

Morgan Lewis

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December 6, 2022

Re: Notice of Data Security Incident

Dear [REDACTED]

We are writing to notify you of a data security incident involving your personal information. While there is no indication that your information has been misused, we want to share with you what happened, what information was involved, what we are doing in response to the incident, and what you can do to protect your continued privacy. We take these matters very seriously and want to assure you that we are doing everything we can to protect information entrusted to us.

Morgan Lewis is a global law firm working with a wide variety of clients. In connection with our work for our client [REDACTED] in [REDACTED] we came into possession of your information when you were a customer of [REDACTED]

What Happened?

We had a recent data security incident in which an employee of our firm unwittingly allowed unauthorized access to the laptop computer assigned to that employee. Although that access did not last very long, during the period of access, it appears that a file with your information was compromised. We discovered the access to the computer that same day, terminated the access, and launched an investigation with the assistance of law enforcement and cybersecurity experts. That investigation concluded on November 7, 2022, and confirmed that your information was involved.

What Information Was Involved?

Again, there is no indication that your personal information has been misused for any fraudulent purpose. But the information included your name, address, social security number, and date of birth.

What We Are Doing

We are committed to maintaining the privacy and security of your information and are taking this incident very seriously. Since learning of the event and containing the incident on the same day,

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we have taken steps to determine what data was involved, the details of the incident, and are taking steps to make sure a similar incident does not occur again.

To help protect your identity, we are offering you a 24-month membership of Experian's® IdentityWorksSM at no cost to you. This product provides you with identity detection and resolution services. To activate your membership and start monitoring your personal information please follow the steps below:

- Ensure that you **enroll by: February 28, 2023** (Your code will not work after this date.)
- **Visit** the Experian IdentityWorks website to enroll: <https://www.experianidworks.com/3bcredit>
- Provide your individual **activation code:** [REDACTED]

If you have questions about the product, need assistance with identity restoration or would like an alternative to enrolling in Experian IdentityWorks online, please contact Experian's customer care team at 1-877-890-9332 by **February 28, 2023**. Be prepared to provide engagement number [REDACTED] as proof of eligibility for the identity restoration services by Experian.

Once you enroll, you have and have access to the following features:

- **Experian credit report at signup:** See what information is associated with your credit file. Daily credit reports are available for online members.
- **Credit Monitoring:** Actively monitors Experian, Equifax and Transunion files for indicators of fraud.
- **Identity Restoration:** Identity Restoration specialists are immediately available to help you address any concerns about potential or actual fraud.
- **Up to \$1 Million Identity Theft Insurance:** Provides coverage for certain costs and unauthorized electronic fund transfers.

If you believe there was unauthorized use of your information and would like to discuss how you may be able to resolve those issues, please reach out to an Experian agent at 1-877-890-9332. The agent can work with you to investigate and resolve the issue (including helping you contact creditors 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 when required). Please note that this Identity Restoration support is available to you for 24 months from the date of this letter.

What You Can Do

We encourage you to enroll in the credit monitoring services offered above, which will alert you to any attempt to establish a new line of credit using your name and social security number. Review the credit monitoring reports provided on a regular basis. If there are reports of new credit being opened that you do not recognize, contact Experian or the identified creditor immediately.


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There are several additional steps you can take to protect your privacy and ensure that your personal information is not used improperly, all of which are best practices individuals should regularly implement.

Carefully review financial statements sent to you by your bank, credit card company, other financial institutions, and government entities, like the IRS, and immediately notify them by phone or email of any suspicious transactions or activity and follow up in writing if you make the notification by phone.

The attached reference guide provides more information and resources.

For More Information

If you have questions or concerns not answered by this letter, please call me at (215) 963-5188. Please know that we take this matter very seriously, and we apologize for any concern and inconvenience this may cause you.

Sincerely,

/s/Georgina L. O'Hara

Georgina L. O'Hara
Global Chief Privacy Officer

REFERENCE GUIDE

If you suspect that you are a victim of identity theft or credit fraud, we encourage you to remain vigilant and consider taking the following steps:

Order Your Free Credit Report. To order your free credit report, visit www.annualcreditreport.com, call toll-free at 877-322-8228, or complete the Annual Credit Report Request Form on the U.S. Federal Trade Commission's website at www.ftc.gov and mail it to Annual Credit Report Request Service, P.O. Box 105281, Atlanta, GA 30348-5281. Do not contact the three credit bureaus individually; they provide your free report only through the website or toll-free number.

When you receive your credit report, review the entire report carefully. Look for any inaccuracies and/or accounts you don't recognize and notify the credit bureaus as soon as possible if there are any.

You have rights under the federal Fair Credit Reporting Act ("FCRA"). These include, among others, the right to know what is in your file; to dispute incomplete or inaccurate information; and to have consumer credit reporting agencies correct or delete inaccurate, incomplete, or unverifiable information. For more information about the FCRA, please visit <https://www.consumer.ftc.gov/articles/pdf-0096-fair-credit-reporting-act.pdf> or www.ftc.gov

Place a Fraud Alert on Your Credit File: To protect yourself from possible identity theft, consider placing a fraud alert on your credit file. A fraud alert helps protect you against the possibility of an identity thief opening new credit accounts in your name. When a merchant checks the credit history of someone applying for credit, the merchant gets a notice that the applicant may be a victim of identity theft. The alert notifies the merchant to take steps to verify the identity of the applicant. You can report potential identity theft to all three of the major credit bureaus by calling any one of the toll-free fraud numbers below. You will reach an automated telephone system that allows you to flag your file with a fraud alert at all three bureaus.

Equifax

www.equifax.com
1-800-525-6285
P.O. Box 740241
Atlanta, Georgia 30374-0241

Experian

www.experian.com
1-888-397-3742
P.O. Box 9532
Allen, Texas 75013

TransUnion

www.transunion.com
1-800-680-7289
Fraud Victim Assistance Division
P.O. Box 2000
Chester, Pennsylvania 19016

Place a Security Freeze on Your Credit File. You have the right to place a "security freeze" on your credit file. A security freeze generally will prevent creditors from accessing your credit file at the three nationwide credit bureaus without your consent. You can request a security freeze free of charge by contacting the credit bureaus using the same contact information noted above.

The credit bureaus may require that you provide proper identification prior to honoring your request. In order to request a security freeze, you will need to provide the following information:

1. Your full name (including middle initial as well as Jr., Sr., II, III, etc.)

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2. Social Security number
3. Date of birth
4. If you have moved in the past five (5) years, provide the addresses where you have lived over the prior 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, military identification, etc.)
7. If you are a victim of identity theft, include a copy of either the police report, investigative report, or complaint to law enforcement agency concerning identity theft

Placing a security freeze on your credit file may delay, interfere with, or prevent timely approval of any requests you make for credit, loans, employment, housing or other services. For more information regarding credit freezes, please contact the credit reporting agencies directly.

Contact the U.S. Federal Trade Commission. If you detect any incident of identity theft or fraud, promptly report the incident to your local law enforcement authorities, your state Attorney General and the Federal Trade Commission ("FTC"). If you believe your identity has been stolen, the FTC recommends that you take these additional steps.

- Close the accounts that you have confirmed or believe have been tampered with or opened fraudulently. Use the FTC's ID Theft Affidavit (available at www.ftc.gov/idtheft) when you dispute new unauthorized accounts.
- File a local police report. Obtain a copy of the police report and submit it to your creditors and any others that may require proof of the identity theft crime.

You can learn more about how to protect yourself from becoming an identity theft victim (including how to place a fraud alert or security freeze) by contacting the FTC:

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

For District of Columbia Residents: You can obtain information from the FTC and the Office of the Attorney General for the District of Columbia about steps to take to avoid identity theft. You can contact the D.C. Attorney General at: 441 4th Street, NW, Washington, DC 20001, 202-727-3400, www.oag.dc.gov

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

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For Maryland Residents: You can obtain information from the Maryland Office of the Attorney General about steps you can take to help prevent identity theft. You can contact the Maryland Attorney General at: 200 St. Paul Place, Baltimore, MD 21202, 888-743-0023, www.oag.state.md.us

For Massachusetts Residents: You have a right to request from us a copy of any police report filed in connection with this incident. If you are the victim of identity theft, you also have the right to file a police report and obtain a copy of it. As noted above, you also have the right to place a security freeze on your credit report at no charge.

For New York Residents: You may also contact the following state agencies for information regarding security breach response and identity theft prevention and protection information:

New York Attorney General's Office
Bureau of Internet and Technology
(212) 416-8433
<https://ag.ny.gov/internet/resource-center>

NYS Department of State's Division of Consumer Protection
(800) 697-1220
<https://www.dos.ny.gov/consumerprotection>

For North Carolina Residents: You can obtain information from the Federal Trade Commission and the North Carolina Office of the Attorney General about steps you can take to help prevent identity theft. You can contact the North Carolina Attorney General at: 9001 Mail Service Center, Raleigh, NC 27699, 1-877-566-7226, www.ncdoj.gov

For Oregon Residents: State laws advise you to report any suspected identity theft to law enforcement, as well as the Federal Trade Commission. You can contact the Oregon Attorney General at: Oregon Department of Justice, 1162 Court Street NE, Salem, OR 97301-4096, (877) 877-9392, www.doj.state.or.us

For Rhode Island Residents: You can obtain information from the Rhode Island Office of the Attorney General about steps you can take to help prevent identity theft. You can contact the Rhode Island Attorney General at: 150 South Main Street, Providence, RI 02903, (401) 274-4400, www.riag.ri.gov. As noted above, you have the right to place a security freeze on your credit report at no charge but note that consumer reporting agencies may charge fees for other services.