



MULLEN
COUGHLIN^{LLC}
ATTORNEYS AT LAW

RECEIVED

AUG 15 2022

CONSUMER PROTECTION

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

August 9, 2022

VIA U.S. MAIL

Consumer Protection Bureau
Office of the New Hampshire Attorney General
33 Capitol Street
Concord, NH 03301

Re: Notice of Data Event

Dear Sir or Madam:

We represent The Country Club at Woodfield, Inc. ("Woodfield") located at 3650 Club Place Boca Raton, FL 33496, and are writing to notify your office of an incident that may affect the security of certain personal information relating to approximately one (1) New Hampshire resident. This notice may be supplemented with any new significant facts learned subsequent to its submission. By providing this notice, Woodfield does not waive any rights or defenses regarding the applicability of New Hampshire law, the applicability of the New Hampshire data event notification statute, or personal jurisdiction.

Nature of the Data Event

On or about July 10, 2022, Woodfield became aware of suspicious activity in its network. Woodfield immediately launched an investigation with the assistance of outside cybersecurity specialists to assess the security of its systems and determine the nature and scope of this incident. The investigation identified unauthorized access to and activity on the network as early as January 18, 2022. However, indications of unauthorized access to, or copying of, data from the network were not observed earlier than July 10, 2022. Woodfield first became aware that sensitive information relating to individuals was at risk on July 12, 2022, and immediately undertook a comprehensive review of impacted and potentially impacted files in order to determine whether they contained sensitive information. The review was recently completed and identified impacted individuals.

The information involved may vary by individual and includes name and Social Security number.

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Notice to New Hampshire Resident

On or about August 12, 2022, Woodfield began providing written notice of this incident to impacted individuals, including approximately one (1) New Hampshire resident. 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 learning of the event, Woodfield moved quickly to investigate and respond to the incident, assess the security of Woodfield systems, and identify potentially affected individuals. Further, Woodfield notified federal law enforcement regarding the event. Woodfield is also working to implement additional safeguards and training to its employees. Woodfield is providing access to credit monitoring services for two (2) years, through Experian, to individuals whose personal information was potentially affected by this incident, at no cost to these individuals.

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

Woodfield 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) 930-4801.

Very truly yours,

Alexander T. Walker of
MULLEN COUGHLIN LLC

ATW/cob
Enclosure

2022 AUG 15 PM 1:10
STATE OF NH
DEPT OF JUSTICE

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 credit 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, 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 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	1-833-395-6938
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

You may further educate yourself regarding identity theft, fraud alerts, credit freezes, and the steps you can take to protect your personal information by contacting the consumer reporting bureaus, the Federal Trade Commission, or your state Attorney General. The Federal Trade Commission may be reached at: 600 Pennsylvania Avenue NW, Washington, DC 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. 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.

For Maryland residents, the Maryland Attorney General may be contacted at: 200 St. Paul Place, 16th Floor, Baltimore, MD 21202; 1-410-528-8662 or 1-888-743-0023; and www.oag.state.md.us. Woodfield is located at 3650 Club Pl, Boca Raton, FL 33496.

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.

STEPS YOU CAN TAKE TO HELP PROTECT YOUR PERSONAL INFORMATION

Enroll in Credit Monitoring

To help protect your identity, we are offering a complimentary 24-month membership of Experian's IdentityWorks. This product provides you with superior identity detection and resolution of identity theft. To activate your membership and start monitoring your personal information please follow the steps below:

- Ensure that you **enroll by: November 30, 2022** (Your code will not work after this date.)
- **Visit** the Experian IdentityWorks website to enroll: <https://www.experianidworks.com/credit>
- Provide your **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 (833) 468-0638 by **November 30, 2022**. Be prepared to provide engagement number as proof of eligibility for the identity restoration services by Experian.

ADDITIONAL DETAILS REGARDING YOUR 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 file for indicators of fraud.
- **Identity Restoration:** Identity Restoration agents 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.²

If you believe there was fraudulent use of your information and would like to discuss how you may be able to resolve those issues, please reach out to an Experian agent at (833) 468-0638. 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 (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).

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 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 three major credit reporting bureaus listed below.

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.



WOODFIELD
BOCA RATON

Return Mail Processing
PO Box 999
Suwanee, GA 30024

August 3, 2022

712272*****SNGLP

SAMPLE A. SAMPLE - L01

APT ABC



123 ANY ST

ANYTOWN, US 12345-6789



Notice of [Extra2] - The Country Club at Woodfield, Inc. ("the Club")

Dear Sample A. Sample:

This letter regards a recent incident that caused disruption to the Club's computer systems. This notice provides information about the incident, our response, and resources available to you to help protect your information from possible misuse, should you feel it necessary to do so.

What Happened? On July 10, 2022, the Club learned that its network had been the target of a cyberattack. The Club immediately took systems offline and launched an investigation into the nature and scope of the incident. The Club has been working with industry-leading cybersecurity specialists and has learned that an unauthorized actor gained access to the Club's network and, on July 10, 2022, copied certain files containing personal information from the network.

What Information Was Involved? The following types of your information are contained in files that were impacted by this incident: name, contact information, and [Extra1]. Although we are not aware of any identity theft or unauthorized use of the involved information, we are making you aware of this incident in an abundance of caution.

What We Are Doing. Data security and the privacy of information are of the utmost priority to the Club. In response to this incident, an investigation was commenced immediately to confirm the nature and scope of this incident. As part of the Club's ongoing commitment to the security of its computer network and information, policies and procedures are being reviewed and enhanced where possible and additional technical safeguards are being implemented to reduce the likelihood of a similar event in the future, including the implementation of an advanced threat detection tool in our environment. The Club has also reported this incident to federal law enforcement.

As an added precaution, we are also offering complimentary access to 24 months of credit monitoring and identity theft restoration services, through Experian. You will need to enroll yourself in these services if you wish to do so, as the Club is not able to activate them on your behalf. Please review the instructions contained in the enclosed *Steps You Can Take to Help Protect Your Personal Information* for additional information on these services.

What You Can Do. The Club encourages you to remain vigilant against incidents of identity theft and fraud, to review your account statements and credit reports for suspicious activity. The Club also suggests that you change personal account passwords as a best practice. You may also review the enclosed *Steps You Can Take to Help Protect Your Personal Information* for additional steps you may take and information on what you can do to better protect against the possibility of identity theft and fraud, should you feel it is appropriate to do so. You are also encouraged to enroll in the complimentary credit monitoring services the Club is offering you.

For More Information. If you have questions about this letter, please call (833) 468-0638 between the hours of 9:00 a.m. and 11:00 p.m., Monday through Friday and 11:00 a.m. and 8:00 p.m., Saturday and Sunday, Eastern Time, (excluding major U.S. holidays).

Sincerely,

The Woodfield Team

EXHIBIT A