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July 23, 2024

VIA ONLINE SUBMISSION

Attorney General Anthony G. Brown
Office of the Attorney General
Department of Professional and Financial Regulation
Attn: Security Breach Notification
200 St. Paul Place
Baltimore, MD 21202

Re: Notice of Data Security Incident

Dear Attorney General Brown:

Constangy, Brooks, Smith & Prophete, LLP represents Work 'N Gear located in the State of Massachusetts, in connection with the data security incident described below. Please be advised Work 'N Gear reserves all rights, claims and defenses in connection herewith.

On January 23, 2024, Work 'N Gear discovered that it had experienced an incident that temporarily disrupted the operability of its computer network. Upon discovery, Work 'N Gear promptly took steps to secure the environment and began an investigation to determine the nature and scope of the issue. In addition, Work 'N Gear began working to restore impacted systems as quickly as possible. Work 'N Gear also engaged a nationally-recognized digital forensics firm to conduct an independent investigation into what happened and determine whether personal information was accessed or acquired without authorization. On July 23, 2024, Work 'N Gear provided notice of this incident to one (1) Maryland resident via U.S. Mail based on the potential impact to their name and Social Security number. A sample copy of the notification letter is included with this correspondence.

In providing notice, Work 'N Gear offered notified individuals complimentary identity protection services through Experian IdentityWorksSM. The services include 24 months of credit and CyberScan monitoring, a \$1,000,000 insurance reimbursement policy, and fully managed id theft recovery services. With this protection, Experian will help you resolve issues if an individual's identity is compromised. Work 'N Gear has also reported this incident to law enforcement. Work 'N Gear also implemented additional measures to enhance the security of its network environment.

If you have any questions or need additional information, please do not hesitate to contact me at msachs@constangy.com or call me at (267) 219-8332.

Sincerely,

A handwritten signature in blue ink that reads "Melissa Sachs".

Melissa Sachs, Esq.



Return Mail Processing
PO Box 999
Suwanee, GA 30024

6 1 1502 *****SNGLP

SAMPLE A. SAMPLE - L01



APT ABC
123 ANY ST
ANYTOWN, US 12345-6789



July 23, 2024

Re: Notice of Data [Extra1]

Dear Sample A. Sample:

Work ‘N Gear, Inc. (“Work ‘N Gear”) is writing to notify you of a data security incident which may have affected your personal information. Work ‘N Gear takes the privacy and security of all information within its possession very seriously. Please read this letter carefully, as it describes the incident and steps that you can take to help protect your information.

On January 23, 2024, Work ‘N Gear discovered that it had experienced an incident that temporarily disrupted the operability of its computer network. Upon discovery, we promptly took steps to secure the environment and conducted an investigation into the incident’s impact and scope. On [Extra3] Work ‘N Gear learned that your name and Social Security number was potentially impacted in connection with the incident, which is the reason for this notification.

Work ‘N Gear reported the matter to law enforcement. Work ‘N Gear also implemented additional measures to enhance the security of its network environment.

To help protect your identity, we are offering complimentary access to Experian IdentityWorksSM for 24 months. Please follow the recommendations included with this letter to protect your personal information.

If you have any questions or need assistance, we encourage you to contact our dedicated call center at 866-530-9927. Experian representatives are available Monday through Friday 8am to 8pm CST, closed Saturday and Sunday (excluding major U.S. holidays). Please have your engagement number available: B127669.

We take your trust in Work ‘N Gear and this matter very seriously. Please accept our apologies for any concern or inconvenience this may cause you.

Sincerely,

Work ‘N Gear

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).

Request a Copy of Your 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 <https://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

Place a 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 <https://www.annualcreditreport.com>.

Put a 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 (FTC)

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

The Capitol
Albany, NY 12224-0341
<https://ag.ny.gov/file-complaint>
1-800-771-7755

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

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>.

Enroll with Experian: If you believe there was fraudulent use of your information as a result of this incident and would like to discuss how you may be able to resolve those issues, please reach out to an Experian agent. If, after discussing your situation with an agent, it is determined that identity restoration support is needed then an Experian Identity Restoration agent is available to work with you to investigate and resolve each incident of fraud that occurred from the date of the incident (including, as appropriate, helping you with contacting credit grantors to dispute charges and close accounts; assisting you in placing a freeze on your credit file with the three major credit bureaus; and assisting you with contacting government agencies to help restore your identity to its proper condition).

Please note that Identity Restoration is available to you for 24 months from the date of this letter and does not require any action on your part at this time. The Terms and Conditions for this offer are located at www.ExperianIDWorks.com/restoration.

While identity restoration assistance is immediately available to you, we also encourage you to activate the fraud detection tools available through Experian IdentityWorks as a complimentary 24-month membership. This product provides you with superior identity detection and resolution of identity theft. To start monitoring your personal information, please follow the steps below:

- Ensure that you **enroll by** October 31, 2024 (Your code will not work after this date.)
- **Visit** the Experian IdentityWorks website to enroll: <https://www.experianidworks.com/credit>
- Provide your **activation code**: ABCDEFGHI

If you have questions about the product, need assistance with Identity Restoration that arose as a result of this incident, or would like an alternative to enrolling in Experian IdentityWorks online, please contact Experian's customer care team at 866-530-9927 by October 31, 2024. Be prepared to provide engagement number B127669 as proof of eligibility for the Identity Restoration services by Experian.

Additional Details Regarding Your 24-Month 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.

* 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.

