



MULLEN
COUGHLIN^{LLC}
ATTORNEYS AT LAW

Christopher J. DiLenno
Office: (267) 930-4775
Fax: (267) 930-4771
Email: cdilenno@mullen.law

426 W. Lancaster Avenue, Suite 200
Devon, PA 19333

October 28, 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 Breckenridge IS, Inc. and its subsidiary, Overby-Seawell Company (“OSC”) located at 3550 George Busbee Parkway N.W., Suite 300, Kennesaw, Georgia 30144, and are writing to notify your office on behalf of Renasant Bank (“Renasant”), a Mississippi-chartered bank headquartered in Tupelo, Mississippi of an incident that may affect the security of some personal information relating to thirteen (13) Maryland residents. By providing this notice, OSC 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

OSC provides property insurance validation services for various lender institutions, including Renasant, within the United States. For business purposes, OSC received the information of individuals from customer organizations which OSC utilized to validate property insurance for its customers.

On July 5, 2022, OSC discovered suspicious activity on certain computer systems. OSC immediately launched an investigation, with the assistance of third-party forensic specialists, to determine the nature and scope of the activity. The investigation determined that there was unauthorized access to certain of our servers beginning on May 26, 2022. OSC learned on July 11, 2022 that certain information related to our customers was obtained from OSC’s network and OSC immediately began the process of determining what data was impacted and to whom that data related. OSC undertook a comprehensive review of impacted files and later determined that

the files contained certain information provided by lenders related to individuals. OSC has seen no evidence of misuse of any information related to this incident. No systems or networks of our customers, such as Renasant, were impacted by this incident.

Starting on July 21, 2022, OSC began providing notice of the incident to customers and, as the review of the data continued, subsequently provided lenders with their specific data that was impacted by this incident. OSC worked with their customers to determine what personal information related to individuals was stored on the OSC network, and to whom that information related. During these communications, OSC offered to mail letters to potentially impacted individuals on behalf of these customers.

The information that could have been subject to unauthorized access includes name, address, and loan account numbers. No Social Security numbers or information related to any bank accounts maintained at Renasant were impacted by this incident.

Notice to Maryland Residents

OSC completed notice to individuals on October 28, 2022. OSC provided written notice of this incident to affected clients of Renasant, which includes thirteen (13) Maryland residents. Written notice was provided in substantially the same form as the letter attached here as ***Exhibit A***.

Other Steps Taken and To Be Taken

Upon discovering the event, OSC moved quickly to investigate and respond to the incident, assess the security of OSC systems, and identify potentially affected individuals. Further, OSC notified federal law enforcement regarding the event. OSC is also working to implement additional safeguards and training to its employees. As shown in Exhibit A, OSC is providing access to credit monitoring services for twenty-four (24) months, through IDX, to individuals whose personal information was potentially affected by this incident, at no cost to these individuals.

Additionally, OSC is providing impacted individuals with guidance on how to better protect against identity theft and fraud, including advising individuals to report any suspected incidents of identity theft or fraud to their credit card company and/or bank. OSC 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.

Office of the Attorney General
October 28, 2022
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Contact Information

Should you have any questions regarding this notification or other aspects of the data security event, please contact us at (267) 930-4775.

Very truly yours,

Christopher J. DiLenno of
MULLEN COUGHLIN LLC

CJD:bld
Enclosure

EXHIBIT A



INSURANCE SERVICES

P.O Box 989728

West Sacramento, CA 95798-9728

To Enroll, Please Call:

(833) 875-0833

Or Visit:

<https://response.idx.us/OSCrenasant>

Enrollment Code: <<Enrollment Code>>

<<Name 1>>

<<Name 2>>

<<Address1>>

<<Address2>>

<<City>>, <<State>> <<Zip>>

October 28, 2022

Notice of Data <<Event/Breach>>

Dear <<Name 1>> <<Name 2>>:

Overby-Seawell Company ("OSC") writes to notify you of an incident that affected the privacy of some of your information. OSC is a vendor that provides property insurance validation for banks and lenders, including Renasant Bank. To perform these services, OSC was provided certain information related to property(ies) you own or for which you co-signed. We are providing this letter in connection with property insurance validation services we provided to Renasant Bank. This letter includes details of the incident, OSC's response, and steps you may take to better protect against possible misuse of your information, should you feel it appropriate to do so.

What Happened? On July 5, 2022, OSC discovered suspicious activity on certain computer systems. We immediately launched an investigation, with the assistance of third-party forensic specialists, to determine the nature and scope of the activity. Our investigation determined that there was unauthorized access to certain of our servers beginning on May 26, 2022. We learned on July 11, 2022 that certain customer information was obtained from OSC's network. OSC undertook a diligent review of all impacted files. This review determined that the files contained certain information related to you. Our business customers' systems, such as Renasant Bank's, were not impacted by this incident.

What Information Was Involved? OSC determined that the following information related to you was present within the impacted files: your name, address, and loan number. Your Social Security number and/or information related to any bank accounts you maintain with Renasant Bank were not impacted by this event. OSC is not aware of any misuse of your information as a result of this incident.

What We Are Doing. Upon discovery, we immediately commenced an investigation to confirm the nature and scope of the incident. We reported this incident to law enforcement and are cooperating and assisting in their investigation. We have deployed enhanced monitoring across our servers, implemented advanced security measures throughout our network, and we are taking steps to implement additional safeguards and review policies and procedures relating to data privacy and security.

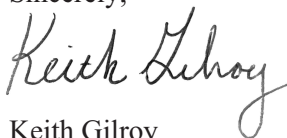
Securing and protecting your information remains our highest priority. Although we are not aware of any misuse of your information as a result of this event, out of an abundance of caution, we are offering you complimentary credit monitoring through IDX. These services will be available to you for 24 months at no cost to you in order to give you peace of mind. This letter contains additional information regarding these services and instructions on how you may enroll. You must complete the enrollment steps listed in this letter.

What You Can Do. We recommend that you activate your complimentary credit monitoring services. OSC also encourages you to remain vigilant against incidents of identity theft and fraud by reviewing your account statements and monitoring free credit reports for suspicious activity and to detect errors. You can review the enclosed *Steps You Can Take to Help Protect Personal Information* for additional details on how to take steps to protect your information, should you feel it is necessary to do so. Please report any suspected activity to OSC.

For More Information. We understand that you may have questions about this incident that are not addressed in this letter. To ensure your questions are answered in a timely manner, please go to <https://response.idx.us/OSCrenasant> or call (833) 875-0833, Monday through Friday, from 9:00 a.m. to 9:00 p.m. Eastern Time. Additionally, you can write to us at Overby-Seawell Company, Attention: Incident Response, 3550 George Busbee Parkway NW, Kennesaw, GA 30144.

We sincerely regret any inconvenience or concern this incident may cause you.

Sincerely,

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

Keith Gilroy
Division President
Overby-Seawell Company

STEPS YOU CAN TAKE TO HELP PROTECT PERSONAL INFORMATION

Credit Monitoring Enrollment Instructions

1. Website and Enrollment. Go to <https://response.idx.us/OSCrenasant> and follow the instructions for enrollment using your Enrollment Code provided at the top of the letter. Please note the deadline to enroll is January 28, 2023.

2. Activate the credit monitoring provided as part of your IDX identity protection membership. The monitoring included in the membership must be activated to be effective. Note: You must have established credit and access to a computer and the internet to use this service. If you need assistance, IDX will be able to assist you.

3. Telephone. Contact IDX at (833) 875-0833 to gain additional information about this event and speak with knowledgeable representatives about the appropriate steps to take to protect your credit identity.

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 Massachusetts Residents, Under Massachusetts law, you have the right to obtain any police report filed in regard to this incident. If you are the victim of identity theft, you also have the right to file a police report and obtain a copy of it.

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.

For New Mexico residents, you have rights pursuant to the Fair Credit Reporting Act, such as the right to be told if information in your credit file has been used against you, the right to know what is in your credit file, the right to ask for your credit score, and the right to dispute incomplete or inaccurate information. Further, pursuant to the Fair Credit Reporting Act, the consumer reporting bureaus 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 credit reports to be provided to employers; you may limit “**prescreened**” offers of credit and insurance you get based on information in your credit report; and you may seek damages from violator. You may have additional rights under the Fair Credit Reporting Act not summarized here. Identity theft victims and active duty military personnel have specific additional rights pursuant to the Fair Credit Reporting Act. We encourage you to review your rights pursuant to the Fair Credit Reporting Act by visiting www.consumerfinance.gov/f/201504_cfpb_summary_your-rights-under-fcra.pdf, or by writing Consumer Response Center, Room 130-A, Federal Trade Commission, 600 Pennsylvania Ave. N.W., Washington, D.C. 20580.

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 are 1 Rhode Island residents impacted



MULLEN
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ATTORNEYS AT LAW

Christopher J. DiLenno
Office: (267) 930-4775
Fax: (267) 930-4771
Email: cdiienno@mullen.law

426 W. Lancaster Avenue, Suite 200
Devon, PA 19333

November 14, 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 represent Breckenridge IS, Inc. located at 3550 George Busbee Parkway N.W., Suite 300, Kennesaw, Georgia 30144, and are writing to supplement our October 28, 2022 notice to your office which is attached hereto as ***Exhibit A***. By providing this notice, Breckenridge 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

Breckenridge provides property insurance validation services for various lender institutions within the United States. On July 5, 2022, Breckenridge discovered suspicious activity on certain computer systems. Breckenridge immediately launched an investigation, with the assistance of third-party forensic specialists, to determine the nature and scope of the activity. The investigation determined that there was unauthorized access to certain of our servers beginning on May 26, 2022. Breckenridge learned on July 11, 2022 that certain information related to our employees was obtained from the network and Breckenridge immediately began the process of determining what specific data and whose data was impacted.

Starting on July 21, 2022, Breckenridge began providing notice of the incident to its customers. At that time before determining any specific impacted individuals as the review of the data continued, Breckenridge provided preliminary information to its employees and the possibility of an impact to their personal data.

Now that our review of the data is completed, we know that the information that could have been subject to unauthorized access includes name, address, Social Security number, Alien number and

Notice to Maryland Residents

Breckenridge completed notice to affected individuals on November 14, 2022. This notice includes fourteen (14) additional Maryland residents. Written notice was provided in substantially the same form as the letter attached here as ***Exhibit B***.

Other Steps Taken and To Be Taken

Upon discovering the event, Breckenridge moved quickly to investigate and respond to the incident, assess the security of Breckenridge systems, and identify potentially affected individuals. Further, Breckenridge notified federal law enforcement regarding the event. Breckenridge is also working to implement additional safeguards and training to its employees. As shown in Exhibit B, Breckenridge is providing access to credit monitoring services for 24 months, through IDX, to individuals whose personal information was potentially affected by this incident, at no cost to these individuals.

Additionally, Breckenridge is providing impacted individuals with guidance on how to better protect against identity theft and fraud, including advising individuals to report any suspected incidents of identity theft or fraud to their credit card company and/or bank. Breckenridge 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) 930-4775.

Very truly yours,



Christopher J. DiIenno of
MULLEN COUGHLIN LLC

CJD:bld
Enclosure

EXHIBIT A

October 28 Notice

Mary Freed

From: Brittany De Hoyos
Sent: Friday, October 28, 2022 3:47 PM
To: idtheft@oag.state.md.us
Cc: Christopher Dilenno; Gregory Mazmanian; Mary Freed; John Mullen
Subject: Breckenridge IS, Inc./Overby-Seawell Company - Notice of Data Event - MD
Attachments: Overby-Seawell Company - Notice of Data Event - MD.pdf

Dear Sir or Madam,

Please see the attached notice of data event.

Best,
Brittany

Brittany De Hoyos
Attorney
Mullen Coughlin LLC
426 W. Lancaster Avenue, Suite 200
Devon, PA 19333
(267) 930-4367 - Office
(316) 214-3202 - Mobile
bdehoyos@mullen.law



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MULLEN
COUGHLIN^{LLC}
ATTORNEYS AT LAW

Christopher J. DiLenno
Office: (267) 930-4775
Fax: (267) 930-4771
Email: cdilenno@mullen.law

426 W. Lancaster Avenue, Suite 200
Devon, PA 19333

October 28, 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 Breckenridge IS, Inc. and its subsidiary, Overby-Seawell Company (“OSC”) located at 3550 George Busbee Parkway N.W., Suite 300, Kennesaw, Georgia 30144, and are writing to notify your office on behalf of Renasant Bank (“Renasant”), a Mississippi-chartered bank headquartered in Tupelo, Mississippi of an incident that may affect the security of some personal information relating to thirteen (13) Maryland residents. By providing this notice, OSC 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.

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OSC provides property insurance validation services for various lender institutions, including Renasant, within the United States. For business purposes, OSC received the information of individuals from customer organizations which OSC utilized to validate property insurance for its customers.

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the files contained certain information provided by lenders related to individuals. OSC has seen no evidence of misuse of any information related to this incident. No systems or networks of our customers, such as Renasant, were impacted by this incident.

Starting on July 21, 2022, OSC began providing notice of the incident to customers and, as the review of the data continued, subsequently provided lenders with their specific data that was impacted by this incident. OSC worked with their customers to determine what personal information related to individuals was stored on the OSC network, and to whom that information related. During these communications, OSC offered to mail letters to potentially impacted individuals on behalf of these customers.

The information that could have been subject to unauthorized access includes name, address, and loan account numbers. No Social Security numbers or information related to any bank accounts maintained at Renasant were impacted by this incident.

Notice to Maryland Residents

OSC completed notice to individuals on October 28, 2022. OSC provided written notice of this incident to affected clients of Renasant, which includes thirteen (13) Maryland residents. Written notice was provided in substantially the same form as the letter attached here as ***Exhibit A***.

Other Steps Taken and To Be Taken

Upon discovering the event, OSC moved quickly to investigate and respond to the incident, assess the security of OSC systems, and identify potentially affected individuals. Further, OSC notified federal law enforcement regarding the event. OSC is also working to implement additional safeguards and training to its employees. As shown in Exhibit A, OSC is providing access to credit monitoring services for twenty-four (24) months, through IDX, to individuals whose personal information was potentially affected by this incident, at no cost to these individuals.

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Office of the Attorney General

October 28, 2022

Page 3

Contact Information

Should you have any questions regarding this notification or other aspects of the data security event, please contact us at (267) 930-4775.

Very truly yours,

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

Christopher J. DiLenno of
MULLEN COUGHLIN LLC

CJD:bld
Enclosure

EXHIBIT A



INSURANCE SERVICES

P.O Box 989728

West Sacramento, CA 95798-9728

To Enroll, Please Call:

(833) 875-0833

Or Visit:

<https://response.idx.us/OSCrenasant>

Enrollment Code: <<Enrollment Code>>

<<Name 1>>

<<Name 2>>

<<Address1>>

<<Address2>>

<<City>>, <<State>> <<Zip>>

October 28, 2022

Notice of Data <<Event/Breach>>

Dear <<Name 1>> <<Name 2>>:

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What Information Was Involved? OSC determined that the following information related to you was present within the impacted files: your name, address, and loan number. Your Social Security number and/or information related to any bank accounts you maintain with Renasant Bank were not impacted by this event. OSC is not aware of any misuse of your information as a result of this incident.

What We Are Doing. Upon discovery, we immediately commenced an investigation to confirm the nature and scope of the incident. We reported this incident to law enforcement and are cooperating and assisting in their investigation. We have deployed enhanced monitoring across our servers, implemented advanced security measures throughout our network, and we are taking steps to implement additional safeguards and review policies and procedures relating to data privacy and security.

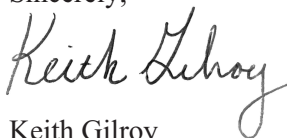
Securing and protecting your information remains our highest priority. Although we are not aware of any misuse of your information as a result of this event, out of an abundance of caution, we are offering you complimentary credit monitoring through IDX. These services will be available to you for 24 months at no cost to you in order to give you peace of mind. This letter contains additional information regarding these services and instructions on how you may enroll. You must complete the enrollment steps listed in this letter.

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We sincerely regret any inconvenience or concern this incident may cause you.

Sincerely,

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

Keith Gilroy
Division President
Overby-Seawell Company

STEPS YOU CAN TAKE TO HELP PROTECT PERSONAL INFORMATION

Credit Monitoring Enrollment Instructions

1. Website and Enrollment. Go to <https://response.idx.us/OSCrenasant> and follow the instructions for enrollment using your Enrollment Code provided at the top of the letter. Please note the deadline to enroll is January 28, 2023.

2. Activate the credit monitoring provided as part of your IDX identity protection membership. The monitoring included in the membership must be activated to be effective. Note: You must have established credit and access to a computer and the internet to use this service. If you need assistance, IDX will be able to assist you.

3. Telephone. Contact IDX at (833) 875-0833 to gain additional information about this event and speak with knowledgeable representatives about the appropriate steps to take to protect your credit identity.

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2. Social Security number;
3. Date of birth;
4. Addresses for the prior two to five years;
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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 Massachusetts Residents, Under Massachusetts law, you have the right to obtain any police report filed in regard to this incident. If you are the victim of identity theft, you also have the right to file a police report and obtain a copy of it.

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.

For New Mexico residents, you have rights pursuant to the Fair Credit Reporting Act, such as the right to be told if information in your credit file has been used against you, the right to know what is in your credit file, the right to ask for your credit score, and the right to dispute incomplete or inaccurate information. Further, pursuant to the Fair Credit Reporting Act, the consumer reporting bureaus 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 credit reports to be provided to employers; you may limit “**prescreened**” offers of credit and insurance you get based on information in your credit report; and you may seek damages from violator. You may have additional rights under the Fair Credit Reporting Act not summarized here. Identity theft victims and active duty military personnel have specific additional rights pursuant to the Fair Credit Reporting Act. We encourage you to review your rights pursuant to the Fair Credit Reporting Act by visiting www.consumerfinance.gov/f/201504_cfpb_summary_your-rights-under-fcra.pdf, or by writing Consumer Response Center, Room 130-A, Federal Trade Commission, 600 Pennsylvania Ave. N.W., Washington, D.C. 20580.

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 are 1 Rhode Island residents impacted

EXHIBIT B

<<Name 1>> <<Name 2>>
<<Address 1>>
<<Address 2>>
<<City>>, <<State>> <<Zip>>
<<Country>>

November 14, 2022

Notice of Data [Event/Breach]

Dear <<Name 1>> <<Name 2>>:

Breckenridge IS, Inc. ("Breckenridge") writes to notify you of an incident that affected the privacy of some of your information. This letter includes details of the incident, our response, and steps you may take to better protect against possible misuse of your information, should you feel it appropriate to do so.

What Happened? On July 5, 2022, Breckenridge discovered suspicious activity on certain computer systems. We immediately launched an investigation, with the assistance of third-party forensic specialists, to determine the nature and scope of the activity. Our investigation determined that there was unauthorized access to certain of our servers beginning on May 26, 2022. We learned on July 11, 2022 that certain information was stolen from Breckenridge network. Breckenridge undertook a comprehensive and detailed review of impacted files and determined on September 22, 2022, that the files contained certain information related to you. Breckenridge has seen no evidence of misuse of any information related to this incident.

What Information Was Involved? Breckenridge determined that the following information related to you was present within the impacted files: <data elements> and name.

What We Are Doing. Upon discovery, we immediately commenced an investigation to confirm the nature and scope of the incident. We reported this incident to law enforcement and are cooperating and assisting in the investigation. We are taking steps to implement additional safeguards and review policies and procedures relating to data privacy and security.

As an added precaution, we are also offering you complimentary access to 24 months of credit monitoring and identity theft restoration services, through IDX. You will need to enroll yourself in these services if you wish to do so, as we are not able to activate them on your behalf. Please review the instructions contained in the attached *Steps You Can Take to Help Protect Your Information* for additional detail on these services

What You Can Do. Breckenridge encourages you to remain vigilant against incidents of identity theft and fraud by reviewing your account statements and monitoring free credit reports for suspicious activity and to detect errors. You can review the enclosed *Steps You Can Take to Help Protect Personal Information* for additional details on how to take steps to protect your information, should you feel it is necessary to do so.

For More Information. We understand that you may have questions about this incident that are not addressed in this letter. To ensure your questions are answered in a timely manner, please call 1-833-896-8665, Monday through Friday, from 9:00 a.m. to 9:00 p.m. Eastern Time. Additionally, you can write to us at Overby-Seawell Company, Attention: Incident Response, 3550 George Busbee Parkway NW, Kennesaw, GA 30144.

We sincerely regret any inconvenience or concern this incident may cause you

Sincerely,

A handwritten signature in black ink, appearing to read "David A. Jordan". The signature is fluid and cursive, with the first name "David" being more prominent.

David A. Jordan
Chief Executive Officer
Breckenridge IS, Inc.

STEPS YOU CAN TAKE TO HELP PROTECT PERSONAL INFORMATION

Credit Monitoring Enrollment Instructions

1. Website and Enrollment. Go to <https://response.idx.us/Breckenridge> and follow the instructions for enrollment using your Enrollment Code provided at the top of the letter. Please note the deadline to enroll is February 14, 2023.

2. Activate the credit monitoring provided as part of your IDX identity protection membership. The monitoring included in the membership must be activated to be effective. Note: You must have established credit and access to a computer and the internet to use this service. If you need assistance, IDX will be able to assist you.

3. Telephone. Contact IDX at 1-833-896-8665 to gain additional information about this event and speak with knowledgeable representatives about the appropriate steps to take to protect your credit identity.

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
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