

June 7, 2021

Tawana B. Johnson, Esq.
470.419.6653 (direct)
Tawana.Johnson@WilsonElser.com

Via electronic-mail: DOJ-CPB@doj.nh.gov; AttorneyGeneral@doj.nh.gov

Attorney General Gordon McDonald

Consumer Protection Bureau
Office of the Attorney General
33 Capitol Street
Concord, NH 03302

Re: Our Client : Boulos Asset Management
Matter : Data Security Incident on March 31, 2021
Wilson Elser File # : 16516.01434

Dear Attorney General McDonald:

We represent Boulos Asset Management (“BAM”), located in Portland, Maine, with respect to a potential data security incident described in more detail below. BAM takes the security and privacy of the information in its control seriously, and has taken steps to prevent a similar incident from occurring in the future.

This letter will serve to inform you of the nature of the security breach, the number of New Hampshire residents being notified, what information has been compromised, and the steps that BAM is taking to secure the integrity of its systems. We have also enclosed hereto a sample of the notification made to the potentially impacted individuals, which includes an offer of free credit monitoring.

1. Nature of the Security Incident

On March 30, 2021, BAM was the target of a ransomware attack. On May 17, 2021, the forensics investigation concluded that this incident may have resulted in the exposure of personal information. Although we have found no evidence that any information has been specifically accessed for misuse, it is possible that the potentially impacted individuals’ names, mailing addresses, W-9 and/or social security numbers, and limited bank account information could have been exposed as a result of this attack.

As of this writing, BAM has not received any reports of related identity theft since the date of the incident (March 30, 2021 to present).

150 East 42nd Street • New York, NY 10017 • p 212.490.3000 • f 212.490.3038

Albany • Atlanta • Austin • Baltimore • Beaumont • Boston • Chicago • Dallas • Denver • Edwardsville • Garden City • Hartford • Houston • Indiana • Kentucky
Las Vegas • London • Los Angeles • Miami • Michigan • Milwaukee • New Jersey • New Orleans • New York • Orlando • Philadelphia • Phoenix • San Diego
San Francisco • Sarasota • Stamford • Virginia • Washington, DC • West Palm Beach • White Plains

wilsonelser.com

2. Number of New Hampshire Residents Affected

A total of twenty-three (23) residents of New Hampshire were potentially affected by this security incident. Notification letters to these individuals were mailed on June 7, 2021, by first class mail. A sample copy of the notification letter is included with this letter.

3. Steps Taken

Immediately upon learning of this incident, BAM contacted a reputable 3rd party forensic team to assist with its investigation. Since then, BAM has been working with law enforcement to help respond to this incident, along with cybersecurity experts to review all policies and procedures relating to the security of BAM systems.

Although BAM is not aware of any evidence of misuse of personal information, BAM extended to all potentially impacted individuals an offer for free credit monitoring and identity theft protection through IDX. This service will include 12 months of credit monitoring, along with a fully managed id theft recovery service, should the need arise.

4. Contact Information

BAM remains dedicated to protecting the sensitive information in its control. If you have any questions or need additional information, please do not hesitate to contact me at Tawana.Johnson@WilsonElser.com or 470.419.6653.

Very truly yours,

Wilson Elser Moskowitz Edelman & Dicker LLP



Tawana B. Johnson, Esq.

Copy: Robert Walker, Esq. (Wilson Elser LLP)
Michael Kar, Esq.

Enclosure: *Sample Notification Letter*

Boulos Asset Management
C/O IDX
10300 SW Greenburg Rd. Suite 570
Portland, OR 97223



To Enroll, Please Call:
1-800-939-4170
Or Visit:
[https://app.idx.us/account-
creation/protect](https://app.idx.us/account-creation/protect)
Enrollment Code:
<<XXXXXXXXXX>>

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

June 7, 2021

Notice of Data Breach

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

We are writing in order to inform you of an incident that may have exposed your sensitive personal information. We take the security of your personal information seriously and want to provide you with information and resources you can use to protect your information.

What Happened and What Information was Involved:

On March 30, 2021, Boulos Asset Management (“BAM”) detected a data security incident. An unauthorized third party attempted to lock us out of our network environment in exchange for a financial payment to resume business operations. We immediately shut off all access to the network and engaged a specialized third-party forensic incident response firm to assist with securing the environment.

We also initiated a comprehensive investigation into what sensitive data could have been compromised. Our forensic investigation determined that your full name, mailing address, social security number, and/or limited bank account information could have been compromised by the cybercriminal. We maintained this client information on our system for standard business and administrative purposes.

As of this writing, BAM has not received any reports of related identity theft since the date of the incident (March 30, 2021 to present).

What We Are Doing:

Upon detecting this incident, we moved quickly to initiate our incident response, which included conducting an investigation with the assistance of third-party forensic specialists and confirming the security of our network environment. We have been working with law enforcement to respond to this incident. We have reviewed and altered our policies and procedures relating to the security of our systems and servers, as well as our information life cycle management.

We have also secured free credit monitoring services for all affected individuals, as set forth in full below.

What You Can Do:

We value the safety of your personal information and are therefore offering credit monitoring and identity theft protection services through IDX, a leading identity protection technology company. IDX’s services include: 12 months of credit and

CyberScan monitoring, a \$1,000,000 insurance reimbursement policy, and fully managed id theft recovery services. With this protection, IDX will help you resolve issues if your identity is compromised.

We encourage you to contact IDX with any questions and to enroll in free IDX services by calling 1-800-939-4170 or going to <https://app.idx.us/account-creation/protect>. IDX is available Monday through Friday, 9:00am – 9:00pm ET. Please note the deadline to enroll is **September 7, 2021**.

Again, at this time, there is no evidence that your information has been misused. However, we encourage you to take full advantage of this service offering. IDX representatives have been fully versed on the incident and can answer questions or concerns you may have regarding protection of your personal information.

For More Information:

Enclosed you will find additional information regarding the resources available to you, and the steps that you can take to further protect your personal information.

We recognize that you may have questions not addressed in this letter. If you have additional questions, please call IDX services at 1-800-939-4170, Monday through Friday, 9:00am – 9:00pm ET.

Boulos Asset Management values the security of your personal data, and we apologize for any inconvenience that this incident has caused.

Sincerely,

A handwritten signature in black ink, appearing to read "Rick Donald", with a stylized flourish at the end.

Rick Donald
Chief Financial Officer
Boulos Asset Management

Additional Information

Credit Reports: You may obtain a copy of your credit report, free of charge, whether or not you suspect any unauthorized activity on your account. You may obtain a free copy of your credit report from each of the three nationwide credit reporting agencies. To order your free credit report, please visit www.annualcreditreport.com, or call toll-free at 1-877-322-8228. You can also order your annual free credit report by mailing a completed Annual Credit Report Request Form (available at <https://www.consumer.ftc.gov/articles/0155-free-credit-reports>) to: Annual Credit Report Request Service, P.O. Box 105281, Atlanta, GA, 30348-5281.

Security Freeze: You also have the right to place a security freeze on your credit report. A security freeze is intended to prevent credit, loans, and services from being approved in your name without your consent. To place a security freeze on your credit report, you need to make a request to each consumer reporting agency. You may make that request by certified mail, overnight mail, regular stamped mail, or by following the instructions found at the websites listed below. The following information must be included when requesting a security freeze (note that if you are requesting a credit report for your spouse or a minor under the age of 16, this information must be provided for him/her as well): (1) full name, with middle initial and any suffixes; (2) Social Security number; (3) date of birth; (4) current address and any previous addresses for the past five years; and (5) any applicable incident report or complaint with a law enforcement agency or the Registry of Motor Vehicles. The request must also include a copy of a government-issued identification card and a copy of a recent utility bill or bank or insurance statement. It is essential that each copy be legible, display your name and current mailing address, and the date of issue. As of September 21, 2018, it is free to place, lift, or remove a security freeze. You may also place a security freeze for children under the age of 16. You may obtain a free security freeze by contacting any one or more of the following national consumer reporting agencies:

| | | |
|---|---|--|
| Equifax Security Freeze P.O. Box 105788 Atlanta, GA 30348 1-800-349-9960 https://www.equifax.com/personal/credit-report-services/credit-freeze/ | Experian Security Freeze P.O. Box 9554 Allen, TX 75013 1-888-397-3742 www.experian.com/freeze/center.html | TransUnion Security Freeze P.O. Box 160 Woodlyn, PA 19094 1-800-909-8872 www.transunion.com/credit-freeze |
|---|---|--|

Fraud Alerts: You can place fraud alerts with the three credit bureaus by phone and online with:

- Equifax (https://assets.equifax.com/assets/personal/Fraud_Alert_Request_Form.pdf);
- TransUnion (<https://www.transunion.com/fraud-alerts>); or
- Experian (<https://www.experian.com/fraud/center.html>).

A fraud alert tells creditors to follow certain procedures, including contacting you, before they open any new accounts or change your existing accounts. For that reason, placing a fraud alert can protect you, but also may delay you when you seek to obtain credit. As of September 21, 2018, initial fraud alerts last for one year. Victims of identity theft can also get an extended fraud alert for seven years. The phone numbers for all three credit bureaus are located above.

Monitoring: You should always remain vigilant and monitor your accounts for suspicious or unusual activity.

File Police Report: You have the right to file or obtain a police report if you experience identity fraud. Please note that in order to file a crime report or incident report with law enforcement for identity theft, you will likely need to provide proof that you have been a victim. A police report is often required to dispute fraudulent items. You can generally report suspected incidents of identity theft to local law enforcement or to the Attorney General.

FTC and Attorneys General: 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. This notice has not been delayed by law enforcement.

For Maryland residents, the Attorney General can be contacted at 200 St. Paul Place, 16th Floor, Baltimore, MD 21202, 1-888-743-0023, and www.oag.state.md.us.

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 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 violators. 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 at 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 North Carolina residents, the Attorney General can be contacted at 9001 Mail Service Center, Raleigh, NC 27699-9001, 1-877-566-7226 or 1-919-716-6400, and www.ncdoj.gov.

For 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, and <https://ag.ny.gov/>.

For Rhode Island residents, the Rhode Island Attorney General can be reached at 150 South Main Street, Providence, Rhode Island 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.

Boulos Asset Management
C/O IDX
10300 SW Greenburg Rd. Suite 570
Portland, OR 97223



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

To Enroll, Please Call:
1-800-939-4170
Or Visit:
[https://app.idx.us/account-
creation/protect](https://app.idx.us/account-creation/protect)
Enrollment Code:
<<XXXXXXXXXX>>

June 7, 2021

Notice of Data Breach

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

We are writing in order to inform you of an incident that may have exposed your sensitive personal information. We take the security of your personal information seriously and want to provide you with information and resources you can use to protect your information.

What Happened and What Information was Involved:

On March 30, 2021, Boulos Asset Management (“BAM”) detected a data security incident. An unauthorized third party attempted to lock us out of our network environment in exchange for a financial payment to resume business operations. We immediately shut off all access to the network and engaged a specialized third-party forensic incident response firm to assist with securing the environment.

We also initiated a comprehensive investigation into what sensitive data could have been compromised. Our forensic investigation determined that your full name, mailing address, and social security number could have been compromised by the cybercriminal. We maintained this employee information on our system for standard payroll, benefits, and organizational purposes.

As of this writing, BAM has not received any reports of related identity theft since the date of the incident (March 30, 2021 to present).

What We Are Doing:

Upon detecting this incident, we moved quickly to initiate our incident response, which included conducting an investigation with the assistance of third-party forensic specialists and confirming the security of our network environment. We have been working with law enforcement to respond to this incident. We have reviewed and altered our policies and procedures relating to the security of our systems and servers, as well as our information life cycle management.

We have also secured free credit monitoring services for all affected individuals, as set forth in full below.

What You Can Do:

We value the safety of your personal information and are therefore offering credit monitoring and identity theft protection services through IDX, a leading identity protection technology company. IDX’s services include: 12 months of credit and

CyberScan monitoring, a \$1,000,000 insurance reimbursement policy, and fully managed id theft recovery services. With this protection, IDX will help you resolve issues if your identity is compromised.

We encourage you to contact IDX with any questions and to enroll in free IDX services by calling 1-800-939-4170 or going to <https://app.idx.us/account-creation/protect>. IDX is available Monday through Friday, 9:00am – 9:00pm ET. Please note the deadline to enroll is **September 7, 2021**.

Again, at this time, there is no evidence that your information has been misused. However, we encourage you to take full advantage of this service offering. IDX representatives have been fully versed on the incident and can answer questions or concerns you may have regarding protection of your personal information.

For More Information:

Enclosed you will find additional information regarding the resources available to you, and the steps that you can take to further protect your personal information.

We recognize that you may have questions not addressed in this letter. If you have additional questions, please call IDX services at 1-800-939-4170, Monday through Friday, 9:00am – 9:00pm ET.

Boulos Asset Management values the security of your personal data, and we apologize for any inconvenience that this incident has caused.

Sincerely,

A handwritten signature in black ink, appearing to read "Rick Donald", with a stylized flourish at the end.

Rick Donald
Chief Financial Officer
Boulos Asset Management

Additional Information

Credit Reports: You may obtain a copy of your credit report, free of charge, whether or not you suspect any unauthorized activity on your account. You may obtain a free copy of your credit report from each of the three nationwide credit reporting agencies. To order your free credit report, please visit www.annualcreditreport.com, or call toll-free at 1-877-322-8228. You can also order your annual free credit report by mailing a completed Annual Credit Report Request Form (available at <https://www.consumer.ftc.gov/articles/0155-free-credit-reports>) to: Annual Credit Report Request Service, P.O. Box 105281, Atlanta, GA, 30348-5281.

Security Freeze: You also have the right to place a security freeze on your credit report. A security freeze is intended to prevent credit, loans, and services from being approved in your name without your consent. To place a security freeze on your credit report, you need to make a request to each consumer reporting agency. You may make that request by certified mail, overnight mail, regular stamped mail, or by following the instructions found at the websites listed below. The following information must be included when requesting a security freeze (note that if you are requesting a credit report for your spouse or a minor under the age of 16, this information must be provided for him/her as well): (1) full name, with middle initial and any suffixes; (2) Social Security number; (3) date of birth; (4) current address and any previous addresses for the past five years; and (5) any applicable incident report or complaint with a law enforcement agency or the Registry of Motor Vehicles. The request must also include a copy of a government-issued identification card and a copy of a recent utility bill or bank or insurance statement. It is essential that each copy be legible, display your name and current mailing address, and the date of issue. As of September 21, 2018, it is free to place, lift, or remove a security freeze. You may also place a security freeze for children under the age of 16. You may obtain a free security freeze by contacting any one or more of the following national consumer reporting agencies:

| | | |
|---|---|--|
| Equifax Security Freeze P.O. Box 105788 Atlanta, GA 30348 1-800-349-9960 https://www.equifax.com/personal/credit-report-services/credit-freeze/ | Experian Security Freeze P.O. Box 9554 Allen, TX 75013 1-888-397-3742 www.experian.com/freeze/center.html | TransUnion Security Freeze P.O. Box 160 Woodlyn, PA 19094 1-800-909-8872 www.transunion.com/credit-freeze |
|---|---|--|

Fraud Alerts: You can place fraud alerts with the three credit bureaus by phone and online with:

- Equifax (https://assets.equifax.com/assets/personal/Fraud_Alert_Request_Form.pdf);
- TransUnion (<https://www.transunion.com/fraud-alerts>); or
- Experian (<https://www.experian.com/fraud/center.html>).

A fraud alert tells creditors to follow certain procedures, including contacting you, before they open any new accounts or change your existing accounts. For that reason, placing a fraud alert can protect you, but also may delay you when you seek to obtain credit. As of September 21, 2018, initial fraud alerts last for one year. Victims of identity theft can also get an extended fraud alert for seven years. The phone numbers for all three credit bureaus are located above.

Monitoring: You should always remain vigilant and monitor your accounts for suspicious or unusual activity.

File Police Report: You have the right to file or obtain a police report if you experience identity fraud. Please note that in order to file a crime report or incident report with law enforcement for identity theft, you will likely need to provide proof that you have been a victim. A police report is often required to dispute fraudulent items. You can generally report suspected incidents of identity theft to local law enforcement or to the Attorney General.

FTC and Attorneys General: 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. This notice has not been delayed by law enforcement.

For Maryland residents, the Attorney General can be contacted at 200 St. Paul Place, 16th Floor, Baltimore, MD 21202, 1-888-743-0023, and www.oag.state.md.us.

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 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 violators. 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 at 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 North Carolina residents, the Attorney General can be contacted at 9001 Mail Service Center, Raleigh, NC 27699-9001, 1-877-566-7226 or 1-919-716-6400, and www.ncdoj.gov.

For 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, and <https://ag.ny.gov/>.

For Rhode Island residents, the Rhode Island Attorney General can be reached at 150 South Main Street, Providence, Rhode Island 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.

Boulos Asset Management
C/O IDX
10300 SW Greenburg Rd. Suite 570
Portland, OR 97223



To Enroll, Please Call:
1-800-939-4170
Or Visit:
[https://app.idx.us/account-
creation/protect](https://app.idx.us/account-creation/protect)
Enrollment Code:
<<XXXXXXXXXX>>

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

June 7, 2021

Notice of Data Breach

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

We are writing in order to inform you of an incident that may have exposed your sensitive personal information. We take the security of your personal information seriously and want to provide you with information and resources you can use to protect your information.

What Happened and What Information was Involved:

On March 30, 2021, Boulos Asset Management (“BAM”) detected a data security incident. An unauthorized third party attempted to lock us out of our network environment in exchange for a financial payment to resume business operations. We immediately shut off all access to the network and engaged a specialized third-party forensic incident response firm to assist with securing the environment.

We also initiated a comprehensive investigation into what sensitive data could have been compromised. Our forensic investigation determined that your full name, mailing address, W-9 and/or social security number could have been compromised by the cybercriminal. We maintained this information for our vendors on our system for standard business purposes.

As of this writing, BAM has not received any reports of related identity theft since the date of the incident (March 30, 2021 to present).

What We Are Doing:

Upon detecting this incident, we moved quickly to initiate our incident response, which included conducting an investigation with the assistance of third-party forensic specialists and confirming the security of our network environment. We have been working with law enforcement to respond to this incident. We have reviewed and altered our policies and procedures relating to the security of our systems and servers, as well as our information life cycle management.

We have also secured free credit monitoring services for all affected individuals, as set forth in full below.

What You Can Do:

We value the safety of your personal information and are therefore offering credit monitoring and identity theft protection services through IDX, a leading identity protection technology company. IDX’s services include: 12 months of credit and

CyberScan monitoring, a \$1,000,000 insurance reimbursement policy, and fully managed id theft recovery services. With this protection, IDX will help you resolve issues if your identity is compromised.

We encourage you to contact IDX with any questions and to enroll in free IDX services by calling 1-800-939-4170 or going to <https://app.idx.us/account-creation/protect>. IDX is available Monday through Friday, 9:00am – 9:00pm ET. Please note the deadline to enroll is **September 7, 2021**.

Again, at this time, there is no evidence that your information has been misused. However, we encourage you to take full advantage of this service offering. IDX representatives have been fully versed on the incident and can answer questions or concerns you may have regarding protection of your personal information.

For More Information:

Enclosed you will find additional information regarding the resources available to you, and the steps that you can take to further protect your personal information.

We recognize that you may have questions not addressed in this letter. If you have additional questions, please call IDX services at 1-800-939-4170, Monday through Friday, 9:00am – 9:00pm ET.

Boulos Asset Management values the security of your personal data, and we apologize for any inconvenience that this incident has caused.

Sincerely,

A handwritten signature in black ink, appearing to read "Rick Donald", with a stylized flourish at the end.

Rick Donald
Chief Financial Officer
Boulos Asset Management

Additional Information

Credit Reports: You may obtain a copy of your credit report, free of charge, whether or not you suspect any unauthorized activity on your account. You may obtain a free copy of your credit report from each of the three nationwide credit reporting agencies. To order your free credit report, please visit www.annualcreditreport.com, or call toll-free at 1-877-322-8228. You can also order your annual free credit report by mailing a completed Annual Credit Report Request Form (available at <https://www.consumer.ftc.gov/articles/0155-free-credit-reports>) to: Annual Credit Report Request Service, P.O. Box 105281, Atlanta, GA, 30348-5281.

Security Freeze: You also have the right to place a security freeze on your credit report. A security freeze is intended to prevent credit, loans, and services from being approved in your name without your consent. To place a security freeze on your credit report, you need to make a request to each consumer reporting agency. You may make that request by certified mail, overnight mail, regular stamped mail, or by following the instructions found at the websites listed below. The following information must be included when requesting a security freeze (note that if you are requesting a credit report for your spouse or a minor under the age of 16, this information must be provided for him/her as well): (1) full name, with middle initial and any suffixes; (2) Social Security number; (3) date of birth; (4) current address and any previous addresses for the past five years; and (5) any applicable incident report or complaint with a law enforcement agency or the Registry of Motor Vehicles. The request must also include a copy of a government-issued identification card and a copy of a recent utility bill or bank or insurance statement. It is essential that each copy be legible, display your name and current mailing address, and the date of issue. As of September 21, 2018, it is free to place, lift, or remove a security freeze. You may also place a security freeze for children under the age of 16. You may obtain a free security freeze by contacting any one or more of the following national consumer reporting agencies:

| | | |
|---|---|--|
| Equifax Security Freeze P.O. Box 105788 Atlanta, GA 30348 1-800-349-9960 https://www.equifax.com/personal/credit-report-services/credit-freeze/ | Experian Security Freeze P.O. Box 9554 Allen, TX 75013 1-888-397-3742 www.experian.com/freeze/center.html | TransUnion Security Freeze P.O. Box 160 Woodlyn, PA 19094 1-800-909-8872 www.transunion.com/credit-freeze |
|---|---|--|

Fraud Alerts: You can place fraud alerts with the three credit bureaus by phone and online with:

- Equifax (https://assets.equifax.com/assets/personal/Fraud_Alert_Request_Form.pdf);
- TransUnion (<https://www.transunion.com/fraud-alerts>); or
- Experian (<https://www.experian.com/fraud/center.html>).

A fraud alert tells creditors to follow certain procedures, including contacting you, before they open any new accounts or change your existing accounts. For that reason, placing a fraud alert can protect you, but also may delay you when you seek to obtain credit. As of September 21, 2018, initial fraud alerts last for one year. Victims of identity theft can also get an extended fraud alert for seven years. The phone numbers for all three credit bureaus are located above.

Monitoring: You should always remain vigilant and monitor your accounts for suspicious or unusual activity.

File Police Report: You have the right to file or obtain a police report if you experience identity fraud. Please note that in order to file a crime report or incident report with law enforcement for identity theft, you will likely need to provide proof that you have been a victim. A police report is often required to dispute fraudulent items. You can generally report suspected incidents of identity theft to local law enforcement or to the Attorney General.

FTC and Attorneys General: 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. This notice has not been delayed by law enforcement.

For Maryland residents, the Attorney General can be contacted at 200 St. Paul Place, 16th Floor, Baltimore, MD 21202, 1-888-743-0023, and www.oag.state.md.us.

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 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 violators. 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 at 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 North Carolina residents, the Attorney General can be contacted at 9001 Mail Service Center, Raleigh, NC 27699-9001, 1-877-566-7226 or 1-919-716-6400, and www.ncdoj.gov.

For 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, and <https://ag.ny.gov/>.

For Rhode Island residents, the Rhode Island Attorney General can be reached at 150 South Main Street, Providence, Rhode Island 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.

Boulos Asset Management
C/O IDX
10300 SW Greenburg Rd. Suite 570
Portland, OR 97223



To Enroll, Please Call:
1-800-939-4170
Or Visit:
<https://app.idx.us/account-creation/protect>
Enrollment Code:
«XXXXXXXXXX»

Parent/Guardian of
«First Name» «Last Name»
«Address1» «Address2»
«City», «State» «Zip»

June 7, 2021

Notice of Data Breach

Dear Parent or Guardian of «First Name» «Last Name»,

We are writing in order to inform you of an incident that may have exposed your child’s sensitive personal information. We take the security of your personal information seriously and want to provide you with information and resources you can use to protect your information.

What Happened and What Information was Involved:

On March 30, 2021, Boulos Asset Management (“BAM”) detected a data security incident. An unauthorized third party attempted to lock us out of our network environment in exchange for a financial payment to resume business operations. We immediately shut off all access to the network and engaged a specialized third-party forensic incident response firm to assist with securing the environment.

We also initiated a comprehensive investigation into what sensitive data could have been compromised. Our forensic investigation determined that your child’s full name, mailing address, and social security number could have been compromised by the cybercriminal. We maintained this information about our employees’ dependents on our system for standard payroll, benefits, and organizational purposes.

As of this writing, BAM has not received any reports of related identity theft since the date of the incident (March 30, 2021 to present).

What We Are Doing:

Upon detecting this incident, we moved quickly to initiate our incident response, which included conducting an investigation with the assistance of third-party forensic specialists and confirming the security of our network environment. We have been working with law enforcement to respond to this incident. We have reviewed and altered our policies and procedures relating to the security of our systems and servers, as well as our information life cycle management.

We have also secured free credit monitoring services for all affected individuals, as set forth in full below.

What You Can Do:

We value the safety of your child’s personal information and are therefore offering identity theft protection services through IDX, a leading identity protection technology company. IDX’s services include: 12 months of CyberScan

monitoring, a \$1,000,000 insurance reimbursement policy, and fully managed id theft recovery services. With this protection, IDX will help you resolve issues if your child's identity is compromised.

We encourage you to contact IDX with any questions and to enroll in free IDX services by calling 1-800-939-4170 or going to <https://app.idx.us/account-creation/protect>. IDX is available Monday through Friday, 9:00am – 9:00pm ET. Please note the deadline to enroll is **September 7, 2021**.

Again, at this time, there is no evidence that your information or your child's information has been misused. However, we encourage you to take full advantage of this service offering. IDX representatives have been fully versed on the incident and can answer questions or concerns you may have regarding protection of your personal information.

For More Information:

Enclosed you will find additional information regarding the resources available to you, and the steps that you can take to further protect your child's personal information.

We recognize that you may have questions not addressed in this letter. If you have additional questions, please call IDX services at 1-800-939-4170, Monday through Friday, 9:00am – 9:00pm ET.

Boulos Asset Management values the security of your personal data, and we apologize for any inconvenience that this incident has caused.

Sincerely,

A handwritten signature in black ink, appearing to read "Rick Donald", with a stylized flourish at the end.

Rick Donald
Chief Financial Officer
Boulos Asset Management

Additional Information

Credit Reports: You may obtain a copy of your credit report, free of charge, whether or not you suspect any unauthorized activity on your account. You may obtain a free copy of your credit report from each of the three nationwide credit reporting agencies. To order your free credit report, please visit www.annualcreditreport.com, or call toll-free at 1-877-322-8228. You can also order your annual free credit report by mailing a completed Annual Credit Report Request Form (available at <https://www.consumer.ftc.gov/articles/0155-free-credit-reports>) to: Annual Credit Report Request Service, P.O. Box 105281, Atlanta, GA, 30348-5281.

Security Freeze: You also have the right to place a security freeze on your credit report. A security freeze is intended to prevent credit, loans, and services from being approved in your name without your consent. To place a security freeze on your credit report, you need to make a request to each consumer reporting agency. You may make that request by certified mail, overnight mail, regular stamped mail, or by following the instructions found at the websites listed below. The following information must be included when requesting a security freeze (note that if you are requesting a credit report for your spouse or a minor under the age of 16, this information must be provided for him/her as well): (1) full name, with middle initial and any suffixes; (2) Social Security number; (3) date of birth; (4) current address and any previous addresses for the past five years; and (5) any applicable incident report or complaint with a law enforcement agency or the Registry of Motor Vehicles. The request must also include a copy of a government-issued identification card and a copy of a recent utility bill or bank or insurance statement. It is essential that each copy be legible, display your name and current mailing address, and the date of issue. As of September 21, 2018, it is free to place, lift, or remove a security freeze. You may also place a security freeze for children under the age of 16. You may obtain a free security freeze by contacting any one or more of the following national consumer reporting agencies:

| | | |
|---|---|--|
| Equifax Security Freeze P.O. Box 105788 Atlanta, GA 30348 1-800-349-9960 https://www.equifax.com/personal/credit-report-services/credit-freeze/ | Experian Security Freeze P.O. Box 9554 Allen, TX 75013 1-888-397-3742 www.experian.com/freeze/center.html | TransUnion Security Freeze P.O. Box 160 Woodlyn, PA 19094 1-800-909-8872 www.transunion.com/credit-freeze |
|---|---|--|

Fraud Alerts: You can place fraud alerts with the three credit bureaus by phone and online with:

- Equifax (https://assets.equifax.com/assets/personal/Fraud_Alert_Request_Form.pdf);
- TransUnion (<https://www.transunion.com/fraud-alerts>); or
- Experian (<https://www.experian.com/fraud/center.html>).

A fraud alert tells creditors to follow certain procedures, including contacting you, before they open any new accounts or change your existing accounts. For that reason, placing a fraud alert can protect you, but also may delay you when you seek to obtain credit. As of September 21, 2018, initial fraud alerts last for one year. Victims of identity theft can also get an extended fraud alert for seven years. The phone numbers for all three credit bureaus are located above.

Monitoring: You should always remain vigilant and monitor your accounts for suspicious or unusual activity.

File Police Report: You have the right to file or obtain a police report if you experience identity fraud. Please note that in order to file a crime report or incident report with law enforcement for identity theft, you will likely need to provide proof that you have been a victim. A police report is often required to dispute fraudulent items. You can generally report suspected incidents of identity theft to local law enforcement or to the Attorney General.

FTC and Attorneys General: 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. This notice has not been delayed by law enforcement.

For Maryland residents, the Attorney General can be contacted at 200 St. Paul Place, 16th Floor, Baltimore, MD 21202, 1-888-743-0023, and www.oag.state.md.us.

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 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 violators. 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 at 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 North Carolina residents, the Attorney General can be contacted at 9001 Mail Service Center, Raleigh, NC 27699-9001, 1-877-566-7226 or 1-919-716-6400, and www.ncdoj.gov.

For 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, and <https://ag.ny.gov/>.

For Rhode Island residents, the Rhode Island Attorney General can be reached at 150 South Main Street, Providence, Rhode Island 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.