



Baker&Hostetler LLP

1735 Market Street
Suite 3300
Philadelphia, PA 19103-7501

T 215.568.3100
F 215.568.3439
www.bakerlaw.com

David B. Sherman
direct dial: 215.564.8380
dsherman@bakerlaw.com

September 19, 2022

VIA EMAIL (IDTHEFT@OAG.STATE.MD.US)

Brian E. Frosh
Attorney General
Office of the Attorney General
Attn: Security Breach Notification
200 St. Paul Place
Baltimore, MD 21202

Re: Incident Notification

Dear Attorney General Frosh:

We are writing on behalf of our client, Ocean House Management (“OHM”), to notify your office concerning a cybersecurity incident.

Through an investigation of an incident involving computer server inoperability, OHM determined that an unauthorized party may have accessed some of OHM’s computer systems. Upon learning of the incident, OHM moved quickly to clean the affected servers and implement enhanced monitoring and alerting software. OHM also notified law enforcement of the incident. OHM undertook a comprehensive review of the accessed or potentially acquired information from the computer servers and determined, on August 16, 2022, that the information may have contained the name, Social Security number, financial account number and/or payment card number of 27 Maryland residents.

On September 19, 2022, OHM is providing notification to the Maryland residents via United States First-Class mail. A sample copy of the notification letter is enclosed. OHM will offer the affected residents with Social Security numbers potentially involved a complimentary one-year subscription to identity monitoring services through Equifax. OHM also will establish a dedicated, toll-free call center that individuals can call to obtain more information regarding the incident.

To help protect against an incident like this from happening in the future, OHM is taking steps to enhance its existing security protocols.

Atlanta Chicago Cincinnati Cleveland Columbus Costa Mesa Dallas Denver Houston
Los Angeles New York Orlando Philadelphia San Francisco Seattle Washington, DC Wilmington

September 19, 2022

Page 2

Please do not hesitate to contact me if you have any questions regarding this matter.

Sincerely,

A handwritten signature in dark ink, appearing to read "David B. Sherman". The signature is fluid and cursive, with the first name "David" being more prominent and the last name "Sherman" following in a similar style.

David B. Sherman
Partner

Enclosure



Return Mail Processing Center
P.O. Box 6336
Portland, OR 97228-6336

<<Mail ID>>
<<Name 1>>
<<Name 2>>
<<Address 1>>
<<Address 2>>
<<Address 3>>
<<Address 4>>
<<Address 5>>
<<City>><<State>><<Zip>>
<<Country>>

<<Date>>

Dear <<Name 1>>:

Ocean House Management (“OHM”) is the current or former property management company for <<Property>>. OHM is writing to inform you that we identified and addressed a data security incident at OHM that may have involved your information. This notice explains the incident, measures we have taken, and some steps you may want to take in response.

Through our investigation of an incident involving computer server inoperability, OHM determined that an unauthorized party may have accessed some of OHM’s computer systems. Upon learning of this, we moved quickly to clean the affected servers and implement enhanced monitoring and alerting software. We also notified law enforcement of this incident.

[IF AH238-Adult CM]

<<We undertook a comprehensive review of the accessed or potentially acquired information from those computer servers and determined that the information may include your name, <<Breached Elements>>. As a precaution, we have secured the services of Equifax to offer you a complimentary one-year membership to Equifax Complete™ Premier which includes credit monitoring and fraud protection. Enrolling in this program will not hurt your credit score. For more information on Equifax Complete™ Premier, including instructions on how to activate your complimentary membership, as well as some additional steps you can take in response to this incident, please see the pages that follow this letter.>>

[IFAH239-Adult CT CM]

<<We undertook a comprehensive review of the accessed or potentially acquired information from those computer servers and determined that the information may include your name, <<Breached Elements>>. As a precaution, we have secured the services of Equifax to offer you a complimentary two-year membership to Equifax Complete™ Premier which includes credit monitoring and fraud protection. Enrolling in this program will not hurt your credit score. For more information on Equifax Complete™ Premier, including instructions on how to activate your complimentary membership, as well as some additional steps you can take in response to this incident, please see the pages that follow this letter.>>

We encourage you to remain vigilant for incidents of fraud by monitoring your financial account statements. If you see charges or activity that you did not authorize, please contact your financial institution immediately.

We regret any inconvenience or concern this may cause you. We are committed to improving and maintaining your confidence in us. If you have any questions, please call OHM’s incident response line at 855-927-3154. The incident response line is open Monday through Friday, 9:00 a.m. to 9:00 p.m., Eastern Time.

Sincerely,

Dant Hirsch, President & Managing Director

Equifax Complete™ Premier Enrollment Information

You must be over age 18 with a credit file to take advantage of the product

Key Features

- Annual access to your 3-bureau credit report and VantageScore¹ credit scores.
- Daily access to your Equifax credit report and 1-bureau VantageScore credit score.
- 3-bureau credit monitoring² with email notifications of key changes to your credit reports.
- WebScan notifications³ when your personal information, such as Social Security Number, credit/debit card or bank account numbers are found on fraudulent Internet trading sites.
- Automatic fraud alerts⁴, which encourages potential lenders to take extra steps to verify your identity before extending credit, plus blocked inquiry alerts and Equifax credit report lock⁵.
- Identity Restoration to help restore your identity should you become a victim of identity theft, and a dedicated Identity Restoration Specialist to work on your behalf.
- Up to \$1,000,000 of identity theft insurance coverage for certain out of pocket expenses resulting from identity theft⁶.
- Lost Wallet Assistance if your wallet is lost or stolen, and one-stop assistance in canceling and reissuing credit, debit and personal identification cards.

Activation Instructions

Go to www.equifax.com/activate

Enrollment Deadline: <<Enrollment Deadline>>

Enter your unique Activation Code of <<Activation Code>> then click “Submit” and follow these 4 steps:

1. Register:
Complete the form with your contact information and click “Continue”.
If you already have a myEquifax account, click the ‘Sign in here’ link under the “Let’s get started” header.
Once you have successfully signed in, you will skip to the Checkout Page in Step 4.
2. Create Account:
Enter your email address, create a password, and accept the terms of use.
3. Verify Identity:
To enroll in your product, we will ask you to complete our identity verification process.
4. Checkout:
Upon successful verification of your identity, you will see the Checkout Page.
Click ‘Sign Me Up’ to finish enrolling.
You’re done!
The confirmation page shows your completed enrollment.
Click “View My Product” to access the product features.

¹The credit scores provided are based on the VantageScore® 3.0 model. For three-bureau VantageScore credit scores, data from Equifax®, Experian®, and TransUnion® are used respectively. Any one-bureau VantageScore uses Equifax data. Third parties use many different types of credit scores and are likely to use a different type of credit score to assess your creditworthiness.

²Credit monitoring from Experian and TransUnion will take several days to begin.

³WebScan searches for your Social Security Number, up to 5 passport numbers, up to 6 bank account numbers, up to 6 credit/debit card numbers, up to 6 email addresses, and up to 10 medical ID numbers. WebScan searches thousands of Internet sites where consumers' personal information is suspected of being bought and sold, and regularly adds new sites to the list of those it searches. However, the Internet addresses of these suspected Internet trading sites are not published and frequently change, so there is no guarantee that we are able to locate and search every possible Internet site where consumers' personal information is at risk of being traded.

⁴The Automatic Fraud Alert feature is made available to consumers by Equifax Information Services LLC and fulfilled on its behalf by Equifax Consumer Services LLC.

⁵Locking your Equifax credit report will prevent access to it by certain third parties. Locking your Equifax credit report will not prevent access to your credit report at any other credit reporting agency. Entities that may still have access to your Equifax credit report include: companies like Equifax Global Consumer Solutions, which provide you with access to your credit report or credit score, or monitor your credit report as part of a subscription or similar service; companies that provide you with a copy of your credit report or credit score, upon your request; federal, state and local government agencies and courts in certain circumstances; companies using the information in connection with the underwriting of insurance, or for employment, tenant or background screening purposes; companies that have a current account or relationship with you, and collection agencies acting on behalf of those whom you owe; companies that authenticate a consumer's identity for purposes other than granting credit, or for investigating or preventing actual or potential fraud; and companies that wish to make pre-approved offers of credit or insurance to you. To opt out of such pre-approved offers, visit www.optoutprescreen.com.

⁶The Identity Theft Insurance benefit is underwritten and administered by American Bankers Insurance Company of Florida, an Assurant company, under group or blanket policies issued to Equifax, Inc., or its respective affiliates for the benefit of its members. Please refer to the actual policies for terms, conditions, and exclusions of coverage. Coverage may not be available in all jurisdictions.

ADDITIONAL STEPS YOU CAN TAKE

We remind you it is always advisable to be vigilant for incidents of fraud or identity theft by reviewing your account statements and free credit reports for any unauthorized activity over the next 12 to 24 months. You may obtain a copy of your credit report, free of charge, once every 12 months from each of the three nationwide credit reporting companies. To order your annual free credit report, please visit www.annualcreditreport.com or call toll free at 1-877-322-8228. Contact information for the three nationwide credit reporting companies is as follows:

- *Equifax*, PO Box 740241, Atlanta, GA 30374, www.equifax.com, 1-800-685-1111
- *Experian*, PO Box 2002, Allen, TX 75013, www.experian.com, 1-888-397-3742
- *TransUnion*, PO Box 2000, Chester, PA 19016, www.transunion.com, 1-800-916-8800

If you believe you are the victim of identity theft or have reason to believe your personal information has been misused, you should immediately contact the Federal Trade Commission and/or the Attorney General's office in your state. You can obtain information from these sources about steps an individual can take to avoid identity theft as well as information about fraud alerts and security freezes. You should also contact your local law enforcement authorities and file a police report. Obtain a copy of the police report in case you are asked to provide copies to creditors to correct your records. Contact information for the Federal Trade Commission is as follows:

- *Federal Trade Commission*, Consumer Response Center, 600 Pennsylvania Avenue NW, Washington, DC 20580, 1-877-IDTHEFT (438-4338), www.identitytheft.gov

Fraud Alerts and Credit or Security Freezes:

Fraud Alerts: There are two types of general fraud alerts you can place on your credit report to put your creditors on notice that you may be a victim of fraud—an initial alert and an extended alert. You may ask that an initial fraud alert be placed on your credit report if you suspect you have been, or are about to be, a victim of identity theft. An initial fraud alert stays on your credit report for one year. You may have an extended alert placed on your credit report if you have already been a victim of identity theft with the appropriate documentary proof. An extended fraud alert stays on your credit report for seven years.

To place a fraud alert on your credit reports, contact one of the nationwide credit bureaus. A fraud alert is free. The credit bureau you contact must tell the other two, and all three will place an alert on their versions of your report.

For those in the military who want to protect their credit while deployed, an Active Duty Military Fraud Alert lasts for one year and can be renewed for the length of your deployment. The credit bureaus will also take you off their marketing lists for pre-screened credit card offers for two years, unless you ask them not to.

Credit or Security Freezes: You have the right to put a credit freeze, also known as a security freeze, on your credit file, free of charge, which makes it more difficult for identity thieves to open new accounts in your name. That's because most creditors need to see your credit report before they approve a new account. If they can't see your report, they may not extend the credit.

How do I place a freeze on my credit reports? There is no fee to place or lift a security freeze. Unlike a fraud alert, you must separately place a security freeze on your credit file at each credit reporting company. For information and instructions to place a security freeze, contact each of the credit reporting agencies at the addresses below:

- **Experian Security Freeze**, PO Box 9554, Allen, TX 75013, www.experian.com
- **TransUnion Security Freeze**, PO Box 2000, Chester, PA 19016, www.transunion.com
- **Equifax Security Freeze**, PO Box 105788, Atlanta, GA 30348, www.equifax.com

You'll need to supply your name, address, date of birth, Social Security number and other personal information.

After receiving your freeze request, each credit bureau will provide you with a unique PIN (personal identification number) or password. Keep the PIN or password in a safe place. You will need it if you choose to lift the freeze.

How do I lift a freeze? A freeze remains in place until you ask the credit bureau to temporarily lift it or remove it altogether. If the request is made online or by phone, a credit bureau must lift a freeze within one hour. If the request is made by mail, then the bureau must lift the freeze no later than three business days after getting your request.

If you opt for a temporary lift because you are applying for credit or a job, and you can find out which credit bureau the business will contact for your file, you can save some time by lifting the freeze only at that particular credit bureau. Otherwise, you need to make the request with all three credit bureaus.

Ocean House Management may be contacted at 1 Bluff Avenue, Watch Hill, RI 02891 or by phone at (855) 678-0364.

[IF AH238-Adult CM]

<<Additional information for residents of the following states:

Maryland: You may contact and obtain information from your state attorney general at: *Maryland Attorney General's Office*, 200 St. Paul Place, Baltimore, MD 21202, 1-888-743-0023 / 1-410-576-6300, www.oag.state.md.us

New York: You may contact and obtain information from these state agencies: *New York Department of State Division of Consumer Protection*, One Commerce Plaza, 99 Washington Ave., Albany, NY 12231-0001, 518-474-8583 / 1-800-697-1220, <http://www.dos.ny.gov/consumerprotection>; and *New York State Office of the Attorney General*, The Capitol, Albany, NY 12224-0341, 1-800-771-7755, <https://ag.ny.gov>

North Carolina: You may contact and obtain information from your state attorney general at: *North Carolina Attorney General's Office*, 9001 Mail Service Centre, Raleigh, NC 27699, 1-919-716-6000 / 1-877-566-7226, www.ncdoj.gov

West Virginia: You have the right to ask that nationwide consumer reporting agencies place “fraud alerts” in your file to let potential creditors and others know that you may be a victim of identity theft, as described above. You also have a right to place a security freeze on your credit report, as described above.

A Summary of Your Rights Under the Fair Credit Reporting Act: The federal Fair Credit Reporting Act (FCRA) promotes the accuracy, fairness, and privacy of information in the files of consumer reporting agencies. There are many types of consumer reporting agencies, including credit bureaus and specialty agencies (such as agencies that sell information about check writing histories, medical records, and rental history records). Your major rights under the FCRA are summarized below. For more information, including information about additional rights, go to www.consumerfinance.gov/learnmore or write to: Consumer Financial Protection Bureau, 1700 G Street NW, Washington, DC 20552.

- You must be told if information in your file has been used against you.
- You have the right to know what is in your file.
- You have the right to ask for a credit score.
- You have the right to dispute incomplete or inaccurate information.
- Consumer reporting agencies must correct or delete inaccurate, incomplete, or unverifiable information.
- Consumer reporting agencies may not report outdated negative information.
- Access to your file is limited.
- You must give your consent for reports to be provided to employers.
- You may limit “prescreened” offers of credit and insurance you get based on information in your credit report.
- You have a right to place a “security freeze” on your credit report, which will prohibit a consumer reporting agency from releasing information in your credit report without your express authorization.
- You may seek damages from violators.

Identity theft victims and active duty military personnel have additional rights. >>

[IF AH239-Adult CT CM]

<<**Connecticut:** You may contact and obtain information from your state attorney general at: *Connecticut Attorney General's Office*, 165 Capitol Ave, Hartford, CT 06106, 1-860-808-5318, www.ct.gov/ag>>