



MULLEN
COUGHLIN^{LLC}
ATTORNEYS AT LAW

Josh Brian
Office: (267) 930-2405
Fax: (267) 930-4771
Email: JBrian@mullen.law

3001 N. Rocky Point Drive East, Suite 200
Tampa, FL 33607

June 15, 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

Re: Notice of Data Event

Dear Sir or Madam:

We represent Hydromax USA (“Hydromax”) located at 11492 Bluegrass Parkway, Suite 106, Louisville, KY 40299, and are writing to notify your office of an event that may affect certain information relating to approximately four (4) Maryland residents. This notice may be supplemented if any new, material facts are learned subsequent to its submission. By providing this notice, Hydromax 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 April 24, 2022, Hydromax identified unusual activity in its computer network. In response, Hydromax investigated the activity to determine its nature and scope. Hydromax determined that an unknown actor accessed its network between April 19, 2022, and April 24, 2022, and that certain files were downloaded without authorization. Hydromax reviewed these files for sensitive information, which concluded on May 20, 2022. The following categories of information were identified in the reviewed files: name and driver’s license number.

Notice to Maryland Residents

On or about June 15, 2022, Hydromax provided written notice of this event to approximately four (4) Maryland residents. Written notice is being provided in substantially the same form as the letter attached here as ***Exhibit A***.

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Other Steps Taken and To Be Taken

Upon detecting the event, Hydromax moved quickly to investigate and respond, assess the security of Hydromax systems, and identify potentially affected individuals. Further, Hydromax notified federal law enforcement regarding the event. Hydromax is also working to implement additional safeguards to mitigate reoccurrence of this type of event. Additionally, Hydromax is providing access to credit monitoring services for one (1) year, through Kroll, to individuals whose information was potentially affected by this event, at no cost to these individuals.

Additionally, Hydromax is providing potentially impacted individuals with guidance on how to better protect against identity theft and fraud. Hydromax is providing the individuals with 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.

Hydromax is providing written notice of this event to relevant state regulators, as necessary.

Contact Information

Should you have any questions regarding this notification or other aspects of the event, please contact us at (267) 930-2405.

Very truly yours,

Josh Brian of
MULLEN COUGHLIN LLC

JPB/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 (Variable Header)>>

Dear <<first_name>> <<middle_name>> <<last_name>> <<suffix>>,

Hydromax USA (“Hydromax”) is writing to inform you of an event at Hydromax. We are providing you with information about the event, our response, and steps you may take, should you feel it is appropriate to do so.

What Happened? On or about April 24, 2022, we identified unusual activity in our computer network. In response, we investigated the activity to determine its nature and scope. We determined that an unknown actor accessed our network between April 19, 2022, and April 24, 2022, and that certain files were downloaded without authorization. We reviewed these files for sensitive information, which concluded on May 20, 2022.

What Information Was Involved? The following information was identified in the reviewed files: <<b2b_text_2 (“name” and data elements)>>.

What We Are Doing. We take this event and the security of information in our care seriously. As part of our ongoing commitment to the privacy of information in our care, we implemented additional technical security measures to mitigate reoccurrence of this type of event. Further, we are also reviewing and enhancing existing policies and procedures and conducting additional workforce data privacy training.

What You Can Do. We encourage you to remain vigilant against incidents of identity theft and fraud by reviewing your account statements and free credit reports for suspicious activity and to detect errors. We also recommend you review the “Steps You Can Take to Help Protect Personal Information” section of this letter. Further, you may activate the offered complimentary identity monitoring services.

For More Information. If you have additional questions, please contact our dedicated assistance line at [\[insert phone number\]](#), Monday through Friday from 8:00 a.m. to 5:30 p.m. Central Time excluding major U.S. holidays. You may also write to Hydromax at Hydromax USA, Attn: Randall Wilson, at 11492 Bluegrass Parkway, Suite 106, Louisville, KY 40299.

Sincerely,

Randall Wilson
Chief Financial Officer
Hydromax USA

STEPS YOU CAN TAKE TO HELP PROTECT PERSONAL INFORMATION

We secured the services of Kroll to provide identity monitoring at no cost to you for one year. Kroll is a global leader in risk mitigation and response, and their team has extensive experience helping people who have sustained an unintentional exposure of confidential data. Your identity monitoring services include Credit Monitoring, Fraud Consultation, and Identity Theft Restoration.

Visit <https://enroll.krollmonitoring.com> to activate and take advantage of your identity monitoring services.

You have until <<b2b_text_6 (date)>> 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.

Additional information describing your services is included with this letter.

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.

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 may need to provide some or all of 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 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
888-298-0045	888-397-3742	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 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.

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.



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.