



MULLEN  
COUGHLIN<sup>LLC</sup>  
ATTORNEYS AT LAW

M. Alexandra Belton  
Office: (267) 930-4773  
Fax: (267) 930-4771  
Email: [abelton@mullen.law](mailto:abelton@mullen.law)

426 W. Lancaster Avenue, Suite 200  
Devon, PA 19333

April 21, 2022

**VIA E-MAIL**

Office of the Attorney General  
Attn: Security Breach Notification  
200 St. Paul Place  
Baltimore, MD 21202  
E-mail: [idtheft@oag.state.md.us](mailto:idtheft@oag.state.md.us)

**Re: Notice of Data Event**

Dear Sir or Madam:

We represent Woods Construction, Inc. (“Woods”), located at 6396 Product Drive, Sterling Heights, Michigan 48312, and write to notify your office of an incident that may affect some information relating to approximately five (5) Maryland residents. This notice will be supplemented with any new significant facts learned subsequent to its submission. By providing this notice, Woods 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 24, 2021, Woods became aware of unusual activity associated with certain Woods email accounts. Woods began an investigation, which included working to assess the security of the email tenant. With the assistance of third-party computer specialists, on November 24, 2021, the investigation identified evidence of unauthorized access to certain email accounts at various time between August 11, 2021, and September 24, 2021. Because Woods was unable to conclusively determine whether information contained within the accounts was viewed by the unauthorized person(s) who accessed the accounts, in an abundance of caution, Woods reviewed the contents of the relevant accounts to determine whether and what sensitive information was present. This review included working with third party data review specialists and was completed in late February 2022. Woods then worked diligently to reconcile this information with its internal records to confirm the individuals whose information may have been affected and the appropriate contact information for those individuals. On April 1, 2022, Woods completed this review and began working to notify the individuals identified by the review. The information that was present in the relevant accounts related to Maryland residents includes name, Social Security number, and driver’s license or state identification number.

### **Notice to Maryland Residents**

On or about April 21, 2022, Woods began providing written notice of this incident to potentially affected individuals, which includes approximately five (5) 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, Woods moved quickly to investigate and respond to the incident and assess the security of Woods email tenant, including taking steps to prevent further access and secure the relevant email accounts. Woods is also working to implement additional safeguards to enhance its existing security measure.

Additionally, Woods is providing written notice to potentially affected individuals which includes guidance on how to better protect against identity theft and fraud, including information on how to place a fraud alert and security freeze on one's credit file, 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. Woods is also providing access to credit and identity monitoring services for one (1) year, through Kroll, to individuals whose information was potentially affected by this incident, at no cost to these individuals.

### **Contact Information**

Should you have any questions regarding this notification or other aspects of the data security event, please contact us at (267) 930-4773.

Very truly yours,

M. Alexandra Belton of  
MULLEN COUGHLIN LLC

MABB/klh  
Enclosure

# **EXHIBIT A**



<<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 Incident] / [Data Breach])>>

Dear <<first\_name>> <<middle\_name>> <<last\_name>> <<suffix>>:

Woods Construction & Interiors (“Woods”) is writing to notify you of a recent incident at Woods that may affect the privacy of some of your information. While, to date, we have no evidence that your information has been misused, we are providing you with information about the event, our response to it, and resources available to you to help better protect your information, should you feel it appropriate to do so.

**What Happened?** On September 24, 2021, Woods became aware of unusual activity associated with certain Woods email accounts. We began an investigation, which included working to assess the security of the email tenant. With the assistance of third-party computer specialists, on November 24, 2021, the investigation identified evidence of unauthorized access to certain email accounts at various times between August 11, 2021 and September 24, 2021. Because we could not conclusively determine whether information contained within the accounts was viewed by the unauthorized person(s) who accessed the accounts, in an abundance of caution, we reviewed the contents of the email accounts to determine whether sensitive information was present at the time of the incident. Through this review, we determined that some of your information was present within one or more of the relevant email accounts at the time of the incident. To date, we are unaware of any actual or attempted misuse of any information as a result of this incident.

**What Information Was Involved?** The investigation determined that, at the time of the incident, one or more of the email accounts contained your <<b2b\_text\_2(name, data elements)>>.

**What We Are Doing.** We take this incident and the security of personal information in our care seriously. Upon discovering this incident, we took steps to prevent further access and secured the relevant employee email accounts. We took steps to investigate and respond to this incident, assess the security of our email tenant, and notify potentially affected individuals. As part of our ongoing commitment to security, Woods implemented additional security measures to help prevent a similar incident in the future. We are also reviewing and enhancing existing policies and procedures and conducting additional workforce training to reduce the likelihood of a similar future event.

**What You Can Do.** We encourage you to remain vigilant against incidents of identity theft and fraud by reviewing your account and monitoring credit reports for suspicious activity and to detect errors. You may also review the information contained in the attached *Steps You Can Take to Help Protect Personal Information*. As an added precaution we have arranged to offer you access to 12 months of complimentary credit and identity monitoring services provided through Kroll. Although we are making these services available to you, we are unable to enroll you directly. For activation instructions, please review the information contained in the attached *Steps You Can Take to Help Protect Personal Information*.



# ***WOODS CONSTRUCTION & INTERIORS***

**For More Information.** We understand that you may have questions about this incident that are not addressed in this letter. If you have additional questions, please contact our dedicated assistance line at [1-800-800-8000](tel:1-800-800-8000), Monday through Friday, during the hours of 8:00 a.m. – 5:30 p.m. Central Time, excluding major US holidays. You may also write to Woods at 6396 Product Drive, Sterling Heights, MI 48312

Sincerely,

Woods Construction & Interiors

# WOODS CONSTRUCTION & INTERIORS

## STEPS YOU CAN TAKE TO HELP PROTECT PERSONAL INFORMATION

### Activate Identity Monitoring

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](http://info.krollmonitoring.com).

If you prefer to activate these services offline and receive monitoring alerts via the US Postal Service, you may activate via our automated phone system by calling 1-888-653-0511, Monday through Friday, 8:00 a.m. to 5:30 p.m. Central Time, excluding major U.S. holidays. Please have your membership number located in your letter ready when calling. Please note that to activate monitoring services, you will be required to provide your name, date of birth, and Social Security number through our automated phone system.

### 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](http://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.

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.

# WOODS CONSTRUCTION & INTERIORS

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

| Equifax                                                                                                                         | Experian                                                                    | TransUnion                                                                                  |
|---------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------|---------------------------------------------------------------------------------------------|
| <a href="https://www.equifax.com/personal/credit-report-services/">https://www.equifax.com/personal/credit-report-services/</a> | <a href="https://www.experian.com/help/">https://www.experian.com/help/</a> | <a href="https://www.transunion.com/credit-help">https://www.transunion.com/credit-help</a> |
| 888-298-0045                                                                                                                    | 1-888-397-3742                                                              | 833-395-6938                                                                                |
| Equifax Fraud Alert, P.O. Box 105069<br>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<br>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](http://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 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](http://www.oag.state.md.us).

*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](http://www.ncdoj.gov).

# 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'll 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.