impacted by this incident.

*For Washington, D.C. residents*, the District of Columbia Attorney General may be contacted at 441 4<sup>th</sup> Street NW #1100, Washington, D.C. 20001; 202-727-3400, and https://oag.dc.gov/consumer-protection. Pyramid Consulting Group, LLC may be contacted at 110 W. 40<sup>th</sup> Street, 8<sup>th</sup> floor, New York, NY 10018.