

Appendix

Waller first identified the incident, which disrupted the operations of some of its IT systems, on November 25, 2021. In response, Waller took steps to secure its network and began an investigation with the assistance of a third-party forensic firm and notified law enforcement. On December 5, 2021, the investigation determined that an unauthorized party removed some files from Waller's file server on November 18, 2021.

After further investigation, it was determined that the file server contained a human resources directory that included files relating to Waller employees and their beneficiaries and dependents, which may have included their name, Social Security number, driver's license number, passport number, financial account number and health insurance information, one (1) of whom was determined to be a Maine resident.

On March 16, 2022, Waller will mail a notification letter to the Maine resident pursuant to Me. Rev. Stat. Tit. 10, §1348.¹ A copy of the notification letter is enclosed. Waller has established a dedicated, toll-free call center where individuals may obtain more information regarding the incident and is offering potentially affected individuals with a Social Security number involved complimentary identity protection services.

To help prevent something like this from happening again, Waller changed network logon credentials, implemented additional safeguards and controls for accessing the corporate network, and implemented enhanced network security tools that were in the process of being implemented prior to the incident.

¹ This report does not waive Waller's objection that Maine lacks personal jurisdiction over it related to any claims that may arise from this incident.



<<Date>> (Format: Month Day, Year)

<<first_name>> <<middle_name>> <<last_name>> <<suffix>>
<<address_1>>
<<address_2>>
<<city>>, <<state_province>> <<postal_code>>
<<country>>

Dear <<first_name>> <<middle_name>> <<last_name>> <<suffix>>,

We are committed to the privacy and security of the information we maintain related to our employees and their family members. We are writing to notify you of a data security incident that involves some of your personal information. This notice explains the incident, measures we have taken and some steps you can take in response.

What Happened?

We first identified the incident, which disrupted the operations of some of our IT systems, on November 25, 2021. In response, we took steps to secure our network and began an investigation with the assistance of a third-party forensic firm and notified law enforcement. On December 5, 2021, the investigation determined that an unauthorized party removed some files from our file server between November 15, 2021 and November 18, 2021.

What Information Was Involved?

After further review, we determined that the file server contained a human resources directory that included files relating to our employees and their beneficiaries and dependents, which may have included your name, Social Security number, driver’s license number, passport number, financial account number and health insurance information.

What We Are Doing.

To help prevent a similar incident in the future, we have changed passwords and implemented additional security measures and controls in our network. We are offering a 12-month membership to identity monitoring services through Kroll. The identity monitoring services we are making available to you include Credit Monitoring, Fraud Consultation, and Identity Theft Restoration. For more information on how to help safeguard your identity and Kroll Identity Monitoring, including instructions on how to activate your complimentary membership, please visit the below website and see the additional information provided with this letter.

Visit <https://enroll.krollmonitoring.com> to activate and take advantage of your identity monitoring services.

You have until <<b2b_text_6(activation deadline)>> to activate your identity monitoring services.

Membership Number: <<Membership Number s_n>>

For more information about Kroll and your Identity Monitoring services, you can visit info.krollmonitoring.com. Additional information describing your services is included with this letter.

What You Can Do.

We remind you to remain vigilant to the possibility of fraud by reviewing your financial statements for any unauthorized activity. You should immediately report any unauthorized activity to your financial institution. For more information on your complimentary membership to Kroll identity monitoring services, as well as additional steps you can take in response to this incident, please see the pages that follow this letter.

For More Information.

We regret that this incident occurred and apologize for any inconvenience. If you have any questions, please call (855) 541-3551, Monday through Friday, between 8:00 am and 5:30 pm, Central Time, excluding some U.S. holidays.

Sincerely,

Waller Lansden Dortch & Davis, LLP



TAKE ADVANTAGE OF YOUR IDENTITY MONITORING SERVICES

You have been provided with access to the following services from Kroll:

Triple Bureau Credit Monitoring

You will receive alerts when there are changes to your credit data at any of the three national credit bureaus—for instance, when a new line of credit is applied for in your name. If you do not recognize the activity, you will have the option to call a Kroll fraud specialist, who will be able to help you determine if it is an indicator of identity theft.

Fraud Consultation

You have unlimited access to consultation with a Kroll fraud specialist. Support includes showing you the most effective ways to protect your identity, explaining your rights and protections under the law, assistance with fraud alerts, and interpreting how personal information is accessed and used, including investigating suspicious activity that could be tied to an identity theft event.

Identity Theft Restoration

If you become a victim of identity theft, an experienced Kroll licensed investigator will work on your behalf to resolve related issues. You will have access to a dedicated investigator who understands your issues and can do most of the work for you. Your investigator will be able to dig deep to uncover the scope of the identity theft, and then work to resolve it.

Kroll's activation website is only compatible with the current version or one version earlier of Chrome, Firefox, Safari and Edge.

To receive credit services, you must be over the age of 18 and have established credit in the U.S., have a Social Security number in your name, and have a U.S. residential address associated with your credit file.

ADDITIONAL STEPS YOU CAN TAKE

We remind you it is always advisable to be vigilant for incidents of fraud or identity theft by reviewing your account statements and free credit reports for any unauthorized activity. You may obtain a copy of your credit report, free of charge, once every 12 months from each of the three nationwide credit reporting companies. To order your annual free credit report, please visit www.annualcreditreport.com or call toll free at 1-877-322-8228. Contact information for the three nationwide credit reporting companies is as follows:

- *Equifax*, PO Box 740241, Atlanta, GA 30374, www.equifax.com, 1-800-685-1111
- *Experian*, PO Box 2002, Allen, TX 75013, www.experian.com, 1-888-397-3742
- *TransUnion*, PO Box 2000, Chester, PA 19016, www.transunion.com, 1-800-916-8800

If you believe you are the victim of identity theft or have reason to believe your personal information has been misused, you should immediately contact the Federal Trade Commission and/or the Attorney General's office in your state. You can obtain information from these sources about steps an individual can take to avoid identity theft as well as information about fraud alerts and security freezes. You should also contact your local law enforcement authorities and file a police report. Obtain a copy of the police report in case you are asked to provide copies to creditors to correct your records. Contact information for the Federal Trade Commission is as follows:

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

Fraud Alerts and Credit or Security Freezes:

Fraud Alerts: There are two types of general fraud alerts you can place on your credit report to put your creditors on notice that you may be a victim of fraud—an initial alert and an extended alert. You may ask that an initial fraud alert be placed on your credit report if you suspect you have been, or are about to be, a victim of identity theft. An initial fraud alert stays on your credit report for one year. You may have an extended alert placed on your credit report if you have already been a victim of identity theft with the appropriate documentary proof. An extended fraud alert stays on your credit report for seven years.

To place a fraud alert on your credit reports, contact one of the nationwide credit bureaus. A fraud alert is free. The credit bureau you contact must tell the other two, and all three will place an alert on their versions of your report.

For those in the military who want to protect their credit while deployed, an Active Duty Military Fraud Alert lasts for one year and can be renewed for the length of your deployment. The credit bureaus will also take you off their marketing lists for pre-screened credit card offers for two years, unless you ask them not to.

Credit or Security Freezes: You have the right to put a credit freeze, also known as a security freeze, on your credit file, free of charge, which makes it more difficult for identity thieves to open new accounts in your name. That's because most creditors need to see your credit report before they approve a new account. If they can't see your report, they may not extend the credit.

How do I place a freeze on my credit reports? There is no fee to place or lift a security freeze. Unlike a fraud alert, you must separately place a security freeze on your credit file at each credit reporting company. For information and instructions to place a security freeze, contact each of the credit reporting agencies at the addresses below:

- **Experian Security Freeze**, PO Box 9554, Allen, TX 75013, www.experian.com
- **TransUnion Security Freeze**, PO Box 2000, Chester, PA 19016, www.transunion.com
- **Equifax Security Freeze**, PO Box 105788, Atlanta, GA 30348, www.equifax.com

You'll need to supply your name, address, date of birth, Social Security number and other personal information. After receiving your freeze request, each credit bureau will provide you with a unique PIN (personal identification number) or password. Keep the PIN or password in a safe place. You will need it if you choose to lift the freeze.

How do I lift a freeze? A freeze remains in place until you ask the credit bureau to temporarily lift it or remove it altogether. If the request is made online or by phone, a credit bureau must lift a freeze within one hour. If the request is made by mail, then the bureau must lift the freeze no later than three business days after getting your request.

If you opt for a temporary lift because you are applying for credit or a job, and you can find out which credit bureau the business will contact for your file, you can save some time by lifting the freeze only at that particular credit bureau. Otherwise, you need to make the request with all three credit bureaus.

Waller Lansden Dortch & Davis, LLP | Nashville City Center, 511 Union St., Suite 2700, Nashville, TN 37219 | (615) 244-6380

Additional information for residents of the following states:

Maryland: You may contact and obtain information from your state attorney general at: *Maryland Attorney General's Office*, 200 St. Paul Place, Baltimore, MD 21202, 1-888-743-0023 / 1-410-576-6300, www.oag.state.md.us

New York: You may contact and obtain information from these state agencies: *New York Department of State Division of Consumer Protection*, One Commerce Plaza, 99 Washington Ave., Albany, NY 12231-0001, 518-474-8583 / 1-800-697-1220, <http://www.dos.ny.gov/consumerprotection>; and *New York State Office of the Attorney General*, The Capitol, Albany, NY 12224-0341, 1-800-771-7755, <https://ag.ny.gov>

North Carolina: You may contact and obtain information from your state attorney general at: *North Carolina Attorney General's Office*, 9001 Mail Service Centre, Raleigh, NC 27699, 1-919-716-6000 / 1-877-566-7226, www.ncdoj.gov