



MULLEN
COUGHLIN^{LLC}
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August 9, 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 Ideal Tridon Holdings, Inc. ("Ideal Tridon"), located at 8100 Tridon Drive, Smyrna, TN 37167, and write to notify your office of an incident that may affect certain personal information relating to approximately one (1) Maryland resident. 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, Ideal Tridon 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 July 3, 2022, Ideal Tridon identified unusual activity on its computer network. In response, Ideal Tridon promptly began taking steps to secure its network and commenced an investigation to determine the full nature and scope of the incident. The investigation to date has determined that certain documents stored within Ideal Tridon's environment were copied from the system as part of the cyber incident on or around July 3, 2022. Ideal Tridon conducted a detailed review of the data that may be affected and, on or around July 15, 2022, determined the relevant documents included some employee information. Ideal Tridon then undertook further review to confirm precisely what data was present in the relevant files and to whom it related. The investigation determined that the affected information related to the Maryland resident includes name, Social Security number, and financial account and routing numbers.

Notice to Maryland Resident

On or about August 9, 2022, Ideal Tridon began providing written notice of this incident, including to the Maryland resident. 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

Ideal Tridon has worked diligently to investigate this incident, restore the security of its network, and determine what information may be affected. Further, Ideal Tridon is working to evaluate its existing security measures and implement additional safeguards. Ideal Tridon is providing notice of this incident and information on steps they may take to protect their information from misuse, including guidance 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. Further, Ideal Tridon is providing affected individuals with access to complimentary credit monitoring services for two (2) years. Ideal Tridon is providing written notice of this incident to other state regulators as necessary and has notified federal law enforcement.

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/ajl
Enclosure

EXHIBIT A



Return Mail Processing
PO Box 589
Claysburg, PA 16625-0589

August 9, 2022



i1898-L01-0000001 T00001 P001 *****SCH 5-DIGIT 12345

SAMPLE A SAMPLE - L01 AFFECTED EMPLOYEES

APT ABC

123 ANY STREET

ANYTOWN, ST 12345-6789



RE: Notice of [Variable Header]

Dear Sample A. Sample:

As you are likely aware, Ideal Tridon Holdings, Inc (“Ideal Tridon”) recently learned that it experienced a cyber incident. Through the investigation to date, we recently learned that this incident may affect your personal information. This letter provides information about the incident, our response, and steps you may take to protect your information, should you feel it is appropriate to do so.

What Happened? On July 3, 2022, we identified unusual activity on our computer network. In response, we promptly began taking steps to secure our network and commenced an investigation to determine the full nature and scope of the incident. While the investigation remains ongoing, we determined certain documents stored within Ideal Tridon’s environment were copied from the system as part of the cyber incident on or around July 3, 2022. We conducted a detailed review of the data that may be affected and, on or around July 15, 2022, we determined the relevant documents included some employee information. Through further review, we have determined that some of your information is included in the data.

What Information Was Involved? The personal information present in the relevant documents included your financial account information related to payroll, Social Security number, and name.

What We Are Doing. We take this incident and the security of information in our care seriously. As part of our ongoing commitment to the privacy of information in our care, we have taken diligent steps to secure our systems following this incident and are implementing additional technical security measures going forward. Additionally, as an added precaution, we are offering you complimentary access to two (2) years of credit monitoring services through Experian. Information on how to enroll in these services is included in the attached ***Steps You Can Take to Help Protect Personal Information*** section of this letter.

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 attached ***Steps You Can Take to Help Protect Personal Information*** section of this letter. We also encourage you to enroll in the complimentary credit monitoring services we are offering. Please note, we are not permitted to enroll you. You will need to follow the instructions below in order to enroll in these services.

For More Information. If you have additional questions, please contact our dedicated assistance line at (833) 475-1814 Monday through Friday from 8:00 a.m. to 10:00 p.m. Central; Saturday and Sunday from 10:00 a.m. to 7:00 p.m. Central (excluding U.S. holidays).

Sincerely,

Richard Stepien
Chief Executive Officer

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i1898-L01

STEPS YOU CAN TAKE TO HELP PROTECT PERSONAL INFORMATION

Enroll in Credit Monitoring

To help protect your identity, we are offering complimentary access to Experian IdentityWorksSM for 24 months.

If you believe there was fraudulent use of your information and would like to discuss how you may be able to resolve those issues, please reach out to an Experian agent. If, after discussing your situation with an agent, it is determined that identity restoration support is needed then an Experian Identity Restoration agent is available to work with you to investigate and resolve each incident of fraud that occurred from the date of the incident (including, as appropriate, helping you with contacting credit grantors to dispute charges and close accounts; assisting you in placing a freeze on your credit file with the three major credit bureaus; and assisting you with contacting government agencies to help restore your identity to its proper condition).

Please note that Identity Restoration is available to you for 24 months from the date of this letter and does not require any action on your part at this time. The Terms and Conditions for this offer are located at www.ExperianIDWorks.com/restoration.

While identity restoration assistance is immediately available to you, we also encourage you to activate the fraud detection tools available through Experian IdentityWorks as a complimentary 24-month membership. This product provides you with superior identity detection and resolution of identity theft. To start monitoring your personal information, please follow the steps below:

- Ensure that you **enroll** by November 30, 2022 (Your code will not work after this date.)
- **Visit** the Experian IdentityWorks website to enroll: <https://www.experianidworks.com/credit>
- Provide your **activation code**: **ABCDEFGHI**

If you have questions about the product, need assistance with Identity Restoration or would like an alternative to enrolling in Experian IdentityWorks online, please contact Experian's customer care team at (833) 475-1814 by November 30, 2022. Be prepared to provide engagement number **B058274** as proof of eligibility for the Identity Restoration services by Experian.

ADDITIONAL DETAILS REGARDING YOUR 24-MONTH EXPERIAN IDENTITYWORKS MEMBERSHIP

A credit card is not required for enrollment in Experian IdentityWorks. You can contact Experian immediately regarding any fraud issues, and have access to the following features once you enroll in Experian IdentityWorks:

- **Experian credit report at signup:** See what information is associated with your credit file. Daily credit reports are available for online members only.*
- **Credit Monitoring:** Actively monitors Experian file for indicators of fraud.
- **Identity Restoration:** Identity Restoration specialists are immediately available to help you address credit and non-credit related fraud.
- **Experian IdentityWorks ExtendCARETM:** You receive the same high-level of Identity Restoration support even after your Experian IdentityWorks membership has expired.
- **\$1 Million Identity Theft Insurance^{**}:** Provides coverage for certain costs and unauthorized electronic fund transfers.

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 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
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.

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. Ideal Tridon Holdings, Inc. is located at 8100 Tridon Drive, Smyrna, TN 37167.



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.

* Offline members will be eligible to call for additional reports quarterly after enrolling.

** The Identity Theft Insurance is underwritten and administered by American Bankers Insurance Company of Florida, an Assurant company. Please refer to the actual policies for terms, conditions, and exclusions of coverage. Coverage may not be available in all jurisdictions.