



Jud Welle
Partner
+1 212 459 7400
JWelle@goodwinlaw.com

Goodwin Procter LLP
The New York Times Building
620 Eighth Avenue
New York, New York 10018

goodwinlaw.com
+1 212 813 8800

CONFIDENTIAL TREATMENT REQUESTED

October 17, 2024

VIA EMAIL

Office of the Attorney General
Attn: Security Breach Notification
200 St. Paul Place
Baltimore, MD 21202

idtheft@oag.state.md.us

RE: Notice of Data Event

Dear Sir or Madam:

We represent Loring, Wolcott & Coolidge (“LWC”) and are writing to notify your Office of a compromise that affected the security of certain personal information relating to 102 Maryland residents. LWC is offers a wide range of fiduciary and investment management services. By providing this notice, LWC does not waive any rights or defenses, including but not limited to rights or defenses regarding the applicability of Maryland law, the applicability of Maryland data event notification statute, or personal jurisdiction.

Notice of Data Event

On May 12, 2024, LWC discovered suspicious activity within its environment (the “Incident”). LWC initiated its incident response protocols and promptly began an investigation with the assistance of third-party cybersecurity specialists, retained through outside counsel, to determine the nature and scope of the suspicious activity. Additionally, in conjunction with the forensic investigation, LWC also worked to contain and remediate the Incident, an effort which has since been completed. As part of its response to this Incident, LWC took steps to implement additional safeguards to further protect the security of its systems. Additionally, LWC notified and consulted with law enforcement throughout the course of the Incident.

The in-depth cyber forensic investigation determined that unauthorized activity occurred between April 26, 2024 and May 12, 2024, that LWC’s systems were impacted by malware, and that a certain amount of data was subject to unauthorized access and in some cases acquisition. With the assistance of a third-party data analytics firm, also retained through outside counsel, LWC conducted a comprehensive and time-intensive review of the data at issue to determine the types of personal information at risk and identify to whom the personal information relates. In addition, LWC conducted a review of its internal files to further assess the impacted data. Following the review, LWC determined that personal information relating to Maryland residents was subject to unauthorized access/acquisition.

The information impacted varies by individual but includes some or all of the following: name, address, Social



October 17, 2024

Page 2

Security number, bank account number, Tax Identification Number (TIN), username and password or email address and password, and health/medical insurance policy number.

Notice to Maryland Residents

On October 17, 2024, LWC began providing written notice of the Incident to potentially impacted individuals, on a rolling basis, which includes 102 residents. Written notice is being provided in substantially the same form as the letter attached hereto as *Exhibit A*. Please also note that LWC is also providing substitute notice of the Incident.

Other Steps Taken and to be Taken

Upon discovery of the Incident, LWC moved quickly to investigate and respond to the Incident, assess the security of its systems, and notify potentially impacted individuals. LWC also reviewed its existing policies and procedures and implemented additional safeguards to further secure its systems and the information contained therein.

Although LWC is unaware of any instances since the Incident occurred in which the personal information has been fraudulently used, LWC is nevertheless offering potentially impacted individuals with access to complimentary credit monitoring for three (3) years and dedicated call center services as well as providing guidance on how to protect against identity theft and fraud, including advising individuals to report any suspected identity theft or fraud to their financial institutions. LWC is also providing individuals with information on how to place a fraud alert and security freeze on one's credit file, information on protecting against tax fraud, the contact details for the national credit reporting agencies, information on how to obtain a free credit report, a reminder to remain vigilant for fraud and identity theft by reviewing account statements and monitoring credit reports, and encouragement to contact the Federal Trade Commission, their Attorney General, and law enforcement to report attempted or actual identity theft and fraud.

Contact Information

Should you have any questions regarding this notification or other aspects of the Incident, please contact me at (212) 459 7400 or cyber@goodwinlaw.com

Respectfully submitted,

Goodwin Procter LLP

/s/ Jud Welle

Jud Welle
Partner

JW

EXHIBIT A



P.O. Box 989728
West Sacramento, CA 95798-9728

<<First Name>><<Last Name>>
<<Address1>>
<<Address2>>
<<City>>, <<State>> <<Zip>>
<<Country>>

Enrollment Code: <<ENROLLMENT>>

To Enroll, Scan the QR Code Below:



Or Visit:

<https://app.idx.us/account-creation/protect>

October 17, 2024

Re: Notice of Security Incident | Notice of Data Breach

Dear <<First Name>><<Last Name>>,

Loring, Wolcott & Coolidge (“LWC”) is writing to advise you of a recent event that may impact the security of certain personal information related to you. We write to provide you with information about the incident, the steps we have taken since discovering the incident, and the steps you can take to better protect your information should you feel it appropriate to do so.

What Happened? On May 12, 2024, LWC discovered suspicious activity within its environment (the “Incident”). LWC initiated its incident response protocols and promptly began an investigation with the assistance of third-party cybersecurity specialists, retained through outside counsel, to determine the nature and scope of the suspicious activity. Additionally, in conjunction with the forensic investigation, LWC also worked to contain and remediate the Incident, an effort which has since been completed. As part of its response to this Incident, LWC took steps to implement additional safeguards to further protect the security of its systems. Additionally, LWC notified and consulted with law enforcement throughout the course of the Incident.

The in-depth cyber forensic investigation determined that unauthorized activity occurred between April 26, 2024 and May 12, 2024, that LWC’s systems were impacted by malware, and that a certain amount of data was subject to unauthorized access and in some cases acquisition. With the assistance of a third-party data analytics firm, also retained through outside counsel, LWC conducted a comprehensive and time-intensive review of the data at issue to determine the types of personal information at risk and identify to whom the personal information relates. In addition, LWC conducted a review of its internal files to further assess the impacted data. Following the review, LWC determined that some of your personal information was subject to unauthorized access/acquisition.

What Information Was Involved? The investigation determined that the following types of your personal information were involved: your name, <<Variable Text 1>>.

What We Are Doing. LWC is committed to and takes very seriously, its responsibility to protect all data entrusted to it. As part of our ongoing commitment to the privacy of personal information in our care, we reviewed our existing policies and procedures and implemented additional safeguards to further secure our systems and the information contained therein. We are also offering you access to **three (3) years of complimentary credit monitoring and identity restoration services**. To enroll, please follow the steps outlined in the attached document.

What You Can Do. We encourage you to remain vigilant against incidents of identity theft and fraud by reviewing your financial account statements and credit reports for any anomalies. We also encourage you to review the enclosed *Steps You Can Take to Help Protect Your Personal Information* for additional guidance and to enroll to receive the three (3) years of complimentary credit monitoring and identity restoration services being offered to you.

For More Information. We understand that you may have questions or concerns that are not addressed in this letter. Please call the dedicated assistance line that we have established regarding this incident by dialing 1-866-980-5849 Monday through Friday from 9 am – 9 pm Eastern Time, excluding U.S. holidays.

LWC sincerely regrets any inconvenience or concern this incident may have caused you.

Sincerely,

Loring, Wolcott & Coolidge

Steps You Can Take to Help Protect Your Personal Information

Enroll in Complimentary Credit Monitoring

- Call 1-866-980-5849 or visit <https://app.idx.us/account-creation/protect> and use the Enrollment Code provided above.
- IDX representatives are available Monday through Friday from 9 am - 9 pm Eastern Time. Please note, the deadline to enroll is **January 17, 2025**.

Monitor Your Accounts

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 Security Freeze

You have the right to place a “security freeze” on your credit report, which will prohibit a consumer reporting agency from releasing information in your credit report without your express authorization. The security freeze is designed to prevent credit, loans, and services from being approved in your name without your consent. However, you should be aware that using a security freeze to take control over who gets access to the personal and financial information in your credit report may delay, interfere with, or prohibit the timely approval of any subsequent request or application you make regarding a new loan, credit, mortgage, or any other account involving the extension of credit. Pursuant to federal law, you cannot be charged to place or lift a security freeze on your credit report. Should you wish to place a security freeze, please contact the major consumer reporting agencies listed below:

Experian

P.O. Box 9554

Allen, TX 75013

1-888-397-3742

www.experian.com/freeze/center.html

TransUnion

P.O. Box 160

Woodlyn, PA 19094

1-888-909-8872

www.transunion.com/credit-freeze

Equifax

P.O. Box 105788

Atlanta, GA 30348-5788

1-800-685-1111

www.equifax.com/personal/credit-report-services

To request a security freeze, you will need to provide the following information:

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, provide the addresses where you have lived over the prior 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, military identification, etc.);
7. 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.

Place a Fraud Alert

As an alternative to a security freeze, you have the right to place an initial or extended “fraud alert” on your 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 you are a victim of identity theft, you are entitled to an extended fraud alert, which is a fraud alert lasting seven years. Should you wish to place a fraud alert, please contact any one of the agencies listed below:

Experian

P.O. Box 9554
Allen, TX 75013
1-888-397-3742
www.experian.com/fraud/center.html

TransUnion

P.O. Box 2000
Chester, PA 19016
1-800-680-7289
www.transunion.com/fraud-victim-resource/place-fraud-alert

Equifax

P.O. Box 105069
Atlanta, GA 30348
1-888-766-0008
www.equifax.com/personal/credit-report-services

Additional Information

You can further educate yourself regarding identity theft, fraud alerts, security freezes, and the steps you can take to protect yourself, by contacting the consumer reporting agencies, the Federal Trade Commission, or your state Attorney General.

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. You have the right to file a police report if you ever experience identity theft or fraud. Please note that in order to file a report with law enforcement for identity theft, you will likely need to provide some proof that you have been a victim. Instances of known or suspected identity theft should also be reported to law enforcement and your state Attorney General. This notice has not been delayed by law enforcement.

California Residents: Visit the California Office of Privacy Protection (www.oag.ca.gov/privacy) for additional information on protection against identity theft. **Iowa Residents:** Office of the Attorney General of Iowa, Hoover State Office Building, 1305 E. Walnut St., Des Moines, IA 50319, Telephone: 515-281-5164, www.iowaattorneygeneral.gov. **Kentucky Residents:** Office of the Attorney General of Kentucky, 700 Capitol Avenue, Suite 118 Frankfort, Kentucky 40601, www.ag.ky.gov, Telephone: 1-502-696-5300. **Maryland Residents:** Office of the Attorney General of Maryland, Consumer Protection Division 200 St. Paul Place, Baltimore, MD 21202, www.oag.state.md.us/Consumer, Telephone: 1-888-743-0023. **New Mexico Residents:** You have rights pursuant to the Fair Credit Reporting Act, such as the right to be told if information in your credit file has been used against you, the right to know what is in your credit file, the right to ask for your credit score, and the right to dispute incomplete or inaccurate information. Further, pursuant to the Fair Credit Reporting Act, the consumer reporting agencies must correct or delete inaccurate, incomplete, or unverifiable information; consumer reporting agencies may not report outdated negative information; access to your file is limited; you must give your consent for credit reports to be provided to employers; you may limit “prescreened” offers of credit and insurance you get based on information in your credit report; and you may seek damages from a violator. You 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. You can review your 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. **New York Residents:** the Attorney General may be contacted at: Office of the Attorney General, The Capitol, Albany, NY 12224-0341; 1-800-771-7755; <https://ag.ny.gov/>. **North Carolina Residents:** Office of the Attorney General of North Carolina, Consumer Protection Division, 9001 Mail Service Center Raleigh, NC 27699-9001, www.ncdoj.gov, Telephone: 1-919-716-6400, 877-566-7226 (toll free within NC). **Oregon Residents:** Oregon Department of Justice, 1162 Court Street NE, Salem, OR 97301-4096, www.doj.state.or.us/, Telephone: 877-877-9392. **Rhode Island Residents:** Office of the Attorney General, 150 South Main Street, Providence, Rhode Island 02903, www.riag.ri.gov, Telephone: 401-274-4400. Under Rhode Island law, you have the right to obtain any police report filed in regard to this incident. There are 111 Rhode Island residents impacted by this incident. **Washington D.C. Residents:** Office of Attorney General for the District of Columbia can be reached at: 400 6th St. NW, Washington, D.C. 20001; 1-202-442-9828; <https://oag.dc.gov>. **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.