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April 14, 2022

Via E-Mail: Idtheft@oag.state.md.us

Attorney General Brian E. Frosh
Office of the Attorney General
Identity Theft Unit
200 St. Paul Place
Baltimore, MD 21202

Re: Data Security Incident

Dear Attorney General Frosh:

Wilson Elser Moskowitz Edelman and Dicker LLP (“Wilson Elser”) represents Mahaffey USA, LLC, located at 4201 Delp Street, Memphis, TN 38118 (“Mahaffey”) with respect to a data security incident described in more detail below. Mahaffey takes the security and privacy of the information in its control seriously, and has taken steps to prevent a similar incident from occurring in the future.

1. Description of the Incident.

On or about October 17, 2021, Mahaffey became aware of a compromise to its email environment, which may have resulted in the inadvertent exposure of personal information of individuals, including current and former Mahaffey clients and employees, to an unknown individual who was not authorized to view it (the “Incident”). Mahaffey has since worked diligently to determine what happened and what information was involved as a result of this Incident.

Based on the results of an investigation conducted by third-party forensic vendors, Mahaffey determined that the following elements of personal information may have been accessed and/or acquired by an unauthorized individual: name, address, date of birth, driver’s license number, and social security number.

As of this writing, Mahaffey has not received any reports of fraud or identity theft related to this matter.

2. Number of Maryland residents affected.

Mahaffey discovered that the Incident may have resulted in the unauthorized exposure of information pertaining to one (1) Maryland resident. A notification letter to this individual was mailed on April 14, 2022, via First Class Mail. Sample copies of the notification letters are attached as **Exhibit A**.

3. Steps taken.

Mahaffey takes the privacy and security of its information seriously, and has taken steps to protect the privacy and security of potentially impacted individuals' information. Upon discovery of the Incident, Mahaffey informed law enforcement and worked with cybersecurity counsel to investigate how the Incident occurred and what information was compromised. Mahaffey is committed to ensuring the security of all information in its control, and is taking steps to prevent a similar event from occurring in the future, including implementing multi-factor authentication across all user accounts, and the changing of passwords of all accounts within its environment. Additionally, the notified Maryland resident was offered complimentary identity theft and credit monitoring services for twelve (12) months.

4. Contact information.

Mahaffey remains dedicated to protecting the sensitive information within its control. If you have any questions or need additional information, please do not hesitate to contact me at Richard.Reiter@wilsonelser.com or (914) 872-7728.

Very truly yours,

WILSON ELSE MOSKOWITZ EDELMAN AND DICKER LLP

Richard Reiter

Richard Reiter

EXHIBIT A



Return to IDX:

<<Notification Vendor Return Address>>

VIA FIRST-CLASS MAIL

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

<<Address 1>> <<Address 2>>

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

To Enroll, Please Call:

<<Insert TFN>>

Or Visit:

<<IDMonitoringURL>>

Enrollment Code:

<<XXXXXXXX>>

<<DATE>>

Notice of Data Incident

Dear <<First Name>><<Last Name>>:

Mahaffey USA LLC recently experienced a data security incident which may have affected your personal information. We take the protection and proper use of the information in our control seriously, and sincerely apologize for any inconvenience this incident may cause. This letter contains additional information about the incident, our response to this incident, and steps you can take to safeguard your information.

What Happened

On or about October 17, 2021, Mahaffey USA LLC was alerted to a compromise of a Mahaffey USA LLC employee's email account, which may have resulted in the inadvertent exposure of personal information of current and former Mahaffey USA LLC customers and employees. We have since worked diligently to determine what happened and what information was involved as a result of this incident.

What Information Was Involved

The elements of your personal information that were exposed may have included, and potentially were not limited to your: name, address, <<data elements>>. Please note that there is no evidence at this time that any of your personal information has been misused as a result of this incident.

What We Are Doing

We are working with cybersecurity counsel to determine the actions to take in response to the incident. Together, we continue to investigate and closely monitor the situation. Further, we are taking steps to strengthen our security posture to prevent a similar event from occurring again in the future.

Out of an abundance of caution, we have arranged for you to enroll in a complementary, identity theft protection services through IDX, the data breach and recovery services expert. IDX identity protection services include: <<twelve (12)/twenty-four (24)>> months of CyberScan monitoring, a \$1,000,000 insurance reimbursement policy, and fully managed id theft recovery services. With this protection, IDX will help you resolve issues if your identity is compromised.

What You Can Do

To enroll in the complimentary credit monitoring service that we are offering you, please go to <https://app.idx.us/account-creation/protect> and using Enrollment Code <<Insert Unique Activation Code>>.

Mahaffey USA LLC | 4161 Delp Street, Memphis, TN 38118

follow the steps to receive the credit monitoring service online within minutes. If you do not have access to the Internet and wish to enroll, please call IDX's toll-free hotline at <<Insert TFN>>.

You can sign up for the online or offline credit monitoring service anytime between now and <<deadline>>. Due to privacy laws, we cannot register you directly. Please note that credit monitoring services might not be available for individuals who do not have a credit file with TransUnion or an address in the United States (or its territories) and a valid Social Security number. Enrolling in this service will not affect your credit score.

Once you are enrolled, you will be able to activate your credit monitoring service valid for <<twelve (12)/twenty-four(24)>> months through TransUnion. The credit monitoring service will notify you if there are any critical changes to your credit file at TransUnion, including fraud alerts, new inquiries, new accounts, new public records, late payments, changes of address, and more. Upon enrolling, you will have access to CyberScan identity protection as well. The service also includes access to an identity restoration program that provides assistance in the event that your identity is compromised and up to \$1,000,000 in identity theft insurance with no deductible. (Policy limitations and exclusions may apply.)

We encourage you to remain vigilant and immediately report any suspicious activity or suspected misuse of your personal information.

For More Information

Please know that the protection of your personal information is a top priority, and we sincerely apologize for any concern or inconvenience that this matter may cause you. If you have any questions, please do not hesitate to call <<call center number>>, Monday – Friday, <<call center hours>>.

Sincerely,

Mahaffey USA LLC

Additional Important Information

For residents of Hawaii, Michigan, Missouri, Virginia, Vermont, and North Carolina: It is recommended by state law that you remain vigilant for incidents of fraud and identity theft by reviewing credit card account statements and monitoring your credit report for unauthorized activity.

For residents of Illinois, Iowa, Maryland, Missouri, North Carolina, Oregon, and West Virginia:

It is required by state laws to inform you that you may obtain a copy of your credit report, free of charge, whether or not you suspect any unauthorized activity on your account. You may obtain a free copy of your credit report from each of the three nationwide credit reporting agencies. To order your free credit report, please visit www.annualcreditreport.com, or call toll-free at 1-877-322-8228. You can also order your annual free credit report by mailing a completed Annual Credit Report Request Form (available at <https://www.consumer.ftc.gov/articles/0155-free-credit-reports>) to: Annual Credit Report Request Service, P.O. Box 105281, Atlanta, GA, 30348-5281.

For residents of Iowa: State law advises you to report any suspected identity theft to law enforcement or to the Attorney General.

For residents of Oregon: State laws advise you to report any suspected identity theft to law enforcement, including the Attorney General, and the Federal Trade Commission.

For residents of Maryland, Rhode Island, Illinois, New York, and North Carolina: You can obtain information from the Maryland and North Carolina Offices of the Attorney General and the Federal Trade Commission about fraud alerts, security freezes, and steps you can take toward preventing identity theft.

Maryland Office of the Attorney General Consumer Protection Division, 200 St. Paul Place, Baltimore, MD 21202 1-888-743-0023
www.oag.state.md.us

Rhode Island Office of the Attorney General Consumer Protection, 150 South Main Street, Providence, RI 02903 1-401-274-4400 www.riag.ri.gov

North Carolina Office of the Attorney General Consumer Protection Division, 9001 Mail Service Center, Raleigh, NC 27699-9001 1-877-566-7226 www.ncdoj.com

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

New York Office of Attorney General Consumer Frauds & Protection, The Capitol, Albany, NY 12224 1-800-771-7755
<https://ag.ny.gov/consumer-frauds/identity-theft>

For residents of Massachusetts: It is required by state law that you are informed of your right to obtain a police report if you are a victim of identity theft.

For residents of all states:

Fraud Alerts: You can place fraud alerts with the three credit bureaus by phone and online with Equifax (https://assets.equifax.com/assets/personal/Fraud_Alert_Request_Form.pdf); TransUnion (<https://www.transunion.com/fraud-alerts>); or Experian (<https://www.experian.com/fraud/center.html>). A fraud alert tells creditors to follow certain procedures, including contacting you, before they open any new accounts or change your existing accounts. For that reason, placing a fraud alert can protect you, but also may delay you when you seek to obtain credit. As of September 21, 2018, initial fraud alerts last for one year. Victims of identity theft can also get an extended fraud alert for seven years. The phone numbers for all three credit bureaus are at the bottom of this page.

Monitoring: You should always remain vigilant and monitor your accounts for suspicious or unusual activity.

Security Freeze: You also have the right to place a security freeze on your credit report. A security freeze is intended to prevent credit, loans, and services from being approved in your name without your consent. To place a security freeze on your credit report, you need to make a request to each consumer reporting agency. You may make that request by certified mail, overnight mail, regular stamped mail, or by following the instructions found at the websites listed below. The following information must be included when requesting a security freeze (note that if you are requesting a credit report for your spouse or a minor under the age of 16, this information must be provided for him/her as well): (1) full name, with middle initial and any suffixes; (2) Social Security number; (3) date of birth; (4) current address and any previous addresses for the past five years; and (5) any applicable incident report or complaint with a law enforcement agency or the Registry of Motor Vehicles. The request must also include a copy of a government-issued identification card and a copy of a recent utility bill or bank or insurance statement. It is essential that each copy be legible, display your name and current mailing address, and the date of issue. As of September 21, 2018, it is free to place, lift, or remove a security freeze. You may also place a security freeze for children under the age of 16. You may obtain a free security freeze by contacting any one or more of the following national consumer reporting agencies:

Equifax Security Freeze

P.O. Box 105788
Atlanta, GA 30348
equifax.com/personal/credit-report-services/
1-800-349-9960

Experian Security Freeze

P.O. Box 9554
Allen, TX 75013
experian.com/freeze/center.html
1-888-397-3742

TransUnion Security Freeze

P.O. Box 160
Woodlyn, PA 19094
transunion.com/credit-freeze
1-888-909-8872

More information can also be obtained by contacting the Federal Trade Commission listed above.