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426 W. Lancaster Avenue, Suite 200
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January 19, 2022

VIA E-MAIL

Office of the Attorney General
Security Breach Notification
200 St. Paul Place, 25th Floor
Baltimore, MD 21202
E-mail: idtheft@oag.state.md.us

Re: Notice of Data Event

Dear Sir or Madam:

We represent Northwood Club ("Northwood Club") located at 6524 Alpha Road, Dallas, TX 75240, and are writing to notify your office of an event that may affect the security of some personal information relating to approximately two (2) Maryland residents. The investigation into this matter is ongoing, and this notice will be supplemented with any new significant facts learned subsequent to its submission. By providing this notice, Northwood Club does not waive any rights or defenses regarding the applicability of Maryland law, the applicability of the Maryland data event notification statute, or personal jurisdiction.

Nature of the Data Event

On or about September 13, 2021, Northwood Club identified suspicious activity its email environment. Following this, Northwood Club promptly launched an investigation, with the assistance of third-party computer forensic specialist, to assess the security of its systems and determine the nature and scope of this event. This investigation determined that an unauthorized individual accessed a single email account from September 11, 2021 to September 13, 2021. Northwood Club, with the assistance of a third-party specialist, then embarked on a comprehensive review of the email account in order to determine the full scope of information potentially impacted. On January 7, 2022, Northwood Club completed this comprehensive review.

The information that could have been subject to unauthorized access includes name, address, and Social Security number.

Notice to Maryland Residents

On or about January 19, 2022, Northwood Club began providing written notice of this event to potentially affected individuals, which includes approximately two (2) Maryland residents. Written notice is being provided in substantially the same form as the letter attached here as ***Exhibit A***.

Other Steps Taken and To Be Taken

Upon discovering the event, Northwood Club moved quickly to investigate and respond to the event, assess the security of Northwood Club systems, and notify potentially affected individuals. Northwood Club is also working to implement additional safeguards and training to its employees. Northwood Club is providing access to credit monitoring services for twelve (12) months, through Equifax, were legally required or in instances where an individual’s Social Security number was impacted.

Additionally, Northwood Club is providing impacted individuals with guidance on how to better protect against identity theft and fraud, including advising individuals to report any suspected incidents of identity theft or fraud to their credit card company and/or bank. Northwood Club is providing individuals with information on how to place a fraud alert and security freeze on one's credit file, information on protecting against tax fraud, the contact details for the national consumer reporting agencies, information on how to obtain a free credit report, a reminder to remain vigilant for incidents of fraud and identity theft by reviewing account statements and monitoring free credit reports, and encouragement to contact the Federal Trade Commission, their state Attorney General, and law enforcement to report attempted or actual identity theft and fraud. Northwood Club also notified other appropriate state regulators.

Contact Information

Should you have any questions regarding this notification or other aspects of the data security event, please contact us at (267) 930-4777.

Very truly yours,

Brian F. Fox of
MULLEN COUGHLIN LLC

BFF/jls
Enclosure

EXHIBIT A

Return Mail Processing Center
P.O. Box 6336
Portland, OR 97228-6336

<<Mail ID>>
<<Name 1>>
<<Name 2>>
<<Address 1>>
<<Address 2>>
<<Address 3>>
<<Address 4>>
<<Address 5>>
<<City>><<State>><<Zip>>
<<Country>>

<<Date>>

Notice of <<Variable Header>>

Dear <<Name 1>>:

Northwood Club writes to inform you of an incident that may affect the security of some of your information. This notice provides information about the incident, our response, and resources available to you to help protect your information from possible misuse, should you feel it necessary to do so.

What Happened? On September 13, 2021, Northwood Club became aware of suspicious activity in our email environment. We immediately launched an investigation to assess the security of our systems and determine the nature and scope of this incident. Our investigation determined that an unauthorized individual accessed a single email account from September 11, 2021 to September 13, 2021. Northwood Club then embarked on a comprehensive review of the email account in order to determine the full scope of information potentially impacted. On January 7, 2022, Northwood Club completed this comprehensive review and confirmed that information related to you could have potentially been impacted by this event.

What Information Was Involved? The information present in the affected email account includes your name and <<data elements>>. While we have no reason to believe that any identity theft or unauthorized use of the affected information has occurred, we are making you aware of this incident in an abundance of caution.

What We Are Doing. Data privacy and security are among our highest priorities, and we immediately commenced an investigation to confirm the nature and scope of this incident. Northwood Club is providing notice of this incident to potentially impacted individuals and pertinent state regulators. As part of Northwood Club's ongoing commitment to the security of information, policies and procedures are being reviewed and enhanced where possible, additional safeguards are being implemented, and workforce training is being conducted to reduce the likelihood of a similar event in the future.

As an added precaution, we are also offering you complimentary access to <<12/24>> months of credit monitoring and identity theft restoration services, through Equifax. You will need to enroll yourself in these services if you wish to do so, as we are not able to activate them on your behalf. Please review the instructions contained in the attached *Steps You Can Take to Help Protect Your Personal Information* for additional information on these services.

What You Can Do. We encourage you to remain vigilant against incidents of identity theft and fraud, to review your account statements, explanation of benefits, and credit reports for suspicious activity. You may also review the enclosed *Steps You Can Take to Help Protect Your Personal Information* for additional steps you may take and information on what you can do to better protect against the possibility of identity theft and fraud, should you feel it is appropriate to do so. We also encourage you to enroll in the complimentary credit monitoring services we are offering you.

For More Information. If you have questions about this letter, please call 855-604-1701 between the hours of 7:00 a.m. and 7:00 p.m., Mountain Time, Monday through Friday.

Sincerely,

Beth Greeson

Beth Greeson, Northwood Club

STEPS YOU CAN TAKE TO HELP PROTECT YOUR PERSONAL INFORMATION

Enroll in Credit Monitoring - Equifax Credit Watch™ Gold[1]

Key Features:

- Credit monitoring with email notifications of key changes to your Equifax credit report;
- Daily access to your Equifax credit report;
- WebScan notifications[2] when your personal information, such as Social Security number, credit/debit card or bank account numbers are found on fraudulent internet trading sites;
- Automatic fraud alerts[3] which encourages potential lenders to take extra steps to verify your identity before extending credit, plus blocked inquiry alerts and Equifax credit report lock;[4]
- Identity Restoration to help restore your identity should you become a victim of identity theft, and a dedicated Identity Restoration Specialist to work on your behalf; and
- Up to $1,000,000 of identity theft insurance coverage for certain out of pocket expenses resulting from identity theft.[5]

Enrollment Deadline: <<Enrollment Deadline>>

Enrollment Instructions:

- Go to www.equifax.com/activate
- Enter your unique Activation Code of <<Activation Code>> then click "Submit" and follow these 4 steps:

1. Register:
   - Complete the form with your contact information and click "Continue".
   - *Note, if you already have a myEquifax account, click the 'Sign in here' link under the "Let's get started" header. Once you have successfully signed in, you will skip to the Checkout Page in Step 4.*
2. Create Account:
   - Enter your email address, create a password, and accept the terms of use.
3. Verify Identity:
   - To enroll in your product, we will ask you to complete our identity verification process.
4. Checkout:
   - Upon successful verification of your identity, you will see the Checkout Page.
   - Click 'Sign Me Up' to finish enrolling.
   - *Note, the confirmation page shows your completed enrollment. You can click "View My Product" to access the product features.*

Monitor Your Accounts

Under U.S. law, a consumer is entitled to one free credit report annually from each of the three major credit reporting bureaus, Equifax, Experian, and TransUnion. To order your free credit report, visit www.annualcreditreport.com or call, toll-free, 1-877-322-8228. You may also directly contact the three major credit reporting bureaus listed below to request a free copy of your credit report.

Consumers have the right to place an initial or extended "fraud alert" on a credit file at no cost. An initial fraud alert is a 1-year alert that is placed on a consumer's credit file. Upon seeing a fraud alert display on a consumer's credit file, a business is required to take steps to verify the consumer's identity before extending new credit. If you are a victim of identity theft, you are entitled to an extended fraud alert, which is a fraud alert lasting seven years. Should you wish to place a fraud alert, please contact any one of the three major credit reporting bureaus listed below.

[1] You must be over age 18 with a credit file to take advantage of the product.

[2] WebScan searches for your Social Security Number, up to 5 passport numbers, up to 6 bank account numbers, up to 6 credit/debit card numbers, up to 6 email addresses, and up to 10 medical ID numbers. WebScan searches thousands of Internet sites where consumers' personal information is suspected of being bought and sold, and regularly adds new sites to the list of those it searches. However, the Internet addresses of these suspected Internet trading sites are not published and frequently change, so there is no guarantee that we are able to locate and search every possible Internet site where consumers' personal information is at risk of being traded.

[3] The Automatic Fraud Alert feature is made available to consumers by Equifax Information Services LLC and fulfilled on its behalf by Equifax Consumer Services LLC.

[4] Locking your Equifax credit report will prevent access to it by certain third parties. Locking your Equifax credit report will not prevent access to your credit report at any other credit reporting agency. Entities that may still have access to your Equifax credit report include: companies like Equifax Global Consumer Solutions, which provide you with access to your credit report or credit score, or monitor your credit report as part of a subscription or similar service; companies that provide you with a copy of your credit report or credit score, upon your request; federal, state and local government agencies and courts in certain circumstances; companies using the information in connection with the underwriting of insurance, or for employment, tenant or background screening purposes; companies that have a current account or relationship with you, and collection agencies acting on behalf of those whom you owe; companies that authenticate a consumer's identity for purposes other than granting credit, or for investigating or preventing actual or potential fraud; and companies that wish to make pre-approved offers of credit or insurance to you. To opt out of such pre-approved offers, visit www.optoutprescreen.com.

[5] The Identity Theft Insurance benefit is underwritten and administered by American Bankers Insurance Company of Florida, an Assurant company, under group or blanket policies issued to Equifax, Inc., or its respective affiliates for the benefit of its Members. Please refer to the actual policies for terms, conditions, and exclusions of coverage. Coverage may not be available in all jurisdictions.

As an alternative to a fraud alert, consumers have the right to place a "credit freeze" on a credit report, which will prohibit a credit bureau from releasing information in the credit report without the consumer's express authorization. The credit freeze is designed to prevent credit, loans, and services from being approved in your name without your consent. However, you should be aware that using a credit freeze to take control over who gets access to the personal and financial information in your credit report may delay, interfere with, or prohibit the timely approval of any subsequent request or application you make regarding a new loan, credit, mortgage, or any other account involving the extension of credit. Pursuant to federal law, you cannot be charged to place or lift a credit freeze on your credit report. To request a security freeze, you will need to provide the following information:

1. Full name (including middle initial as well as Jr., Sr., II, III, etc.);
2. Social Security number;
3. Date of birth;
4. Addresses for the prior two to five years;
5. Proof of current address, such as a current utility bill or telephone bill;
6. A legible photocopy of a government-issued identification card (state driver's license or ID card, etc.); and
7. A copy of either the police report, investigative report, or complaint to a law enforcement agency concerning identity theft if you are a victim of identity theft.

Should you wish to place a fraud alert or credit freeze, please contact the three major credit reporting bureaus listed below:

Equifax	**Experian**	**TransUnion**
https://www.equifax.com/personal/ credit-report-services/	https://www.experian.com/help/	https://www.transunion.com/credit-help
1-888-298-0045	1-888-397-3742	1-833-395-6938
Equifax Fraud Alert, P.O. Box 105069 Atlanta, GA 30348-5069	Experian Fraud Alert, P.O. Box 9554, Allen, TX 75013	TransUnion Fraud Alert, P.O. Box 2000, Chester, PA 19016
Equifax Credit Freeze, P.O. Box 105788 Atlanta, GA 30348-5788	Experian Credit Freeze, P.O. Box 9554, Allen, TX 75013	TransUnion Credit Freeze, P.O. Box 160, Woodlyn, PA 19094

Additional Information

You may further educate yourself regarding identity theft, fraud alerts, credit freezes, and the steps you can take to protect your personal information by contacting the consumer reporting bureaus, the Federal Trade Commission, or your state Attorney General. The Federal Trade Commission may be reached at: 600 Pennsylvania Avenue NW, Washington, DC 20580; www.identitytheft.gov; 1-877-ID-THEFT (1-877-438-4338); and TTY: 1-866-653-4261. The Federal Trade Commission also encourages those who discover that their information has been misused to file a complaint with them. You can obtain further information on how to file such a complaint by way of the contact information listed above. You have the right to file a police report if you ever experience identity theft or fraud. Please note that in order to file a report with law enforcement for identity theft, you will likely need to provide some proof that you have been a victim. Instances of known or suspected identity theft should also be reported to law enforcement and your state Attorney General. This notice has not been delayed by law enforcement.

For District of Columbia residents, the District of Columbia Attorney General may be contacted at: 400 6th Street, NW, Washington, DC 20001; 202-727-3400; and oag@dc.gov.

For Maryland residents, the Maryland Attorney General may be contacted at: 200 St. Paul Place, 16th Floor, Baltimore, MD 21202; 1-410-528-8662 or 1-888-743-0023; and www.oag.state.md.us. Northwood Club is located at 6524 Alpha Road, Dallas, Texas 75240.

For New Mexico residents, you have rights pursuant to the Fair Credit Reporting Act, such as the right to be told if information in your credit file has been used against you, the right to know what is in your credit file, the right to ask for your credit score, and the right to dispute incomplete or inaccurate information. Further, pursuant to the Fair Credit Reporting Act, the consumer reporting bureaus must correct or delete inaccurate, incomplete, or unverifiable information; consumer reporting agencies may not report outdated negative information; access to your file is limited; you must give your consent for credit reports to be provided to employers; you may limit "prescreened" offers of credit and insurance you get based on information in your credit report; and you may seek damages from violator. You may have additional rights under the Fair Credit Reporting Act not summarized here. Identity theft victims and active duty military personnel have specific additional rights pursuant to the Fair Credit Reporting Act. We encourage you to review your rights pursuant to the Fair Credit Reporting Act by visiting www.consumerfinance.gov/f/201504_cfpb_summary_your-rights-under-fcra.pdf, or by writing Consumer Response Center, Room 130-A, Federal Trade Commission, 600 Pennsylvania Ave. N.W., Washington, D.C. 20580.

For New York residents, the New York Attorney General may be contacted at: Office of the Attorney General, The Capitol, Albany, NY 12224-0341; 1-800-771-7755; or https://ag.ny.gov/.

For North Carolina residents, the North Carolina Attorney General may be contacted at: 9001 Mail Service Center, Raleigh, NC 27699-9001; 1-877-566-7226 or 1-919-716-6000; and www.ncdoj.gov.