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November 18, 2022

VIA E-MAIL (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, GCG Wealth Management (“GCG”), to notify your office of a security incident. GCG is a financial advisory firm located in Charlotte, North Carolina.

On April 11, 2022, GCG launched an investigation into suspicious activity associated with an employee email account. GCG’s email system is hosted by an Advisor Group vendor/organization named Smarsh. Upon discovery, GCG took steps to secure the email account and began an investigation. While GCG has no evidence that any information was stolen or misused, on August 10, 2022, the investigation determined an unauthorized person accessed an employee’s email account that contained personal information including names, Social Security numbers, financial account numbers and driver’s license numbers. GCG then worked to identify addresses for the individuals whose information was involved, including nine (9) Maryland residents.

On November 8, 2022, GCG began mailing notification letters to the Maryland residents via U.S. mail in accordance with Md. Code Ann., Com. Law § 14-3504.¹ A copy of the

¹ This report is not, and does not constitute, a waiver of GCG’s objection that Maryland lacks personal jurisdiction over the company related to this matter.

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notification letter is enclosed. GCG is providing a telephone number for notified individuals to call with any questions they may have about the incident. GCG is offering notified individuals a complimentary one-year membership to credit monitoring and identity protection services.

To help prevent this type of incident from happening again, GCG is working with Advisor Group and Smarsh to implement additional measures to enhance its existing email controls.

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

Sincerely,

A handwritten signature in black ink that reads "M. Scott Koller". The signature is written in a cursive, flowing style.

M. Scott Koller
Partner

Enclosure



<<Date>> (Format: Month Day, Year)

<<first_name>> <<middle_name>> <<last_name>> <<suffix>>
<<address_1>>
<<address_2>>
<<city>>, <<state_province>> <<postal_code>>
<<country>>

Dear <<first_name>> <<last_name>>:

We are writing to notify you that GCG Wealth Management (“GCG”) experienced a security incident that may have involved some of your personal information. As you might know, GCG Wealth Management utilizes Woodbury Financial as our Broker Dealer and Registered Investment Advisor and is the organization in which our financial professionals are registered with. The parent company of Woodbury Financial is Advisor Group.

This letter explains the incident, outlines the measures we have taken, and provides steps you can take in response.

What Happened?

On April 11, 2022, we launched an investigation into suspicious activity originating from an employee’s email account. As soon as we became aware of the activity, we took immediate steps to secure the account and launched an investigation. Our investigation determined that an unauthorized individual accessed a GCG employee’s email account. GCG’s email system is hosted by an Advisor Group vendor/organization named Smarsh.

While we have no evidence that your specific information was accessed or misused, we are notifying you out of an abundance of caution. GCG took immediate steps to make sure our clients and partners information was no longer accessible. Your advisor has experienced no disruptions in servicing your account.

Unfortunately, due to the world we live in today, cyber security breaches are often a topic of conversation. It is our responsibility to make sure that we are keeping your information secure and inaccessible by outside parties. A responsibility we take seriously.

What Information Was Involved?

The account contained an email or attachment that may have included your information, including your name, address, date of birth, driver’s license number, financial account number, Social Security number, and other information related to the accounts we service on your behalf.

What We Are Doing.

Your confidence and trust are important to us, and we regret any inconvenience or concern this incident may cause. To further help protect your information, we have implemented additional measures to enhance our existing security protocols and are re-educating our staff for awareness on these types of incidents. Additionally, we have arranged to provide identity monitoring at no cost to you for one year through Kroll. The identity monitoring services we are making available to you include Credit Monitoring, Fraud Consultation, and Identity Theft Restoration. For more information on identity theft prevention and Kroll Identity Monitoring, including instructions on how to activate your complimentary membership, please visit the below website and see the additional information provided with this letter.

Visit <https://enroll.krollmonitoring.com> to activate and take advantage of your identity monitoring services.

You have until <<b2b_text_6 (ActivationDeadline)>> to activate your identity monitoring services.

Membership Number: <<MembershipNumber (S_N)>>

Securities and investment advisory services offered through Woodbury Financial Services, Inc. (WFS) member FINRA/SIPC.

WFS is separately owned and other entities and/or marketing names, products or services referenced here are independent of WFS.

For more information about Kroll and your Identity Monitoring services, you can visit info.krollmonitoring.com.

Additional information describing your services is included with this letter.

What You Can Do.

We encourage you to remain vigilant by reviewing your account statements and credit reports for any unauthorized activity over the next 12 to 24 months. If you see unauthorized charges or activity, please contact your financial institution immediately. For more information, including some additional steps you can take to help protect your information, please see the pages that follow this letter.

For More Information.

We regret this incident occurred and apologize for any inconvenience. If you have any questions, please call <<TFN>>, Monday through Friday, 9:00 a.m. to 6:30 p.m., Eastern Time, excluding major U.S. holidays.

Sincerely,

James Ball

James Ball

Chief Compliance Officer, GCG Wealth Management



Hal Gilbert

Senior Privacy Officer, Woodbury Financial Services, Inc.



TAKE ADVANTAGE OF YOUR IDENTITY MONITORING SERVICES

You have been provided with access to the following services from Kroll:

Single Bureau Credit Monitoring

You will receive alerts when there are changes to your credit data—for instance, when a new line of credit is applied for in your name. If you do not recognize the activity, you will have the option to call a Kroll fraud specialist, who will be able to help you determine if it is an indicator of identity theft.

Fraud Consultation

You have unlimited access to consultation with a Kroll fraud specialist. Support includes showing you the most effective ways to protect your identity, explaining your rights and protections under the law, assistance with fraud alerts, and interpreting how personal information is accessed and used, including investigating suspicious activity that could be tied to an identity theft event.

Identity Theft Restoration

If you become a victim of identity theft, an experienced Kroll licensed investigator will work on your behalf to resolve related issues. You will have access to a dedicated investigator who understands your issues and can do most of the work for you. Your investigator will be able to dig deep to uncover the scope of the identity theft, and then work to resolve it.

Kroll's activation website is only compatible with the current version or one version earlier of Chrome, Firefox, Safari and Edge.

To receive credit services, you must be over the age of 18 and have established credit in the U.S., have a Social Security number in your name, and have a U.S. residential address associated with your credit file.

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.ftc.gov/idtheft

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.

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.

GCG Wealth Management is located at 1415 Vantage Park Drive, Suite 250, Charlotte, NC, 28203, (704)-372-4491.

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: 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