

June 26, 2023

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Via Electronic Mail:

Attorney General Anthony G. Brown
Office of the Attorney General
Attn: Security Breach Notification
200 St. Paul Place
Baltimore, MD 21202

Re: Our Client : Town of Braintree
Wilson Elser File # : 16516.02115

Dear Attorney General Brown:

Wilson Elser Moskowitz Edelman and Dicker LLP (“Wilson Elser”) represents Town of Braintree (“Braintree”) with respect to a recent data privacy incident (hereinafter, the “Incident”). Braintree takes the security and privacy of the information in its control very seriously, and has taken steps to prevent a similar incident from occurring in the future.

This letter will serve to inform you of the nature of the Incident, what information may have been compromised, the number of Maryland residents being notified, and the steps that Braintree has taken in response to the Incident. We have also enclosed hereto a sample of the notification made to the potentially impacted individuals, which includes an offer of free credit monitoring services.

1. Nature of Security Incident

On May 11, 2023, Braintree detected suspicious activity within its network environment. Upon discovery, Braintree immediately engaged a law firm specializing in cybersecurity and data privacy to investigate further. Additionally, Braintree engaged third-party forensic specialists to assist Braintree in its analysis of any unauthorized activity. While the investigation is ongoing, Braintree has determined that an unauthorized third party accessed files containing certain individuals’ personal information during this incident. On June 12, 2023, the investigation identified persons whose personal information may have been accessed.

Braintree found no evidence that personal information has been misused; however, it is possible

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Detroit, MI | Edwardsville, IL | Garden City, NY | Hartford, CT | Houston, TX | Jackson, MS | Las Vegas, NV | London, England | Los Angeles, CA | Louisville, KY
Madison, NJ | McLean, VA | Merrillville, IN | Miami, FL | Milwaukee, WI | Nashville, TN | New Orleans, LA | New York, NY | Orlando, FL | Philadelphia, PA | Phoenix, AZ
Raleigh, NC | San Diego, CA | San Francisco, CA | Sarasota, FL | Seattle, WA | Stamford, CT | St. Louis, MO | Washington, DC | West Palm Beach, FL | White Plains, NY

that the following information could have been accessed by an unauthorized third party: including names, addresses, financial account information, driver's license numbers, and Social Security Numbers.

As of this writing, Braintree has not received any reports of related identity theft since the date of the Incident.

2. Number of Maryland Residents Affected

A total of one (1) Maryland residents have been potentially affected by this incident. Notification letters to individuals were mailed to potentially impacted individuals on June 26, 2023, by first class mail. A sample copy of the notification letter is included with this letter under *Exhibit A*.

3. Steps taken in response to the Incident

Data security is one of Braintree's highest priorities. Upon detecting this incident, Braintree moved quickly to initiate a response, which included conducting an investigation with the assistance of forensic IT specialists and confirming the security of Braintree network environment. Since the incident, Braintree rebuilt affected systems and has taken steps to bolster its network security. Braintree also reviewed and altered its policies, procedures, and network security software relating to the security of systems and servers, as well as how data is stored and managed. Additionally, Braintree provided each potentially impacted individual with free credit monitoring and identity theft protection.

4. Contact information

Braintree remains dedicated to protecting the sensitive information in its control. If you have any questions or need additional information, please do not hesitate to contact me at Dominik.Cvitanovic@WilsonElser.com or 504.372-6698.

Sincerely,

Wilson Elser Moskowitz Edelman & Dicker LLP

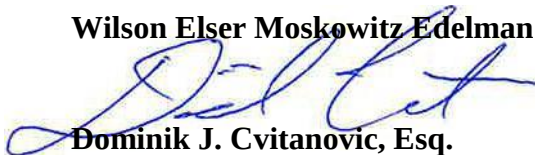

Dominik J. Cvitanovic, Esq.

EXHIBIT A



4145 SW Watson Avenue
Suite 400
Beaverton, OR 97005

Enrollment Code: <<XXXXXXXXXX>>

To Enroll, Scan the QR Code Below:



Or Visit:

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

Via First-Class Mail

<<FirstName>> <<LastName>>

<<Address1>> <<Address2>>

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

June 26, 2023

Notice of Data Breach

Dear <<FirstName>> <<LastName>>:

The Town of Braintree (“Braintree”) is writing to inform you of a recent data security incident that may have resulted in unauthorized access to and acquisition of your sensitive personal information. While we are unaware of any fraudulent misuse of your personal information at this time, we are providing you with details about the incident, steps we are taking in response, and resources available to help you protect against the potential misuse of your information. Please be assured Braintree takes the protection and proper use of your personal information very seriously.

What Happened?

On May 11, 2023, Braintree became aware of suspicious activity in its network environment. Upon discovery, Braintree immediately engaged a law firm specializing in cybersecurity and data privacy to investigate further. Additionally, Braintree engaged third-party forensic specialists to assist Braintree in its analysis of any unauthorized activity. While the investigation is ongoing, Braintree determined that an unauthorized third party accessed files containing certain individuals’ personal information during this incident. Braintree then performed an extensive and comprehensive review of the data set to identify whose personal information may have been within that data set.

On June 12, 2023, Braintree identified all individuals whose sensitive information may have been compromised.

What Information Was Involved?

Braintree has found no evidence that your information has been specifically misused; however, it is possible the following personal information may have been accessed by an unauthorized third party: names, driver’s licenses, Social Security numbers, and financial account information.

Please be assured that Braintree has **no** evidence that any payment card information was compromised as a result of this incident.

What We Are Doing?

Data security is one of our highest priorities. Upon detecting this incident we moved quickly to initiate a response, which included retaining a leading forensic investigation firm who assisted in conducting an investigation along with the assistance of leading IT specialists to confirm the security of our network environment. Additionally, we are coordinating with the FBI. We have also deployed additional monitoring tools and will continue to enhance the security of our systems.

We take the protection and proper use of personal information very seriously. As part of our ongoing commitment to information privacy and the security of information, we are notifying you of this incident. We are also offering you complimentary credit monitoring and identity theft protection through IDX, A ZeroFox Company, the data breach and recovery services expert. IDX identity protection services include: [12 months/24 months] of credit and CyberScan monitoring, a \$1,000,000 insurance reimbursement policy, and fully managed id theft recovery services. With this protection, IDX will help you resolve issues if your identity is compromised.

What You Can Do

We encourage you to remain vigilant against incidents of identity theft and fraud, to review your account statements, and to monitor your credit reports for suspicious or unauthorized activity. Additionally, security experts suggest that you contact your financial institution and all major credit bureaus to inform them of such a breach and then take whatever steps are recommended to protect your interests, including the possible placement of a fraud alert on your credit file. Please review the enclosed *Steps You Can Take to Help Protect Your Information*, to learn more about how to protect against the possibility of information misuse.

We encourage you to contact IDX with any questions and to enroll in free identity protection services by calling 1-800-939-4170 or going to <https://app.idx.us/account-creation/protect> and using the Enrollment Code provided above. IDX representatives are available Monday through Friday from 9:00 a.m. to 9:00 p.m. Eastern time Please note the deadline to enroll is September 26, 2023.

Again, at this time, there is no evidence that your information has been misused. However, we encourage you to take full advantage of this service offering. IDX representatives have been fully versed on the incident and can answer questions or concerns you may have regarding protection of your personal information.

For More Information

Representatives are available for 90 days from the date of this letter, to assist you with questions regarding this incident, between the hours of 9:00 a.m. to 9:00 p.m. Eastern time, Monday through Friday, excluding holidays. Please call the help line 1-800-939-4170 and supply the fraud specialist with your unique code listed above.

Braintree sincerely regrets any concern or inconvenience this matter may cause, and remains dedicated to ensuring the privacy and security of all information in our control.

Sincerely,



Jim Lee
Braintree Schools
Superintendent

Additional Information

Credit Reports: You may obtain a copy of your credit report, free of charge, whether or not you suspect any unauthorized activity on your account. You may obtain a free copy of your credit report from each of the three nationwide credit reporting agencies. To order your free credit report, please visit www.annualcreditreport.com, or call toll-free at 1-877-322-8228. You can also order your annual free credit report by mailing a completed Annual Credit Report Request Form (available at <https://www.consumer.ftc.gov/articles/0155-free-credit-reports>) to: Annual Credit Report Request Service, P.O. Box 105281, Atlanta, GA, 30348-5281.

Security Freeze: You also have the right to place a security freeze on your credit report. A security freeze is intended to prevent credit, loans, and services from being approved in your name without your consent. To place a security freeze on your credit report, you need to make a request to each consumer reporting agency. You may make that request by certified mail, overnight mail, regular stamped mail, or by following the instructions found at the websites listed below. The following information must be included when requesting a security freeze (note that if you are requesting a credit report for your spouse or a minor under the age of 16, this information must be provided for him/her as well): (1) full name, with middle initial and any suffixes; (2) Social Security number; (3) date of birth; (4) current address and any previous addresses for the past five years; and (5) any applicable incident report or complaint with a law enforcement agency or the Registry of Motor Vehicles. The request must also include a copy of a government-issued identification card and a copy of a recent utility bill or bank or insurance statement. It is essential that each copy be legible, display your name and current mailing address, and the date of issue. As of September 21, 2018, it is free to place, lift, or remove a security freeze. You may also place a security freeze for children under the age of 16. You may obtain a free security freeze by contacting any one or more of the following national consumer reporting agencies:

Equifax Security Freeze P.O. Box 105788 Atlanta, GA 30348 1-800-349-9960 https://www.equifax.com/personal/credit-report-services/credit-freeze/	Experian Security Freeze P.O. Box 9554 Allen, TX 75013 1-888-397-3742 www.experian.com/freeze/center.html	TransUnion Security Freeze P.O. Box 160 Woodlyn, PA 19094 1-888-909-8872 www.transunion.com/credit-freeze
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Fraud Alerts: You can place fraud alerts with the three credit bureaus by phone and online with:

- Equifax ([https://assets.equifax.com/assets/personal/Fraud Alert Request Form.pdf](https://assets.equifax.com/assets/personal/Fraud%20Alert%20Request%20Form.pdf));
- TransUnion (<https://www.transunion.com/fraud-alerts>); or
- Experian (<https://www.experian.com/fraud/center.html>).

A fraud alert tells creditors to follow certain procedures, including contacting you, before they open any new accounts or change your existing accounts. For that reason, placing a fraud alert can protect you, but also may delay you when you seek to obtain credit. As of September 21, 2018, initial fraud alerts last for one year. Victims of identity theft can also get an extended fraud alert for seven years. The phone numbers for all three credit bureaus are at the bottom of this page.

Monitoring: You should always remain vigilant and monitor your accounts for suspicious or unusual activity.

File Police Report: You have the right to file or obtain a police report if you experience identity fraud. Please note that in order to file a crime report or incident report with law enforcement for identity theft, you will likely need to provide proof that you have been a victim. A police report is often required to dispute fraudulent items. You can generally report suspected incidents of identity theft to local law enforcement or to the Attorney General.

FTC and Attorneys General: You can further educate yourself regarding identity theft, fraud alerts, security freezes, and the steps you can take to protect yourself, by contacting the consumer reporting agencies, the Federal Trade Commission, or your state Attorney General. The Federal Trade Commission can be reached at: 600 Pennsylvania Avenue NW, Washington, DC 20580, www.identitytheft.gov, 1-877-ID-THEFT (1-877-438-4338), 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. This notice has not been delayed by law enforcement.

For Arizona residents, the Attorney General may be contacted at the Consumer Protection & Advocacy Section, 2005 North Central Avenue, Phoenix, AZ 85004, 1-602-542-5025.

For Colorado residents, the Attorney General may be contacted through Consumer Protection 1300 Broadway, 9th Floor, Denver, CO 80203 1-720-508-6000, www.coag.gov.

For District of Columbia residents, the Attorney General may be contacted at the Office of the Attorney General for the District of Columbia, 441 4th Street NW, Washington, DC 20001, 1-202-727-3400, www.oag.dc.gov.

For Illinois residents, the Attorney General can be contacted at 100 West Randolph Street, Chicago, IL 60601; 1-866-999-5630; www.illinoisattorneygeneral.gov.

For Iowa residents, you can report any suspected identity theft to law enforcement or to the Attorney General.

For Massachusetts residents, it is required by state law that you are informed of your right to obtain a 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 Maryland residents, you may also wish to review information provided by the Maryland Attorney General on how to avoid identity theft at <https://www.marylandattorneygeneral.gov/Pages/IdentityTheft/default.aspx>, or by sending an email to idtheft@oag.state.md.us, or calling 410-576-6491.

For New Mexico residents, state law advises you to review personal account statements and credit reports, as applicable, to detect errors resulting from the security breach. You also 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 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 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 violators. 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 at 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, you 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>

For North Carolina residents, the Attorney General can be contacted at 9001 Mail Service Center, Raleigh, NC 27699-9001, 1-877-566-7226 or 1-919-716-6400, and www.ncdoj.gov. You may also obtain information about steps you can take to prevent identify theft from the North Carolina Attorney General at <https://ncdoj.gov/protecting-consumers/protecting-your-identity/protect-yourself-from-id-theft/>.

For Oregon residents, state law advises you to report any suspected identity theft to law enforcement, including the Attorney General, and the Federal Trade Commission.

For Rhode Island residents, this incident involves <<#>> individuals in Rhode Island. Under Rhode Island law, you have the right to file and obtain a copy of a police report. You also have the right to request a security freeze, as described above. You may contact and obtain information from your state attorney general at: *Rhode Island Attorney General’s Office*, 150 South Main Street, Providence, RI 02903, 1-401-274-4400, www.riag.ri.gov

For Vermont Residents: If you do not have internet access but would like to learn more about how to place a security freeze on your credit report, contact the Vermont Attorney General’s Office at 802-656-3183 (800-649-2424 toll free in Vermont only).