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426 W. Lancaster Avenue, Suite 200
Devon, PA 19333

April 3, 2024

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 the Gloucester County Improvement Authority ("GCIA") located at 109 Budd Boulevard Woodbury, New Jersey 08096, 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. By providing this notice, the GCIA 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 December 20, 2022, the GCIA became aware of suspicious activity in its computer network. In response, it immediately took steps to secure its systems, restore access to information, and launched an investigation to determine the nature and scope of the event. This investigation determined that between December 14, 2022, and December 20, 2022, an unauthorized actor gained access to certain systems and downloaded certain information stored within those systems.

Following the investigation, the GCIA worked with third-party data review specialists to perform a comprehensive and diligent programmatic and manual review of the files stored on the impacted systems to determine what information was impacted, if any, and to whom the information related. The GCIA then undertook additional review of its internal records to confirm the identities and contact information for impacted individuals in order to provide notification. This review was recently completed.

The information that could have been subject to unauthorized access may vary by individual but includes name and Social Security number.

Notice to Maryland Resident

While the data review was ongoing, the GCIA posted a preliminary notice of the event on its website beginning on February 17, 2023. On or about April 3, 2024, the GCIA 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, the GCIA moved quickly to investigate and respond to the incident, assess the security of GCIA systems, and identify potentially affected individuals. Further, the GCIA notified federal law enforcement regarding the event. The GCIA is also working to implement additional safeguards and training to its employees. The GCIA is providing access to credit monitoring services for one (1) year, through TransUnion, to individuals whose personal information was potentially affected by this incident, at no cost to these individuals.

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

GCIA is providing written notice of this incident to relevant state and federal regulators, as necessary. GCIA is also notifying the U.S. Department of Health and Human Services pursuant to the Health Insurance Portability and Accountability Act (HIPAA).

Contact Information

Should you have any questions regarding this notification or other aspects of the data security event, please contact us at (267) 930-1129.

Very truly yours,

Brittany R. Bickel of
MULLEN COUGHLIN LLC

BRB/jc2
Attachment

EXHIBIT A

Gloucester County Improvement Authority
c/o Cyberscout
1 Keystone Ave., Unit 700
Cherry Hill, NJ 08003
DB-08658 1-1

[redacted]

April 2, 2024

Notice of Security Incident

Dear [redacted]

The Gloucester County Improvement Authority ("GCIA") is writing to inform you of an event that may impact the security of some of your information. While we have received no indications of actual misuse of your information as a result of this event, this notice provides information about the event, our response, and resources available to you to help protect your information, should you feel it appropriate to do so.

What Happened? On December 20, 2022, the GCIA became aware of suspicious activity in our computer network. We immediately worked to secure our systems, restore access to the information, and determine the nature and scope of the event through an investigation with the assistance of third-party subject matter specialists. We also promptly notified federal law enforcement. Through our investigation, we determined that an unknown actor gained access to certain systems between December 14, 2022, and December 20, 2022, and downloaded certain information from those systems.

We then worked with third-party data review specialists to perform a comprehensive review of the files stored on the impacted systems to determine what information was impacted, if any, and to whom the information related. While the review was ongoing, we posted a preliminary notice of the event to our website. Following that review, we undertook additional review of our internal files to identify contact information for impacted individuals. This review was recently completed.

What Information Was Involved? Our investigation determined that the impacted information may have included date of birth, provider name, medicare number, medical record number/patient ID, Social Security number, health insurance policy number, mental/physical treatment, and diagnosis information and your name. Please note that we do not have any evidence to indicate that any information was subject to actual or attempted misuse as a result of this incident.

What We Are Doing. The confidentiality, privacy, and security of information in our care are among our highest priorities, and we take this event very seriously. Upon becoming aware of this incident, we immediately took steps to secure our systems and initiated a full investigation. We also reviewed our security policies and procedures and are implementing additional security measures to reduce the risk of similar future events.

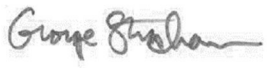
As an added precaution, we are offering you immediate access to Single Bureau Credit Monitoring/Single Bureau Credit Report/Single Bureau Credit Score services at no charge. These services provide you with alerts for 12 months from the date of enrollment when changes occur to your credit file. This notification 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. You can find information

on how to enroll in these services in the below *Steps You Can Take to Help Protect Personal Information.* We encourage you to enroll in these services as we are not able 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 and free credit reports for suspicious activity and to detect errors. Additional information and resources are included in the enclosed *Steps You Can Take to Help Protect Personal Information*. You may also enroll in the complimentary credit monitoring services available to you. Enrollment instructions are enclosed with this letter.

For More Information. If you have additional questions, please call our dedicated assistance line at 1-800-405-6108, from 8:00 a.m. to 8:00 p.m. Eastern time, Monday through Friday, excluding holidays.

Sincerely,



George D. Strachan
Executive Director
Gloucester County Improvement Authority

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/gcia 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 one-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 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 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.