



MULLEN
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August 14, 2023

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

To Whom It May Concern:

We represent Bold Concepts, Inc. ("BCI") located at 814 W Diamond Ave, Gaithersburg, Maryland 20878, and are writing to notify your office of an incident that may affect the security of certain personal information relating to thirty (30) Maryland residents. This notice may be supplemented with any new significant facts learned subsequent to its submission. By providing this notice, BCI 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 July 26, 2023, BCI became aware that certain personal information was inadvertently disclosed via email to a short list of current and former employees. Following discovery, BCI immediately took steps to recall the email from internal inboxes and requested outside recipients delete the email from their external inboxes.

The information inadvertently disclosed for the Maryland residents includes: name, date of birth, Social Security number, hire/term date, and 401k balances/contributions for individuals who participated in BCI's company 401k plan.

Notice to Maryland Residents

On August 14, 2023, BCI provided written notice of this incident to thirty (30) Maryland residents. Written notice is being 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, BCI moved quickly to investigate and respond to the incident, assess the security of BCI systems, and identify potentially affected individuals. BCI is also working to implement additional safeguards and training to its employees. BCI is providing access to credit monitoring services for twelve (12) months, through TransUnion, to individuals whose personal information was potentially affected by this incident, at no cost to these individuals.

Additionally, BCI is providing impacted individuals with guidance on how to better protect against identity theft and fraud. BCI 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.

BCI is providing written notice of this incident to relevant state regulators, as necessary.

Contact Information

Should you have any questions regarding this notification or other aspects of the data security event, please contact us at (267) 930-4788.

Very truly yours,

Paul T. McGurkin, Jr. of
MULLEN COUGHLIN LLC

PTM/bld
Enclosure

EXHIBIT A

Bold Concepts, Inc.
c/o Cyberscout
1 Keystone Ave., Unit 700
Cherry Hill, NJ 08003
DB-07803



August 14, 2023

RE: Notice of Data Incident

Dear [REDACTED]:

Bold Concepts, Inc. ("BCI") writes to notify you of an incident that may impact the privacy of some of your personal information. While we are unaware of any actual or attempted misuse of your personal information, we are providing you with information about the incident, our response, and steps you may take to better protect against the possibility of misuse of your information, should you feel it is necessary to do so.

What Happened? On July 26, 2023, certain personal information was inadvertently disclosed via email to a short list of current and former employees. This error was discovered soon thereafter, and we immediately took steps to recall the email from internal inboxes and requested outside recipients delete the email from their external inboxes. We are providing you with notice of this event as we value transparency.

What Information Was Involved? The attachment that was incorrectly distributed contains the following types of information related to you: your name, date of birth, Social Security number, hire/term date, and 401k balances/contributions if you currently or previously participated in our company 401k plan.

What We Are Doing. We take this incident and the security of your personal information seriously. Upon discovering this error, we immediately took steps to recall the email from internal inboxes and requested outside recipients delete the email from their external inboxes. As part of our ongoing commitment to the security of personal information in our care, we are working to review our existing policies and procedures, to implement additional safeguards, and to provide additional training to our employees on data privacy. We will be notifying state regulators, as required.

As an added precaution, we are offering you access to Single Bureau Credit Monitoring/Single Bureau Credit Report/Single Bureau Credit Score services at no charge. These services provide you with alerts for 12 months from the date of enrollment when changes occur to your credit file. This notification is sent to you the same day that the change or update takes place with the bureau. Finally, we are providing you with proactive fraud assistance to help with any questions that you might have or in event that you become a victim of fraud. These services will be provided by Cyberscout through Identity Force, a TransUnion company specializing in fraud assistance and remediation services. We encourage you to enroll in these services as we are unable to do so on your behalf.

What You Can Do. We encourage you to remain vigilant against incidents of identity theft and fraud and to review your account statements and free credit reports for suspicious activity and to detect errors. You should promptly report any such suspicious activity to law enforcement. You should report any suspicious charges on your credit or debit card to the bank that issued the card or to the card company, as appropriate. Please also review the enclosed *Steps You Can Take to Help Protect Personal Information*, which contains additional information and resources.

For More Information. We understand that you may have questions about this incident that are not addressed in this letter. Representatives are available for 90 days from the date of this letter, to assist you with questions regarding this incident, between the hours of 8:00 a.m. to 8:00 p.m. Eastern time, Monday through Friday, excluding holidays. Please call the help line at 1-800-405-6108. You may also write to BCI at 814 W Diamond Ave, Ste. 200 Gaithersburg, Maryland 20878.

Sincerely,

Bold Concepts, Inc.

STEPS YOU CAN TAKE TO HELP PROTECT PERSONAL INFORMATION

Enroll in Monitoring Services

To enroll in Credit Monitoring services at no charge, please log on to <https://secure.identityforce.com/benefit/bcinc> and follow the instructions provided. When prompted please provide the following unique code to receive services: [REDACTED]. In order for you to receive the monitoring services described above, you must enroll within 90 days from the date of this letter. The enrollment requires an internet connection and e-mail account and may not be available to minors under the age of 18 years of age. Please note that when signing up for monitoring services, you may be asked to verify personal information for your own protection to confirm your 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 a free credit report, visit www.annualcreditreport.com or call, toll-free, 1-877-322-8228. Consumers may also directly contact the three major credit reporting bureaus listed below to request a free copy of their 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 consumers are the victim of identity theft, they are entitled to an extended fraud alert, which is a fraud alert lasting seven years. Should consumers wish to place a fraud alert, please contact any 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 a consumer’s name without consent. However, consumers should be aware that using a credit freeze to take control over who gets access to the personal and financial information in their credit report may delay, interfere with, or prohibit the timely approval of any subsequent request or application they make regarding a new loan, credit, mortgage, or any other account involving the extension of credit. Pursuant to federal law, consumers cannot be charged to place or lift a credit freeze on their credit report. To request a credit freeze, individuals may need to provide some or all of 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 they are a victim of identity theft.

Should consumers wish to place a credit freeze or fraud alert, 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	1-800-916-8800
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

Consumers may further educate themselves regarding identity theft, fraud alerts, credit freezes, and the steps they can take to protect your personal information by contacting the consumer reporting bureaus, the Federal Trade Commission, or their state Attorney General. The Federal Trade Commission may be reached at: 600 Pennsylvania Avenue NW, Washington, D.C. 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. Consumers can obtain further information on how to file such a complaint by way of the contact information listed above. Consumers have the right to file a police report if they ever experience identity theft or fraud. Please note that in order to file a report with law enforcement for identity theft, consumers will likely need to provide some proof that they have been a victim. Instances of known or suspected identity theft should also be reported to law enforcement and the relevant state Attorney General. This notice has not been delayed by law enforcement.

For District of Columbia residents, the District of Columbia Attorney General may be contacted at: 400 6th Street, NW, Washington, D.C. 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; 1-410-576-6300 or 1-888-743-0023; and <https://www.marylandattorneygeneral.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.