

BLANKROME

1271 Avenue of the Americas | New York, NY 10020
blankrome.com

Phone: (412) 932-2754
Fax: (412) 204-3488
Email: jennifer.daniels@blankrome.com

April 29, 2024

VIA ELECTRONIC MAIL

Attorney General Anthony G. Brown
Office of the Attorney General
Attn: Security Breach Notification
200 St. Paul Place
Baltimore, MD 21202
Idtheft@oag.state.md.us

Re: **Incident Notification**

Dear Attorney General Brown,

I write on behalf of Notions Marketing, Inc. (“Notions”), acting as outside counsel to Notions. Pursuant to Maryland Code Commercial Law 14-3504, I am writing to notify you of a potential compromise of personal information involving one (1) Maryland resident.

I. Description of Incident

On March 15, 2024, Notions Marketing, Inc. (“Notions”) discovered abnormal behavior on its systems and immediately began to assess and contain the incident. Notions discovered a third-party vendor’s laptop was compromised and that an unauthorized actor was exploiting the account of that vendor to access Notions’ systems. Immediately after discovering this unauthorized access, Notions launched an investigation and took steps to contain and remediate the incident. Notions restricted the vendor account’s access to Notions’ systems, removed malicious files, conducted an analysis of Notions’ systems, and reset administrative passwords.

Notions promptly engaged independent third-party computer forensics, analytics, and data mining experts to determine if any personal information was impacted and, if so, with whom it was associated. On March 29, 2024, Notions’ investigation confirmed that some of Notions’ information, which may have included personal information, had been exfiltrated or accessed without authorization. The categories of personal information that may have been impacted as a result of this incident include: name, address, telephone number, date of birth, and Social Security number. Notions’ investigation also determined that some of the information exfiltrated from Notions’ systems may have been published to the dark web by the relevant hackers. Notions has notified law enforcement of this incident.

Notions' investigation into the full scope of this incident is still underway. However, Notions has determined that the incident began on January 31, 2024. Notions was able to fully contain its systems one day after detection, on March 16, 2024.

At this time, Notions' investigation indicates that only one (1) resident of Maryland was impacted by this incident.

II. Remedial Steps Taken in Response to the Incident

Immediately upon detecting this incident, Notions took steps to secure its environment from further risk, began remediation and recovery efforts, and launched an investigation in partnership with third-party cybersecurity experts. Notions is continuing to monitor for any developments that may arise and Notions' response efforts are still underway. At this time, Notions has implemented additional administrative and technical safeguards to enhance the security of its systems and prevent similar incidents from occurring in the future, including by conducting an overhaul of its endpoint monitoring systems. Notions has restricted vendor access to its internal systems and is reviewing its vendor management protocols to enhance the security of its systems. Notions is also providing impacted individuals with free credit monitoring and identity theft protection services through Experian for twenty-four (24) months. Finally, Notions is providing impacted individuals with resources, including a call center, through which they can learn more about the incident and how to properly protect themselves.

III. Notification to the Affected Residents

To comply with our notification obligations, Notions will be mailing a notification letter to the affected Maryland resident substantially in the same form as the letter attached as Exhibit A no later than April 30, 2024.

If you have any questions or require any additional information regarding this incident, please do not hesitate to contact me.

Sincerely,



Jennifer Daniels
Partner
Blank Rome LLP

Enclosure



1271 Avenue of the Americas | New York, NY 10020
blankrome.com

EXHIBIT A

Please see attached.



Return Mail Processing
PO Box 589
Claysburg, PA 16625-0589

April 29, 2024

L2381-L01-0000001 T00001 P001 *****SCH 5-DIGIT 12345

SAMPLE A SAMPLE - L01 INDIVIDUAL

[COMPANY]

APT ABC

123 ANY STREET

ANYTOWN, FC 1A2 B3C

COUNTRY



Notice of Data Breach

Dear Sample A. Sample:

Notions Marketing, Inc. (“Notions”, “we”, “us”, “our”) is writing to inform you of a data security incident that involved your personal information. Notions values its employees and is committed to protecting your personal information, which is why we are writing to explain what happened, what information was involved, our response, and provide you with resources to further protect your personal information.

What Happened?

On March 15, 2024, Notions discovered abnormal behavior on our systems and immediately began to assess and contain the incident. We discovered a third-party vendor’s laptop was compromised and that an unauthorized actor was exploiting the account of that vendor to access our systems. Immediately after discovering this unauthorized access, we launched an investigation and took steps to contain and remediate the incident. We restricted the vendor account’s access to our systems, removed malicious files, conducted an analysis of our systems, and reset administrative passwords.

We promptly engaged independent third-party computer forensics, analytics, and data mining experts to determine if any personal information was impacted and, if so, with whom it was associated. On March 29, 2024, our investigation confirmed that some of Notions’ information, which may have included your personal information, had been exfiltrated or accessed without authorization. Our investigation also determined that some of the information exfiltrated from our systems may have been published to the dark web by the relevant hackers. We have notified law enforcement of this incident.

Our investigation into the full scope of this incident is still underway. However, we have determined that the incident began on January 31, 2024. Notions was able to fully contain our systems one day after detection, on March 16, 2024.

What Information Was Involved?

At this time, we have determined that the categories of your personal information that may have been impacted as a result of this incident include: name, address, telephone number, date of birth, and social security number.

What We Are Doing.

We are committed to protecting the information you have entrusted to us. Immediately upon detecting this incident, we took steps to secure our environment from further risk, began remediation and recovery efforts, and launched an investigation in partnership with third-party cybersecurity experts. We have notified law enforcement of the incident and are continuing to monitor for any developments that may arise. Notions has implemented additional administrative and technical safeguards to further enhance the security of the information in our possession and to help prevent similar incidents from happening in the future.

0000001



In addition, while we are still investigating the incident, out of an abundance of caution, we are offering you complimentary credit monitoring and identity protection services through Experian's® Identity Works. Steps to enroll in this service are detailed below. This service helps detect possible misuse of your personal information, provides you with identity protection support, and helps with resolution of identity theft. This service includes a bureau credit report, credit monitoring, and identity restoration support.

To activate your membership and start monitoring your personal information, please visit <https://www.experianidworks.com/credit>. You have until August 30, 2024 to activate your identity and credit monitoring services. Your activation code is ABCDEFGHI.

If you have questions about the product, need assistance with identity restoration, or would like an alternative to enrolling online, please contact Experian's customer care team, toll free, at 833-931-7568 by August 30, 2024. Be prepared to provide engagement number B121582 as proof of eligibility for the identity restoration services by Experian.

Additional Details Regarding Your Experian IdentityWorks Membership

A credit card is not required for enrollment in Experian IdentityWorks. You can contact Experian immediately regarding any fraud issues, and have access to the following features once you enroll in Experian IdentityWorks:

- **Experian credit report at signup:** See what information is associated with your credit file. Daily credit reports are available for online members only.*
- **Credit Monitoring:** Actively monitors Experian file for indicators of fraud.
- **Identity Restoration:** Identity Restoration specialists are immediately available to help you address credit and non-credit related fraud.
- **Experian IdentityWorks ExtendCARE™:** You receive the same high-level of Identity Restoration support even after your Experian IdentityWorks membership has expired.
- **\$1 Million Identity Theft Insurance**:** Provides coverage for certain costs and unauthorized electronic fund transfers.

What You Can Do.

In addition to utilizing the credit monitoring and identity theft protection program above, we recommend that you remain vigilant against incidents of identity theft and fraud by regularly reviewing your credit reports and account statements for suspicious activity and to detect any potential errors. If you discover any suspicious or unusual activity on your accounts, please promptly contact the relevant financial institution or company. We are providing additional information below about steps you can take to protect your personal information, including placing a fraud alert and / or security freeze on your credit files, and/or obtaining a free credit report. We recommend that you review or update any relevant login credentials, such as usernames, passwords, or security questions, to ensure their ongoing security.

For More Information.

We deeply regret any concern this incident may cause. If you have any further questions regarding this incident, please call the dedicated and confidential Notions toll-free telephone line that we have set up to respond to questions at 833-931-7568. The response line is available Monday through Friday, 8:00 a.m. through 8:00 p.m. Central Time (excluding U.S. holidays). Please be prepared to provide engagement number B121582.

Sincerely,

James Petkunas
Notions Marketing Corporation
Senior Vice President Operations and Technology

*Offline members will be eligible to call for additional reports quarterly after enrolling.

**The Identity Theft Insurance is underwritten and administered by American Bankers Insurance Company of Florida, an Assurant company. Please refer to the actual policies for terms, conditions, and exclusions of coverage. Coverage may not be available in all jurisdictions.

Additional Resources

Order Credit Report

We encourage you to remain vigilant against incidents of identity theft and fraud, to review your account statements, and to monitor your credit reports for suspicious activity. Under U.S. law you are entitled to one free credit report annually from each of the three major credit reporting bureaus. To order your free credit report, visit www.annualcreditreport.com or call, toll-free, 1-877-322-8228. You may also contact the three major credit bureaus directly to request a free copy of your credit report.

Place A Fraud Alert

At no charge, you can also have these credit bureaus place a "fraud alert" on your file that alerts creditors to take additional steps to verify your identity prior to granting credit in your name. Note, however, that because it tells creditors to follow certain procedures to protect you, it may also delay your ability to obtain credit while the agency verifies your identity. As soon as one credit bureau confirms your fraud alert, the others are notified to place fraud alerts on your file. Should you wish to place a fraud alert, or should you have any questions regarding your credit report, please contact any one of the agencies listed below.

	Experian	Equifax	TransUnion
Address	Experian Fraud Division P.O. Box 9554 Allen, TX 75013	Equifax Consumer Fraud Division PO Box 740256 Atlanta GA 30374	TransUnion LLC P.O. Box 2000 Chester, PA 19016
Website	www.experian.com	www.equifax.com	www.transunion.com
Phone	1-888-397-3742	1-800-685-1111	1-800-888-4213

It is necessary to contact only ONE of these bureaus and use only ONE of these methods. As soon as one of the three bureaus confirms your fraud alert, the others are notified to place alerts on their records as well. You will receive confirmation letters in the mail and will then be able to order all three credit reports, free of charge, for your review. An initial fraud alert will last for one year.

Place A Security Freeze

You may also place a security freeze, also known as a credit freeze, on your credit reports. A security freeze prohibits a credit bureau from releasing any information from a consumer's credit report without the consumer's written authorization. However, please be advised that placing a security freeze on your credit report may delay, interfere with, or prevent the timely approval of any requests you make for new loans, credit mortgages, employment, housing, or other services. Under federal law, you cannot be charged to place, lift, or remove a security freeze. You will need to place a security freeze separately with each of the three major credit bureaus listed above if you wish to place a freeze on all your credit files. Please contact the Credit Reporting Agencies listed above to find out more on how to place a security freeze.

To request a security freeze, you will need to provide some or all the following information to the credit reporting agency, depending on whether you do so online, by phone, or by mail:

1. Your full name (including middle initial as well as Jr., Sr., II, III, etc.)
2. Social Security Number
3. Date of Birth
4. If you have moved in the past five (5) years, the addresses where you have lived over the prior five years
5. Proof of current address, such as a current utility bill, telephone bill, rental agreement, or deed
6. A legible photocopy of a government issued identification card (state driver's license or ID card, military identification, etc.)
7. Social Security Card, pay stub, or W2
8. If you are a victim of identity theft, include a copy of either the police report, investigative report, or complaint to a law enforcement agency concerning identity theft.

The credit reporting agencies have one (1) to three (3) business days after receiving your request to place a security freeze on your credit report, based upon the method of your request. The credit bureaus must also send written confirmation to you within five (5) business days and provide you with a unique personal identification number (PIN) or password (or both) that can be used by you to authorize the removal or lifting of the security freeze. It is important to maintain this PIN/password in a secure place, as you will need it to lift or remove the security freeze.

0000001



To lift the security freeze to allow a specific entity or individual access to your credit report, you must make a request to each of the credit reporting agencies by mail, via their website, or by phone (using the contact information above). You must provide proper identification (including name, address, and social security number) and the PIN number or password provided to you when you placed the security freeze, as well as the identities of those entities or individuals you would like to receive your credit report. You may also temporarily lift a security freeze for a specified period rather than for a specific entity or individual, using the same contact information above. The credit bureaus have between one (1) hour (for requests made online) and three (3) business days (for request made by mail) after receiving your request to lift the security freeze for those identified entities or for the specified period.

Reporting Identity Theft: You should also know that you have the right to file a police report if you ever experience identity fraud. Please note that to file a crime report or incident report with law enforcement for identity theft, you will likely need to provide some kind of proof that you have been a victim. A police report is often required to dispute fraudulent items. You can report suspected incidents of identity theft to local law enforcement, your state Attorney General, or the Federal Trade Commission. This notice has not been delayed by law enforcement.

The Federal Trade Commission can be reached at: 600 Pennsylvania Avenue NW, Washington, DC 20580, www.identitytheft.gov, 1-877-ID-THEFT (1-877-438-4338); 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. You can obtain further information on how to file such a complaint by way of the contact information listed above.

D.C. Residents: You may contact the Office of the Attorney General for the District of Columbia, 400 6th Street, NW, Washington, DC 20001, <https://oag.dc.gov/>, 1-202-727-3400.

Maryland Residents: You may obtain information from the Maryland Office of the Attorney General about steps you can take to avoid identity theft at: Office of the Attorney General of Maryland, Consumer Protection Division, 200 St. Paul Place, Baltimore, MD 21202; Telephone: 1-888-743-0023; www.oag.state.md.us/Consumer.

New York Residents: You may obtain information about security breach response and identity theft prevention and protection from the following New York state agencies:

New York Attorney General Consumer Frauds & Protection Bureau 120 Broadway, 3 rd Floor New York, NY 10271 (800)771-7755 www.ag.ny.gov	New York Department of State Division of Consumer Protection 99 Washington Avenue, Suite 650 Albany, NY 12231 (800)697-1220 www.dos.ny.gov
--	---

North Carolina Residents: You may obtain information about preventing identity theft from the North Carolina Attorney General's Office at: Office of the Attorney General of North Carolina, 9001 Mail Service Center, Raleigh, NC 27699-9001; Telephone: 1-919-716-6400; www.ncdoj.gov.

Rhode Island residents: You have the right to obtain a police report if you are a victim of identity theft. You may also obtain information about avoiding identity theft from the Office of the State of Rhode Island Attorney General, 150 South Main Street Providence, RI 02903, <https://riag.ri.gov/>, 1-401-274-4400.

All US Residents: Identity Theft Clearinghouse, Federal Trade Commission, 600 Pennsylvania Avenue, NW Washington, DC 20580, www.consumer.gov/idtheft, 1-877-IDTHEFT (438-4338), TTY: 1-866-653-4261.