



MULLEN
COUGHLIN_{LLC}
ATTORNEYS AT LAW

Kevin M. Mekler
Office: (267) 930-2190
Fax: (267) 930-4771
Email: Kmekler@mullen.law

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

August 12, 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 Spouting Rock Asset Management, LLC (“Spouting Rock”) located at 925 W Lancaster Ave., Suite 250, Bryn Mawr, PA 19010, and are writing to notify your office of an incident that may affect the security of certain personal information relating to three (3) Maryland residents. 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, Spouting Rock 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 May 17, 2022, Spouting Rock became aware of suspicious activity involving a single employee email account. Spouting Rock promptly commenced an investigation with the assistance of third-party computer forensic specialists. That investigation is ongoing, but has determined that one Spouting Rock email account was subject to unauthorized access between May 5, 2022 and May 17, 2022. As a result, Spouting Rock undertook a comprehensive analysis of the potentially impacted files in order to identify what information was contained within the files, and to whom that information belongs.

On July 15, 2022, Spouting Rock’s review of the involved systems determined that the potentially impacted files included personal information related to Maryland residents. The information that

could have been subject to unauthorized access varies by individual but includes name and Social Security number.

Notice to Maryland Residents

On or about August 12, 2022, Spouting Rock began providing written notice of this incident to three (3) 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 unusual system activity, Spouting Rock initiated an investigation with the assistance of third-party specialists to determine the full nature and scope of this incident. Spouting Rock is also reviewing existing policies and procedures and implementing additional safeguards to further secure the information in its systems as appropriate. Spouting Rock is providing access to credit monitoring services for twenty-four (24) months through Experian, to individuals whose personal information was potentially affected by this incident, at no cost to these individuals.

Additionally, Spouting Rock is providing impacted individuals with guidance on how to better protect against identity theft and fraud. Spouting Rock is providing 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.

Contact Information

Should you have any questions regarding this notification or other aspects of the data security event, please contact us at (267) 930-2190.

Very truly yours,

Kevin M. Mekler of
MULLEN COUGHLIN LLC

KMK/njp

EXHIBIT A



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

i2063-L01-0000001 T00001 P001 *****SCH 5-DIGIT 12345



SAMPLE A SAMPLE - L01 INDIVIDUAL
APT ABC
123 ANY STREET
ANYTOWN, ST 12345-6789



August 12, 2022

Re: Notice of Data [Extra1]

Dear Sample A. Sample:

Spouting Rock Asset Management, LLC (“Spouting Rock”) is writing to make you aware of an incident that may affect some of your personal information. We take this incident seriously and write to provide you with information about the incident, what we are doing in response, and the resources that we are making available to you to help protect your information, should you feel it is appropriate to do so.

What Happened? On or about May 17, 2022, Spouting Rock became aware of suspicious activity involving a single employee O365 account. We promptly took steps to secure the account and initiated an investigation, with the assistance of third-party specialists, to determine the nature and scope of the event, including any risk to data present within the account. That investigation is ongoing, but has determined that one Spouting Rock email account was subject to unauthorized access between May 5, 2022 and May 17, 2022. Because we could not rule out access to specific data within the mailbox, we took steps to identify what information was contained within the mailbox, and to whom that information related. We are providing this notice to you because we determined that your information was present in the impacted data during the period of unauthorized access.

What Information Was Involved? While our investigation remains ongoing, on or about July 15, 2022, our review of the involved systems determined that the impacted files included your [Extra2] and name.

What We Are Doing. We take this incident and the security of information within our care seriously. Upon discovery of this incident, we began an in-depth investigation with the assistance of third-party specialists to determine the full nature and scope of this incident. As part of our ongoing commitment to the privacy of information in our care, we are reviewing our existing policies and procedures and implementing additional safeguards to further secure the information in our systems as appropriate. As an added precaution, we arranged to have Experian provide credit monitoring services for 24 months at no cost to you. Instructions on how to enroll in these services are included with this letter. We will also notify relevant state regulatory authorities as required by law.

What You Can Do. We encourage you to remain vigilant against incidents of identity theft and fraud by reviewing your account statements and monitoring your free credit reports for suspicious activity and to detect errors over the next 12 to 24 months. Please also review the information contained in the enclosed *Steps You Can Take to Help Protect Personal Information*. You may also enroll in the complimentary identity credit monitoring services we are making available to you. Enrollment instructions are attached to this letter.

925 W. Lancaster Ave.,
Suite 250
Bryn Mawr, PA 19010
610•788•2128

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For More Information. We understand you may have additional questions not addressed by this letter. If you have questions, please call our dedicated assistance line at (833) 796-8638 Monday through Friday 8 am – 10 pm CT, Saturday and Sunday 10 am – 7 pm CT (excluding major U.S. holidays). Be prepared to provide your engagement number B058924.

Sincerely,

Spouting Rock Asset Management, LLC

STEPS YOU CAN TAKE TO PROTECT PERSONAL INFORMATION

Enroll in Credit Monitoring

To help protect your identity, we are offering complimentary access to Experian IdentityWorksSM for [Extra3].

If you believe there was fraudulent use of your information as a result of this incident 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 [Extra3] 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 [Extra3] 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: www.experianidworks.com/credit
- Provide your **activation code**: ABCDEFGHI

If you have questions about the product, need assistance with Identity Restoration that arose as a result of this incident, or would like an alternative to enrolling in Experian IdentityWorks online, please contact Experian's customer care team at (833) 796-8638 by November 30, 2022. Be prepared to provide engagement number B058924 as proof of eligibility for the Identity Restoration services by Experian.

ADDITIONAL DETAILS REGARDING YOUR [Extra3] 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 ExtendCARE™:** 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.

* 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.

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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 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
1-888-298-0045	1-888-397-3742	1-833-395-6938
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 District of Columbia residents, the District of Columbia Attorney General may be contacted at: 400 6th Street, NW, Washington, DC 20001; 202-727-3400; and oag.dc.gov.

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. Spouting Rock is located at 925 W Lancaster Ave Suite 250, Bryn Mawr, PA 19010.

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.

For Rhode Island residents, the Rhode Island Attorney General may be reached at: 150 South Main Street, Providence, RI 02903; www.riag.ri.gov; and 1-401-274-4400. Under Rhode Island law, you have the right to obtain any police report filed in regard to this incident. There is 1 Rhode Island resident impacted by this incident.





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ATTORNEYS AT LAW

Kevin M. Mekler
Office: (267) 930-2190
Fax: (267) 930-4771
Email: Kmekler@mullen.law

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

December 5, 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: Supplemental Notice of Data Event

Dear Sir or Madam:

We continue to represent Spouting Rock Asset Management, LLC (“Spouting Rock”) located at 925 W Lancaster Ave., Suite 250, Bryn Mawr, PA 19010. We are writing to supplement our notice to your office on August 12, 2022, a copy of which is attached hereto as ***Exhibit A***. By providing this supplemental notice, Spouting Rock 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.

At the time the initial round of notification letters were mailed to potentially affected individuals, there were a number of individuals for whom an address could not be located. As a result, an extensive manual review of source documents and corporates records was necessary to correctly identify them and their addresses. This additional review was completed on November 11, 2022.

As we previously reported, on or about August 12, 2022, Spouting Rock began providing written notice of this incident to potentially affected individuals. On December 5, 2022, Spouting Rock provided notice to an additional two (2) Maryland residents. Written notice is being provided in substantially the same form as the letter attached here as ***Exhibit B***.

Spouting Rock is providing access to credit monitoring services for 24 months through Experian to individuals whose personal information was potentially affected by this incident, at no cost to these individuals. Additionally, Spouting Rock is providing potentially impacted individuals with guidance on how to better protect against identity theft and fraud. Spouting Rock is also providing

Office of the Attorney General

December 5, 2022

Page 2

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.

Should you have any questions regarding this notification or other aspects of the data security event, please contact us at (267) 930-2190.

Very truly yours,

A handwritten signature in black ink, appearing to read 'K. Mekler', with a long horizontal flourish extending to the right.

Kevin M. Mekler of
MULLEN COUGHLIN LLC

KMK/jc1

EXHIBIT A

Kelsey Hutchinson

From: James Cope
Sent: Friday, August 12, 2022 4:38 PM
To: idtheft@oag.state.md.us
Cc: Kevin Mekler; Nicholas Pontzer; John Mullen; Kelsey Hutchinson
Subject: Spouting Rock Asset Management, LLC – Notice of Data Event – MD
Attachments: Spouting Rock Asset Management, LLC - Notice of Data Event - MD.pdf

Sir or Madam,

Please see the attached notice of data event.

Thank you,
Jimmy

James Cope
Attorney
Mullen Coughlin LLC
426 W. Lancaster Avenue, Suite 200
Devon, PA 19333
(267) 930-4766 - Office
(610) 291-4624 - Mobile
jcope@mullen.law



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Email: Kmekler@mullen.law

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Tampa, FL 33607

August 12, 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 Spouting Rock Asset Management, LLC (“Spouting Rock”) located at 925 W Lancaster Ave., Suite 250, Bryn Mawr, PA 19010, and are writing to notify your office of an incident that may affect the security of certain personal information relating to three (3) Maryland residents. 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, Spouting Rock 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 May 17, 2022, Spouting Rock became aware of suspicious activity involving a single employee email account. Spouting Rock promptly commenced an investigation with the assistance of third-party computer forensic specialists. That investigation is ongoing, but has determined that one Spouting Rock email account was subject to unauthorized access between May 5, 2022 and May 17, 2022. As a result, Spouting Rock undertook a comprehensive analysis of the potentially impacted files in order to identify what information was contained within the files, and to whom that information belongs.

On July 15, 2022, Spouting Rock’s review of the involved systems determined that the potentially impacted files included personal information related to Maryland residents. The information that

could have been subject to unauthorized access varies by individual but includes name and Social Security number.

Notice to Maryland Residents

On or about August 12, 2022, Spouting Rock began providing written notice of this incident to three (3) 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 unusual system activity, Spouting Rock initiated an investigation with the assistance of third-party specialists to determine the full nature and scope of this incident. Spouting Rock is also reviewing existing policies and procedures and implementing additional safeguards to further secure the information in its systems as appropriate. Spouting Rock is providing access to credit monitoring services for twenty-four (24) months through Experian, to individuals whose personal information was potentially affected by this incident, at no cost to these individuals.

Additionally, Spouting Rock is providing impacted individuals with guidance on how to better protect against identity theft and fraud. Spouting Rock is providing 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.

Contact Information

Should you have any questions regarding this notification or other aspects of the data security event, please contact us at (267) 930-2190.

Very truly yours,

A handwritten signature in black ink, appearing to read 'K. Mekler', with a stylized flourish at the end.

Kevin M. Mekler of
MULLEN COUGHLIN LLC

KMK/njp

EXHIBIT A

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

i2063-L01-0000001 T00001 P001 *****SCH 5-DIGIT 12345



SAMPLE A SAMPLE - L01 INDIVIDUAL
APT ABC
123 ANY STREET
ANYTOWN, ST 12345-6789



August 12, 2022

Re: Notice of Data [Extra1]

Dear Sample A. Sample:

Spouting Rock Asset Management, LLC (“Spouting Rock”) is writing to make you aware of an incident that may affect some of your personal information. We take this incident seriously and write to provide you with information about the incident, what we are doing in response, and the resources that we are making available to you to help protect your information, should you feel it is appropriate to do so.

What Happened? On or about May 17, 2022, Spouting Rock became aware of suspicious activity involving a single employee O365 account. We promptly took steps to secure the account and initiated an investigation, with the assistance of third-party specialists, to determine the nature and scope of the event, including any risk to data present within the account. That investigation is ongoing, but has determined that one Spouting Rock email account was subject to unauthorized access between May 5, 2022 and May 17, 2022. Because we could not rule out access to specific data within the mailbox, we took steps to identify what information was contained within the mailbox, and to whom that information related. We are providing this notice to you because we determined that your information was present in the impacted data during the period of unauthorized access.

What Information Was Involved? While our investigation remains ongoing, on or about July 15, 2022, our review of the involved systems determined that the impacted files included your [Extra2] and name.

What We Are Doing. We take this incident and the security of information within our care seriously. Upon discovery of this incident, we began an in-depth investigation with the assistance of third-party specialists to determine the full nature and scope of this incident. As part of our ongoing commitment to the privacy of information in our care, we are reviewing our existing policies and procedures and implementing additional safeguards to further secure the information in our systems as appropriate. As an added precaution, we arranged to have Experian provide credit monitoring services for 24 months at no cost to you. Instructions on how to enroll in these services are included with this letter. We will also notify relevant state regulatory authorities as required by law.

What You Can Do. We encourage you to remain vigilant against incidents of identity theft and fraud by reviewing your account statements and monitoring your free credit reports for suspicious activity and to detect errors over the next 12 to 24 months. Please also review the information contained in the enclosed *Steps You Can Take to Help Protect Personal Information*. You may also enroll in the complimentary identity credit monitoring services we are making available to you. Enrollment instructions are attached to this letter.

925 W. Lancaster Ave.,
Suite 250
Bryn Mawr, PA 19010
610•788•2128

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For More Information. We understand you may have additional questions not addressed by this letter. If you have questions, please call our dedicated assistance line at (833) 796-8638 Monday through Friday 8 am – 10 pm CT, Saturday and Sunday 10 am – 7 pm CT (excluding major U.S. holidays). Be prepared to provide your engagement number B058924.

Sincerely,

Spouting Rock Asset Management, LLC

STEPS YOU CAN TAKE TO PROTECT PERSONAL INFORMATION

Enroll in Credit Monitoring

To help protect your identity, we are offering complimentary access to Experian IdentityWorksSM for [Extra3].

If you believe there was fraudulent use of your information as a result of this incident 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 [Extra3] 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 [Extra3] 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: www.experianidworks.com/credit
- Provide your **activation code**: ABCDEFGHI

If you have questions about the product, need assistance with Identity Restoration that arose as a result of this incident, or would like an alternative to enrolling in Experian IdentityWorks online, please contact Experian's customer care team at (833) 796-8638 by November 30, 2022. Be prepared to provide engagement number B058924 as proof of eligibility for the Identity Restoration services by Experian.

ADDITIONAL DETAILS REGARDING YOUR [Extra3] 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.

* 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.

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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 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
1-888-298-0045	1-888-397-3742	1-833-395-6938
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 District of Columbia residents, the District of Columbia Attorney General may be contacted at: 400 6th Street, NW, Washington, DC 20001; 202-727-3400; and oag.dc.gov.

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. Spouting Rock is located at 925 W Lancaster Ave Suite 250, Bryn Mawr, PA 19010.

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.

For Rhode Island residents, the Rhode Island Attorney General may be reached at: 150 South Main Street, Providence, RI 02903; www.riag.ri.gov; and 1-401-274-4400. Under Rhode Island law, you have the right to obtain any police report filed in regard to this incident. There is 1 Rhode Island resident impacted by this incident.



EXHIBIT B



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

December 5, 2022

i6869-L01-0000001 T00001 P001 *****SCH 5-DIGIT 12345



SAMPLE A SAMPLE - L01 ADULT
APT ABC
123 ANY STREET
ANYTOWN, ST 12345-6789



[RE: Line]

Dear Sample A. Sample:

Spouting Rock Asset Management, LLC (“Spouting Rock”) is writing to make you aware of an incident that may affect some of your personal information. We take this incident seriously and write to provide you with information about the incident, what we are doing in response, and the resources that we are making available to you to help protect your information, should you feel it is appropriate to do so.

What Happened? On or about May 17, 2022, Spouting Rock became aware of suspicious activity involving a single employee O365 account. We promptly took steps to secure the account and initiated an investigation, with the assistance of third-party specialists, to determine the nature and scope of the event, including any risk to data present within the account. That investigation determined that one Spouting Rock email account was subject to unauthorized access between May 5, 2022 and May 17, 2022. Because we could not rule out access to specific data within the mailbox, we took steps to identify what information was contained within the mailbox, and to whom that information related. We are providing this notice to you because we determined that your information was present in the impacted data during the period of unauthorized access.

What Information Was Involved? Our review of the involved systems determined that the impacted files included your [Data Elements] and name.

What We Are Doing. We take this incident and the security of information within our care seriously. Upon discovery of this incident, we began an in-depth investigation with the assistance of third-party specialists to determine the full nature and scope of this incident. As part of our ongoing commitment to the privacy of information in our care, we are reviewing our existing policies and procedures and implementing additional safeguards to further secure the information in our systems as appropriate. As an added precaution, we arranged to have Experian provide credit monitoring services for 24 months at no cost to you. Instructions on how to enroll in these services are included with this letter. We will also notify relevant state regulatory authorities as required by law.

What You Can Do. We encourage you to remain vigilant against incidents of identity theft and fraud by reviewing your account statements and monitoring your free credit reports for suspicious activity and to detect errors over the next 12 to 24 months. Please also review the information contained in the enclosed *Steps You Can Take to Help Protect Your Information*. You may also enroll in the complimentary identity credit monitoring services we are making available to you. Enrollment instructions are attached to this letter.

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For More Information. We understand you may have additional questions not addressed by this letter. If you have questions, please call our dedicated assistance line at (833) 796-8638, Monday through Friday 8 am – 10 pm CT, Saturday and Sunday 10 am – 7 pm CT (excluding major U.S. holidays).

Sincerely,

Spouting Rock Asset Management, LLC

STEPS YOU CAN TAKE TO 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 as a result of this incident 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 Months 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 March 31, 2023** (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 that arose as a result of this incident, or would like an alternative to enrolling in Experian IdentityWorks online, please contact Experian's customer care team at (833) 796-8638 by March 31, 2023. Be prepared to provide engagement number B081502 as proof of eligibility for the Identity Restoration services by Experian.

ADDITIONAL DETAILS REGARDING YOUR 24 MONTHS 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.

* 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.



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 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
1-888-298-0045	1-888-397-3742	1-833-395-6938
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 District of Columbia residents, the District of Columbia Attorney General may be contacted at: 400 6th Street, NW, Washington, DC 20001; 202-727-3400; and oag.dc.gov.

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. Spouting Rock is located at 925 W Lancaster Ave Suite 250, Bryn Mawr, PA 19010.

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