POLSINELLI

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January 17, 2025

Pasha A. Sternberg
310-229-1335
psternberg@polsinelli.com

VIA E-MAIL (IDTHEFT@OAG.STATE.MD.US)
Office of the Attorney General
Attn: Jeff Karberg, Administrator of the Identity Theft Program
Attn: Security Breach Notification
200 St. Paul Place
Baltimore, MD 21202

Re: ***Notification of Data Security Incident***

Dear Mr. Karlberg:

We represent Promontory Investments LLC d/b/a Promontory Club ("Promontory"), 8417 Ranch Club Trail, Building E, Park City, UT 84098 in connection with an incident that may have involved the personal information of Maryland residents. Promontory is reporting the incident pursuant to Md. Code Ann, Com. Law § 14-3504(h). This notice will be supplemented, if necessary, with any new significant facts discovered subsequent to this submission. While Promontory is notifying you of this incident, Promontory does not waive any rights or defenses relating to the incident, this notice, or the applicability of Maryland law on personal jurisdiction.

NATURE OF THE INCIDENT

On November 13, 2024, Promontory discovered that an unauthorized third party gained access to its computer network. Upon discovering the incident, Promontory promptly contained the issue, began an internal investigation, and engaged a third-party forensic firm to further investigate the incident and confirm the security of its systems. Through that investigation, Promontory determined that, between November 11, 2024 and November 13, 2024, the unauthorized third party had accessed files on the Promontory network. Promontory reviewed the contents of those files to determine if they contained any personal information and on December 16, 2024, determined that they contained twelve (12) Maryland residents' names, date of birth, and contact information. At this time Promontory is not aware of any fraud or identity theft to any individual as a result of this incident.

NOTICE TO THE RESIDENTS

On January 14, 2025, Promontory mailed notification letters to Maryland residents via first-class United States mail. A copy of that notification letter is attached here for reference.

STEPS TAKEN RELATING TO THE INCIDENT

Upon learning of the incident, Promontory promptly took steps to secure its network, notified law enforcement, and began an internal investigation. Promontory also engaged a forensic security firm to investigate the incident and confirm the security of its systems. Promontory is undertaking efforts to reduce the risk of a similar incident occurring in the future, including enhancing its technical security measures. Promontory is also notifying the individuals and providing them with information on how they can protect against fraudulent activity and ID theft.

CONTACT INFORMATION

Please contact me if you have any questions or if I can provide you with any further information concerning this matter.

Very truly yours,

Pasha A. Sternberg

Enclosure

PROMONTORY
Secure Processing Center
P.O. Box 3826
Suwanee, GA 30024

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

<<Date>>

RE: NOTICE OF DATA <<Variable Data 1>>

Dear <<Full Name>>:

Promontory Investments LLC dba Promontory Club ("Promontory" or "we" or "us") values and respects the privacy of your information and takes seriously its obligation to safeguard information entrusted to us, which is why we are writing to advise you of a recent incident that may have involved some of your personal information. **Notably, we have no evidence that your personal information has been misused for the purpose of committing fraud or identity theft.** Nonetheless, we are writing to advise you of the incident and to provide you with guidance on what you can do to protect yourself, should you feel it is appropriate to do so.

What Happened? On November 11, 2024, we discovered unusual activity on our computer network. Upon identifying the issue, we promptly took steps to contain and remediate the incident and began an internal investigation. We also engaged a forensic security firm to investigate and confirm the security of our computer systems. The forensic investigation determined that the unauthorized third party accessed certain files on our network between November 11 and November 13, 2024.

What Information Was Involved? After reviewing the files, we determined that they may have included your name contact information, date of birth, and Social Security number.

What We Are Doing. In addition to the actions described above, we have taken steps to reduce the risk of this type of incident occurring in the future, including enhancing our technical security measures. Although we are not aware of any instances of fraud or identity theft involving your information, we are also offering a complimentary one-year membership of Experian IdentityWorks℠ Credit 3B. This product helps detect possible misuse of your personal information and provides you with identity protection services focused on immediate identification and resolution of identity theft. IdentityWorks Credit 3B is completely free to you, and enrolling in this program will not hurt your credit score. **For more information on identity theft prevention and IdentityWorks Credit 3B, including instructions on how to activate your complimentary one-year membership, please see the additional information provided in this letter.**

What You Can Do. While we have no evidence that your personal information has been misused, we encourage you to take advantage of the complimentary credit monitoring included in this letter. You can also find more information on steps to protect yourself against possible identity theft or fraud in the enclosed *Additional Important Information* page.

For More Information. For further information and assistance, please call 435-962-9920 from 9 AM – 5 PM Mountain Time, Monday through Friday.

Sincerely,

Promontory Investments LLC

ACTIVATING YOUR COMPLIMENTARY CREDIT MONITORING

To help protect your identity, we are offering a **complimentary** one-year membership of Experian IdentityWorks℠ Credit 3B. This product helps detect possible misuse of your personal information and provides you with superior identity protection support focused on immediate identification and resolution of identity theft.

Activate IdentityWorks Credit 3B Now in Three Easy Steps

1. ENROLL by: **<<Enrollment Deadline>>** (Your code will not work after this date.)
2. VISIT the **Experian IdentityWorks website** to enroll: **https://www.experianidworks.com/3bcredit**
3. PROVIDE the **Activation Code**: **<<Activation Code>>**

If you have questions about the product, need assistance with identity restoration or would like an alternative to enrolling in Experian IdentityWorks online, please contact Experian's customer care team at 877-288-8057. Be prepared to provide engagement number **<<Engagement Number>>** as proof of eligibility for the identity restoration services by Experian.

ADDITIONAL DETAILS REGARDING YOUR 12-MONTH EXPERIAN IDENTITYWORKS CREDIT 3B MEMBERSHIP:

A credit card is **not** required for enrollment in Experian IdentityWorks Credit 3B.
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, 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.
- **Up to $1 Million Identity Theft Insurance**:** Provides coverage for certain costs and unauthorized electronic fund transfers.

Activate your membership today at https://www.experianidworks.com/3bcredit or call 877-288-8057 to register with the activation code above.

What you can do to protect your information: There are additional actions you can consider taking to reduce the chances of identity theft or fraud on your account(s). Please refer to www.ExperianIDWorks.com/restoration for this information. If you have any questions about IdentityWorks, need help understanding something on your credit report or suspect that an item on your credit report may be fraudulent, please contact Experian's customer care team at 877-288-8057.

* 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.

Additional Important Information

As a precautionary measure, we recommend that you remain vigilant to protect against potential fraud and/or identity theft by, among other things, reviewing your account statements and monitoring 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 should also promptly report any fraudulent activity or any suspected incidents of identity theft to proper law enforcement authorities, including the police and your state's attorney general, as well as the Federal Trade Commission ("FTC").

You may wish to review the tips provided by the FTC on fraud alerts, security/credit freezes and steps you can take to avoid identity theft. For more information and to contact the FTC, please visit www.ftc.gov/idtheft or call 1-877-ID-THEFT (1-877-438-4338). You may also contact the FTC at Federal Trade Commission, 600 Pennsylvania Avenue, NW, Washington, DC 20580.

Credit Reports: You may obtain a free copy of your credit report once every 12 months from each of the three national credit reporting agencies by visiting www.annualcreditreport.com, by 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 can print a copy of the request form at https://www.annualcreditreport.com/manualRequestForm.action.

Alternatively, you may elect to purchase a copy of your credit report by contacting one of the three national credit reporting agencies. Contact information for the three national credit reporting agencies for the purpose of requesting a copy of your credit report or for general inquiries is as follows:

Equifax	Experian	TransUnion
1-866-349-5191	1-888-397-3742	1-800-888-4213
www.equifax.com	www.experian.com	www.transunion.com
P.O. Box 740241	P.O. Box 2002	P.O. Box 2000
Atlanta, GA 30374	Allen, TX 75013	Chester, PA 19016

Fraud Alerts: You may want to consider placing a fraud alert on your credit report. A fraud alert is free and will stay on your credit report for one (1) year. The alert informs creditors of possible fraudulent activity within your report and requests that the creditor contact you prior to establishing any new accounts in your name. To place a fraud alert on your credit report, contact any of the three national credit reporting agencies using the contact information listed above. Additional information is available at www.annualcreditreport.com.

Credit and Security Freezes: You may have the right to place a credit freeze, also known as a security freeze, on your credit file, so that no new credit can be opened in your name without the use of a PIN number that is issued to you when you initiate the freeze. A credit freeze is designed to prevent potential credit grantors from accessing your credit report without your consent. If you place a credit freeze, potential creditors and other third parties will not be able to get access to your credit report unless you temporarily lift the freeze. Therefore, using a credit freeze may delay your ability to obtain credit. Unlike a fraud alert, you must separately place a credit freeze on your credit file at each credit reporting company. Since the instructions for how to establish a credit freeze differ from state to state, please contact the three major credit reporting companies as specified below to find out more information:

Equifax Security Freeze	Experian Security Freeze	TransUnion Security Freeze
1-888-298-0045	1-888-397-3742	1-888-909-8872
https://www.equifax.com/personal/credit-report-services/credit-freeze/	https://www.experian.com/freeze/center.html	https://www.transunion.com/credit-freeze
P.O. Box 105788	P.O. Box 9554	P.O. Box 160
Atlanta, GA 30348	Allen, TX 75013	Woodlyn, PA 19094

This notification was not delayed by law enforcement.

Iowa Residents: Iowa residents can contact the Office of the Attorney general to obtain information about steps to take to avoid identity theft from the Iowa Attorney General's office at: Office of the Attorney General of Iowa, Hoover State Office Building, 1305 E. Walnut Street, Des Moines IA 50319, 515-281-5164.

Maryland Residents: Maryland residents can contact the Office of the Attorney General to obtain information about steps you can take to avoid identity theft from the Maryland Attorney General's office at: Office of the Attorney General, 200 St. Paul Place, Baltimore, MD 21202, (888) 743-0023, http://www.marylandattorneygeneral.gov/.

New Mexico: Individuals have rights under the Fair Credit Reporting Act. We encourage you to review your rights under the Fair Credit Reporting Act by visiting https://files.consumerfinance.gov/f/documents/bcfp_consumer-rights-summary_2018-09.pdf, or by requesting information in writing from the Consumer Financial Protection Bureau, 1700 G Street N.W., Washington, DC 20552.

New York State Residents: New York residents can obtain information about preventing identity theft from the New York Attorney General's Office at: Office of the Attorney General for the State of New York, Bureau of Consumer Frauds & Protection, The Capitol, Albany, New York 12224-0341; https://ag.ny.gov/consumer-frauds/identity-theft; (800) 771-7755.

North Carolina Residents: North Carolina residents can obtain information about preventing identity theft from the North Carolina Attorney General's Office at: North Carolina Attorney General's Office, Consumer Protection Division, 9001 Mail Service Center, Raleigh, NC 27699-9001; 877-5-NO-SCAM (Toll-free within North Carolina); 919-716-6000; www.ncdoj.gov.

Oregon Residents: You are advised to report any suspected identity theft to law enforcement, including the Federal Trade Commission and the Oregon Attorney General. For more information on security locks, you can visit the Oregon Department of Consumer and Business Services website at dfr.oregon.gov/financial/protect/Pages/stolen-identity.aspx and click "Place a credit freeze."

Rhode Island Residents: We believe that this incident affected <<RI Count>> Rhode Island residents. Rhode Island residents can contact the Office of the Attorney general at: Rhode Island Office of the Attorney General, 150 South Main Street, Providence, RI 02903, (401) 274-4400, www.riag.ri.gov. You have the right to obtain any police report filed in regard to this incident. If you are the victim of identity theft, you also have the right to file a police report and obtain a copy of it.

Vermont Residents: If you do not have internet access but would like to learn more about how to place a security freeze on your credit report, contact the Vermont Attorney General's Office at 802-656-3183 (800-649-2424 toll free in Vermont only).