



MULLEN
COUGHLIN^{LLC}
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426 W. Lancaster Avenue, Suite 200
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August 23, 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 Shamrock Trading Corporation (“Shamrock”) located at 9300 Metcalf Avenue, Overland Park, KS 66212, and are writing to notify your office of an incident that may affect the security of certain personal information relating to approximately four (4) Maryland residents. This notice will be supplemented with any new significant facts learned subsequent to its submission. By providing this notice, Shamrock 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 or around May 6, 2024, Shamrock became aware of suspicious activity affecting certain systems storing customer data. In response, Shamrock promptly took steps to secure the systems and initiated an investigation into the nature and scope of the event. The investigation determined that certain files on the affected systems were accessible and taken without authorization from May 6, 2024, to May 7, 2024. Shamrock conducted a review of the affected files in order to identify the types of information contained in them and to whom the information relates. On May 17, 2024, Shamrock’s review determined that the affected files contained personal information pertaining to certain individuals.

The information that could have been subject to unauthorized access includes name, Social Security Number, and driver’s license number.

Notice to Maryland Residents

On or about August 23, 2024, Shamrock provided written notice of this incident to approximately four (4) Maryland residents. 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, Shamrock moved quickly to investigate and respond to the incident, assess the security of the affected systems, and identify potentially affected individuals. Further, Shamrock notified federal law enforcement regarding the event. Shamrock is also working to implement additional security measures and is reviewing its policies and procedures to further protect against similar events moving forward. Shamrock is providing access to credit monitoring services for one (1) year, through Experian, to individuals whose personal information was potentially affected by this incident, at no cost to these individuals.

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

Shamrock is providing written notice of this incident to relevant state regulators, as necessary, and to the three major credit 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) 930-4345.

Very truly yours,

A handwritten signature in blue ink, appearing to read "Erica Wicas".

Erica Wicas of
MULLEN COUGHLIN LLC

EMW/ao1
Enclosure

EXHIBIT A



Return Mail Processing
PO Box 999
Suwanee, GA 30024

4 1 718 *****SNGLP

SAMPLE A. SAMPLE - L01



APT ABC

123 ANY ST

ANYTOWN, US 12345-6789



August 23, 2024

NOTICE OF [Extra3]

Dear Sample A. Sample:

Shamrock Trading Corporation (“Shamrock”) is providing notice of an event that involves some of your personal information. This notice provides information about the event, our response, and resources available to you to help protect your information from possible misuse, should you feel it appropriate to do so.

What Happened? On or around May 6, 2024, Shamrock became aware of suspicious activity affecting certain systems storing customer data. In response, we promptly took steps to secure the systems and initiated an investigation into the nature and scope of the event. The investigation determined that certain files on the affected systems were accessible and taken without authorization from May 6, 2024, to May 7, 2024. We conducted a review of the affected files in order to identify the types of information contained in them and to whom the information relates. On May 17, 2024, our review determined that the affected files contained some of your personal information.

What Information Was Involved? The personal information related to you within the affected files includes your name and the following information: [Extra1].

What We Are Doing. The confidentiality, privacy, and security of personal information is among our highest priorities. Upon becoming aware of this event, we took prompt steps to secure the affected systems and initiate an investigation. We are implementing additional security measures and are reviewing our policies and procedures to further protect against similar events moving forward. We also notified federal law enforcement and are continuing to cooperate with law enforcement authorities.

Additionally, as an added precaution, we are offering you credit monitoring and identity restoration services for [Extra2] months through Experian at no cost to you. Instructions for enrolling in the services provided, as well as general guidance on how to better protect against identity theft or fraud, are included in the attached *Steps You Can Take to Help Protect Personal Information*.

What You Can Do. We encourage you to remain vigilant against incidents of identity theft and fraud by reviewing your account statements and monitoring your free credit reports for suspicious activity and to detect errors. You may also review the information contained in the enclosed *Steps You Can Take to Help Protect Personal Information*. There you will also find more information on the complimentary credit monitoring and identity restoration services we are making available to you.

For More Information. Shamrock understands you may have questions about this event not addressed in the letter. If you have additional questions, please contact our dedicated call center at 833-918-3958, Monday through Friday, from 8am - 8pm Central Time (excluding U.S. holidays). You may also write to 9300 Metcalf Avenue, Overland Park, KS 66212.

Sincerely,

James Maurer, Vice President
Shamrock Trading Corporation
<https://shamrocktradingcorp.com/>

Steps You Can Take To Help Protect Personal Information

Enroll in Monitoring Services

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 [Extra2]-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** November 29, 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 833-918-3958 by November 29, 2024. Be prepared to provide engagement number [Engagement Number] as proof of eligibility for the Identity Restoration services by Experian.

ADDITIONAL DETAILS REGARDING YOUR [EXTRA2]-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

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 1-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:

* 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.

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 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. There are approximately 0 Rhode Island residents that may be impacted by this event.