



MULLEN
COUGHLIN^{LLC}
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July 31, 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 Brownell Travel, Inc. ("Brownell") located at 216 Summit Blvd., Birmingham, Alabama 35243, and write to notify your office of an event that may affect the security of certain personal information relating to certain Maryland residents. This notice may be supplemented if significant new facts are learned subsequent to its submission. By providing this notice, Brownell 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

In late November of last year, Brownell identified suspicious activity on certain company computer systems. Brownell immediately launched an extensive investigation with the assistance of third-party cybersecurity and digital forensics specialist to determine the nature and scope of the event. Brownell also promptly reported the event to federal law enforcement. Through the investigation, Brownell determined that an unknown actor gained access to certain systems maintained by its third-party managed services provider and viewed or downloaded certain data on those systems between November 10, 2023 and November 26, 2023.

In an abundance of caution, Brownell then conducted a comprehensive and time-intensive third-party review of the information stored on the impacted systems to determine what information was potentially affected and to whom the information related. Following the third-party review, Brownell undertook a detailed manual review of its records to determine the identities and contact information for potentially affected individuals to issue notifications. Brownell recently completed its review.

The personal information that could have been subject to unauthorized access for Maryland residents includes: name, Social Security number, passport number, taxpayer identification number, driver's license

or state identification number, health insurance information, financial account information, and payment card information.

Notice to Maryland Residents

On December 15, 2023, Brownell provided preliminary notice, along with complimentary credit monitoring services, to potentially affected employees while its investigation was ongoing. On July 31, 2024, Brownell continued providing written notice of this event to potentially affected individuals, including approximately two hundred fifty-three Maryland residents. Written notice is being provided in substantially the same form as the letter attached hereto as ***Exhibit A***.

Other Steps Taken and To Be Taken

Upon becoming aware of the event, Brownell moved quickly to investigate and respond, assess the security of its computer systems, and identify potentially affected individuals. In addition, Brownell is working to implement additional safeguards and training to its employees and advisors. Brownell is also providing access to credit monitoring services for twelve (12) months, through Experian, to individuals whose personal information was potentially affected by this event, at no cost to these individuals. Brownell also established a toll-free call center to address any questions from notified individuals.

Additionally, Brownell is providing potentially affected individuals with guidance on how to better protect against identity theft and fraud, including advising individuals to report any suspected incidents of identity theft or fraud to their credit card company and/or bank. Brownell 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.

Brownell is providing written notice of this event to appropriate state privacy regulators and the three major consumer reporting agencies, Equifax, Experian, and TransUnion.

Contact Information

Should you have any questions regarding this notification or other aspects of the data security event, please contact us at (267) 930-4802.

Very truly yours,



Samuel Sica, III of
MULLEN COUGHLIN LLC

SZS/reh
Enclosure

EXHIBIT A



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

July 30, 2024

BROWNELL
DISCOVER MORE

L7657-L01-0000001 T00001 P001 *****SCH 5-DIGIT 12345



SAMPLE A SAMPLE - L01 INDIVIDUAL
APT ABC
123 ANY STREET
ANYTOWN, ST 12345-6789



Dear Sample A. Sample:

Brownell Travel, Inc. ("Brownell") writes to inform you of an event that may have affected the security of certain information related to you. While we have no indications of identity theft or fraud 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? Late last year, Brownell identified suspicious activity on certain computer systems. We immediately launched an extensive investigation to determine the nature and scope of the event and worked quickly to: (1) secure our systems; (2) restore access to our systems to continue to operate without disruption; and (3) work with cybersecurity specialists to investigate whether this resulted in any impact to information housed on our systems. We also promptly reported this event to federal law enforcement. Through our investigation, we determined that an unknown actor gained access to certain systems and was able to view or download certain data between November 10, 2023 and November 26, 2023.

In an abundance of caution, we then conducted a comprehensive and time-intensive third-party review of the information stored on the impacted systems to determine what information was potentially affected and to whom the information related. After which, we undertook a manual review of our records to determine the identities and contact information for potentially affected individuals to issue notifications. We recently completed our review.

What Information Was Involved? Our investigation determined that at the time of the event, your name and [Extra1] were stored within the impacted systems and may have been affected by this event.

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 the activity, we immediately took steps to secure our systems and initiated a comprehensive incident response. We also reviewed our security policies and procedures and are enhancing our security measures to reduce the risk of similar future events.

As an added precaution, we are offering you access to credit monitoring and identity restoration services for 24 months at no cost to you, through Experian. Enrollment instructions are enclosed with this letter.

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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 complementary credit-monitoring services available to you.

For More Information. If you have additional questions, please contact our toll-free assistance line at 1-833-918-4504. This toll-free line is available Monday through Friday from 09:00 am ET to 09:00 pm ET (excluding U.S. holidays). Please be prepared to reference engagement number B128206 when speaking with an agent. You may also write to Brownell at 216 Summit Blvd., Birmingham, AL 35243.

Sincerely,

David Harris
President
Brownell Travel, Inc.

STEPS YOU CAN TAKE TO HELP PROTECT PERSONAL INFORMATION

Enroll in Monitoring Services

To help protect your identity, we are offering complimentary access to Experian IdentityWorksSM for 24 months.

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 1-833-918-4504 by October 31, 2024. Be prepared to provide engagement number B128206 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.



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. Consumers should be aware, however, 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. 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 District of Columbia residents, the District of Columbia Attorney General may be contacted at: 400 6th Street, NW, Washington, D.C. 20001; (202) 442-9828; and oag.dc.gov.

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 Mexico residents, consumers have rights pursuant to the Fair Credit Reporting Act, such as the right to be told if information in their credit file has been used against them, the right to know what is in their credit file, the right to ask for their credit score, and the right to dispute incomplete or inaccurate information. Further, pursuant to the Fair Credit Reporting Act, the consumer reporting bureaus must correct or delete inaccurate, incomplete, or unverifiable information; consumer reporting agencies may not report outdated negative information; access to consumers' files is limited; consumers must give consent for credit reports to be provided to employers; consumers may limit "prescreened" offers of credit and insurance based on information in their credit report; and consumers may seek damages from violators. Consumers may have additional rights under the Fair Credit Reporting Act not summarized here. Identity theft victims and active-duty military personnel have specific additional rights pursuant to the Fair Credit Reporting Act. We encourage consumers to review their rights pursuant to the Fair Credit Reporting Act by visiting www.consumerfinance.gov/f/201504_cfpb_summary_your-rights-under-fcra.pdf, or by writing Consumer Response Center, Room 130-A, Federal Trade Commission, 600 Pennsylvania Ave. N.W., Washington, D.C. 20580.

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.

For Rhode Island residents, the Rhode Island Attorney General may be reached at: 150 South Main Street, Providence, RI 02903; www.riag.ri.gov; and 1-401-274-4400. Under Rhode Island law, individuals have the right to obtain any police report filed in regard to this event. Fees may be required to be paid to the consumer reporting agencies. There are approximately [#] Rhode Island residents that may be impacted by this event.

