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October 19, 2022

File No. 53223.2

VIA ELECTRONIC SUBMISSION

Attorney General Brian E. Frosh
Office of the Attorney General
Attn: Security Breach Notification
200 St. Paul Place
Baltimore, MD. 21202
Email: IDtheft@oag.state.md.us

Re: Notice of Data Security Incident

Dear Attorney General Frosh:

Lewis Brisbois Bisgaard & Smith LLP (“Lewis Brisbois”) represents Flambeau, Inc. (“Flambeau”) with respect to a recent data security incident described in greater detail below. The purpose of this letter is to notify you of the incident pursuant to Maryland’s data breach notification statute. (Md. Code Ann. Comm. Law §§ 14-3501-3508).

1. Nature of the Security Incident

On July 27, 2022, Flambeau experienced an incident disrupting access to certain systems within its digital network. Flambeau took immediate steps to secure its systems and promptly launched an investigation. Flambeau engaged independent digital forensics and incident response experts to determine what happened and investigate the extent of unauthorized activity in the environment. On September 16, 2022, Flambeau determined that personal information may have been potentially affected as a result of the incident. Although Flambeau has no reason to believe that any potentially affected information has been misused as a result of this incident, Flambeau has taken the necessary steps to notify all potentially impacted individuals.

2. Number of Maryland Resident(s) Affected

Flambeau notified two (2) Maryland residents of this incident via First-Class U.S. Mail on October 19, 2022. The impacted information included the residents’ first and last names, dates of birth, mailing addresses, and Social Security numbers. A sample copy of the notification letter is included with this correspondence.

3. Steps Taken Relating to the Incident

Following discovery of the data security incident, Flambeau implemented additional security features in its environment to reduce the risk of a similar incident occurring in the future. Additionally, Flambeau retained IDX, a company specializing in credit and identity monitoring services, to offer complimentary privacy and identity theft protection for 12 months to those with impacted Social Security numbers. These services also include credit and CyberScan monitoring, identity restoration, and a \$1 million identity theft insurance policy. The affected residents were also provided with additional information about steps to take to protect their confidential information and privacy.

4. Contact Information

Flambeau remains dedicated to protecting the personal information in its control. If you have any questions or need additional information, please contact me at (214) 722-7141 or by e-mail at Lindsay.Nickle@lewisbrisbois.com.

Please let me know if you have any questions.

Very truly yours,



Lindsay B. Nickle
LEWIS BRISBOIS BISGAARD & SMITH LLP

Enclosure: Sample Consumer Notification Letter



Return to IDX
P.O. Box 989728
West Sacramento, CA 95798-9728

To Enroll, Please Call:

1-833-875-0830

Or Visit:

<https://app.idx.us/account-creation/protect>
Enrollment Code: <<ENROLLMENT>>

<<FIRST NAME>> <<LAST NAME>>
<<ADDRESS1>>
<<ADDRESS2>>
<<CITY>>, <<STATE>> <<ZIP>>
<<Country>>

October 19, 2022

Subject: Notice of Data <<Variable Text 1: Breach or Security Incident>>

Dear <<FIRST NAME>> <<LAST NAME>>,

I am writing to inform you about a data security incident experienced by Flambeau, Inc. ("Flambeau") that may have affected your personal information. Flambeau takes the privacy and security of all personal information in its possession very seriously. Please read this letter carefully as it contains information regarding the incident and steps that you can take to help protect your personal information.

What Happened? On July 27, 2022, we experienced an incident that disrupted access to our computer systems. In response, we took immediate steps to secure the systems and promptly launched an investigation. We engaged independent digital forensics and incident response experts to help us determine what happened and to identify any information that may have been accessed or acquired without authorization. On September 16, 2022, we learned that your personal information may have been impacted in connection with the incident, which is the reason for this notification. **Please note that we have no evidence of the misuse or attempted misuse of any potentially impacted information.**

What Information Was Involved? The information potentially impacted in connection with this incident included your name as well as your W2 information include date of birth, mailing address, and Social Security number. **No health or medical records were included with this information. No information of any spouse or children was included.**

What Are We Doing? As soon as we discovered this incident, we took the immediate steps described above. In addition, we implemented measures to enhance the security of our digital environment in an effort to minimize the risk of a similar incident occurring in the future.

Although we have no evidence of the misuse of any potentially impacted information, we are providing you with information about steps that you can take to help protect your personal information and is offering you complimentary identity protection services through IDX – a data breach and recovery services expert. These services include <<12/24>> months of credit and dark web monitoring, a \$1 million identity fraud loss reimbursement policy, and fully managed identity theft recovery services.

The deadline to enroll in these services is January 19, 2023. With this protection, IDX will help to resolve issues if your identity is compromised.

What You Can Do: You can follow the recommendations on the following page to help protect your personal information. Flambeau also encourages you to enroll in the complimentary services being offered to you through IDX by using the enrollment code provided.

For More Information: Further information about how to protect your personal information appears on the following page. If you have questions or need assistance, please call IDX at 1-833-875-0830 from 8:00 A.M. to 8:00 P.M. Central Time, Monday through Friday (excluding holidays). IDX call center representatives are fully versed on this incident and can answer any questions that you may have.

Please accept my sincere apologies and know that we take this matter very seriously and deeply regret any worry or inconvenience this may cause you.

Sincerely,

A handwritten signature in black ink that reads "Sonja A. Stauffacher". The signature is written in a cursive, flowing style.

Sonja A. Stauffacher
VP Administration
Flambeau, Inc.
801 Lynn Avenue
Baraboo, WI 53913

Steps You Can Take to Protect Your Personal Information

Review Your Account Statements and Notify Law Enforcement of Suspicious Activity: As a precautionary measure, we recommend that you remain vigilant by reviewing your account statements and credit reports closely. If you detect any suspicious activity on an account, you should promptly notify the financial institution or company with which the account is maintained. You also should promptly report any fraudulent activity or any suspected incidence of identity theft to proper law enforcement authorities, your state attorney general, and/or the Federal Trade Commission (FTC).

Copy of Credit Report: You may obtain a free copy of your credit report from each of the three major credit reporting agencies once every 12 months by visiting <http://www.annualcreditreport.com/>, calling toll-free 1-877-322-8228, or by completing an Annual Credit Report Request Form and mailing it to Annual Credit Report Request Service, P.O. Box 105281, Atlanta, GA 30348. You also can contact one of the following three national credit reporting agencies:

Equifax

P.O. Box 105788
Atlanta, GA 30348
1-888-378-4329
www.equifax.com

Experian

P.O. Box 9532
Allen, TX 75013
1-800-831-5614
www.experian.com

TransUnion

P.O. Box 1000
Chester, PA 19016
1-800-916-8800
www.transunion.com

Fraud Alert: You may want to consider placing a fraud alert on your credit report. An initial fraud alert is free and will stay on your credit file for at least one year. The alert informs creditors of possible fraudulent activity within your report and requests that the creditor contact you prior to establishing any accounts in your name. To place a fraud alert on your credit report, contact any of the three credit reporting agencies identified above. Additional information is available at <http://www.annualcreditreport.com>.

Security Freeze: You have the right to put a security freeze on your credit file for up to one year at no cost. This will prevent new credit from being opened in your name without the use of a PIN number that is issued to you when you initiate the freeze. A security freeze is designed to prevent potential creditors from accessing your credit report without your consent. As a result, using a security freeze may interfere with or delay your ability to obtain credit. You must separately place a security freeze on your credit file with each credit reporting agency. In order to place a security freeze, you may be required to provide the consumer reporting agency with information that identifies you including your full name, Social Security number, date of birth, current and previous addresses, a copy of your state-issued identification card, and a recent utility bill, bank statement or insurance statement.

Additional Free Resources: You can obtain information from the consumer reporting agencies, the FTC, or from your respective state Attorney General about fraud alerts, security freezes, and steps you can take toward preventing identity theft. You may report suspected identity theft to local law enforcement, including to the FTC or to the Attorney General in your state.

Federal Trade Commission

600 Pennsylvania Ave, NW
Washington, DC 20580
consumer.ftc.gov
1-877-438-4338

Maryland Attorney General

St. Paul Plaza
200 St. Paul Place
Baltimore, MD 21202
marylandattorneygeneral.gov
1-888-743-0023

New York Attorney General

Bureau of Internet and Technology
Resources
28 Liberty Street
New York, NY 10005
ag.ny.gov
1-212-416-8433 / 1-800-771-7755

North Carolina Attorney General

9001 Mail Service Center
Raleigh, NC 27699
ncdoj.gov
1-877-566-7226

Rhode Island Attorney General

150 South Main Street
Providence, RI 02903
<http://www.riag.ri.gov>
riag.ri.gov
1-401-274-4400

Washington D.C. Attorney General

400 S 6th Street, NW
Washington, DC 20001
oag.dc.gov
1-202-727-3400

You also have certain rights under the Fair Credit Reporting Act (FCRA): These rights include to know what is in your file; to dispute incomplete or inaccurate information; to have consumer reporting agencies correct or delete inaccurate, incomplete, or unverifiable information; as well as other rights. For more information about the FCRA, and your rights pursuant to the FCRA, please visit https://files.consumerfinance.gov/f/201504_cfpb_summary_your-rights-under-fcra.pdf.