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March 26, 2024

VIA EMAIL

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

Re: Notice of Data Security Breach

Dear Attorney General Brown:

Constangy, Brooks, Smith and Prophete LLP (“Constangy”) represents Bartlett Dairy, Inc. (“Bartlett Dairy”) in connection with a data security incident described in greater detail below. The purpose of this letter is to notify you of the incident in compliance with Maryland’s data breach notification statute.

1. Nature of Incident

On June 21, 2023, Bartlett Dairy identified unusual activity in its computer network, which was subsequently confirmed to be the result of a malicious encryption event. Bartlett Dairy immediately took steps to contain the activity and engaged a cybersecurity firm to investigate what happened and help determine whether any sensitive data was affected. Through that investigation, Bartlett Dairy learned of information suggesting that an unknown actor gained unauthorized access to its network and acquired certain files, some of which may have contained individuals’ personal information. On June 30, 2023 Bartlett Dairy determined that these files contained personal information for employees and worked diligently to issue notification letters to such individuals, which was accomplished on June 24, 2023.

Bartlett Dairy then worked with additional experts comprehensively review the remaining impacted data to determine whether personal information for non-employees was involved. At the conclusion of that review, Bartlett Dairy worked to collect up-to-date mailing addresses in order to provide notification of this incident to impacted individuals. Bartlett Dairy completed those efforts on February 27, 2024 and arranged for notification letters to be sent as soon as possible.

The impacted information varies by individual but may include the residents’ names along with their Social Security Number and Driver License or State ID Number.

2. Number of Maryland residents affected

Bartlett Dairy notified 6 Maryland residents of the incident via first class U.S. mail on March 26, 2024. A sample copy of the notification letter is included with this correspondence.

3. Steps taken relating to the incident

As soon as Bartlett Dairy discovered the incident, it took the steps described above. In addition, as noted above, Bartlett Dairy provided notice of the incident to potentially impacted individuals on March 26, 2024. Finally, in an effort to reduce the likelihood of a similar incident occurring in the future, Bartlett Dairy has

taken steps to further bolster the security of its network and the information in its possession.

In addition, Bartlett Dairy is offering affected individuals complimentary credit monitoring and identity protection services through IDX, a leader in consumer identity protection. These services include 12 months of credit monitoring, identity protection through Dark Web monitoring, a \$1,000,000 identity theft insurance reimbursement policy, and fully managed identity theft recovery services. With this protection, IDX will help them resolve issues if their identity is affected.

4. Contact information

Bartlett Dairy takes the privacy and security of all information in its possession very seriously. If you have any questions or need additional information, please do not hesitate to contact me at 718.614.8371 or dmcmillan@constangy.com.

Sincerely yours,

A handwritten signature in black ink, appearing to read "D. McMillan", followed by a horizontal line.

David McMillan of
CONSTANGY, BROOKS, SMITH &
PROPHETE LLP

Encl.: Sample Consumer Notification Letter



Return to IDX
P.O. Box 989728
West Sacramento, CA 95798-9728

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

Enrollment Code: <<ENROLLMENT>>

To Enroll, Scan the QR Code Below:



Or Visit:

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

March 26, 2024

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

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

The purpose of this communication is to notify you of a data security incident experienced by Bartlett Dairy, Inc. ("Bartlett Dairy") which may have affected your personal information. At Bartlett Dairy, we take the privacy and security of all information within our possession very seriously. This is why we are notifying you of the incident, providing you with steps you can take to help protect your personal information, and offering you the opportunity to enroll in complimentary credit monitoring and identity protection services.

What Happened? On June 21, 2023, we identified unusual activity in our computer network, which was subsequently confirmed to be the result of a malicious encryption event. We immediately took steps to contain the activity and engaged a cybersecurity firm to investigate what happened and help determine whether any sensitive data was affected. Through that investigation, we learned of information suggesting that an unknown actor gained unauthorized access to our network and acquired certain files, some of which may have contained individuals' personal information. We then worked with additional experts to conduct a comprehensive review of the impacted data to determine what personal information was involved and to identify the individuals who may have been affected. At the conclusion of that review, we worked diligently to collect up-to-date mailing addresses in order to provide notification of this incident to impacted individuals. We completed those efforts on February 27, 2024 and arranged for notification letters to be sent as soon as possible.

What Information Was Involved? We believe that the information involved this incident may have included your name along with your <<Data Elements>>. We have no evidence of any actual or attempted misuse of this information.

What We Are Doing. As soon as we discovered this incident, we launched an investigation and took steps to secure its IT environment, including by implementing enhanced security measures to help prevent a similar incident from occurring in the future. We also notified the Federal Bureau of Investigation and will offer whatever assistance it can in any resulting investigation.

While there is no evidence your information has been misused, out of an abundance of caution we are offering you complimentary credit monitoring and identity theft protection services through IDX – a data breach and recovery services expert. These services include: <<12/24>> months of credit¹ and CyberScan monitoring, a \$1,000,000 insurance reimbursement policy, and fully managed identity theft recovery services. To enroll, please call (888) 403-9225 or visit <https://app.idx.us/account-creation/protect> or scan the QR image and provide the enrollment code at the top of this notification letter. Please note that the deadline to enroll is June 26, 2024.

¹To receive credit monitoring services, you must be over the age of 18 and have established credit in the U.S., have a Social Security number in your name, and have a U.S. residential address associated with your credit file.

What You Can Do. We encourage you to enroll in the complimentary credit protection services we are offering. With this protection, IDX can help you resolve issues if your identity is compromised. Please also review the guidance at the end of this letter which includes additional resources you may utilize to help protect your information.

For More Information. If you have questions or need assistance, please contact (888) 403-9225, Monday through Friday from 9:00 a.m. to 9:00 p.m. Eastern Time, excluding major U.S. holidays. IDX representatives are fully versed on this incident and can help answer questions you may have regarding the protection of your information.

Please accept our sincere apologies and know that we deeply regret any worry or inconvenience that this may cause you.

Very truly yours,

A handwritten signature in black ink, appearing to read 'Joseph Paykin', with a stylized, cursive script.

Joseph Paykin
Bartlett Dairy, Inc.
90-04 161st St.
Jamaica, NY 11432

STEPS YOU CAN TAKE TO HELP PROTECT YOUR 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, and
www.ftc.gov/idtheft
1-877-438-4338

Maryland Attorney General

200 St. Paul Place
Baltimore, MD 21202
oag.state.md.us
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>.