

BakerHostetler

January 21, 2022

VIA E-MAIL (IDTHEFT@OAG.STATE.MD.US)

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

Baker&Hostetler LLP

11601 Wilshire Boulevard
Suite 1400
Los Angeles, CA 90025-0509
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Re: Incident Notification

Dear Attorney General Frosh:

We are writing on behalf of our client, Woodbury Financial Services, Inc. (“Woodbury”) to notify your office of a security incident involving one (1) Maryland resident.

Woodbury experienced a data incident involving unauthorized access to an employee’s email account. We immediately took steps to secure our email environment and began an investigation. An outside cybersecurity firm was engaged to assist with the investigation and determined that the unauthorized access was limited in scope, lasting only an hour. However, we were not able to determine which emails or attachments, if any, were viewed by the unauthorized party. Therefore, we conducted a thorough review of the contents of the affected email accounts to determine the specific individuals whose information was contained within the emails and attachments. While Woodbury has no evidence that any information was stolen or misused, the affected computer and email account may have contained personal information, including names, social security numbers, financial account numbers, and driver’s license numbers.

On September 29, 2021, the investigation determined an unauthorized person accessed files and folders that contained personal information. Woodbury then worked to identify the individuals whose information was accessed as a result of the incident.

On January 19, 2022, Woodbury started mailing notification letters to the one (1) Maryland resident via U.S. mail in accordance with Md. Code Ann., Com. Law § 14-3504.¹ A

¹ This report is not, and does not constitute, a waiver of Woodbury’s objection that Maryland lacks personal jurisdiction over the company related to this matter.

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copy of the notification letter is enclosed. Woodbury is providing a telephone number for potentially affected individuals to call with any questions they may have about the incident. Woodbury is offering notified individuals complimentary one-year memberships to identity monitoring services.

To help prevent this type of incident from happening again, Woodbury is implementing additional security safeguards and further enhancing its already exiting security protocols.

Please do not hesitate to contact me if you have any questions regarding this matter.

Sincerely,

A handwritten signature in black ink that reads "M. Scott Koller". The signature is written in a cursive, flowing style.

M. Scott Koller
Partner

Enclosure

Woodbury Financial Services, Inc.

10300 SW Greenburg Rd. Suite 570
Portland, OR 97223



To Enroll, Please Call:

1-800-939-4170

Or Visit:

<https://app.idx.us/account-creation/protect>

Enrollment Code: <<XXXXXXXXXX>>

<<First Name>> <<Last Name>>

<<Address1>> <<Address2>>

<<City>>, <<State>> <<Zip>>

January 19, 2022

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

We are writing to inform you of an incident that may have involved some of your information. This notice explains the incident, measures we have taken, and provides additional steps you may consider taking.

What Happened?

On July 9, 2021, we learned that unauthorized messages were being sent from an employee's email account. We immediately took steps to secure our email environment and began an investigation. An outside cybersecurity firm was engaged to assist with the investigation and determined that the unauthorized access was limited in scope, lasting only an hour. However, we were not able to determine which emails or attachments, if any, were viewed by the unauthorized party. Therefore, we conducted a thorough review of the contents of the affected email accounts to determine the specific individuals whose information was contained within the emails and attachments.

What Information Was Involved?

On September 29, 2021, our investigation determined that an email or attachment in the account included some of your information, including your <<Variable Text>>.

What We Are Doing.

We assure you that we take this incident very seriously. While we have no indication that your information was actually viewed by the unauthorized person, or that it was misused, we wanted to notify you of this incident. To help prevent something like this from happening in the future, we have implemented additional measures to enhance our existing security protocols.

What You Can Do.

We encourage you to remain vigilant by regularly reviewing your financial accounts and credit reports for any unauthorized activity over the next twelve to twenty-four months. If you see charges or activity you did not authorize, please contact your financial professional immediately. Out of an abundance of caution, we are also offering you a complimentary one-year membership in credit monitoring services through IDX. These identity protection services include: one year of credit and CyberScan monitoring, a \$1,000,000 insurance reimbursement policy, and fully managed identity theft recovery services. These services are completely free to you and enrolling in this program will not hurt your credit score. We encourage you to contact IDX with any questions and to enroll in free identity protection services by calling 1-800-939-4170 or going to <https://app.idx.us/account-creation/protect> and using the Enrollment Code provided above. IDX representatives are available Monday through Friday, between 9:00 AM and 9:00 PM, Eastern time. Please note the deadline to enroll is April 19, 2022.

For additional steps you can take in response to the incident, please see the additional information provided in this letter.

For More Information.

We regret this incident occurred and apologize for any inconvenience. If you have any questions, please call 717-564-6400, Monday through Friday, 9:00 a.m. to 5:00 p.m. Eastern Time.

Sincerely,

Stephen A. Marrazzo

Investment Advisor Representative



Recommended Steps to help Protect your Information

- 1. Website and Enrollment.** Go to <https://app.idx.us/account-creation/protect> and follow the instructions for enrollment using your Enrollment Code provided at the top of the letter.
- 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 1-800-939-4170 to gain additional information about this event and speak with knowledgeable representatives about the appropriate steps to take to protect your credit identity.
- 4. Review your credit reports.** We recommend that you remain vigilant by reviewing account statements and monitoring credit reports. Under federal law, you also are entitled every 12 months to one free copy of your credit report from each of the three major credit reporting companies. To obtain a free annual credit report, go to www.annualcreditreport.com or call 1-877-322-8228. You may wish to stagger your requests so that you receive a free report by one of the three credit bureaus every four months.

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 as a consequence of this incident, you will be assigned an ID Care Specialist who will work on your behalf to identify, stop and reverse the damage quickly.

ADDITIONAL STEPS YOU CAN TAKE

We remind you it is always advisable to be vigilant for incidents of fraud or identity theft by reviewing your account statements and free credit reports for any unauthorized activity over the next 12 to 24 months. You may obtain a copy of your credit report, free of charge, once every 12 months from each of the three nationwide credit reporting companies. To order your annual free credit report, please visit www.annualcreditreport.com or call toll free at 1-877-322-8228. Contact information for the three nationwide credit reporting companies is as follows:

- *Equifax*, PO Box 740241, Atlanta, GA 30374, www.equifax.com, 1-800-685-1111
- *Experian*, PO Box 2002, Allen, TX 75013, www.experian.com, 1-888-397-3742
- *TransUnion*, PO Box 2000, Chester, PA 19016, www.transunion.com, 1-800-916-8800

If you believe you are the victim of identity theft or have reason to believe your personal information has been misused, you should immediately contact the Federal Trade Commission and/or the Attorney General's office in your state. You can obtain information from these sources about steps an individual can take to avoid identity theft as well as information about fraud alerts and security freezes. You should also contact your local law enforcement authorities and file a police report. Obtain a copy of the police report in case you are asked to provide copies to creditors to correct your records. Contact information for the Federal Trade Commission is as follows:

- *Federal Trade Commission*, Consumer Response Center, 600 Pennsylvania Avenue NW, Washington, DC 20580, 1-877-IDTHEFT (438-4338), www.ftc.gov/idtheft

Fraud Alerts and Credit or Security Freezes:

Fraud Alerts: There are two types of general fraud alerts you can place on your credit report to put your creditors on notice that you may be a victim of fraud—an initial alert and an extended alert. You may ask that an initial fraud alert be placed on your credit report if you suspect you have been, or are about to be, a victim of identity theft. An initial fraud alert stays on your credit report for one year. You may have an extended alert placed on your credit report if you have already been a victim of identity theft with the appropriate documentary proof. An extended fraud alert stays on your credit report for seven years.

To place a fraud alert on your credit reports, contact one of the nationwide credit bureaus. A fraud alert is free. The credit bureau you contact must tell the other two, and all three will place an alert on their versions of your report.

For those in the military who want to protect their credit while deployed, an Active Duty Military Fraud Alert lasts for one year and can be renewed for the length of your deployment. The credit bureaus will also take you off their marketing lists for pre-screened credit card offers for two years, unless you ask them not to.

Credit or Security Freezes: You have the right to put a credit freeze, also known as a security freeze, on your credit file, free of charge, which makes it more difficult for identity thieves to open new accounts in your name. That's because most creditors need to see your credit report before they approve a new account. If they can't see your report, they may not extend the credit.

How do I place a freeze on my credit reports? There is no fee to place or lift a security freeze. Unlike a fraud alert, you must separately place a security freeze on your credit file at each credit reporting company. For information and instructions to place a security freeze, contact each of the credit reporting agencies at the addresses below:

- **Experian Security Freeze**, PO Box 9554, Allen, TX 75013, www.experian.com
- **TransUnion Security Freeze**, PO Box 2000, Chester, PA 19016, www.transunion.com
- **Equifax Security Freeze**, PO Box 105788, Atlanta, GA 30348, www.equifax.com

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 bureau will provide you with 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.

How do I lift a freeze? A freeze remains in place until you ask the credit bureau to temporarily lift it or remove it altogether. If the request is made online or by phone, a credit bureau must lift a freeze within one hour. If the request is made by mail, then the bureau must lift the freeze no later than three business days after getting your request.

If you opt for a temporary lift because you are applying for credit or a job, and you can find out which credit bureau the business will contact for your file, you can save some time by lifting the freeze only at that particular credit bureau. Otherwise, you need to make the request with all three credit bureaus.

Woodbury Financial Services, Inc. is located at 5291 Devonshire Road, Harrisburg, PA 17112 and can be reached at (717) 564-6400.

Additional information for residents of the following states:

Maryland: You may contact and obtain information from your state attorney general at: *Maryland Attorney General's Office*, 200 St. Paul Place, Baltimore, MD 21202, 1-888-743-0023 / 1-410-576-6300, www.oag.state.md.us

North Carolina: You may contact and obtain information from your state attorney general at: *North Carolina Attorney General's Office*, 9001 Mail Service Centre, Raleigh, NC 27699, 1-919-716-6000 / 1-877-566-7226, www.ncdoj.gov.