



MULLEN
COUGHLIN^{LLC}
ATTORNEYS AT LAW

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426 W. Lancaster Avenue, Suite 200
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November 2, 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 Bunkhouse Management, LLC (“Bunkhouse”) located at 1711 South Congress Avenue, Suite 300, Austin, Texas 78704, 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, Bunkhouse 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 around May 12, 2022, Bunkhouse discovered suspicious activity related to a Bunkhouse employee email account. Bunkhouse immediately took steps to secure the email account and launched an investigation which included working with third-party forensic specialists to determine the nature and scope of the activity. Bunkhouse’s investigation determined that there was unauthorized access to the affected email account from April 28, 2022, to May 11, 2022. However, the forensic investigation was unable to determine whether there was access to specific emails and attachments within the account. In an abundance of caution, a programmatic and manual review of the contents of the email account was completed to determine whether sensitive information was present in the emails at the time of the incident. Bunkhouse then worked to identify contact information for the impacted individuals. That process completed on July 22, 2022. Through this process, Bunkhouse determined that certain information related to certain individuals was accessible, although not necessarily actually accessed or viewed by unauthorized individuals, within the account at the time of this incident and may have been impacted.

The information that could have been subject to unauthorized access includes name, Social Security number, and health insurance information.

Notice to Maryland Residents

On or about November 2, 2022, Bunkhouse 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**. Bunkhouse's investigation into this event is ongoing and additional impacted individuals may be identified. This notification may be supplemented if it is determined that a significant number of additional Maryland residents are notified.

Other Steps Taken and To Be Taken

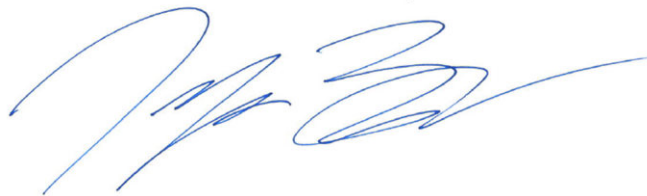
Upon discovering the event, Bunkhouse moved quickly to investigate and respond to the incident, assess the security of Bunkhouse systems, and identify potentially affected individuals. Further, Bunkhouse notified federal law enforcement regarding the event. Bunkhouse is also working to implement additional safeguards and training to its employees. Bunkhouse is providing access to credit monitoring services for at least twelve (12) months, through Experian, to individuals whose personal information was potentially affected by this incident, at no cost to these individuals.

Additionally, Bunkhouse is providing impacted individuals with guidance on how to better protect against identity theft and fraud. Bunkhouse 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. Bunkhouse is providing written notice of this incident to the three major credit reporting agencies, Equifax, Experian, and TransUnion.

Contact Information

Should you have any questions regarding this notification or other aspects of the data security event, please contact us at (267) 930-4784.

Very truly yours,

A handwritten signature in blue ink, appearing to read 'Jeff Boogay', with a long horizontal flourish extending to the right.

Jeffrey J. Boogay of
MULLEN COUGHLIN LLC

JJB/jlm
Enclosure

EXHIBIT A

Bunkhouse Management, LLC

Return Mail Processing
PO Box 999
Suwanee, GA 30024

November 2, 2022

5 1 1336 *****SNGLP

SAMPLE A. SAMPLE - L01

APT ABC



123 ANY ST

ANYTOWN, US 12345-6789



NOTICE OF [Extra1]

Dear Sample A. Sample:

Bunkhouse Management LLC (“Bunkhouse”) writes to inform you of a recent incident that may impact the privacy of some of your information. While we are unaware of any attempted or actual misuse of your information at this time, we are providing you with this notice in an abundance of caution, to inform you of the incident, our response, and steps you may take to help protect your information, should you feel it is necessary to do so.

What Happened? On or around May 12, 2022, Bunkhouse discovered suspicious activity related to a Bunkhouse employee email account. Bunkhouse immediately took steps to secure the email account and launched an investigation which included working with third-party forensic specialists to determine the nature and scope of the activity. Bunkhouse’s investigation determined that there was unauthorized access to the affected email account from April 28, 2022 to May 11, 2022. However, the forensic investigation was unable to determine whether there was access to specific emails and attachments within the account. In an abundance of caution, a programmatic and manual review of the contents of the email account was completed to determine whether sensitive information was present in the emails at the time of the incident. Bunkhouse then worked to identify contact information for the impacted individuals. That process completed on July 22, 2022. We are notifying you because that investigation determined certain information related to you may have been impacted.

What Information Was Involved? The information that may have been impacted by this incident includes your [Extra2] and name. At this time, we have no indication that your information was subject to actual or attempted misuse as a result of this incident.

What We Are Doing. The confidentiality, privacy, and security of information within our care is among Bunkhouse’s highest priorities. Upon learning of the incident, we took immediate steps to secure Bunkhouse’s email environment and investigate the activity. We commenced an investigation that included working with third-party forensic specialists to understand the nature and scope of the incident. As part of our ongoing commitment to the privacy of information in our care, we are reviewing our policies, procedures, and processes related to the storage and access of sensitive information to reduce the likelihood of a similar future incident.

As an added precaution, we are also offering [Extra3] of complimentary access to credit monitoring services through Experian. Individuals who wish to receive these services must enroll by following the below enrollment instructions, as we are unable to activate them on your behalf.

For More Information. We understand that you may have questions about this incident that are not addressed in this letter. If you have additional questions, or need assistance, please call our dedicated assistance line at **(855) 896-4452**, Monday through Friday, from 6 a.m. to 8 p.m. PST and Saturday and Sunday, from 8 a.m. to 5 p.m. PST (excluding all major US holidays). Be prepared to provide engagement # **[Engagement Number]** for assistance. You may also write to Bunkhouse at 1711 South Congress Avenue, Suite 300, Austin, TX 78704.

Bunkhouse takes the privacy and security of the information in our care seriously. We sincerely regret any inconvenience or concern this incident may cause you.

Sincerely,

Bunkhouse Management LLC

STEPS YOU CAN TAKE TO HELP PROTECT YOUR INFORMATION

Enroll in Credit Monitoring

To help protect your identity, we are offering a complimentary [Extra3] membership of Experian's® IdentityWorksSM. This product provides you with superior identity detection and resolution of identity theft. To activate your membership and start monitoring your personal information please follow the steps below:

- Ensure that you **enroll by: February 28, 2023** (Your code will not work after this date.)
- **Visit** the Experian IdentityWorks website to enroll: <https://www.experianidworks.com/3bcredit>
- Provide your **activation code: ABCDEFGHI**

If you have questions about the product, need assistance with identity restoration or would like an alternative to enrolling in Experian IdentityWorks online, please contact Experian's customer care team at **(855) 896-4452** by **February 28, 2023**. Be prepared to provide engagement number **[Engagement Number]** 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, Equifax and Transunion files 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.
- **Up to \$1 Million Identity Theft Insurance^{**}:** Provides coverage for certain costs and unauthorized electronic fund transfers.

If you believe there was fraudulent use of your information and would like to discuss how you may be able to resolve those issues, please reach out to an Experian agent at (855) 896-4452. 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 (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 this Identity Restoration support 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. You will also find self-help tips and information about identity protection at this site.

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.

* 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.

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 one-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 credit 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 California residents: Visit the California Office of Privacy Protection (www.oag.ca.gov/privacy) for additional information on protection against identity theft.

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. Bunkhouse is located at 1711 South Congress Avenue, Suite 300, Austin, TX 78704.

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 Oregon residents: Oregon Department of Justice, 1162 Court Street NE, Salem, OR 97301-4096, www.doj.state.or.us/, Telephone: 877-877-9392.