

# EXHIBIT 1

We represent Digital Insurance LLC d/b/a OneDigital (“OneDigital”) located at 200 Galleria Parkway, Suite 1950, Atlanta, GA 30339, an insurance brokerage firm whose customers include 2Life Communities (“2Life”) located at 30 Wallingford Road, Brighton, MA 02135. OneDigital is writing to notify your office of an incident that may affect the security of certain personal information received from 2Life and relating to one (1) Maine resident. By providing this notice, OneDigital does not waive any rights or defenses regarding the applicability of Maine law, the applicability of the Maine data event notification statute, or personal jurisdiction.

### **Nature of the Data Event**

On Wednesday, June 8, 2022, OneDigital became aware of potential unauthorized access to OneDigital’s environment. In response, OneDigital engaged privacy counsel Mullen Coughlin LLC, and worked with third-party computer forensic specialists through counsel to determine the nature and scope of any potential unauthorized activity, and to determine if any legally protected information was potentially impacted.

The bulk of the impacted information did not relate to OneDigital, but instead belonged to a limited number of OneDigital’s business customers located largely in Massachusetts. On June 22, 2022, OneDigital reached out to its business customers to gather current address information for notification purposes.

On Wednesday, July 13, 2022, 2Life provided address information for purposes of notification. A national change of address search was run, which confirmed on July 21, 2022 the addresses and states of residence for impacted individuals, including one (1) Maine resident. On Wednesday, July 27, 2022, 2Life requested that OneDigital provide notification to certain state regulators, including your office, on its behalf.

This event has had no impact on any OneDigital operations, and OneDigital has found no sign of any ransomware or other malware within its network environment. Further, OneDigital is not aware of any public disclosure or misuse of potentially impacted information.

### **Notice to Maine Residents**

On or about July 29, 2022, OneDigital provided written notice of this incident to one (1) Maine resident on behalf of 2Life. Written notice is being provided in substantially the same form as the letter attached here as *Exhibit A*.

### **Other Steps Taken and To Be Taken**

Upon discovering the event, OneDigital moved quickly to investigate and respond to the incident, assess the security of OneDigital systems, and identify potentially affected individuals. OneDigital is also working to implement additional safeguards and training to its employees. Further, OneDigital notified federal law enforcement regarding the event.

Additionally, OneDigital is providing access to credit monitoring services for two (2) years through Experian, to individuals whose personal information was potentially affected by this incident, at no cost to these individuals. OneDigital is also providing impacted individuals with guidance on how to better protect against identity theft and fraud, including advising individuals to report any suspected incidents of identity theft or fraud. OneDigital is providing individuals with 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 review account statements and monitoring free credit reports, and encouragement to contact the Federal Trade Commission, their state Attorney General, and law enforcement to report attempted or actual identity theft and fraud.

OneDigital is also providing written notice of this incident to certain state and federal regulators on behalf of 2Life.

# EXHIBIT A



Return Mail Processing  
PO Box 999  
Suwanee, GA 30024

July 29, 2022

6 1 1150 \*\*\*\*\*SNGLP

SAMPLE A. SAMPLE - 2life

APT ABC

123 ANY ST

ANYTOWN, US 12345-6789



**Re: Notice of Data Security Event/Breach**

Dear Sample A. Sample:

Benemax, a division of Digital Insurance, LLC dba OneDigital (“OneDigital”), a business associate of your current or former employer, is writing to inform you, on behalf of [Company], of an incident that may affect the security of your personal information. We take this incident very seriously and are providing you with information and access to resources so that you can protect yourself against the possibility of misuse of your personal information, should you feel it appropriate to do so.

**What Happened?** On June 8, 2022, OneDigital became aware of potential suspicious activity relating to individual information within OneDigital’s environment. We immediately began an investigation to confirm the security of our network and to determine the nature and scope of this event. With the assistance of third-party forensic investigators, we learned that OneDigital was the victim of unauthorized access to OneDigital systems and data by an unauthorized third party. OneDigital, with the assistance of third-party forensic specialists, confirmed the security of its environment and initiated a comprehensive review to identify any individuals whose information was contained in the impacted systems and potentially affected by the incident. On June 16, 2022, OneDigital concluded its extensive review of the potentially impacted data and then began working with [Company] to determine contact information and notify potentially impacted individuals.

**What Information Was Involved?** Our investigation determined that at the time of the event, your name and [Extra1], [Extra2], [Extra3], [Extra4], [Extra5], [Extra6], [Extra7], [Extra8], [Extra9], and [Extra10] were stored within the potentially impacted data, which information we processed on behalf of [Company]. To date, OneDigital has not received any reports of fraudulent misuse of any information potentially impacted by this event and continues to monitor for any reports of misuse.

**What We Are Doing.** OneDigital is committed to, and takes very seriously, its responsibility to protect all data entrusted to us by [Company]. We are continuously taking steps to enhance data security protections. As part of our incident response, we changed user account passwords to prevent further unauthorized access and disciplined employees who were not following proper protocol. We have also continued ongoing efforts to enhance security controls and to implement additional controls to help protect our systems from unauthorized access.

As an added precaution, we are offering you access to 24 months of free credit/identity monitoring and identity restoration services through Experian. Instructions for enrolling in the credit monitoring services, as well additional information on how to better protect against identity theft or fraud, are included in the attached *Steps You Can Take to Help Protect Personal Information*.

***What You Can Do.*** You can review the attached *Steps You Can Take to Help Protect Personal Information*. You can also enroll to receive the free credit/identity monitoring and identity restoration services being offered to you.

***For More Information.*** If you have questions or concerns that are not addressed in this notice letter, you may call the dedicated assistance line we have established regarding this incident. Please call (833) 468-0630 toll-free Monday through Friday from 8 am – 10 pm Central, or Saturday and Sunday from 10 am – 7 pm Central (excluding major U.S. holidays). Be prepared to provide your engagement number B058102.

We sincerely regret the inconvenience and concern this incident causes for you. We remain committed to safeguarding information in our care and will continue to take proactive steps to enhance data security.

Sincerely,

OneDigital Corporate Privacy Officer

## STEPS YOU CAN TAKE TO HELP PROTECT PERSONAL INFORMATION

### **Enroll in Credit Monitoring**

To help protect your identity, we are offering complimentary access to Experian IdentityWorks<sup>SM</sup> for twenty-four (24) months.

If you believe there was fraudulent use of your information as a result of this incident and would like to discuss how you may be able to resolve those issues, please reach out to an Experian agent. 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 from the date of the incident (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 Identity Restoration is available to you for twenty-four (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](http://www.ExperianIDWorks.com/restoration).

While identity restoration assistance is immediately available to you, we also encourage you to activate the fraud detection tools available through Experian IdentityWorks as a complimentary twenty-four (24) month membership. This product provides you with superior identity detection and resolution of identity theft. To start monitoring your personal information, please follow the steps below:

- Ensure that you **enroll by October 31, 2022** (Your code will not work after this date.)
- **Visit** the Experian IdentityWorks website to enroll: [\*\*https://www.experianidworks.com/credit\*\*](https://www.experianidworks.com/credit)
- Provide your **activation code: ABCDEFGHI**

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 **(833) 468-0630** by **October 31, 2022**. Be prepared to provide engagement number **B058102** 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 specialists are immediately available to help you address credit and non-credit related fraud.
- **Experian IdentityWorks ExtendCARE<sup>TM</sup>:** You receive the same high-level of Identity Restoration support even after your Experian IdentityWorks membership has expired.

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

- **\$1 Million Identity Theft Insurance\*\*:** Provides coverage for certain costs and unauthorized electronic fund transfers.

### **Monitor Your Accounts**

Under U.S. law, a consumer is entitled to one free credit report annually from each of the three major credit reporting bureaus, Equifax, Experian, and TransUnion. To order your free credit report, visit [www.annualcreditreport.com](http://www.annualcreditreport.com) or call, toll-free, 1-877-322-8228. You may also directly contact the three major credit reporting bureaus listed below to request a free copy of your credit report.

Consumers have the right to place an initial or extended “fraud alert” on a credit file at no cost. An initial fraud alert is a 1-year alert that is placed on a consumer’s credit file. Upon seeing a fraud alert display on a consumer’s credit file, 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, which is a fraud alert lasting seven years. Should you wish to place a fraud alert, please contact any one of the three major credit reporting bureaus listed below.

As an alternative to a fraud alert, consumers 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 the consumer’s 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 to take control over who gets access to the personal and financial information in your credit report 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 security freeze, you will need to provide the following information:

1. Full name (including middle initial as well as Jr., Sr., II, III, etc.);
2. Social Security number;
3. Date of birth;
4. Addresses for the prior two to five years;
5. Proof of current address, such as a current utility bill or telephone bill;
6. A legible photocopy of a government-issued identification card (state driver’s license or ID card, etc.); 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 credit freeze, please contact the three major credit reporting bureaus listed below:

<b>Equifax</b>	<b>Experian</b>	<b>TransUnion</b>
<a href="https://www.equifax.com/personal/credit-report-services/">https://www.equifax.com/personal/credit-report-services/</a>	<a href="https://www.experian.com/help/">https://www.experian.com/help/</a>	<a href="https://www.transunion.com/credit-help">https://www.transunion.com/credit-help</a>
888-298-0045	1-888-397-3742	833-395-6938
Equifax Fraud Alert, P.O. Box 105069 Atlanta, GA 30348-5069	Experian Fraud Alert, P.O. Box 9554, Allen, TX 75013	TransUnion Fraud Alert, P.O. Box 2000, Chester, PA 19016
Equifax Credit Freeze, P.O. Box 105788 Atlanta, GA 30348-5788	Experian Credit Freeze, P.O. Box 9554, Allen, TX 75013	TransUnion Credit Freeze, P.O. Box 160, Woodlyn, PA 19094

\*\* 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.



## **Internal Revenue Service Identity Protection PIN (IP PIN)**

You may also obtain an Identity Protection PIN (IP PIN) from the Internal Revenue Service, a six-digit number that prevents someone else from filing a tax return using your Social Security number or Individual Taxpayer Identification Number. The IP PIN is known only to you and the IRS, and helps the IRS verify your identity when you file your electronic or paper tax return. Even though you may not have a filing requirement, an IP PIN still protects your account. If you do not already have an IP PIN, you may get an IP PIN as a proactive step to protect yourself from tax-related identity theft either online, by paper application or in-person. Information about the IP PIN program can be found here: <https://www.irs.gov/identity-theft-fraud-scams/get-an-identity-protection-pin>.

### **Additional Information**

You may further educate yourself regarding identity theft, fraud alerts, credit freezes, and the steps you can take to protect your personal information by contacting the consumer reporting bureaus, the Federal Trade Commission, or your state Attorney General. The Federal Trade Commission may be reached at: 600 Pennsylvania Avenue NW, Washington, DC 20580; [www.identitytheft.gov](http://www.identitytheft.gov); 1-877-ID-THEFT (1-877-438-4338); and TTY: 1-866-653-4261. The Federal Trade Commission also encourages those who discover that their information has been misused to file a complaint with them. You can obtain further information on how to file such a complaint by way of the contact information listed above. 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 and your state Attorney General. This notice has not been delayed by law enforcement.

*For District of Columbia residents*, the District of Columbia Attorney General may be contacted at: 400 6th Street, NW, Washington, DC 20001; 202-727-3400; and [oag.dc.gov](http://oag.dc.gov).

*For Maryland residents*, the Maryland Attorney General may be contacted at: 200 St. Paul Place, 16th Floor, Baltimore, MD 21202; 1-410-528-8662 or 1-888-743-0023; and [www.oag.state.md.us](http://www.oag.state.md.us). OneDigital is located at 200 Galleria Parkway, Suite 1950, Atlanta, Georgia 30339

*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, the consumer reporting bureaus must correct or delete inaccurate, incomplete, or unverifiable information; consumer reporting agencies may not report outdated negative information; access to your file is limited; you must give your consent for credit reports to be provided to employers; you may limit “prescreened” offers of credit and insurance you get based on information in your credit report; and you may seek damages from violator. 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 [www.consumerfinance.gov/f/201504\\_cfpb\\_summary\\_your-rights-under-fcra.pdf](http://www.consumerfinance.gov/f/201504_cfpb_summary_your-rights-under-fcra.pdf), or by writing Consumer Response Center, Room 130-A, Federal Trade Commission, 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](http://www.ncdoj.gov).

*For Rhode Island residents*, the Rhode Island Attorney General may be reached at: 150 South Main Street, Providence, RI 02903; [www.riag.ri.gov](http://www.riag.ri.gov); and 1-401-274-4400. Under Rhode Island law, you have the right to obtain any police report filed in regard to this incident. There are 132 Rhode Island residents impacted by this incident.