



MULLEN
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April 7, 2023

VIA E-MAIL

Office of the Attorney General of Iowa
Consumer Protection Division
Security Breach Notifications
1305 E. Walnut Street
Des Moines, Iowa 50319-0106
E-mail: consumer@ag.iowa.gov

Re: Notice of Data Event

Dear Sir or Madam:

We represent 90 Degree Benefits, Inc.'s Minnesota and Wisconsin locations, formerly EBSO, Inc. (collectively "90 Degree Benefits – MN/WI"), located at 7020 N. Port Washington Rd, Suite 206, Glendale, WI 53217, and are writing to notify your Office of an incident that may affect the security of information relating certain Iowa residents. The investigation into this matter is ongoing, and this notice will be supplemented with any new significant facts learned subsequent to its submission. By providing this notice, 90 Degree Benefits – MN/WI does not waive any rights or defenses regarding the applicability of Iowa law, the applicability of the Iowa data event notification statute, or personal jurisdiction.

Nature of the Data Event

On or about December 10, 2022, 90 Degree Benefits – MN/WI identified suspicious network activity that impacted certain computer systems. Upon discovering this activity, 90 Degree Benefits – MN/WI immediately launched an investigation with the assistance of a leading independent digital forensics firm to determine what happened and whether information had been accessed or acquired without authorization. This investigation recently confirmed that certain systems and files containing information belonging to individuals associated with 90 Degree Benefits – MN/WI employer clients were accessed without authorization between December 5, 2022, and December 11, 2022. Although the investigation was unable to conclude what information was actually viewed, accessed, or taken, out of an abundance of caution, 90 Degree Benefits – MN/WI is conducting a review of the impacted systems in order to provide notice to potentially affected clients and individuals whose information may have been present at the time of this incident.

While this review is ongoing, 90 Degree Benefits – MN/WI began notifying certain clients of this incident because information associated with their organization was identified during the review. Although the

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information varies for individuals, the information that may have been impacted by this event includes an individual's name, address, date of birth, Social Security number, medical/health information, and/or information related to the payment of healthcare services. 90 Degree Benefits – MN/WI is providing notice to impacted individuals and regulators, as required, on its clients' behalf.

Notice to Iowa Residents

On or about February 8, 2023 and March 10, 2023, 90 Degree Benefits – MN/WI provided written notice of this incident to clients and potentially affected individuals. Due to the ongoing nature of the investigation and notice, on or about April 7, 2023, 90 Degree Benefits – MN/WI provided notice to approximately nine hundred seventy-two (972) Iowa residents on behalf of the impacted clients. Written notice is being provided in substantially the same form as the letter attached here as **Exhibit A**. Notification to impacted clients and individuals is ongoing, and 90 Degree Benefits – MN/WI may supplement this notification if it is determined that a significant amount of additional Iowa residents will receive notice.

Other Steps Taken and To Be Taken

Upon discovering the event, 90 Degree Benefits – MN/WI moved quickly to investigate and respond to the incident, assess the security of 90 Degree Benefits – MN/WI systems, and identify potentially affected clients and individuals. Further, 90 Degree Benefits – MN/WI notified federal law enforcement regarding the event and are fully cooperating with their investigation. 90 Degree Benefits – MN/WI is also working to implement enhanced security measures to help prevent a similar event from occurring in the future.

Out of an abundance of caution, 90 Degree Benefits – MN/WI is also providing access to complimentary credit monitoring services for 12 months through IDX, to potentially impacted individuals. Additionally, 90 Degree Benefits – MN/WI is providing impacted individuals with guidance on how to better protect against identity theft and fraud, including 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 remain vigilant for incidents of fraud and identity theft by reviewing account statements and explanations of benefits 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. 90 Degree Benefits – MN/WI also notified applicable regulators and the national consumer reporting agencies.

Contact Information

Should you have any questions regarding this notification or other aspects of the data security event, please contact us at (267) 930-4637.

Very truly yours,

A handwritten signature in black ink, appearing to read 'Gregory Lederman', written in a cursive style.

Gregory Lederman of
MULLEN COUGHLIN LLC

EXHIBIT A



Return Mail to IDX:
P.O. Box 989728
West Sacramento, CA 95798-9728

To Enroll, Please Call:
1-833-753-4468
Or Visit:
<https://response.idx.us/90-Degree-Benefits-Wisconsin>
Enrollment Code: <<Enrollment Code>>

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

April 7, 2023

Re: Notice of Data <<Security Incident / Breach>>

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

We are writing to inform you of a recent incident at 90 Degree Benefits, Inc.'s Wisconsin location, formerly EBSO, Inc. ("90 Degree Benefits-Wisconsin"), that may have impacted your 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 or about December 10, 2022, 90 Degree Benefits-Wisconsin identified suspicious network activity that impacted certain computer 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 information had been accessed or acquired without authorization. While our investigation remains ongoing, we recently confirmed that certain systems and files containing information belonging to individuals were accessed without authorization between December 5, 2022 and December 11, 2022.

What Information Was Involved: The information may have included your name, address, date of birth, Social Security number, medical/health information, and/or information related to the payment of healthcare services. We are not aware of any actual or attempted misuse of your information as a result of this incident.

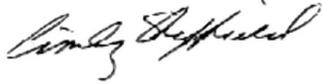
What We Are Doing: As soon as we discovered this incident, we launched an investigation and took steps to secure our environment, including by implementing enhanced security measures to help prevent a similar incident from occurring in the future. We also notified the Federal Bureau of Investigation 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 complimentary identity monitoring and protection services through IDX. Additional information about these services and how to enroll is included with this letter.

What You Can Do: We encourage you to remain vigilant against incidents of identity theft and fraud by reviewing your account statements and explanation of benefits and monitoring your free credit reports for suspicious activity and to detect errors. You may also review the information contained in the attached *Steps You Can Take to Help Protect Your Personal Information*. You can also enroll in the complimentary services being offered to you. 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 1-833-753-4468, 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. You may also write to us at 7020 N. Port Washington Road, Suite 206, Milwaukee, WI 53217.

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 that reads "Cindy Sheffield".

Cindy Sheffield, CEO
90 Degree Benefits - Wisconsin

Steps You Can Take to Help Protect Your Personal Information

Enroll in Credit Monitoring and Identity Restoration

1. *Website and Enrollment.* Go to <https://response.idx.us/90-Degree-Benefits-Wisconsin> and follow the instructions for enrollment using your Enrollment Code provided at the top of the letter. The deadline to enroll in services is July 7, 2023.

2. *Activate the credit monitoring* provided as part of your IDX identity protection 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.

3. *Telephone.* Contact IDX at 1-833-753-4468 to gain additional information about this event and speak with knowledgeable representatives about the appropriate steps to take to protect your credit identity.

If you discover any suspicious items and have enrolled in IDX identity protection, notify them immediately by calling or by logging into the IDX website and filing a request for help.

If you file a request for help or report suspicious activity, you will be contacted by a member of our ID Care team who will help you determine the cause of the suspicious items. In the unlikely event that you fall victim to identity theft, you will be assigned an ID Care Specialist who will work on your behalf to identify, stop and reverse the damage quickly.

Review Your Account Statements and Notify Law Enforcement of Suspicious Activity: If you detect any suspicious activity on your 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. If you are a victim of identity theft, you are entitled to an extended fraud alert, which is a fraud alert lasting seven years. 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 a new loan, credit, mortgage, or any other account involving the extension of credit. You must separately place a security freeze on your credit file with each credit reporting agency. Pursuant to federal law, you cannot be charged to place or lift a credit freeze on your credit report. 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
www.identitytheft.gov
1-877-438-4338

Maryland Attorney General

200 St. Paul Place, 16th Floor
Baltimore, MD 21202
oag.state.md.us
1-888-743-0023

New York Attorney General

28 Liberty Street
New York, NY 10005
<https://ag.ny.gov/>
1-800-771-7755

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
www.riag.ri.gov
1-401-274-4400
This incident impacted 48 Rhode
Island residents.

Washington D.C. Attorney General

400 6th 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>. Under Massachusetts and Rhode Island law, you have a right to obtain any police report filed in regarding to this incident. This notice has not been delayed by law enforcement.