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426 W. Lancaster Avenue, Suite 200
Devon, PA 19333

October 28, 2024

**<u>VIA E-MAIL</u>**

Office of the Attorney General
Attn: Security Breach Notification
200 St. Paul Place
Baltimore, MD 21202
E-mail: idtheft@oag.state.md.us

**Re: <u>Notice of Data Event</u>**

To Whom It May Concern:

We represent CUSO Financial Services, LP ("CUSO"), located at 10150 Meanly Drive, First Floor, San Diego, California 92131, and its affiliated entities, and are writing to notify your office of an event that may affect the security of certain information relating to approximately four hundred thirty-nine (439) Maryland residents. This notice may be supplemented if any new significant facts are learned subsequent to its submission. By providing this notice, CUSO 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 January 19, 2024, CUSO became aware of suspicious activity involving a third-party service provider which CUSO utilizes for archiving communications, as required by The Financial Industry Regulatory Authority ("FINRA"). CUSO investigated this activity and determined that an unauthorized individual accessed one CUSO employee's account between December 19, 2023, and January 19, 2024. Therefore, in response, CUSO undertook a thorough and complex review of the affected account with the assistance of specialists to identify whether any personal information was involved.

This review was completed on September 10, 2024, after an extensive analysis of the underlying source files to confirm accurate information was completed. Since then, CUSO has been working to finalize the data set and validate address information to provide accurate notification to individuals. The scope of Maryland residents was confirmed on October 22, 2024 following receipt of the notification vendor’s correlation of the address information provided by CUSO with the U.S. Postal Service’s National Change of Address Database.

The information that could have been subject to unauthorized access includes name, and Social Security number, medical information, driver's license/state identification number, and financial account information.

**Notice to Maryland Residents**

On or about October 28, 2024, CUSO began providing written notice of this event to approximately four hundred thirty-nine (439) 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 becoming aware of the event, CUSO moved quickly to investigate and respond to the event, assess the security of CUSO systems, and identify potentially affected individuals. Further, CUSO notified federal law enforcement regarding the event. CUSO is also working to implement additional safeguards and training to its employees. CUSO is providing access to credit monitoring services for one (1) year, through Experian, to individuals whose personal information was potentially affected by this event, at no cost to these individuals.

Additionally, CUSO is providing impacted individuals with guidance on how to better protect against identity theft and fraud. CUSO 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. CUSO is providing written notice of this event 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) 930-4651.

Very truly yours,

Jillian Seifrit of
MULLEN COUGHLIN LLC

JZS/jlt
Enclosure

# EXHIBIT A

Secure Processing Center
25 Route 111, P.O. Box 1048
Smithtown, NY 11787

Postal Endorsement Line
<<Full Name>>
<<Address 1>>
<<Address 2>>
<<Address 3>>
<<City>>, <<State>> <<Zip>>
<<Country>>
***Postal IMB Barcode

<<Date>>

**<<Variable Header>>**

Dear <<Full Name>>:

We are writing to inform you of an event that may have affected the security of some of your personal information. Atria Wealth Solutions is the holding company for CUSO Financial Services, LP ("CUSO"). CUSO is a nationwide broker-dealer providing investment services that takes your privacy and security very seriously. We want to provide you with details about the event, our response, and steps you can take to help protect your information.

**What Happened?**
On January 19, 2024, CUSO became aware of suspicious activity involving a third-party service provider which we use for archiving communications as required by The Financial Industry Regulatory Authority ("FINRA"). An investigation determined that an unauthorized individual accessed one CUSO employee's account between December 19, 2023, and January 19, 2024. We immediately launched a thorough review of the affected account with the assistance of cybersecurity specialists to identify whether any personal information was involved. Our investigation confirmed that information related to you was stored in the affected account. Out of an abundance of caution, we are notifying you of this event.

**What Information Was Involved?**
The review determined that the affected account contained the following types of information related to you: your name and <<Data Elements>>.

**What We Are Doing**
Upon learning of the incident, we immediately secured the affected account, reset passwords, and engaged cybersecurity specialists to conduct a thorough investigation. We have also notified federal law enforcement and continue to work with them. In addition, we are offering you <<12/24>> months of complimentary monitoring and identity restoration services through Experian as a precautionary measure. Enclosed with this letter are the details and instructions for enrolling in these services.

**What You Can Do**
We encourage you to remain vigilant against identity theft and fraud by reviewing your account statements and monitoring your credit reports over the next 12 to 24 months. If you detect any suspicious activity, promptly report it to the appropriate financial institution. We have also included a document titled Steps You Can Take to Help Protect Personal Information, which offers additional guidance. You may also enroll in the complimentary monitoring services provided.

**For More Information**

If you have any questions or concerns, please contact our toll-free assistance line at , available Monday through Friday from 9:00 a.m. to 9:00 p.m. Eastern Time (excluding major U.S. holidays). You may also write to us at:

Attention: Legal Department
Atria Wealth Solutions
295 Madison Ave Suite 1407
New York, NY 10017

Sincerely,

Leon M. Johnson
Chief Information Security Officer

## STEPS YOU CAN TAKE TO HELP PROTECT PERSONAL INFORMATION

**<u>Enroll in Monitoring Services</u>**

To help protect your identity, we are offering complimentary access to Experian IdentityWorks℠ for <<12/24>> months.

If you believe there was fraudulent use of your information as a result of this event 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 event (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 <<12/24>> 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 <u>immediately available to you</u>, we also encourage you to activate the fraud detection tools available through Experian IdentityWorks as a complimentary <<12/24>>**-**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** **<<Enrollment Deadline>>** (Your code will not work after this date.)
- **Visit** the Experian IdentityWorks website to enroll: <u>https://www.experianidworks.com/3bcredit</u>
- Provide your **activation code**: **<<Activation Code>>**

If you have questions about the product, need assistance with Identity Restoration that arose as a result of this event or would like an alternative to enrolling in Experian IdentityWorks online, please contact Experian's customer care team at by **<<Enrollment Deadline>>**. Be prepared to provide **engagement number** **<<Engagement Number>>** as proof of eligibility for the Identity Restoration services by Experian.

### Additional Details Regarding Your <<12/24>>-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.[1]
- **Credit Monitoring:** Actively monitors Experian, Equifax and Transunion files 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[2]:** Provides coverage for certain costs and unauthorized electronic fund transfers.

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[1] Offline members will be eligible to call for additional reports quarterly after enrolling.

[2] 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 your free credit report, visit www.annualcreditreport.com or call, toll-free, 1-877-322-8228. You may also directly contact the three major credit reporting bureaus listed below to request a free copy of your 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 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 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 your name without your consent. However, you should be aware that using a credit 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 credit freeze on your credit report. To request a security freeze, you will need to provide 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, military identification, etc.); and
7. A copy of either the police report, investigative report, or complaint to a law enforcement agency concerning identity theft if you are a victim of identity theft.

Should you wish to place a fraud alert or credit freeze, 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**

As a best practice, consumers should change all passwords to their personal accounts on a regular basis, use strong passwords, and refrain from using the same password for multiple accounts. 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 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; 202-727-3400; 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 <<RI Count>> Rhode Island residents that may be impacted by this event.