

July 2, 2021

BY ONLINE FORM

Attorney General Aaron Frey
Office of the Attorney General
6 State House Station
Augusta, ME 04333

Dear Attorney General Frey,

We are writing to notify you of a data security incident involving a Morgan Stanley vendor that impacted approximately 116 Maine residents. This letter supplements the Maine Security Breach Reporting Form our counsel has submitted to your office on July 2, 2021 via <https://appengine.egov.com/apps/me/maine/ag/reportingform> (the “Online Notice”).

On May 20, 2021, Morgan Stanley was notified by Guidehouse, a vendor that provides account maintenance services to Morgan Stanley’s StockPlan Connect business, that it had suffered an information security incident. Guidehouse advised us that data that it maintained for Morgan Stanley had been accessed through the Accellion FTA vulnerability. Specifically, Morgan Stanley documents in the possession of Guidehouse containing the personal information of StockPlan Connect participants, including participants in Maine, were obtained by an unauthorized individual. The underlying data and personally identifiable information of StockPlan Connect participants in these files is owned by certain of Morgan Stanley’s corporate clients that retain Morgan Stanley StockPlan Connect to provide stock plan management services to their employees. Guidehouse, in turn, was providing a service to Morgan Stanley to identify the best available address for participants whose contact information was invalid. Although the files in Guidehouse’s possession were encrypted, we have been told by Guidehouse that the unauthorized individual was able to obtain the decryption key during the security incident, due to the Accellion FTA vulnerability.

The files obtained from the vendor included the following participant information: name; address (last known address); date of birth; Social Security number (if the participant had one); and corporate company name. Note that any data within these files did not contain passwords that could be used to access financial accounts.

Morgan Stanley has reviewed Guidehouse’s remediation of the incident. According to Guidehouse, the Accellion FTA vulnerability that led to this incident was patched in January 2021, within 5 days of the patch becoming available. Although the data was obtained by the unauthorized individual around that time, the vendor did not discover the attack until March of 2021, and did not discover the impact to Morgan Stanley until May 2021, due to the difficulty in retroactively determining which files were stored in the Accellion FTA appliance when the appliance was vulnerable. Guidehouse has informed Morgan Stanley that it found no evidence that Morgan Stanley’s data had been distributed beyond the threat actor.

Consistent with our obligation under 10 M.R.S.A. section 1348(3), we are notifying the StockPlan Connect corporate clients that own or license the Maine residents' data affected by this incident. (Please see Appendix A for a list of the data owners). We have notified these entities via a written notice delivered by the U.S. Postal Service or through electronic communications. A sample copy of the notice to our corporate clients is attached to the Online Notice. However, pursuant to Morgan Stanley client requests and to ensure that all individuals impacted by this incident are notified, Morgan Stanley is also independently providing notifications to affected individuals. Sample copies of the notices to Maine residents are also attached to the Online Notice.

In addition, Guidehouse has arranged with Experian to provide any potentially affected Maine residents with credit monitoring services for 24 months at no charge to them. We will arrange to provide codes to our corporate clients or directly to Maine residents as applicable.

To the extent you have any questions about this notification, please contact James Alex at +1 (212) 537-3014 or james.alex@morganstanley.com for additional information.

Respectfully submitted,

/s/ Morgan Stanley
Morgan Stanley

APPENDIX A

Names and Addresses of Data Owners/Licensees

Entity Name	Address	City	State	Zip Code
Adelphia Communications Corporation	5619 DTC Pkwy.	Greenwood Village	Colorado	80111
Amazon.com, Inc.	2201 Westlake Ave.	Seattle	Washington	98121
Assurant, Inc.	28 Liberty Street	New York	New York	10005
AT&T Inc.	208 South Akard Street	Dallas	Texas	75202
Automatic Data Processing	One ADP Boulevard	Roseland	New Jersey	07068
Axcelis Technologies, Inc.	108 Cherry Hill Drive	Beverly	Massachusetts	01915
Becton Dickinson And Company	1 Becton Dr., MC 079	Franklin Lakes	New Jersey	07417
Boston Scientific	300 Boston Scientific Way	Marlborough	Massachusetts	01752
Broadridge Financial Solutions, Inc.	Two Gateway Center	Lake Success	New Jersey	07102
Brown & Brown, Inc.	300 North Beach Street	Volusia	Florida	
CDK Global Holdings, LLC	1950 Hassell Road	Hoffman Estates	Illinois	60169
Cerner Corporation	2800 Rockcreek Parkway	Kansas City	Missouri	64117
Children's Place Retail Stores	915 Secaucus Rd.	Secaucus	New Jersey	07094
Comcast	1500 Market St.	Philadelphia	Pennsylvania	19102
Conduent Incorporated	100 Campus Drive, Suite 200	Florham Park	New Jersey	07932
Corning, Inc.	1 Riverfront Plaza MP-HQ-E2-A12	Corning	New York	14831
Darden Restaurants, Inc.	1000 Darden Center Drive	Orlando	Florida	32837
Dell Technologies	One Dell Way RR 1-8038	Round Rock	Texas	78682
Dollar Tree Stores Inc.	500 Volvo Parkway	Chesapeake	Virginia	23320
Donnelley Financial Solutions, Inc.	35 W. Wacker	Chicago	Illinois	60601
Entegris Inc.	3500 Lyman Boulevard	Chaska	Minnesota	55318

Exelon Corporation	10 South Dearborn Street	Chicago	Illinois	60680
HP Inc	1501 Page Mill Road, Building 5	Palo Alto	California	94304
Lawson Products, Inc.	8770 W Bryn Mawr Ave, Ste 900	Chicago	Illinois	60631
Marsh & McLennan	1166 Avenue Of The Americas	New York	New York	10036
Ryder System, Inc.	11690 NW 105 Street	Miami	Florida	33178
Scientific Games Corporation	6601 Bermuda Road	Las Vegas	Nevada	89119
Sinclair Broadcast Group, Inc.	10706 Beaver Dam Road	Hunt Valley	Maryland	21030
SPX	3515 Ballatyne Corp Place	Charlotte	North Carolina	28277
SPX FLOW, Inc.	13320 Ballantyne Corporate Place	Charlotte	North Carolina	28277
SunRun	595 Market Street 29Th Floor	San Francisco	California	94105
Telephone and Data Systems Inc,	Suite 4000 30 North LaSalle Street	Chicago	Illinois	60602
Telephone and Data Systems Inc,	Suite 4000 30 North LaSalle Street	Chicago	Illinois	60602
TransLumen Technologies, LLC	175 East Delaware Place Suite 6808	Chicago	Illinois	60611
United Continental Holdings, Inc.	77 W Wacker Dr.	Chicago	Illinois	60601
United States Cellular Corporation	8410 West Bryn Mawr Avenue, Suite 700	Chicago	Illinois	60631
UnumProvident Companies	18 Chestnut Street	Worcester	Massachusetts	01608
Ventas, Inc.	10350 Ormsby Park Place, Suite 300	Louisville	Kentucky	40223
ViacomCBS Inc.	19TH Floor 51 W 52ND Street	New York	New York	10019
Waste Management	1001 Fannin Street Ste 4000	Houston	Texas	77002
Werner Enterprises	14507 Frontier Road	Omaha	Nebraska	68138