MULLEN COUGHLIN LLC
ATTORNEYS AT LAW

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411 Theodore Fremd, Ste 206S
Rye, NY 10580

November 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 DWD & Associates, Inc. d/b/a Just In Time GCP ("Just In Time") located at 675 Griffiths Road, Warrington, Pennsylvania 18976, and are writing to notify your office of an incident that may affect the security of certain personal information relating to one (1) Maryland resident. This notice will be supplemented with any new significant facts learned subsequent to its submission. By providing this notice, Just In Time 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 or about June 27, 2023, Just In Time became aware of suspicious activity related to an employee's email account. Just In Time quickly took steps to secure its email environment and launched an investigation to determine the potential cause of this activity. On or about July 27, 2023, Just In Time determined that an unknown actor potentially accessed limited documents containing employee information between June 19, 2023 and June 29, 2023. Just In Time then commenced a review of relevant files to determine what information was potentially impacted. On or about September 24, 2023, Just In Time determined that the information that could have been subject to unauthorized access includes name, address, and Social Security number.

Notice to Maryland Resident

On or about November 14, 2023, Just In Time provided written notice of this incident to one (1) Maryland resident. 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, Just In Time moved quickly to investigate and respond to the incident, assess the security of Just In Time email accounts, and identify potentially affected individuals. Further, Just In Time is also working to implement additional safeguards and training to its employees. Just In Time is providing access to credit monitoring services for twenty-four (24) months, through IDX, to individuals whose personal information was potentially affected by this incident, at no cost to these individuals.

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

Contact Information

Should you have any questions regarding this notification or other aspects of the data security event, please contact us at (267) 930-2297.

Very truly yours,

Michele Veltri of
MULLEN COUGHLIN LLC

MTV/klh
Enclosure

EXHIBIT A

To Enroll, Please Visit:
https://app.idx.us/account-creation/protect

Enrollment Code: [redacted]
Expiration Date: January 26, 2024

Just in Time GCP
1243 Easton Road, Suite 102A
Warrington, PA 18976
Tel. 215-343-4484 | Fax 215-792-7842
justintimegcp.com

November 14, 2023

[redacted]

NOTICE OF DATA BREACH

Dear [redacted]:

DWD & Associates, Inc. d/b/a Just in Time GCP, ("Just in Time GCP") writes to inform you of a recent incident that may impact the privacy of some of your information. Just in Time GCP takes this incident seriously and the confidentiality, privacy, and security of information in Just in Time GCP's care is one of our highest priorities. We are writing to provide you with an overview of the incident, our response, and resources available to help protect your information, should you feel it appropriate to do so.

What Happened? On or about June 27, 2023, Just in Time GCP became aware of recent suspicious activity related to an employee's email account. Just in Time GCP quickly took steps to secure its environment and launched an investigation to determine the potential cause of this activity. While the investigation is ongoing, it was recently determined that an unknown person potentially accessed limited documents containing employee information between June 19, 2023 and June 29, 2023. Just in Time GCP immediately commenced a review of relevant files to determine what information was potentially impacted.

What Information Was Involved? While the investigation is ongoing, we are notifying you out of an abundance of caution as the review of potentially accessed files determined that your information may be impacted. The information related to you includes your name, address, and social security number.

What We Are Doing. Just in Time GCP takes this incident and the security of information in our care seriously. While the investigation remains ongoing, the investigation and response performed to date includes reviewing the contents of relevant documents and notifying potentially impacted individuals, as they are identified. As part of our ongoing commitment to information security, we are also assessing and validating the security of our systems and reviewing our technical safeguards, policies, and procedures to reduce the likelihood of similar events from occurring in the future. We also are reporting this incident to applicable regulatory agencies, where required.

As an added precaution, Just in Time GCP is offering you 24 months of complimentary credit monitoring through IDX. Enrollment instructions can be found in the enclosed *Steps You Can Take to Help Protect Personal Information.* Please note, you must enroll by January 26, 2024 in the complimentary credit monitoring yourself as Just in Time GCP is unable to do so on your behalf.

What You Can Do. We encourage you to remain vigilant against incidents of identity theft and fraud by reviewing your account statements and monitoring your free credit reports for suspicious activity and to detect errors.

For More Information. Just in Time GCP understands you may have questions about this incident that are not addressed in this letter. If you have additional questions, please contact Alycia Hannum, Associate Director Human Resources, at ahannum@justintimegcp.com.

Sincerely,

DWD & Associates, Inc. d/b/a Just in Time GCP

STEPS YOU CAN TAKE TO PROTECT YOUR PERSONAL INFORMATION

Enroll in Credit Monitoring Services

1. **Website and Enrollment.** Go to https://app.idx.us/account-creation/protect and follow the instructions for enrollment using your Enrollment Code provided at the top of the letter.

2. **Activate the credit monitoring** provided as part of your IDX identity protection membership. The monitoring included in the membership must be activated to be effective. Note: You must have established credit and access to a computer and the internet to use this service. If you need assistance, IDX will be able to assist you.

3. **Review your credit reports**. We recommend that you remain vigilant by reviewing account statements and monitoring credit reports. Under federal law, you also are entitled every 12 months to one free copy of your credit report from each of the three major credit reporting companies. To obtain a free annual credit report, go to www.annualcreditreport.com or call 1-877-322-8228. You may wish to stagger your requests so that you receive a free report by one of the three credit bureaus every four months.

If you discover any suspicious items and have enrolled in IDX identity protection, notify them immediately by calling or by logging into the IDX website and filing a request for help.

If you file a request for help or report suspicious activity, you will be contacted by a member of our ID Care team who will help you determine the cause of the suspicious items. In the unlikely event that you fall victim to identity theft as a consequence of this incident, you will be assigned an ID Care Specialist who will work on your behalf to identify, stop and reverse the damage quickly.

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.);
1. Social Security number;
2. Date of birth;
3. Addresses for the prior two to five years;
4. Proof of current address, such as a current utility bill or telephone bill;
5. A legible photocopy of a government-issued identification card (state driver's license or ID card, etc.); and
6. 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) 442-9828; 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 New Mexico residents, consumers have rights pursuant to the Fair Credit Reporting Act, such as the right to be told if information in their credit file has been used against them, the right to know what is in their credit file, the right to ask for their credit score, and the right to dispute incomplete or inaccurate information. Further, pursuant to the Fair Credit Reporting Act, the consumer reporting bureaus must correct or delete inaccurate, incomplete, or unverifiable information; consumer reporting agencies may not report outdated negative information; access to consumers' files is limited; consumers must give consent for credit reports to be provided to employers; consumers may limit "prescreened" offers of credit and insurance based on information in their credit report; and consumers may seek damages from violators. Consumers 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 consumers to review their rights pursuant to the Fair Credit Reporting Act by visiting 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, the New York Attorney General may be contacted at: Office of the Attorney General, The Capitol, Albany, NY 12224-0341; 1-800-771-7755; or https://ag.ny.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.

For Rhode Island residents, the Rhode Island Attorney General may be reached at: 150 South Main Street, Providence, RI 02903; www.riag.ri.gov; and 1-401-274-4400. Under Rhode Island law, individuals have the right to obtain any police report filed in regard to this event. There are approximately 0 Rhode Island residents that may be impacted by this event.