

May 18, 2023

VIA E-MAIL

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

To Whom It May Concern,

Brown Rudnick LLP represents IMARK Electrical, Inc. (“IMARK”) located at 1997 Annapolis Exchange Parkway, Suite 300, Annapolis, MD 21401, in connection with a recent data security incident. We write to notify you of the incident in accordance with Maryland’s data breach notification statute, Md. Code Ann., Com. Law § 14-3504(h).

1. Nature of the Incident

On April 28, 2023, IMARK became aware of an unauthorized access to a portion of IMARK’s online platform that enables the exchange of loyalty points for merchandise and gifts after intercepting unencrypted communications between IMARK and the company that fulfills orders placed from the IMARK loyalty points website. IMARK took immediate steps to resolve the breach, determine what happened, and what information might have been accessed. IMARK continued its investigation with the help of a third-party firm, which determined that this incident might have involved personal information belonging to certain IMARK customers. IMARK then worked diligently to identify information associated with customers to provide them with notification of this incident.

2. Notice to Maryland Residents

This incident involved the personal information of fourteen (14) Maryland residents. The information involved includes first name, last name, username, portal password, business e-mail address, and business mailing address. The affected individuals will receive a letter notifying them of the incident and providing steps they can take to protect their information. A sample of the notification letter is attached. The notification letters will be sent via USPS Mail.

3. Additional Measures Taken to Address the Incident

Upon discovery of the incident, IMARK immediately contained the points of unauthorized access, blocked specific IP addresses, and heightened the security features of its online portal. IMARK is in the process of preparing to notify impacted individuals and provide them with information to protect against identity theft.

4. Contact Information

IMARK is dedicated to protecting the personal information in its control. Should you have any questions regarding this notification or other aspects of the incident, please contact me at (202) 536-1747 or at MRichardson@brownrudnick.com.

Sincerely,

A handwritten signature in black ink that reads "Mr. Richardson". The signature is written in a cursive, slightly stylized font.

BROWN RUDNICK LLP

601 Thirteenth Street NW

Washington, D.C. 20005

IMARK Electrical, Inc.

1997 Annapolis Exchange Parkway, Suite 300

Annapolis, MD 21401

Tel: 301-567-8888

Date: May ___, 2023



NOTICE OF DATA BREACH

What Happened?

On April 28, 2023 at roughly 4:00 PM Eastern Time (GMT – 500) IMARK was notified by an electrical member that someone (unknown and unauthorized by the member) had used that member's Gateway to Growth points to purchase merchandise. We promptly investigated and determined that an external actor had gained access to the IMARK Gateway to Growth website accounts only, and immediately shut down the affected website at approximately 8:30 PM Eastern Time after identifying the threat. Our investigation revealed that the (as yet) unknown bad actor was able to intercept unencrypted communications between IMARK and company responsible for fulfilling member merchandise orders using Gateway to Growth points. From our analysis of system access and use data, the breach began on April 28, 2023 at approximately 10:00 AM Eastern Time and the bad actor converted, in total (inclusive of all members impacted by this breach), less than \$2,000 (USD) worth of Gateway to Growth points into gift cards. We have since restored the stolen points to the impacted members' accounts.

What Information Was Involved?

Members' first and last names, IMARK portal username and password, business email addresses, and their business address were involved in this data breach. No other member information was accessible to the bad actor based upon their access to the Gateway to Growth area of IMARK's system.

What We Are Doing.

As mentioned above, we restored all Gateway to Growth points to members. We also encrypted member passwords, added identity verifying steps to log into the IMARK site (commonly referred to as multi-factor authentication), and blocked specific IP addresses. We are continuing to investigate this breach with a third-party security company to ensure IMARK is in the best possible position to avoid another breach from happening, including on-going monitoring of our system for similar (and other suspicious activity), monthly staff training for cybersecurity related issues, monthly phishing testing and review, and weekly checks on operating system and antivirus software and updates.

What You Can Do.	If you use or used the same password and email address that was compromised because of this breach for any other online account, change your password for those accounts and related security questions immediately. Stay vigilant and alert. Review your account statements, and monitor your free credit reports (typically offered annually by major consumer reporting agencies). You can also obtain information on preventing identity theft from the regulatory sources provided below, including, but not limited to, how to register and obtain fraud alerts and security freezes.						
Other Important Information. While we genuinely do not believe there is a risk of harm to any member because of this breach, below please find the contact information for relevant consumer reporting agencies and federal and state-based regulators who can provide you with additional information and resources to better avoid any further incidents occurring. Please note that the issuance of this notice has not been delayed by any law enforcement investigation. <u>Major Consumer Reporting Agencies</u> <table><tr><td> <u>Equifax</u> 1550 Peachtree Street N.W. Atlanta, Georgia 30309 https://www.equifax.com/personal/contact-us/ Toll Free: 1-888-378-4329 </td><td> <u>Experian</u> 475 Anton Blvd. Costa Mesa, California 92626 https://www.experian.com/help/ Toll Free: 1-888-397-3742 </td></tr><tr><td colspan="2"> <u>TransUnion</u> 555 West Adams Street Chicago, Illinois 60661 https://www.transunion.com/customer-support/contact-us-consumers?atvy=%7B%22201363%22%3A%22Experience+B%22%7D Toll Free: 1-888-806-1627 </td></tr><tr><td colspan="2"> <u>Federal Trade Commission</u> Bureau of Consumer Protection 600 Pennsylvania Avenue, NW Washington, DC 20580 https://www.ftc.gov/about-ftc/bureaus-offices/bureau-consumer-protection/about-bureau-consumer-protection Toll Free: 1-877-382-4357 </td></tr></table>		<u>Equifax</u> 1550 Peachtree Street N.W. Atlanta, Georgia 30309 https://www.equifax.com/personal/contact-us/ Toll Free: 1-888-378-4329	<u>Experian</u> 475 Anton Blvd. Costa Mesa, California 92626 https://www.experian.com/help/ Toll Free: 1-888-397-3742	<u>TransUnion</u> 555 West Adams Street Chicago, Illinois 60661 https://www.transunion.com/customer-support/contact-us-consumers?atvy=%7B%22201363%22%3A%22Experience+B%22%7D Toll Free: 1-888-806-1627		<u>Federal Trade Commission</u> Bureau of Consumer Protection 600 Pennsylvania Avenue, NW Washington, DC 20580 https://www.ftc.gov/about-ftc/bureaus-offices/bureau-consumer-protection/about-bureau-consumer-protection Toll Free: 1-877-382-4357	
<u>Equifax</u> 1550 Peachtree Street N.W. Atlanta, Georgia 30309 https://www.equifax.com/personal/contact-us/ Toll Free: 1-888-378-4329	<u>Experian</u> 475 Anton Blvd. Costa Mesa, California 92626 https://www.experian.com/help/ Toll Free: 1-888-397-3742						
<u>TransUnion</u> 555 West Adams Street Chicago, Illinois 60661 https://www.transunion.com/customer-support/contact-us-consumers?atvy=%7B%22201363%22%3A%22Experience+B%22%7D Toll Free: 1-888-806-1627							
<u>Federal Trade Commission</u> Bureau of Consumer Protection 600 Pennsylvania Avenue, NW Washington, DC 20580 https://www.ftc.gov/about-ftc/bureaus-offices/bureau-consumer-protection/about-bureau-consumer-protection Toll Free: 1-877-382-4357							
For More Information.	Our contact information is above, but you can also reach us toll-free at 1-800-338-8308.						

MD Breach Notification

Final Audit Report

2023-05-18

Created:	2023-05-18
By:	Ethan Lin (ELin@brownrudnick.com)
Status:	Signed
Transaction ID:	CBJCHBCAABAAVt1945UBAaATxZiSzk-ZY-zsji6EciU

"MD Breach Notification" History

-  Document created by Ethan Lin (ELin@brownrudnick.com)
2023-05-18 - 7:51:37 PM GMT
-  Document emailed to Matthew Richardson (mrichardson@brownrudnick.com) for signature
2023-05-18 - 7:51:55 PM GMT
-  Email viewed by Matthew Richardson (mrichardson@brownrudnick.com)
2023-05-18 - 8:25:16 PM GMT
-  Document e-signed by Matthew Richardson (mrichardson@brownrudnick.com)
Signature Date: 2023-05-18 - 8:25:37 PM GMT - Time Source: server
-  Agreement completed.
2023-05-18 - 8:25:37 PM GMT