



Aubrey Weaver
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1650 Market Street
Suite 3600
Philadelphia, Pennsylvania 19103

August 31, 2023

VIA ELECTRONIC MAIL

Attorney General Anthony G. Brown
Maryland Attorney General's Office
Attn: Security Breach Notification
200 St. Paul Place
Baltimore, MD 21202
E-Mail: Idtheft@oag.state.md.us

Re: Notice of Data Security Incident

Dear Attorney General Brown:

We represent New Century Advisors, LLC ("NCA") an institution investment management firm in Chevy Chase, Maryland, in connection with a data security incident described in greater detail below. NCA takes the protection of all information within its possession very seriously and is taking steps to help prevent similar incidents from occurring in the future. We are writing to notify you that this incident may have affected the personal information of five (5) Maryland residents.

1. Nature of the Security Incident.

On June 16, 2023, NCA became aware of a data security incident impacting certain network systems. In response, we immediately took steps to secure our digital environment and engaged leading cybersecurity firms to assist with the investigation to determine whether sensitive or personal information may have been accessed or acquired during the incident. Through the course of our investigation, we learned that certain internal files were acquired from our network between June 15 and June 16, 2023. We thereafter undertook a review of the potentially affected data, which concluded in August 2023. At that time, we identified certain employee information that may have been involved in this issue and began preparing to provide this notice.

Based on its review, NCA learned that the incident may have involved the Maryland residents' names, Social Security numbers and, in one instance, passport information.

2. Number of Maryland Residents Affected.

NCA is notifying the five (5) potentially affected Maryland residents via first class U.S. mail on August 31, 2023, via the attached notification letter template, or a substantially similar version thereof.

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3. Steps Taken Relating to the Incident.

As soon as NCA discovered this incident, it took steps to secure its systems and launched an investigation to determine what happened and whether personal information had been accessed or acquired without authorization. NCA has also implemented additional safeguards to help ensure the security of its systems and to reduce the risk of a similar incident occurring in the future.

In addition, NCA is offering twenty-four (24) months of complimentary credit and identity monitoring services to the potentially affected individuals whose Social Security numbers may have been involved in the incident.

4. Contact Information.

NCA remains dedicated to protecting the personal information in its control. If you have any questions or need additional information, please do not hesitate to contact me at 215.770.4234 or via email at aweaver@constangy.com.

Very truly yours,

A handwritten signature in black ink, appearing to read 'Aubrey Weaver', with a stylized, flowing script.

Aubrey Weaver of
Constangy, Brooks, Smith & Prophete LLP

Encl.: Sample Consumer Notification Letter



<<FirstName>> <<LastName>>
<<Address1>>
<<Address2>>
<<City>>, <<State>> <<Zip>>

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

Subject: Notice of Data Security Incident

Dear <<first name>> <<last name>>:

New Century Advisors, LLC (“NCA”), is notifying you of a recent data security incident that may have involved your personal information. NCA takes the privacy and security of all personal information within its possession very seriously. That is why we are informing you of this incident, providing you with steps you can take to protect your personal information, and offering you the opportunity to enroll in complimentary credit monitoring and identity protection services.

What Happened? On June 16, 2023, NCA became aware of a data security incident impacting certain network systems. In response, we immediately took steps to secure our digital environment and engaged leading cybersecurity firms to assist with the investigation to determine whether sensitive or personal information may have been accessed or acquired during the incident. Through the course of our investigation, we learned that certain internal files were acquired from our network between June 15 and June 16, 2023. We thereafter undertook a review of the potentially affected data, which concluded in August 2023. At that time, we identified certain employee information that may have been involved in this issue and began preparing to provide this notice.

What Information Was Involved? The information potentially impacted in connection with this incident may have included your <<data elements>>.

What Are We Doing? As soon as we discovered this incident, we took the steps described above. As part of the response process, we implemented additional measures to reduce the risk of a similar incident occurring in the future.

Additionally, we are providing you with 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 24 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.

What You Can Do: We recommend that you review the guidance included with this letter about how to protect your information. To enroll in Credit Monitoring services at no charge, please log on to <https://secure.identityforce.com/benefit/ncallc> and follow the instructions provided. When prompted please provide the following unique code to receive services: <<unique code>>.

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 credit monitoring 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.

For more information. If you have any questions or need assistance, please contact me at 240-395-0555.

We take the privacy and security of all information within our possession very seriously. Please accept our sincere apologies and know that NCA deeply regrets any worry or inconvenience that this may cause you.

Sincerely,

Thomas Hines, Chief Compliance Officer

New Century Advisors, LLC
2 Wisconsin Circle, Suite 940
Chevy Chase, MD 20815

STEPS YOU CAN TAKE TO HELP PROTECT YOUR PERSONAL INFORMATION

Review Your Account Statements and Notify Law Enforcement of Suspicious Activity: As a precautionary measure, we recommend that you remain vigilant by reviewing your account statements and credit reports closely. If you detect any suspicious activity on an account, you should promptly notify the financial institution or company with which the account is maintained. You also should promptly report any fraudulent activity or any suspected incidence of identity theft to proper law enforcement authorities, your state attorney general, and/or the Federal Trade Commission (FTC).

Copy of Credit Report: You may obtain a free copy of your credit report from each of the three major credit reporting agencies once every 12 months by visiting <http://www.annualcreditreport.com/>, calling toll-free 1-877-322-8228, or by completing an Annual Credit Report Request Form and mailing it to Annual Credit Report Request Service, P.O. Box 105281, Atlanta, GA 30348. You also can contact one of the following three national credit reporting agencies:

Equifax

P.O. Box 105851
Atlanta, GA 30348
1-800-525-6285
www.equifax.com

Experian

P.O. Box 9532
Allen, TX 75013
1-888-397-3742
www.experian.com

TransUnion

P.O. Box 1000
Chester, PA 19016
1-800-916-8800
www.transunion.com

Fraud Alert: You may want to consider placing a fraud alert on your credit report. An initial fraud alert is free and will stay on your credit file for at least one year. The alert informs creditors of possible fraudulent activity within your report and requests that the creditor contact you prior to establishing any accounts in your name. To place a fraud alert on your credit report, contact any of the three credit reporting agencies identified above. Additional information is available at <http://www.annualcreditreport.com>.

Security Freeze: You have the right to put a security freeze on your credit file for up to one year at no cost. This will prevent new credit from being opened in your name without the use of a PIN number that is issued to you when you initiate the freeze. A security freeze is designed to prevent potential creditors from accessing your credit report without your consent. As a result, using a security freeze may interfere with or delay your ability to obtain credit. You must separately place a security freeze on your credit file with each credit reporting agency. In order to place a security freeze, you may be required to provide the consumer reporting agency with information that identifies you including your full name, Social Security number, date of birth, current and previous addresses, a copy of your state-issued identification card, and a recent utility bill, bank statement or insurance statement.

Additional Free Resources: You can obtain information from the consumer reporting agencies, the FTC, or from your respective state Attorney General about fraud alerts, security freezes, and steps you can take toward preventing identity theft. You may report suspected identity theft to local law enforcement, including to the FTC or to the Attorney General in your state.

Federal Trade Commission

600 Pennsylvania Ave, NW
Washington, DC 20580
consumer.ftc.gov
1-877-438-4338

Maryland Attorney General

St. Paul Plaza
200 St. Paul Place
Baltimore, MD 21202
marylandattorneygeneral.gov
1-888-743-0023

Virginia Attorney General

202 North Ninth Street
Richmond, VA 23219
oag.state.va.us
1-804-786-2071

Washington D.C. Attorney General

400 S 6th Street, NW
Washington, DC 20001
oag.dc.gov
1-202-727-3400

You also have certain rights under the Fair Credit Reporting Act (FCRA): These rights include to know what is in your file; to dispute incomplete or inaccurate information; to have consumer reporting agencies correct or delete inaccurate, incomplete, or unverifiable information; as well as other rights. For more information about the FCRA, and your rights pursuant to the FCRA, please visit <https://www.consumer.ftc.gov/articles/pdf-0096-fair-credit-reporting-act.pdf>.