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February 14, 2024

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:

Constangy, Brooks, Smith & Prophete, LLP represents Davlyn Investments ("Davlyn") in connection with a recent data security incident described below. Davlyn is notifying affected individuals of the incident. The purpose of this letter is to provide formal notice to your office pursuant to Md. Code Ann., Comm. Law § 14-3504.

I. Nature of the Security Incident

On December 25, 2023, Davlyn learned of unusual activity within its digital environment. Upon discovery, Davlyn took immediate steps to secure its environment. In addition, Davlyn retained an independent third-party computer forensic investigator to conduct an investigation to determine what happened. The forensic investigation revealed that an unauthorized actor gained access to the Davlyn network, and that some personal information may have been acquired without authorization in connection with the incident. Davlyn determined in January 2024 that the information may have included names and Social Security numbers. Davlyn thereafter worked diligently to confirm the identity of potentially affected individuals and arrange for the provision of notice.

II. Number of Maryland Residents Affected

Based on Davlyn's investigation, a total of one (1) Maryland resident may have been affected. After issuing a preliminary notice via email in January, a notification letter was sent to this individual via first class U.S. mail on February 14, 2024. A sample copy of that notification letter is enclosed.

III. Actions Taken in Response to the Incident

As soon as Davlyn discovered the incident, it launched an investigation, took immediate steps to enhance the security of its network, and worked to determine whether any personal information was accessed or acquired without authorization in connection with the incident. Davlyn then

Alabama Arkansas California Colorado District of Columbia Florida Georgia Illinois
Indiana Maryland Massachusetts Minnesota Missouri New Jersey New York
North Carolina Oregon Pennsylvania South Carolina Tennessee Texas Virginia Washington

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Constangy, Brooks, Smith & Prophete, LLP

worked diligently to determine what personal information may have been affected, the individuals to whom the information pertained, and the addresses for those individuals to provide appropriate notification.

Davlyn has established a toll-free call center through IDX to answer questions about the incident and address related concerns. In addition, Davlyn is offering the Maryland resident twelve (12) months of complimentary credit and CyberScan monitoring, a \$1,000,000 insurance reimbursement policy, and fully managed identity theft recovery services.

IV. Contact Information

If you have any questions or need additional information, please do not hesitate to contact me at 215.770.4234 or aweaver@constangy.com.

Sincerely,

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

Aubrey Weaver
Partner, Cybersecurity & Data Privacy Team



4145 SW Watson Ave
Suite 400
Beaverton, OR 97005

Enrollment Code: <<XXXXXXXXXX>>

To Enroll, Scan the QR Code Below:



Or Visit:

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

<<First Name>> <<Last Name>>
<<Address1>>
<<Address2>>
<<City>>, <<State>> <<Zip>>

February 14, 2024

Subject: Notice of Data <<Security Incident/Breach>>

Dear <<First Name>> <<Last Name>>,

I am writing to provide you with formal notice of the data security incident that may have involved your personal information. Davlyn Investments (“Davlyn”) takes the privacy and security of personal information very seriously. This letter provides steps you can take to protect your information, including enrolling in the complimentary credit monitoring and identity protection services we are making available to you.

What Happened? On December 25, 2023, Davlyn learned of unusual activity involving certain systems in our network. Upon discovering this activity, our managed services team took immediate steps to secure our network. We also engaged a team of leading external cybersecurity experts to assist in our response and conduct an investigation to determine what happened and what information may have been involved. In early January, our investigation revealed that certain Davlyn data may have been accessed or acquired without authorization in connection with the incident. We thereafter took steps to provide notification to all potentially affected individuals.

What Information Was Involved? The potentially affected information includes your name and Social Security number.

What Are We Doing? As soon as we discovered this incident, we took the steps described above. We have also implemented additional safeguards to help ensure the security of our network environment and to reduce the risk of a similar incident occurring in the future.

Additionally, to help relieve concerns and to help protect your information following this incident, Davlyn is offering complimentary credit monitoring and identity protection services through IDX, a data breach and recovery services expert. The IDX services include credit and CyberScan monitoring, a \$1,000,000 insurance reimbursement policy, and fully managed identity theft recovery services. If you have not already enrolled in the IDX services, we encourage you to do so using the code provided above. The deadline to enroll is May 14, 2024.

What Can You Do? If you have not already done so, we recommend that you activate your complimentary IDX services by calling 1-800-939-4170, going to <https://app.idx.us/account-creation/protect>, or scanning the QR image and using the Enrollment Code provided above. We also recommend that you review the guidance included with this letter about steps you can take to protect your information.

For More Information: Further information on protecting your information appears on the following page. If you have questions, please call the dedicated call center for this incident at 1-800-939-4170 from 6:00 am to 6:00 pm Pacific Time, Monday through Friday (excluding holidays).

We take your trust in us and this matter very seriously. Please accept our sincere apologies for any worry or inconvenience that this may cause you.

Sincerely,

Jon Williams and Paul Kerr
Davlyn Investments
12625 High Bluff Drive Suite 315
San Diego, CA 92130

Steps You Can Take to 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 2000
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, and
www.ftc.gov/idtheft
1-877-438-4338

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

New York Attorney General
Bureau of Internet and Technology
Resources
28 Liberty Street
New York, NY 10005
1-212-416-8433

North Carolina Attorney General
9001 Mail Service Center
Raleigh, NC 27699
ncdoj.gov
1-877-566-7226

Rhode Island Attorney General
150 South Main Street
Providence, RI 02903
<http://www.riag.ri.gov>
1-401-274-4400

Washington D.C. Attorney General
441 4th 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>.