

BRENDA SHARTON

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SENT VIA E-MAIL

July 14, 2022

Maryland Office of the Attorney General
email idtheft@oag.state.md.us

Dear Sir/Madam:

We write on behalf of our client Nassau Point Investors (“Nassau Point”) to notify you that Nassau Point recently became aware of a phishing incident resulting in a business email compromise by an unauthorized third party that affected one employee’s Office 365 account. Nassau Point took immediate action to review this incident and secure its systems. Nassau Point reviewed this incident and determined that certain data files were exfiltrated by the unauthorized third party. Nassau Point subsequently performed an assessment of these data files and determined that some of the files contained personal information for 1 resident of Maryland. The unauthorized access occurred between April 26, 2022 and May 15, 2022.

After becoming aware of the incident, Nassau Point undertook a review, working with third party experts, to determine the nature and scope of the unauthorized access. After the review, Nassau Point implemented additional security measures to help further protect against this type of incident going forward. After conducting a comprehensive analysis of the compromised data to determine the affected individuals, Nassau Point determined that the incident potentially affected 1 Maryland resident’s social security number.

Nassau Point is taking action to provide assistance to potentially affected individuals, even though it currently has no evidence of any misuse of or fraudulent activity relating to anyone’s personal information as a result of this incident. Nassau Point will notify affected individuals by mail on or about July 14, 2022 and will provide 24 months of identity theft monitoring services from TransUnion. Nassau Point has also provided information about steps that individuals can take to protect themselves, such as regularly monitoring financial statements and credit reports. A template copy of the notification letter Nassau Point has sent to affected Maryland residents is attached to this notice as Appendix A.

Thank you for your attention to this matter.

Sincerely,

Brenda Sharton

Brenda R. Sharton
Brenda.Sharton@Dechert.com

cc: Bailey E. Dervishi, Esq.
Bailey.Dervishi@Dechert.com

APPENDIX A



NASSAU POINT INVESTORS

PO Box 290245 | Nashville, TN | 37229-9715

<<Date>> [Month Day, Year]

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

<Address 1>

<Address 2>

<City>, <State> <Zip>

NOTICE OF DATA BREACH

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

We write to notify you of a recent incident that occurred that could affect some of your personal information. Please review this letter carefully.

What Happened

Nassau Point Investors ("Nassau Point") recently became aware of a phishing incident resulting in a business email compromise by an unauthorized third party that affected one employee's Office 365 account. We reviewed this incident and determined that certain data files were exfiltrated by the unauthorized third party. We subsequently performed an assessment of these data files and, <<variable text 1_(mid-June)>>, determined that some of the files contained certain personal information. The unauthorized access occurred between April 26, 2022, and May 15, 2022.

What Information Was Involved

From the review, we have determined that the personal information affected includes your <<variable text 2_(information impacted)>>. At this time, we are not aware of any malicious or fraudulent activity relating to anyone's personal information as a result of this incident, but we are sending you this notice as a precaution and to encourage you to take steps to monitor your personal information.

What We Are Doing

After becoming aware of the incident, Nassau Point undertook a review, working with third party experts, to determine the nature and scope of the unauthorized access and ensure it was contained. After securing the system, we implemented additional security measures to help further protect against this type of incident going forward.

Although we are not aware of any misuse of or fraudulent activity relating to anyone's personal information as a result of this incident, as an added precaution we are offering complimentary access to TransUnion's myTrueIdentity for 24 months, at no cost to you.

To activate your membership and start monitoring your personal information, please follow the steps below:

- Ensure that you enroll by October 13, 2022 (Your code will not work after this date.)
- Visit the myTrueIdentity website to enroll: www.mytrueidentity.com
- Provide your activation code: <<reference_id>>
- Follow the three steps to receive your credit monitoring service online

If you do not have access to the Internet and wish to enroll in a similar offline, paper based, credit monitoring service, via U.S. Mail delivery, please call the TransUnion Fraud Response Services toll-free hotline at 1-855-288-5422. When prompted, enter the following 6-digit telephone pass code 699003 and follow the steps to enroll in the offline credit monitoring service, add an initial fraud alert to your credit file, or to speak to a TransUnion representative if you believe you may be a victim of identity theft.

Additional details of the TransUnion myTrueIdentity service are provided in the enclosed "Additional Resources."

What You Can Do

As always, we recommend that you remain vigilant for incidents of fraud and identity theft, including by regularly viewing your account statements and monitoring your free credit reports. For more information on how you can help protect yourself, please review the enclosed "Additional Resources."

For More Information

We are sorry for any inconvenience caused by this incident. If you have any questions, please call 1-866-221-6689 Monday through Friday from 8:00 a.m. to 5:00 p.m. Central Time, excluding major US holidays. <<Variable Text 3 (website URL)>>

Sincerely,

Jon Wendell
Founder & Managing Member

ADDITIONAL RESOURCES

Additional Details Regarding Your 24-Month TransUnion myTrueIdentity Membership

As a safeguard, we have arranged for you to enroll, at no cost to you, in an online credit monitoring service (myTrueIdentity) for 24 months provided by TransUnion Interactive, a subsidiary of TransUnion®, one of the three nationwide credit reporting companies.

Once you are enrolled, you will be able to obtain 24 months of unlimited access to your TransUnion credit report and VantageScore® credit score by TransUnion. The daily 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, change of address and more. The service also includes the ability to lock and unlock your TransUnion credit report online, access to identity restoration services that provides assistance in the event your identity is compromised to help you restore your identity and up to \$1,000,000 in identity theft insurance with no deductible. (Policy limitations and exclusions may apply.)

You can sign up for the myTrueIdentity online Credit Monitoring service anytime between now and October 13, 2022. 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 credit file at TransUnion®, or an address in the United States (or its territories) and a valid Social Security number, or are under the age of 18. Enrolling in this service will not affect your credit score.

If you have questions about your myTrueIdentity online credit monitoring benefits, need help with your online enrollment, or need help accessing your credit report, or passing identity verification, **please contact the myTrueIdentity Customer Service Team toll-free at: 1-844-787-4607**, Monday-Friday: 8am-9pm, Saturday-Sunday: 8am-5pm Eastern time.

Monitor Your Accounts

We recommend that you regularly review statements from your accounts and periodically obtain your credit report from one or more of the national credit reporting companies. You may obtain a free copy of your credit report online at www.annualcreditreport.com, by calling toll-free 1-877-322-8228, or by mailing an Annual Credit Report Request Form (available at www.annualcreditreport.com) to Annual Credit Report Request Service, P.O. Box 105281, Atlanta, GA, 30348-5281. You may also purchase a copy of your credit report by contacting one or more of the three national credit reporting agencies listed below.

- **Equifax®** – P.O. Box 740241, Atlanta, GA 30374-0241 – 1-800-685-1111 – www.equifax.com
- **Experian** – P.O. Box 9701, Allen, TX 75013-9701 – 1-888-397-3742 – www.experian.com
- **TransUnion** – P.O. Box 1000, Chester, PA 19016-1000 – 1-800-888-4213 – www.transunion.com

When you receive your credit reports, review them carefully. Look for accounts or creditor inquiries that you did not initiate or do not recognize. Look for information, such as home address and Social Security number that is not accurate. If you see anything you do not understand, call the credit reporting agency at the telephone number on the report.

Credit Freeze

You have the right to put a security freeze, also known as a credit freeze, on your credit file, so that no new credit can be opened in your name without the use of a Personal Identification Number (PIN) that is issued to you when you initiate a freeze. A credit freeze is designed to prevent potential credit grantors from accessing your credit report without your consent. If you place a credit freeze, potential creditors and other third parties will not be able to access your credit report unless you temporarily lift the freeze. Therefore, using a credit freeze may delay your ability to obtain credit. Pursuant to federal law, you cannot be charged to place or lift a credit freeze on your credit report. Should you wish to place a credit freeze, please contact all three major consumer reporting agencies listed below.

- **Equifax®** – P.O. Box 105788, Atlanta, GA 30348-5788 – 1-800-685-1111 – www.equifax.com/personal/credit-report-services
- **Experian** – P.O. Box 9554, Allen, TX 75013-9554 – 1-888-397-3742 – www.experian.com/freeze/center.html
- **TransUnion** – P.O. Box 160, Woodlyn, PA 19094-0160 – www.transunion.com/credit-freeze

You must separately place a credit freeze on your credit file at each credit reporting agency. The following information should be included when requesting a credit freeze:

- 1) Full name, with middle initial and any suffixes;
- 2) Social Security number;
- 3) Date of birth (month, day, and year);
- 4) Current address and previous addresses for the past five (5) years;
- 5) Proof of current address, such as a current utility bill or telephone bill;
- 6) Other personal information as required by the applicable credit reporting agency.

If you request a credit freeze online or by phone, then the credit reporting agencies have one (1) business day after receiving your request to place a credit freeze on your credit file report. If you request a lift of the credit freeze online or by phone, then the credit reporting agency must lift the freeze within one (1) hour. If you request a credit freeze or lift of a credit freeze by mail, then the credit agency must place or lift the credit freeze no later than three (3) business days after getting your request.

Fraud Alerts

You also have the right to place an initial or extended fraud alert on your file at no cost. An initial fraud alert lasts 1-year and 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 7 years. Should you wish to place a fraud alert, please contact any one of the agencies listed below. The agency you contact will then contact the other two credit agencies.

- **Equifax®** – P.O. Box 105788, Atlanta, GA 30348-5788 – 1-888-766-0008 – www.equifax.com/personal/credit-report-services
- **Experian** – P.O. Box 9554, Allen, TX 75013-9554 – 1-888-397-3742 – www.experian.com/fraud/center.html
- **TransUnion** – P.O. Box 2000, Chester, PA 19016-2000 – 1-800-909-8872 – www.transunion.com/fraud-victim-resource/place-fraud-alert

Additional Information

You can further educate yourself regarding identity theft and the steps you can take to protect yourself, by contacting your state Attorney General or the Federal Trade Commission. Instances of known or suspected identity theft should be reported to law enforcement, your Attorney General, and the FTC.

- **The Federal Trade Commission** – 600 Pennsylvania Avenue, NW, Washington, DC 20580 – 1-877-438-4338 – TTY 1-866-653-4261 – www.ftc.gov/idtheft

For Massachusetts Residents: Under Massachusetts law, you have the right to obtain any police report filed in regard to this incident. If you are the victim of identity theft, you also have the right to file a police report and obtain a copy of it. Under Massachusetts law, you may also place, lift, or remove a security freeze on your credit reports, free of charge. You must place your request for a freeze with each of the three major consumer reporting agencies as detailed above.

For Maryland Residents: You can obtain information from the Maryland Attorney General about steps you can take to avoid identity theft: 200 St. Paul Place, 25th Floor, Baltimore, MD 21202 – 1-888-743-0023 – marylandattorneygeneral.com.