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June 9, 2022

VIA Email

Attorney General Wayne Stenehjem
Office of the Attorney General
Consumer Protection and Antitrust
1050 East Interstate Avenue, Suite 200
Bismarck, ND 58503-5574

Re: Notice of Data Security Incident

Dear Attorney General Stenehjem:

Lewis Brisbois Bisgaard & Smith LLP represents 90 Degree Benefits, Inc.'s Wisconsin location, in connection with a recent data security incident that may have affected the information of certain North Dakota residents. This letter is sent under N.D. Cent. Code §§ 51-30-01 et seq.

1. NATURE OF THE SECURITY INCIDENT

90 Degree Benefits Wisconsin experienced a data security incident on February 27, 2022 that allowed unauthorized access to systems and files containing personal information. 90 Degree Benefits Wisconsin immediately launched an investigation and engaged a leading independent digital forensics firm to help determine what happened and what information may have been accessed. 90 Degree Benefits Wisconsin also notified the FBI about the incident. Through its forensic investigation, 90 Degree Benefits Wisconsin identified unauthorized access from February 24-27, 2022 to certain systems and files.

90 Degree Benefits Wisconsin also engaged independent experts to conduct a review of data that could have potentially been accessed as a result of the incident, and, on April 21, 2022, determined that the information related to its client's employees and health plan members, including the personal information of 312 North Dakota residents. To date, 90 Degree Benefits Wisconsin has no knowledge that any of this information has been misused.

2. NUMBER OF NORTH DAKOTA RESIDENTS AFFECTED

90 Degree Benefits Wisconsin started notifying the 312 North Dakota residents of this data security incident via first class U.S. mail on June 9, 2022. A sample copy of the notification letter sent to the affected individuals is attached.

3. STEPS TAKEN RELATING TO THE INCIDENT

90 Degree Benefits Wisconsin has taken steps in response to this incident to prevent similar incidents from occurring in the future. Those steps have included working with leading cybersecurity experts and software solutions to enhance the security of its digital environment. Furthermore, 90 Degree Benefits provided affected consumers with information about steps that they can take protect their personal information and offered them complimentary identity monitoring services.

4. CONTACT INFORMATION

Please feel free to contact me at (312) 345-1718 or Todd.Rowe@lewisbrisbois.com if you have any further questions.

Respectfully,

/s/ Todd Rowe

Todd Rowe of
LEWIS BRISBOIS BISGAARD & SMITH LLP

Encl: Sample Individual Notification Letter



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

To Enroll, Please Call:
833-774-2180
Or Visit:
<https://response.idx.us/90DegreeBenefitsWisconsin>
Enrollment Code: <<Enrollment>>

<<First Name>> <<Last Name>>
<<Address1>>
<<Address2>>
<<City>>, <<State>> <<Zip>>

June 6, 2022

Re: Notice of Data Security Incident

Dear <<First Name>> <<Last Name>>,

We are writing to inform you of a data security incident at 90 Degree Benefits Wisconsin location, formerly EBSO, Inc., that may have impacted your personal information. 90 Degree Benefits Wisconsin is committed to the privacy and security of all information in our possession. This is why we are writing to notify you of this incident, to offer you complimentary identity monitoring services, and to inform you about steps that can be taken to help safeguard your personal information.

What Happened: On February 27, 2022, 90 Degree Benefits Wisconsin location experienced a data security incident that impacted certain systems. Upon discovering this, we immediately launched an investigation with the assistance of a leading independent digital forensics firm to determine what happened and whether personal information had been accessed or acquired without authorization. Through this investigation, we learned that systems and files containing personal information were accessed without authorization. While the investigation was unable to conclude whether your information was actually viewed or accessed, out of an abundance of caution, we are offering you complimentary identity monitoring services to mitigate any potential risk of the misuse of your information.

What Information Was Involved: The information may have included your personal information.

What We Are Doing: As soon as we discovered this incident, we launched an investigation and took steps to secure our environment, including by implementing enhanced security measures to help prevent a similar incident from occurring in the future. We also notified the Federal Bureau of Investigation and are fully cooperating with their investigation. Additionally, we are providing you with information on steps you can take to help protect your personal information, and offering you identity monitoring and protection services through IDX, a data security and recovery services expert. Your complimentary IDX identity monitoring and protection services include: <<12 months / 24 months>> credit and CyberScan monitoring, a \$1,000,000 insurance reimbursement policy, and fully managed identity theft recovery services. Additional information about these services is included with this letter. To take advantage of these services, you must follow the instructions in this letter to enroll. Please note that the deadline to enroll is September 6, 2022.

What You Can Do: Please read the recommendations included with this letter which you can follow to help protect your personal information. You can also enroll in the complimentary services being offered to you, at no cost. Activation instructions and a description of the services being provided are included with this letter.

For More Information: If you have questions or need assistance, please contact **833-774-2180**, Monday through Friday from 8:00 a.m. to 8:00 p.m. Central Time, excluding major U.S. holidays. Our representatives are fully versed on this incident and can help answer questions you may have regarding the protection of your information. Please accept our sincere apologies and know that we deeply regret any inconvenience that this may cause you.

Sincerely,

A handwritten signature in cursive script, appearing to read "Cindy Sheffield".

Cindy Sheffield, CEO
90 Degree Benefits - Wisconsin

Steps You Can Take to Protect Your Personal Information

Review Your Account Statements and Notify Law Enforcement of Suspicious Activity: As a precautionary measure, we recommend that you remain vigilant by reviewing your account statements and credit reports closely. If you detect any suspicious activity on an account, you should promptly notify the financial institution or company with which the account is maintained. You also should promptly report any fraudulent activity or any suspected incidence of identity theft to proper law enforcement authorities, your state attorney general, and/or the Federal Trade Commission (FTC).

Copy of Credit Report: You may obtain a free copy of your credit report from each of the three major credit reporting agencies once every 12 months by visiting <http://www.annualcreditreport.com/>, calling toll-free 1-877-322-8228, or by completing an Annual Credit Report Request Form and mailing it to Annual Credit Report Request Service, P.O. Box 105281, Atlanta, GA 30348. You also can contact one of the following three national credit reporting agencies:

Equifax

P.O. Box 105851
Atlanta, GA 30348
1-800-525-6285
www.equifax.com

Experian

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

TransUnion

P.O. Box 2000
Chester, PA 19016
1-800-916-8800
www.transunion.com

Fraud Alert: You may want to consider placing a fraud alert on your credit report. An initial fraud alert is free and will stay on your credit file for at least one year. The alert informs creditors of possible fraudulent activity within your report and requests that the creditor contact you prior to establishing any accounts in your name. To place a fraud alert on your credit report, contact any of the three credit reporting agencies identified above. Additional information is available at <http://www.annualcreditreport.com>.

Security Freeze: You have the right to put a security freeze on your credit file for up to one year at no cost. This will prevent new credit from being opened in your name without the use of a PIN number that is issued to you when you initiate the freeze. A security freeze is designed to prevent potential creditors from accessing your credit report without your consent. As a result, using a security freeze may interfere with or delay your ability to obtain credit. You must separately place a security freeze on your credit file with each credit reporting agency. In order to place a security freeze, you may be required to provide the consumer reporting agency with information that identifies you including your full name, Social Security number, date of birth, current and previous addresses, a copy of your state-issued identification card, and a recent utility bill, bank statement or insurance statement.

Additional Free Resources: You can obtain information from the consumer reporting agencies, the FTC, or from your respective state Attorney General about fraud alerts, security freezes, and steps you can take toward preventing identity theft. You may report suspected identity theft to local law enforcement, including to the FTC or to the Attorney General in your state.

Federal Trade Commission

600 Pennsylvania Ave, NW
Washington, DC 20580
consumer.ftc.gov, and
www.ftc.gov/idtheft
1-877-438-4338

Maryland Attorney General

200 St. Paul Place
Baltimore, MD 21202
oag.state.md.us
1-888-743-0023

New York Attorney General

Bureau of Internet and Technology
Resources
28 Liberty Street
New York, NY 10005
1-212-416-8433

North Carolina Attorney General

9001 Mail Service Center
Raleigh, NC 27699
ncdoj.gov
1-877-566-7226

Rhode Island Attorney General

150 South Main Street
Providence, RI 02903
<http://www.riag.ri.gov>
1-401-274-4400

Washington D.C. Attorney General

441 4th Street, NW
Washington, DC 20001
oag.dc.gov
1-202-727-3400

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



<<12 months / 24 months>> Enrollment in IDX Identity Protection

Website and Enrollment. Please visit <https://response.idx.us/90DegreeBenefitsWisconsin> and follow the instructions for enrollment using your Enrollment Code included with this letter.

Activate the credit monitoring provided as part of your IDX 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.

Telephone. Contact IDX at **833-774-2180** to speak with knowledgeable representatives about the appropriate steps to take to protect your credit identity.

This IDX enrollment will include <<12 months / 24 months>> enrollment into:

SINGLE BUREAU CREDIT MONITORING - Monitoring of credit bureau for changes to the member's credit file such as new credit inquires, new accounts opened, delinquent payments, improvements in the member's credit report, bankruptcies, court judgments and tax liens, new addresses, new employers, and other activities that affect the member's credit record.

CYBERSCAN™ - Dark Web monitoring of underground websites, chat rooms, and malware, 24/7, to identify trading or selling of personal information like SSNs, bank accounts, email addresses, medical ID numbers, driver's license numbers, passport numbers, credit and debit cards, phone numbers, and other unique identifiers.

IDENTITY THEFT INSURANCE - Identity theft insurance will reimburse members for expenses associated with restoring their identity should they become a victim of identity theft. If a member's identity is compromised, the policy provides coverage for up to \$1,000,000, with no deductible, from an A.M. Best "A-rated" carrier. Coverage is subject to the terms, limits, and/or exclusions of the policy.

FULLY-MANAGED IDENTITY RECOVERY - IDX fully-managed recovery service provides restoration for identity theft issues such as (but not limited to): account creation, criminal identity theft, medical identity theft, account takeover, rental application, tax fraud, benefits fraud, and utility creation. This service includes a complete triage process for affected individuals who report suspicious activity, a personally assigned IDX Specialist to fully manage restoration of each case, and expert guidance for those with questions about identity theft and protective measures.