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Hotline: 877-382-2724 (877-DTA-BRCH)

October 3, 2024

VIA ELECTRONIC MAIL

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

Re: Balboa Bay Club Ventures LLC - Notice of Data Event

To Whom It May Concern:

We represent Balboa Bay Club Ventures LLC ("BBCV") located at 1221 West Coast Highway, Newport Beach, California 92663, and are writing to notify your office of an incident that may affect the security of certain personal information relating to approximately one (1) Maryland resident. This notice may be supplemented with any new significant facts learned subsequent to its submission. By providing this notice, BBCV 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.

1. Nature of the Data Event

On July 18, 2024, BBCV experienced a network disruption and immediately initiated an investigation of the matter. BBCV engaged independent cybersecurity experts to assist with the process. As a result of the investigation, BBCV determined that certain files may have been accessed and / or acquired without authorization. BBCV undertook a comprehensive review of those files and learned that some of your personal information was included within the potentially affected data, which is the reason for this notification. On September 17, 2024, BBCV confirmed contact information for the impacted population and began the process to notify individuals accordingly. Please note that BBCV has no evidence of the misuse of any potentially impacted information.

The information that could have been subject to unauthorized access includes first and last name, as well as driver's license number and Social Security number.

2. Notice to Maryland Residents

On or about October 1, 2024, BBCV provided written notice of this incident to approximately one (1) Maryland resident. Written notice is being provided in substantially the same form as the letter attached here as *Exhibit A*.

3. Other Steps Taken and To Be Taken

Upon discovering the event, BBCV moved quickly to investigate and respond to the incident, assess the security of BBCV systems, and identify potentially affected individuals. BBCV is also working to implement additional safeguards and training to its employees. BBCV is providing access to credit monitoring services for twelve (12) months, through TransUnion, to individuals whose personal information was potentially affected by this incident, at no cost to these individuals.

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

BBCV 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.

4. Contact Information

Should you have any questions regarding this notification or other aspects of the data security event, please contact us at 917.414.8991.

Very truly yours,

A handwritten signature in dark ink, appearing to read 'MEF', is written over a horizontal line.

Maria Efaplatmidis of
Constangy, Brooks, Smith & Prophete LLP

Exhibit A

Balboa Bay Club Ventures LLC
c/o Cyberscout
PO Box 1286
Dearborn, MI 48120-9998



October 1, 2024

Subject: Notice of Data Breach

Dear [REDACTED]:

Balboa Bay Club Ventures LLC (BBCV), Newport Beach Country Club (NBCC), International Bay Clubs, LLC (IBC) are writing to inform you of a recent data security incident that may have affected your personal information. BBCV, NBCC, and IBC take the privacy and security of all information within its possession very seriously. Please read this letter carefully as it contains information regarding the incident and steps that you can take to help protect your personal information.

What Happened. On July 18, 2024, BBCV experienced a network disruption and immediately initiated an investigation of the matter. BBCV engaged independent cybersecurity experts to assist with the process. As a result of the investigation, BBCV determined that certain files may have been accessed and / or acquired without authorization. BBCV undertook a comprehensive review of those files and learned that some of your personal information was included within the potentially affected data, which is the reason for this notification. On September 17, 2024, BBCV confirmed contact information for the impacted population and began the process to notify individuals accordingly. Please note that BBCV has no evidence of the misuse of any potentially impacted information.

What Information Was Involved. The information may have included your first and last name, driver's license number, and Social Security number.

What We Are Doing. As soon as BBCV discovered this incident, BBCV took the steps described above and implemented measures to enhance security and minimize the risk of a similar incident occurring in the future.

BBCV is also offering you 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 twelve (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 victim of fraud. These services will be provided by Cyberscout, a TransUnion company specializing in fraud assistance and remediation services.

To enroll in Credit Monitoring services at no charge, please log onto <https://bfs.cyberscout.com/activate> 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.

What You Can Do. You can follow the recommendations on the following page to help protect your personal information. You can also enroll in the complementary services offered to you through Cyberscout by using the enrollment code provided above.

For More Information. Further information about how to protect your personal information appears on the following page. If you have questions or need assistance, please call 1-844-995-6302 Monday through Friday from 8:00 A.M. to 8:00 P.M. Eastern Time, excluding holidays. We take your trust in us and this matter very seriously. Please accept our sincere apologies for any worry or inconvenience this may cause.

Sincerely,

*Balboa Bay Club Ventures LLC
Newport Beach Country Club
International Bay Clubs*

Steps You Can Take to Help Protect Your Personal 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 (the “FTC”).

Copy of 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 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

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 www.annualcreditreport.com.

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

600 Pennsylvania Ave, NW
Washington, DC 20580
consumer.ftc.gov
877-438-4338

Maryland Attorney General

200 St. Paul Place
Baltimore, MD 21202
www.marylandattorneygeneral.gov/Pages/CPD
888-743-0023

Washington D.C. Attorney General

400 S 6th Street, NW
Washington, DC 20001
oag.dc.gov/consumer-protection
202-442-9828

California Attorney General

1300 I Street
Sacramento, CA 95814
www.oag.ca.gov/privacy
800-952-5225

NC Attorney General

9001 Mail Service Center
Raleigh, NC 27699
ncdoj.gov/protectingconsumers/
877-566-7226



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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 www.consumer.ftc.gov/sites/default/files/articles/pdf/pdf-0096-fair-credit-reporting-act.pdf.