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January 29, 2026

VIA ONLINE SUBMISSION

Attorney General Nick Brown
Office of the Attorney General
Consumer Protection Division
1125 Washington Street SE
P.O. Box 40100
Olympia, WA 98504-0100
Tel: 206-464-6684

Re: Notice of Data Security Incident

Dear Attorney General Nick Brown:

Constangy, Brooks, Smith & Prophete, LLP, represents The Phia Group ("Phia") in conjunction with a data security incident discussed below. The Phia Group is an experienced provider of healthcare cost containment techniques designed to control costs located in Canton, Massachusetts. The purpose of this letter is to notify you of the incident in accordance with Washington's data breach notification statute, Wash. Rev. Code §§ 19.255.005 – 040.

1. Nature of the Security Incident

On or about December 1, 2025, Phia determined that personal information belonging to its clients may have been involved in a data security incident we experienced. The incident began on July 9, 2024, when Phia discovered suspicious activity that temporarily disrupted the operability of its computer network. Phia promptly took steps to secure the environment and began an investigation to determine the nature and scope of the issue. Phia also began working to restore impacted systems as quickly as possible and engaged digital forensic specialists to conduct an investigation into what happened and whether personal information was accessed or acquired without authorization. The investigation determined that some data may have been acquired between July 8, 2024 and July 9, 2024. Phia then began a comprehensive and thorough review of the data potentially involved to identify what personal information may have been impacted and to whom it belonged.

Phia worked diligently to identify the data owners associated with the data that may have been involved in the incident. This was a complicated process that was completed on or about December

1, 2025. Phia sent letters to the respective data owners on December 4, 2025, providing them with information about how to access to their list of individuals whose data was identified in the investigation. Phia is sending individual notifications on behalf of data owners who opt in to Phia's notification process. Phia will update this notice as additional residents are notified, if any.

Please note that we have no evidence of fraudulent misuse, or attempted misuse, of the potentially impacted information.

2. Number of Residents Affected

The incident involved personal information for approximately 2,802 Washington residents. The personal information involved in the incident varies by individual, but may include the following for affected Washington residents: Clinical Information, Date of Birth, Doctor's Name, Driver License or State ID Number, Health Insurance Account Member Number, Health Insurance Group Number, Medical Diagnosis Information, Medical Record Number (MRN), Medical Treatment/Procedure Information, Medicare Number, Patient Account Number (PAN), Social Security Number, and Treatment Location.

3. Notification to Affected Individuals

On January 28 and 29, 2026, Phia notified approximately 2,802 Washington residents within the potentially affected population, via USPS First-Class Mail on behalf of the data owners on the attached list. The notification letter provides resources and steps individuals can take to help protect their information. The notification letter also offers individuals with a social security number, driver's license number or financial account number potentially involved, the opportunity to enroll in complimentary identity protection services including 12 months of credit monitoring and fully managed identity theft recovery services. A sample notification letter is enclosed.

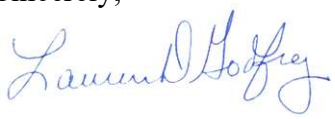
4. Steps Taken Relating to the Incident

Upon discovering this incident, in addition to taking the steps described above, Phia took steps to learn more about what happened and what information could have been affected. Phia has established a toll-free call center through Kroll to answer questions about the incident and address related concerns. Finally, Phia notified the potentially affected individuals and provided them with steps they can take to protect their personal information.

5. Contact Information

If you have any questions or need additional information, please do not hesitate to contact me.

Sincerely,



Lauren D. Godfrey
Partner, Constangy Cyber Team

Encl.: Sample Notification Letter
Data Owner List

THE PHIA GROUP

EMPOWERING PLANS

<<Date>> (Format: Month Day, Year)

<<first_name>> <<middle_name>> <<last_name>> <<suffix>>
<<address_1>>
<<address_2>>
<<city>>, <<state_province>> <<postal_code>>
<<country>>

<<<b2b_text_1 (Re: Notice of Data [Breach / Security Incident])>>

Dear <<first_name>> <<last_name>>:

The Phia Group, LLC ("The Phia Group") is writing to notify you of a data security incident which may have affected the privacy of your information. The Phia Group works with health benefit plans and their third-party administrators, and is an experienced provider of healthcare cost containment techniques designed to control healthcare and benefit plan costs. We held limited information related to you due to our relationship with <<b2b_text_2 (Client)>>. Phia takes the privacy and security of information in its possession very seriously and sincerely apologizes for any inconvenience this incident may cause. Please read this letter carefully as it contains information regarding the incident and information about steps that you can take to help protect your information.

What Happened? Recently, we learned that some of your personal information may have been involved in a data security incident we experienced. The incident began on July 9, 2024, when we discovered suspicious activity that temporarily disrupted the operability of our computer network. We promptly took steps to secure the environment and began an investigation to determine the nature and scope of the issue. We also began working to restore impacted systems as quickly as possible, and engaged digital forensic specialists to conduct an investigation into what happened and whether personal information was accessed or acquired without authorization. The investigation determined that some data may have been acquired between July 8, 2024 and July 9, 2024. We then completed a comprehensive and thorough review of the data potentially involved to identify what personal information was impacted and to whom it belonged. We advised the applicable health benefit plan and/or the health plan's third party administrator that information regarding some of their plan participants was affected. We then coordinated with <<b2b_text_2 (Client)>> to issue this notification to you.

Please note that we have no evidence of fraudulent misuse, or attempted misuse, of the potentially impacted information.

What Information was Involved? The information that may have been affected in connection with this incident includes your name as well as <<b2b_text_3 (Data Elements)>><<b2b_text_4 (Data Elements cont.)>>.

What Are We Doing? As soon as we discovered the incident, we took the steps discussed above. In addition, we reported the incident to law enforcement. To reduce the likelihood of a similar incident occurring in the future, we implemented additional measures to enhance the security of the network environment.

We are also providing you with access to <<Monitoring Term Length (Months)>> months of credit monitoring and fully managed identity theft recovery services through Kroll. You have until <<b2b_text_6 (activation deadline)>> to activate the services offered at no charge to you.

What You Can Do. You can follow the recommendations included with this letter to protect your personal information. We recommend that you review current and past credit and debit card account statements for discrepancies or unusual activity. If you see anything that you do not understand or that looks suspicious, or if you suspect that any fraudulent transactions have taken place, you should call the bank that issued the credit or debit card immediately.

You can also activate the complementary services offered to you through Kroll by following the instructions below.

Visit **https://enroll.krollmonitoring.com** to activate and take advantage of your identity monitoring services.

You have until <<b2b_text_6 (activation deadline)>> to activate your identity monitoring services.

Membership Number: **<<Membership Number s_n>>**

For more information about Kroll and your Identity Monitoring services, you can visit info.krollmonitoring.com.

Additional information describing your services is included with this letter.

For More Information: If you have questions about this letter or need assistance, please do not hesitate to reach out to our designated call center at Kroll at 1-866-408-2595 Monday through Friday from 9:00 am to 6:30 pm Eastern Time, excluding holidays and they will be happy to provide you with additional information.

We take your trust in us and this matter very seriously. The security and privacy of patient data is among our highest priorities. Please accept our apologies for any concern or inconvenience this may cause you.

Sincerely,

The Phia Group, LLC

PO Box 313
Canton, MA 02021

Steps You Can Take to Help 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 (the "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 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
1-833-799-5355
www.transunion.com/get-credit-report

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 www.annualcreditreport.com. For TransUnion: www.transunion.com/fraud-alerts.

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. For TransUnion: www.transunion.com/credit-freeze.

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
877-438-4338

Maryland Attorney General
200 St. Paul Place
Baltimore, MD 21202
www.marylandattorneygeneral.gov/Pages/CPD
888-743-0023

Oregon Attorney General
1162 Court St., NE
Salem, OR 97301
www.doj.state.or.us/consumer-protection
877-877-9392

California Attorney General
1300 I Street
Sacramento, CA 95814
www.oag.ca.gov/privacy
800-952-5225

New York Attorney General
The Capitol
Albany, NY 12224
800-771-7755
ag.ny.gov

Rhode Island Attorney General
150 South Main Street
Providence, RI 02903
www.riag.ri.gov
401-274-4400

Iowa Attorney General
1305 E. Walnut Street
Des Moines, Iowa 50319
www.iowaattorneygeneral.gov
888-777-4590

NY Bureau of Internet and Technology
28 Liberty Street
New York, NY 10005
www.dos.ny.gov/consumerprotection/
212.416.8433

Washington D.C. Attorney General
400 S 6th Street, NW
Washington, DC 20001
oag.dc.gov/consumer-protection
202-442-9828

Kentucky Attorney General
700 Capitol Avenue, Suite 118
Frankfort, Kentucky 40601
www.ag.ky.gov
502-696-5300

NC Attorney General
9001 Mail Service Center
Raleigh, NC 27699
ncdoj.gov/protectingconsumers/
877-566-7226

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 www.consumer.ftc.gov/sites/default/files/articles/pdf/pdf-0096-fair-credit-reporting-act.pdf

KROLL

TAKE ADVANTAGE OF YOUR IDENTITY MONITORING SERVICES

You have been provided with access to the following services from Kroll:

Single Bureau Credit Monitoring

You will receive alerts when there are changes to your credit data, for instance, when a new line of credit is applied for in your name. If you do not recognize the activity, you will have the option to call a Kroll fraud specialist, who will be able to help you determine if it is an indicator of identity theft.

Fraud Consultation

You have unlimited access to consultation with a Kroll fraud specialist. Support includes showing you the most effective ways to protect your identity, explaining your rights and protections under the law, assistance with fraud alerts, and interpreting how personal information is accessed and used, including investigating suspicious activity that could be tied to an identity theft event.

Identity Theft Restoration

If you become a victim of identity theft, an experienced Kroll licensed investigator will work on your behalf to resolve related issues. You will have access to a dedicated investigator who understands your issues and can do most of the work for you. Your investigator will be able to dig deep to uncover the scope of the identity theft and then work to resolve it.

Kroll's activation website is only compatible with the current version or one version earlier of Chrome, Firefox, Safari and Edge.

To receive credit services, you must be over the age of 18 and have established credit in the U.S., have a Social Security number in your name, and have a U.S. residential address associated with your credit file.