

Dominic A. Paluzzi
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February 7, 2022

VIA U.S. MAIL

Brian E. Frosh
Office of the Maryland Attorney General
Attn: Security Breach Notification
200 St. Paul Place
Baltimore, MD 21202

Re: Caulipower, LLC – Incident Notification

Dear Mr. Frosh:



McDonald Hopkins PLC represents Caulipower, LLC (“Caulipower”). I am writing to provide notification of an incident that may affect the security of personal information of one (1) Maryland resident. Caulipower’s investigation is ongoing, and this notification will be supplemented with any new or significant facts or findings subsequent to this submission, if any. By providing this notice, Caulipower does not waive any rights or defenses regarding the applicability of Maryland law or personal jurisdiction.

Caulipower recently learned that an unauthorized individual obtained access to a limited number of employee email accounts between July 11, 2021 and July 19, 2021. Upon learning of this issue, Caulipower immediately commenced a prompt and thorough investigation. As part of this investigation, Caulipower has been working very closely with external cybersecurity professionals experienced in handling these types of incidents. Caulipower devoted considerable time and effort to determine what information was contained in the affected email accounts. Based on its comprehensive investigation and manual document review, Caulipower discovered on January 12, 2022 that the compromised email accounts contained a limited amount of personal information, including the affected resident’s full name and Social Security number.

At the time of this notification, Caulipower is not aware of any reports of identity theft or fraud arising out of this incident. Nevertheless, out of an abundance of caution, Caulipower wanted to inform you (and the affected resident) of the incident and to explain the steps that it is taking to help safeguard the affected resident against identity fraud. Caulipower is providing the affected resident with written notification of this incident commencing on or about February 8, 2022 in substantially the same form as the letter attached hereto. Caulipower is offering the affected resident a complimentary one-year membership with a credit monitoring service. Caulipower will advise the affected resident to always remain vigilant in reviewing financial account statements for fraudulent or irregular activity on a regular basis. Caulipower will advise the affected resident about the process for placing a fraud alert and/or security freeze on their credit files and obtaining free credit reports. The affected resident is also being provided with the

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contact information for the consumer reporting agencies, the Maryland Attorney General, and the Federal Trade Commission.

At Caulipower, protecting the privacy of personal information is a top priority. Caulipower is committed to maintaining the privacy of personal information in its possession and has taken many precautions to safeguard it. Caulipower continually evaluates and modifies its practices to enhance the security and privacy of the personal information it maintains.

Should you have any questions regarding this notification, please contact me at (248) 220-1356 or dpaluzzi@mcdonaldhopkins.com. Thank you for your cooperation.

Very truly yours,



Dominic A. Paluzzi

DAP/bg
Enclosure

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Dear [REDACTED]:

We are writing with important information regarding a recent security incident. The privacy and security of the personal information we maintain is of the utmost importance to Caulipower, LLC ("Caulipower"). As such, we wanted to provide you with information about the incident, explain the services we are making available to you, and let you know that we continue to take significant measures to protect your information.

What Happened?

We recently learned that an unauthorized individual may have obtained access to a limited number of Caulipower employee email accounts.

What We Are Doing.

Upon learning of the issue, we immediately commenced a prompt and thorough investigation. As part of our investigation, we have been working very closely with external cybersecurity professionals experienced in handling these types of incidents. After an extensive forensic investigation and manual document review, we discovered on January 12, 2022 that the impacted email accounts that may have been accessed between July 11, 2021 and July 19, 2021 contained some of your personal information. We have no evidence that any of the information has been misused. Nevertheless, out of an abundance of caution, we want to make you aware of the incident.

What Information Was Involved?

The impacted email accounts contained some of your personal information, specifically your [REDACTED].

What You Can Do.

To protect you from potential misuse of your information, we are offering a complimentary one-year membership of Experian IdentityWorksSM Credit 3B. This product helps detect possible misuse of your personal information and provides you with identity protection services focused on immediate identification and resolution of identity theft. IdentityWorks Credit 3B is completely free to you and enrolling in this program will not hurt your credit score. For more information on identity theft prevention and IdentityWorks Credit 3B, including instructions on how to activate your complimentary one-year membership, please see the additional information provided in this letter.

This letter also provides other precautionary measures you can take to protect your personal information, including placing a fraud alert and/or security freeze on your credit files, and/or obtaining a free credit report. Additionally, you should always remain vigilant in reviewing your account statements for fraudulent or irregular activity on a regular basis. To the extent it is helpful, we have also provided information on protecting your medical information on the following pages.

For More Information.

Please accept our apologies that this incident occurred. We are committed to maintaining the privacy of personal information in our possession and have taken many precautions to safeguard it. We continually evaluate and modify our practices and internal controls to enhance the security and privacy of your personal information. Since this incident, we have reset passwords, implemented a robust endpoint detection response tool, and worked with an external cybersecurity firm to further harden our network security.

If you have any further questions regarding this incident, please call our dedicated and confidential toll-free response line that we have set up to respond to questions at [REDACTED]. This response line is staffed with professionals familiar with this incident and knowledgeable on what you can do to protect against misuse of your information. The response line is available [REDACTED].

Sincerely,

[REDACTED]

1. The first step in the process of identifying a problem is to recognize that a problem exists. This is often done by comparing current performance with a desired state or goal. If there is a significant difference, a problem is identified.

1. The first step in the process is to identify the problem or issue that needs to be addressed. This involves gathering information and understanding the context of the problem.

[illegible]

– OTHER IMPORTANT INFORMATION –

1. Activate IdentityWorks Credit 3B Now in Three Easy Steps

1. ENROLL by: [REDACTED] (Your code will not work after this date.)
2. VISIT the Experian IdentityWorks website to enroll: [REDACTED]
3. PROVIDE the Activation Code: [REDACTED]

If you have questions about the product, need assistance with identity restoration or would like an alternative to enrolling in Experian IdentityWorks online, please contact Experian's customer care team at [REDACTED]. Be prepared to provide engagement number [REDACTED] as proof of eligibility for the identity restoration services by Experian.

ADDITIONAL DETAILS REGARDING YOUR 12-MONTH EXPERIAN IDENTITYWORKS CREDIT 3B MEMBERSHIP:

A credit card is **not** required for enrollment in Experian IdentityWorks Credit 3B.

You can contact Experian **immediately without needing to enroll in the product** regarding any fraud issues. Identity Restoration specialists are available to help you address credit and non-credit related fraud.

Once you enroll in Experian IdentityWorks, you will have access to the following additional features:

- **Experian credit report at signup:** See what information is associated with your credit file. Daily credit reports are available for online members only.*
- **Credit Monitoring:** Actively monitors Experian, Equifax and Transunion files for indicators of fraud.
- **Experian IdentityWorks ExtendCARE™:** You receive the same high-level of Identity Restoration support even after your Experian IdentityWorks membership has expired.
- **\$1 Million Identity Theft Insurance**:** Provides coverage for certain costs and unauthorized electronic fund transfers.

**Activate your membership today at [REDACTED]
or call [REDACTED] to register with the activation code above.**

What you can do to protect your information: There are additional actions you can consider taking to reduce the chances of identity theft or fraud on your account(s). Please refer to www.ExperianIDWorks.com/restoration for this information. If you have any questions about IdentityWorks, need help understanding something on your credit report or suspect that an item on your credit report may be fraudulent, please contact Experian's customer care team at [REDACTED].

* Offline members will be eligible to call for additional reports quarterly after enrolling.

** Identity theft insurance is underwritten by insurance company subsidiaries or affiliates of American International Group, Inc. (AIG). The description herein is a summary and intended for informational purposes only and does not include all terms, conditions and exclusions of the policies described. Please refer to the actual policies for terms, conditions, and exclusions of coverage. Coverage may not be available in all jurisdictions.

2. Placing a Fraud Alert on Your Credit File.

Whether or not you choose to use the complimentary 12-month credit monitoring services, we recommend that you place an initial 1-year "fraud alert" on your credit files, at no charge. A fraud alert tells creditors to contact you personally before they open any new accounts. To place a fraud alert, call any one of the three major credit bureaus at the numbers listed below. As soon as one credit bureau confirms your fraud alert, they will notify the others.

Equifax
P.O. Box 105788

Experian
P.O. Box 9554

TransUnion LLC
P.O. Box 6790

4. The fourth part of the document discusses the implications of the findings and suggests areas for further research. It highlights the need for continued investigation into the underlying mechanisms of the observed phenomena.

5. The fifth part of the document provides a conclusion and summarizes the key points of the study. It reiterates the importance of the findings and the need for continued research in this field.

6. The sixth part of the document includes a list of references and a bibliography. It cites the various sources of information used in the study and provides a comprehensive overview of the relevant literature.

7. The seventh part of the document contains a list of appendices and supplementary materials. These include additional data, figures, and tables that provide further detail and support for the findings of the study.

8. The eighth part of the document includes a list of acknowledgments and a list of authors. It recognizes the contributions of the individuals and organizations that supported the research and provides contact information for the authors.

9. The ninth part of the document contains a list of footnotes and a list of references. It provides additional information and clarifications for the text and cites the sources of the references.

10. The tenth part of the document includes a list of appendices and supplementary materials. These include additional data, figures, and tables that provide further detail and support for the findings of the study.

Atlanta, GA 30348
<https://www.equifax.com/personal/credit-report-services/credit-fraud-alerts/>
(800) 525-6285

Allen, TX 75013
<https://www.experian.com/fraud/center.html>
(888) 397-3742

Fullerton, CA 92834
<https://www.transunion.com/fraud-alerts>
(800) 680-7289

3. **Placing a Security Freeze on Your Credit File.**

If you are very concerned about becoming a victim of fraud or identity theft, you may request a "security freeze" be placed on your credit file, *at no charge*. A security freeze prohibits, with certain specific exceptions, the consumer reporting agencies from releasing your credit report or any information from it without your express authorization. You may place a security freeze on your credit report by sending a request in writing or by mail, to all three nationwide credit reporting companies. To find out more about how to place a security freeze, you can use the following contact information:

Equifax Security Freeze
P.O. Box 105788
Atlanta, GA 30348
<https://www.equifax.com/personal/credit-report-services/credit-freeze/>
1-800-349-9960

Experian Security Freeze
P.O. Box 9554
Allen, TX 75013
<http://experian.com/freeze>
1-888-397-3742

TransUnion Security Freeze
P.O. Box 2000
Chester, PA 19016
<http://www.transunion.com/credit-freeze>
1-888-909-8872

In order to place the security freeze, you'll need to supply your name, address, date of birth, Social Security number and other personal information. After receiving your freeze request, each credit monitoring company will send you a confirmation letter containing a unique PIN (personal identification number) or password. Keep the PIN or password in a safe place. You will need it if you choose to lift the freeze.

If your personal information has been used to file a false tax return, to open an account or to attempt to open an account in your name or to commit fraud or other crimes against you, you may file a police report in the City in which you currently reside.

If you do place a security freeze *prior* to enrolling in the credit monitoring service as described above, you will need to remove the freeze in order to sign up for the credit monitoring service. After you sign up for the credit monitoring service, you may refreeze your credit file.

4. **Obtaining a Free Credit Report.**

Under federal law, you are entitled to one free credit report every 12 months from each of the above three major nationwide credit reporting companies. Call 1-877-322-8228 or request your free credit reports online at www.annualcreditreport.com. Once you receive your credit reports, review them for discrepancies. Identify any accounts you did not open or inquiries from creditors that you did not authorize. Verify all information is correct. If you have questions or notice incorrect information, contact the credit reporting company.

5. **Additional Helpful Resources.**

Even if you do not find any suspicious activity on your initial credit reports, the Federal Trade Commission (FTC) recommends that you check your credit reports periodically. Checking your credit report periodically can help you spot problems and address them quickly.

If you find suspicious activity on your credit reports or have reason to believe your information is being misused, call your local law enforcement agency and file a police report. Be sure to obtain a copy of the police report, as many creditors will want the information it contains to absolve you of the fraudulent debts. You may also file a complaint with the FTC by contacting them on the web at www.ftc.gov/idtheft, by phone at 1-877-IDTHEFT (1-877-438-4338), or by mail at Federal Trade Commission, Consumer Response Center, 600 Pennsylvania Avenue, NW, Washington, DC 20580. Your complaint will be added to the FTC's Identity Theft Data Clearinghouse, where it will be accessible to law enforcement for their investigations. In addition, you may obtain information from the FTC about fraud alerts and security freezes.

If this notice letter states that your financial account information and/or credit or debit card information was impacted, we recommend that you contact your financial institution to inquire about steps to take to protect your account, including whether you should close your account or obtain a new account number.

Iowa Residents: You may contact law enforcement or the Iowa Attorney General's Office to report suspected incidents of identity Theft: Office of the Attorney General of Iowa, Consumer Protection Division, Hoover State Office Building, 1305 East Walnut Street, Des Moines, IA 50319, www.iowaattorneygeneral.gov, Telephone: (515) 281-5164.

Maryland Residents: You may obtain information about avoiding identity theft from the Maryland Attorney General's Office: Office of the Attorney General of Maryland, Consumer Protection Division, 200 St. Paul Place, Baltimore, MD 21202, www.oag.state.md.us/Consumer, Telephone: 1-888-743-0023.

New York Residents: You may obtain information about preventing identity theft from the New York Attorney General's Office: Office of the Attorney General, The Capitol, Albany, NY 12224-0341; <https://ag.ny.gov/consumer-frauds-bureau/identity-theft>; Telephone: 800-771-7755.

North Carolina Residents: You may obtain information about preventing identity theft from the North Carolina Attorney General's Office: Office of the Attorney General of North Carolina, Department of Justice, 9001 Mail Service Center, Raleigh, NC 27699-9001, www.ncdoj.gov/, Telephone: 877-566-7226.

6. Protecting Your Medical Information.

If this notice letter indicates that your medical information was impacted, we have no information to date indicating that your medical information involved in this incident was or will be used for any unintended purposes. As a general matter, however, the following practices can help to protect you from medical identity theft.

- Only share your health insurance cards with your health care providers and other family members who are covered under your insurance plan or who help you with your medical care.
- Review your "explanation of benefits statement" which you receive from your health insurance company. Follow up with your insurance company or care provider for any items you do not recognize. If necessary, contact the care provider on the explanation of benefits statement and ask for copies of medical records from the date of the potential access (noted above) to current date.
- Ask your insurance company for a current year-to-date report of all services paid for you as a beneficiary. Follow up with your insurance company or the care provider for any items you do not recognize.