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August 14, 2023

VIA ONLINE SUBMISSION

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

Office of the Attorney General:

On behalf of Milliman, Inc., (“Milliman”), whose office is located at 1301 5th Avenue, Suite 3800, Seattle, WA 98101, and pursuant to M.G.L. c. 93H § 3A, this letter provides notice of a recent data security incident. This letter is also submitted on behalf of certain Milliman clients identified in the attached Appendix A. By providing this notice, Milliman does not waive any rights or defenses regarding the applicability of Maine law or personal jurisdiction.

Milliman provides administrative services to employee benefit and pension plan sponsors. As part of those services, Milliman utilizes a third-party vendor, Pension Benefit Information, LLC (“PBI”), to conduct research on whether plan members and beneficiaries have passed away. For that purpose, Milliman transferred data regarding its clients’ consumers to PBI utilizing a secure and encrypted file transfer protocol.

PBI recently notified Milliman that PBI experienced a data security incident affecting the data of Milliman’s clients. Specifically, PBI disclosed that it utilized the “MOVEit Transfer” software provided by Progress Software Corporation (“Progress Software”) for PBI’s secure file transfer protocol (“SFTP”) servers. PBI also indicated that it stored Milliman clients’ data on PBI’s SFTP servers utilizing the MOVEit Transfer software.

According to information provided to Milliman by PBI, on or around May 31, 2023, Progress Software disclosed for the first time that its MOVEit Transfer software contained a previously unknown, “zero-day” vulnerability that could be exploited by an unauthorized actor (CVE-2023-34362). PBI also disclosed that it launched an investigation into the nature and scope of the MOVEit vulnerability’s impact to PBI’s systems. According to PBI, its investigation determined that an unauthorized third party accessed one of PBI’s MOVEit Transfer servers on May 29, 2023, and May 30, 2023, and downloaded data. PBI explained it then conducted a manual review of its data to confirm the identities of individuals potentially affected by this event. PBI completed that review on July 21, 2023, and confirmed to Milliman at that time that the personal information of certain consumers of Milliman’s clients were affected and Milliman, following reconciliation of the data, was able to recently inform its clients of the scope of individuals whose information may have been affected.

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The Milliman clients whose consumer data was affected by the incident include those companies listed in the attached Appendix A.

PBI has advised us that it immediately took steps to patch the vulnerability in its MOVEit Transfer software, and PBI is reviewing and enhancing its information security policies and procedures.

Milliman has stopped transferring data to PBI pending further evaluation of PBI's information security practices. Milliman is also evaluating potential vendor management and security enhancements.

Together with PBI, Milliman has determined that the incident involved the personal information of 160 Maine residents. While the data elements varied by individual, the elements were limited to names, social security numbers, dates of birth, and mailing addresses. PBI is providing written notification to those individuals on behalf of Milliman and its clients identified herein, which includes an offer for 24 months of cost-free credit monitoring. This notification will be sent to the impacted Maine residents via regular mail starting on August 14, 2023. A sample copy of that individual notice is attached for your review.

Please feel free to contact me with any questions at (716) 898-2102 or dgreene@octillolaw.com.

Sincerely,

OCTILLO

A handwritten signature in black ink, appearing to read 'D. Greene', with a long horizontal flourish extending to the right.

Daniel P. Greene, Esq.

Certified Information Privacy Professional, United States (CIPP/US)

Certified Information Privacy Professional, Europe (CIPP/E)

Encl.

APPENDIX A
Milliman Impacted Client List

Acuity Brands Lighting, Inc.
AdventHealth
AECOM
Aflac Incorporated
AGFA Corporation
Albemarle Corporation
Allen & Company LLC
Alliance Beverage Distributing Co.
Alpha Metallurgical Resources
Altec, Inc.
Amentum
American Cancer Society
American Society of Composers, Authors and Publishers
Amtrak
Antelope Valley Medical Center
Apple Bank for Savings
Aramco
Archdiocese of Galveston-Houston
Archdiocese of Portland in Oregon
Argo Group US, Inc.
Armstrong County Memorial Hospital
ASARCO, LLC
Atalco LLC
Atrium Health
Babcock Power Inc.
Baptist Health
Barton Group
Bi-State Development Agency of the Missouri-Illinois Metropolitan District
Blue Bird Corporation
Blythedale Children's Hospital
Board of Trustees of the Prosecuting Attorneys' and Circuit Attorneys' Retirement System
Boise Cascade Company
Bose Corporation
Brighthouse Financial
Brooklyn Bureau Of Community Service
Broward Health
California School Employees Association
Cal-Oak Products
Carl Zeiss, Inc.
Cascade Hardwoods
Case Western Reserve University
Casio America
Catholic Church Extension Society
Catholic Diocese of Fort Worth
CCX, Inc.
CEMEX, Inc.
CH2MHill BWXT West Valley, LLC
Chart Industries, Inc.
City of Oxnard
City of San Clemente
Clearwater Paper Corporation
Collins Pine
Columbian Mutual Life Insurance Company

Community Service Society of New York
Conagra Brands, Inc.
Concord Hospital - Laconia
Consumer Portfolio Services
Continental Divide Electric Cooperative
Cotter Corporation
CoxHealth
Credit Human Federal Credit Union
CRH Americas
Dallas Theological Seminary
Delta Health System
Dolese Bros. Co.
Donnelley Financial US, LLC
East Cambridge Savings Bank
Elliot Health System
Equitable Financial Life Insurance Company
Erste Group Bank AG New York Branch
Finch Paper LLC
First Financial Bancorp
Firstmark Credit Union
Fish & Richardson P.C.
Frontier Communications Parent, Inc.
Fulton County Medical Center
General Atomics and Affiliated Companies
Golden Rain Foundation of Walnut Creek
Good Samaritan Hospital Corvallis
Gorton's Inc.
Graco Inc.
Grand View Health
Gränges Americas Inc.
Guard Publishing Company
Hawai'i Pacific Health
Haworth Inc.
Helena Agri-Enterprises, LLC
Hopkes Logging Company
Hospital Central Services Cooperative, Inc.
IMT Insurance Company
Ingersoll Rand Industrials
Intercounty Electric Cooperative Association
J.R. Simplot Company
Japan Airlines International Co., Ltd.
Jewish Federation Council of Greater Los Angeles
Kaiser Permanente
Kayser-Roth Corporation
Kearney-National Inc.
Keeneland Association, Inc.
Kern Regional Center
King Ranch, Inc.
Kloekner Namasco Holding Corporation
Knights of Columbus
L.A. Philharmonic Association
Lenawee County
Lighthouse Guild International, Inc.
LSC Communications LLC
Lutheran Social Service of MN
Macy's Department Stores

Magellan Midstream Partners, LP
Maimonides Medical Center
Marshall Medical Center
Maxar
Medical Insurance Exchange of California
Memorial Health System
Merle Norman Cosmetics, Inc.
Merrill & Ring Inc.
Metropolitan Transit Authority of Harris County
Miller & Chevalier Chartered
Modesto Irrigation District
Motion Picture Association, Inc.
Motiva Enterprises LLC
MultiCare Health System
Munich American Reassurance Company
Municipal Employees Credit Union Of Baltimore, Inc.
Murphy Company
Nabors Industries
Narragansett Bay Commission
National Geographic Society
Noble Services Company LLC
North Dakota Farmers Union
North Shore Bank
Northeast Georgia Health System, Inc.
Northeast Medical Center Hospital
Northwest Fiber, LLC dba Ziplly Fiber
Novus International, Inc.
NY Daily News Enterprises, LLC
Office Depot OfficeMax
Olympus Corporation of the Americas
Optimus Steel, LLC
Packaging Corporation of America
Parkland Health and Hospital System
Pedernales Electric Cooperative, Inc.
PeoplesBank
Petroleum Club of Houston
Pioneer North America, Inc.
Piper Aircraft, Inc.
PNM Resources, Inc.
PotlatchDeltic Corporation
Providence Health & Services
Puget Sound Energy
Qualstar Credit Union
Rayonier Advanced Materials Inc.
Rayonier Inc.
Renasant Bank
Burger King Company, LLC
Ripley Entertainment, Inc.
Robinson Industries, Inc
Rockefeller Group
Royal Neighbors of America
R.R. Donnelley & Sons Company
RSG
Salado Isolation Mining Contractors, LLC
San Diego Union-Tribune
San Jacinto River Authority

SantaFe HealthCare, Inc. (AvMed, Inc.)
Savings Bank Of Danbury
SCO Family of Services
Sekisui America Corporation
Senior Operations LLC
Sheet Metal Workers Local No. 124
Simpson / Green Diamond
South Dakota Farmers Union
South Jersey Industries
Southern Minnesota Beet Sugar Cooperative
Southern New Hampshire Medical Center
Stimson Lumber Company
Sumitomo Mitsui Banking Corporation
Swanson Group
SWIFT
Symrise Inc.
Taylor Morrison, Inc.
Teck American
Tenet Healthcare
Texans Credit Union
Texas Scottish Rite Hospital for Children
The California Endowment
The New York Racing Association, Inc.
The Oklahoma Publishing Company
Thomaston Savings Bank
Thryv Holdings, Inc.
TidalHealth Nanticoke, Inc.
Tidewater Inc.
Titan International, Inc.
Town of Brookfield
Town of Greenwich
TriMas
Truman Medical Centers
UniSea, Inc
United Jewish Appeal-Federation of Jewish Philanthropies of NY Inc & Affiliated Agencies
University of Missouri System
Utah Transit Authority
Vanderbilt Minerals, LLC
Vigilant
Vigor Industrial
Virginia Mason Medical Center
Vizient, Inc.
Volunteer Energy Cooperative
Volunteers of America
Walton Electric Membership Corporation
Washington Mills Tonawanda, Inc.
West Georgia Health System
Windstream Services, LLC
Woodward, Inc.
WorldVision, Inc.
XL America, Inc.
Yakima Valley Medical
Yamhill Log Scaling & Grading