



MULLEN
COUGHLIN_{LLC}
ATTORNEYS AT LAW

RECEIVED

JUL 06 2021

CONSUMER PROTECTION

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Palm Harbor, FL 34684

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Email: Kmekler@mullen.law

June 28, 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 Braman Management Association (“Braman”) located at 2060 Biscayne Boulevard, 2nd Floor, Miami, Florida 33137 and are writing to notify your office of an incident that may affect the security of some personal information relating to five (5) New Hampshire residents. This notice will be supplemented with any new significant facts learned subsequent to its submission. By providing this notice, Braman 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 April 12, 2021, Braman discovered a security incident impacting certain systems within its computer network. Upon discovery of the event, Braman launched an internal investigation to confirm the full nature and scope of what occurred. Braman worked with third-party forensic specialists to investigate and respond to this incident, as well as to restore its operations. On April 26, 2021, the investigation determined that certain files were accessed as a result of this event. Working with third party computer specialists, Braman immediately began reviewing these files to determine the nature and scope of the data that the files contained. Through this review, on June 9, 2021, we determined that information associated with certain individuals was included in files and folders that may have been accessed by an unauthorized third party.

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The information that could have been subject to unauthorized access includes name, address, Social Security number, driver's license number, and health insurance information.

Notice to New Hampshire Residents

On or about June 28, 2021 Braman began providing written notice of this incident to affected individuals, which includes five (5) 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, Braman moved quickly to investigate and respond to the incident, assess the security of Braman systems, and notify potentially affected individuals. Braman has security measures in place to protect the data on its systems and it continues to assess and updated security measures and employee training to safeguard the information in our care. As part of its ongoing commitment to the security of information, Braman continues is also reviewing its policies and procedures to examine existing security measures. In addition, Braman is providing access to credit monitoring services for one (1) year, through IDX, to individuals whose personal information was potentially affected by this incident, at no cost to these individuals.

Additionally, Braman 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. Braman 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.

Office of the New Hampshire Attorney General

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Contact Information

Should you have any questions regarding this notification or other aspects of the data security event, please contact us at (267) 930-2190.

Very truly yours,



Kevin M. Mekler of
MULLEN COUGHLIN LLC

KMK/jcl

EXHIBIT A

Braman Management Association
P.O. Box 1907
Suwanee, GA 30024

To Enroll, Please Call:
1-833-909-3910
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 28, 2021

NOTICE OF DATA BREACH

Dear <<First Name>> <<Last Name>>:

Braman Management Association (“Braman”) takes the security of personal information seriously. While we have no indication that your personal information has been misused, we are writing to inform you of an incident and provide you with resources available to you to help protect your information. Braman provides management and advisory services to motor vehicle dealership locations in Florida and Colorado.

What Happened? On April 12, 2021, Braman discovered a security incident impacting certain systems within its computer network. Upon discovery of the event, Braman immediately launched an internal investigation to confirm the full nature and scope of what occurred. We worked tirelessly with third-party forensic specialists to investigate and respond to this incident, as well as to restore our operations. Additionally, we reported the incident to Federal authorities and are cooperating in their investigation. Through our investigation, on June 9, 2021, we determined your personal data was included in files and folders that may have been accessed by an unauthorized third party.

What Information Was Involved? Again, we have no evidence of any identity theft or fraud connected to this event, but because your data was contained within files and folders that may have been accessed, we are notifying you out of an abundance of caution. Our investigation confirmed that the data present in the impacted database includes your name and <<variable text - data elements>>.

What We Are Doing. Addressing this incident has been Braman’s utmost priority. We have security measures in place to protect the data on our systems and we continue to assess and update security measures and employee training to safeguard the information in our care. As part of our ongoing commitment to the security of information, we are also reviewing our policies and procedures to examine existing security measures.

While we have no evidence of any misuse of your information related to this event, we would like to offer you access to complimentary identity theft protection services for 12 months through IDX. These services include fraud consultation and identity theft restoration services. If you wish to activate the credit monitoring services, you may follow the instructions included in the “*Steps You Can Take to Help Protect Personal Information*” section of this letter. We encourage you to activate these services as we are unable to do so on your behalf.

What You Can Do. We encourage you to remain vigilant against incidents of identity theft and fraud by reviewing your account statements and monitoring your free credit reports for suspicious activity and to detect errors. We also encourage you to review the “*Steps You Can Take to Help Protect Personal Information*” section of this letter, which describes steps you can take to help protect yourself.

For More Information. We understand that you may have questions about this incident that are not addressed in this letter. If you have additional questions, please call our dedicated assistance line at 1-833-909-3910 Monday through Friday from 9 a.m. to 9 p.m. Eastern Time. You may also write to Braman Management Association, 2060 Biscayne Boulevard, 2nd Floor, Miami, Florida 33137.

We sincerely regret any inconvenience or concern this incident may have caused.

Sincerely,

A handwritten signature in black ink, appearing to read "David Leibowitz". The signature is fluid and cursive, with a long horizontal stroke at the beginning and a distinct loop at the end.

David Leibowitz
Secretary and General Counsel
Braman Management Association

STEPS YOU CAN TAKE TO HELP PROTECT PERSONAL INFORMATION

Enroll in Identity Protection Services

1. Website and Enrollment. Go to <https://app.idx.us/account-creation/protect> and follow the instructions for enrollment using your Enrollment Code provided at the top of the letter.

2. Activate the credit monitoring provided as part of your IDX identity protection membership. The monitoring included in the membership must be activated to be effective. Note: You must have established credit and access to a computer and the internet to use this service. If you need assistance, IDX will be able to assist you.

3. Telephone. Contact IDX at 1-833-909-3910 to gain additional information about this event and speak with knowledgeable representatives about the appropriate steps to take to protect your credit identity.

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:

- Full name (including middle initial as well as Jr., Sr., II, III, etc.);
- Social Security number;
- Date of birth;
- Addresses for the prior two to five years;
- Proof of current address, such as a current utility bill or telephone bill;
- A legible photocopy of a government-issued identification card (state driver’s license or ID card, etc.); and
- 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
888-298-0045	1-888-397-3742	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 District of Columbia residents, the District of Columbia Attorney General may be contacted at: 441 4th St. NW #1100 Washington, D.C. 20001; 202-727-3400; and oag@dc.gov.

For Maryland residents, the Maryland Attorney General may be contacted at: 200 St. Paul Place, 16th Floor, Baltimore, MD 21202; 1-410-528-8662 or 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 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 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 4 Rhode Island residents impacted by this incident.