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CONSUMER PROTECTION

MULLEN COUGHLIN LLC
ATTORNEYS AT LAW

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75 S. Clinton Avenue, Suite 510
Rochester, NY 14604

November 3, 2021

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 Western Spirits Beverage Company ("Western Spirits") located at 2200 Lapsley Lane, Bowling Green, Kentucky 42103, and are writing to notify your office of an incident that may affect the security of some personal information relating to three (3) New Hampshire residents. The investigation into this matter is ongoing, and this notice will be supplemented with any new significant facts learned subsequent to its submission. By providing this notice, Western Spirits 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 September 18, 2021, Western Spirits became aware of suspicious activity within its computer network, including the encryption of files. Upon discovery, Western Spirits engaged our law firm to conduct a legal investigation into the nature and scope of the activity. The investigation has determined that certain unencrypted information within Western Spirits systems was accessed by an unauthorized actor; however, there is no evidence that any information has been subject to disclosure or misuse. Western Spirits has completed a deliberate and thorough assessment of the information potentially impacted during this event and to whom that information pertained. The information that could have been subject to unauthorized access includes name, address, and Social Security number.

Notice to New Hampshire Residents

On or about November 3, 2021, Western Spirits provided written notice of this incident to all potentially affected individuals, which includes three (3) New Hampshire 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 discovering the event, Western Spirits moved quickly to investigate and respond to the incident, to assess the security of Western Spirits systems, and to notify potentially affected individuals. Western Spirits is also working to implement additional safeguards and training to its employees. Western Spirits is providing access to credit monitoring services for one (1) year, through Experian, to individuals whose personal information was potentially affected by this incident, at no cost to these individuals.

Additionally, Western Spirits is providing impacted individuals with guidance on how to better protect against identity theft and fraud, including advising individuals to report any suspected incidents of identity theft or fraud to their credit card company and/or bank. Western Spirits is 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 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.

Contact Information

Should you have any questions regarding this notification or other aspects of the data security event, please contact us at (267) 930-4741.

Very truly yours,

James Paulino of
MULLEN COUGHLIN LLC

JMP/ljw
Enclosure (1)

EXHIBIT A

WESTERN SPIRITS

Beverage Company

Return Mail Processing
PO Box 999
Suwanee, GA 30024

21380 **********SNGLP
SAMPLE A. SAMPLE - L01
APT ABC
123 ANY ST
ANYTOWN, US 12345-6789

November 3, 2021

[Extra2]

Dear Sample A. Sample:

Western Spirits Beverage Company ("Western Spirits") is writing to inform you of a recent incident that may affect the privacy of some of your information. Western Spirits takes the protection of your information very seriously and, although we have no evidence of actual or attempted misue of your information relating to this incident, this letter provides details regarding the incident, our response, and access to resources so that you can protect your personal information, should you feel it is appropriate to do so. We also are offering you 12 months of complimentary credit and fraud monitoring, with $1,000,000 in identity theft insurance; enrollment instructions can be found in the following pages.

What Happened? On September 18, 2021, Western Spirits learned that it was the victim of a criminal cyberattack. We promptly took steps to secure our systems and commenced an investigation into the nature and scope of the incident. We have been working diligently to determine what may have happened and what information may have been affected. While the investigation was able to confirm that certain systems were accessed by the criminal actor, we have been unable to determine exactly what information was accessed. Therefore, in an abundance of caution, Western Spirits conducted an extensive review of the entire contents of the impacted systems, and on October 4, 2021, Western Spirits's investigation confirmed that the the potentially impacted data included certain information relating to you.

What Information Was Involved? Although we are unaware of any actual or attempted misuse of your information, we are providing you this notification out of an abundance of caution because certain information relating to you was accessed during this event. The potentially impacted information relating to you includes your name and Social Security number.

What We Are Doing. The privacy and security of information are among one of our highest priorities and Western Spirits has strict security measures in place to protect information in our care. Upon discovering this incident, we immediately took steps to secure the environment and to conduct an investigation to determine the scope of any unauthorized access to legally protected information. We also commenced a review of existing security policies and are implementing additional measures and enhanced security tools to further protect information in our systems. We are also implementing additional safeguards and are providing additional training to our employees on data privacy and security. Finally, we have reported this incident to law enforcement, and will participate with any criminal investigation into this matter.

In addition to providing notice of this event to you, we are also providing identity theft and credit monitoring protection services for 12 months through Experian at no cost to you. Information and instructions on how to enroll in these complimentary services can be found in the "Steps You Can Take to Protect Personal Information" attached to this letter.

What You Can Do. While Western Spirits is not aware of any actual or attempted misuse of information as a result of this incident, we nonetheless encourage you to remain vigilant against incidents of identity theft and fraud by reviewing your account statements, and to monitor your credit reports for suspicious activity. You may review the information contained in the attached "Steps You Can Take to Protect Protect Information." You may also enroll to receive the identity protection services we are making available to you. There is no charge to you for the cost of this service; however, you will need to enroll yourself in this service.

For More Information. We understand you may have questions about this incident that are not addressed in this letter. We've set up a dedicated assistance line to answer your privacy questions. If you have additional questions or concerns, please call us toll-free at (855) 356-3059, 9:00 AM to 11:00 PM Eastern Time, Monday through Friday and 11:00 AM to 8:00 PM Eastern Time, Saturday and Sunday (excluding major U.S. holidays). Be prepared to provide your engagement number B020767.

We sincerely regret any inconvenience this incident may cause you. Protecting information provided to Western Spirits is very important to us, and we remain committed to safeguarding the information in our care.

Sincerely,

Western Spirits Beverage Company

STEPS YOU CAN TAKE TO PROTECT PERSONAL INFORMATION

Enroll in Credit Monitoring Services

To help protect your identity, we are offering a complimentary 12-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**: **January 31, 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 **(855) 356-3059** by **January 31, 2022**. Be prepared to provide engagement number as proof of eligibility for the identity restoration services by Experian.

ADDITIONAL DETAILS REGARDING YOUR 12-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.*
- **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.

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.

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;

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* 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.

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, 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 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 bureaus 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 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. We encourage you to 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.

For District of Columbia residents, the District of Columbia Attorney General may be contacted at: 400 6th St NW, Washington, DC 20001, USA; 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; 1-410-528-8662 or 1-888-743-0023; and www.oag.state.md.us. Western Spirits is located at 2200 Lapsley Lane, Bowling Green, KY 42103.

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, you have the right to obtain any police report filed in regard to this incident. There are 0 Rhode Island residents impacted by this incident.