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December 14, 2020

Via Email (attorneygeneral@doj.nh.gov) and Federal Express

The Honorable Gordon MacDonald
Attorney General of the State of New Hampshire
Office of the Attorney General
33 Capitol Street
Concord, NH 03301

RECEIVED

DEC 15 2020

CONSUMER PROTECTION

RE: Reporting of Security Incident Pursuant to N.H. Rev. Stat. § 359-C:20

Dear Attorney General MacDonald:

We are writing on behalf of Brookwood Financial Partners LLC. (the "Company") to advise you of an incident that may affect the security of personal information relating to 11 New Hampshire residents. By providing this notice, the Company does not waive any rights or defenses regarding the applicability of New Hampshire law or personal jurisdiction.

On September 22, 2020, the Company discovered an exploit in process and determined that an unauthorized third party had gained access to certain Company files by what appeared to be a sophisticated credential stuffing exploit. The Company immediately cut off access and retained a nationally-known independent forensics firm and began an investigation to review and determine what information may have been accessed or acquired by the attacker. As a result of the Company's investigation, it was determined that the attacker was able to access and exfiltrate copies of data files. Upon extensive analysis of the data in the affected files, it was determined as of October 17, 2020 that the files contained personal information including name, date of birth, driver's license, and Social Security number of individuals, including that of 11 New Hampshire residents.

The Company is taking this incident very seriously, and took immediate steps to strengthen the protection of personal information, including updating user authentication controls, and actively reviewing related policies and procedures.

The Company is not aware of any misuse of personal information of those New Hampshire residents at this time. The Company is sending the attached notices to affected New Hampshire residents on December 15, 2020, and the Company has arranged to make credit monitoring and identity protection services by IDX available to them at no cost for two (2) years. This includes access to assist individuals with credit restoration and credit monitoring services as described in the attached notice.

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Please contact the undersigned at cjarosemintz.com or 617-348-1732 should you need further information or have any additional questions.

Sincerely,

A handwritten signature in black ink, appearing to read 'Cynthia J. Larose'.

Cynthia J. Larose
Member

Attachment



To Enroll, Please Call:
(833) 905-3227
Or Visit:
<https://app.idx.us/account-creation/protect>
Enrollment Code: [XXXXXXXXXX]

<<Date>>

<<First Name>> <<Last Name>>
<<Address1>>
<<Address2>>
<<Address3>>
<<City>>, <<State>> <<Zip>>

Notice of Data Breach

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

What Happened

We are writing to inform you of an incident involving certain personal information you have provided to us. Based on our current review as described further below, we have no indication that any such information has been used inappropriately. We want to provide you with information about the incident and with the attached additional information that you may find helpful.

On September 22, 2020, we discovered that a group of files containing confidential information were accessed by a malicious and unknown third party. We immediately retained a nationally known third party forensics firm to lead an investigation to understand the nature and scope of the incident and, in particular, whose information may have been compromised. As of October 17, 2020, we determined that your personal information was among the information potentially impacted.

What Information Was Involved

The following personal information may have been involved in the incident: <<name, address, social security number, account number, date of birth, driver's license, passport, wire instructions, and ACH information.>><<name, address, account number, date of birth, driver's license, passport, wire instructions, and ACH information.>>

What We Are Doing

We have implemented additional internal safeguards to protect personal information from theft or similar criminal activity in the future and are continuing with our technical investigation and evaluation of risk mitigation activities to implement further security measures.

In addition, we are offering identity theft protection services through IDX, the nation's largest provider of data breach response services. IDX identity protection services include: 24 months of credit and CyberScan monitoring, a \$1,000,000 insurance reimbursement policy, and fully managed identity theft recovery services. The cost for all IDX services will be borne by Brookwood. With this protection, IDX will help you resolve issues if your identity is compromised.

What You Can Do

We encourage you to contact IDX with any questions and to enroll in free identity protection services by calling (833) 905-3227 or going to <https://app.idx.us/account-creation/protect> and using the Enrollment Code provided above. IDX representatives are available Monday through Friday from 9:00 AM – 9:00 PM Eastern Time. Please note the deadline to enroll is February 17, 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 free service offering.

For More Information

You will find detailed instructions for enrollment on the enclosed Additional Information document. Also, you will need to reference the enrollment code at the top of this letter when calling or enrolling online, so please do not discard this letter.

Please call (833) 905-3227 or go to <https://app.idx.us/account-creation/protect> for assistance or for any additional questions you may have.

Sincerely,



Thomas Nicholas Trkla
Chairman and Chief Executive Officer
(Enclosure)

Additional Information

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 (833) 905-3227 to gain additional information about this event and speak with knowledgeable representatives about the appropriate steps to take to protect your credit identity.

4. Review your credit reports. It is always a good practice to be vigilant for incidents of fraud or identity theft by reviewing your account statements and free credit reports for any unauthorized activity. Under federal law, you also are entitled every 12 months to one free copy of your credit report from each of the three major credit reporting companies. To obtain a free annual credit report, go to www.annualcreditreport.com or call 1-877-322-8228. You may wish to stagger your requests so that you receive a free report by one of the three credit bureaus every four months.

If you discover any suspicious items and have enrolled in IDX identity protection, notify them immediately by calling or by logging into the IDX website and filing a request for help.

If you file a request for help or report suspicious activity, you will be contacted by a member of our ID Care team who will help you determine the cause of the suspicious items. In the unlikely event that you fall victim to identity theft as a consequence of this incident, you will be assigned an ID Care Specialist who will work on your behalf to identify, stop and reverse the damage quickly.

You should also know that you have the right to file a police report if you ever 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 some kind of proof that you have been a victim. A police report is often required to dispute fraudulent items. You can report suspected incidents of identity theft to local law enforcement or to the Attorney General.

5. Place Fraud Alerts with the three credit bureaus. If you choose to place a fraud alert, we recommend you do this after activating your credit monitoring. You can place a fraud alert at one of the three major credit bureaus by phone and also via their websites. 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. The contact information for all three bureaus is as follows:

Credit Bureaus

Equifax Fraud Reporting
1-866-349-5191
P.O. Box 105069
Atlanta, GA 30348-5069
www.equifax.com

Experian Fraud Reporting
1-888-397-3742
P.O. Box 9554
Allen, TX 75013
www.experian.com

TransUnion Fraud Reporting
1-800-680-7289
P.O. Box 2000
Chester, PA 19022-2000
www.transunion.com

It is necessary to contact only ONE of these bureaus and use only ONE of these methods. As soon as one of the three bureaus confirms your fraud alert, the others are notified to place alerts on their records as well. You will receive confirmation letters in the mail and will then be able to order all three credit reports, free of charge, for your review. An initial fraud alert will last for one year.

Please Note: No one is allowed to place a fraud alert on your credit report except you.

6. Security Freeze. By placing a security freeze, someone who fraudulently acquires your personal identifying information will not be able to use that information to open new accounts or borrow money in your name. You will need to contact the three national credit reporting bureaus listed above to place the freeze. Keep in mind that when you place the freeze, you will not be able to borrow money, obtain instant credit, or get a new credit card until you temporarily lift or permanently remove the freeze. There is no cost to freeze or unfreeze your credit files.

7. You can obtain additional information about the steps you can take to avoid identity theft from the following agencies. The Federal Trade Commission also encourages those who discover that their information has been misused to file a complaint with them.

California Residents: California Office of Privacy Protection (www.oag.ca.gov/privacy) for additional information on protection against identity theft.

Kentucky Residents: Office of the Attorney General of Kentucky, 700 Capitol Avenue, Suite 118 Frankfort, Kentucky 40601, www.ag.ky.gov, Telephone: 1-502-696-5300.

Maryland Residents: Office of the Attorney General of Maryland, Consumer Protection Division 200 St. Paul Place Baltimore, MD 21202, www.oag.state.md.us/Consumer, Telephone: 1-888-743-0023.

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 a 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. You can review your rights pursuant to the Fair Credit Reporting Act by visiting www.consumerfinance.gov/f/201904_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.

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; <https://ag.ny.gov/>.

North Carolina Residents: Office of the Attorney General of North Carolina, 9001 Mail Service Center Raleigh, NC 27699-9001, www.ncdoj.gov, Telephone: 1-919-716-6400.

Oregon Residents: Oregon Department of Justice, 1162 Court Street NE, Salem, OR 97301-4096, www.doj.state.or.us/, Telephone: 877-877-9392

Rhode Island Residents: Office of the Attorney General, 150 South Main Street, Providence, Rhode Island 02903, www.riag.ri.gov, Telephone: 401-274-4400

All US Residents: Identity Theft Clearinghouse, Federal Trade Commission, 600 Pennsylvania Avenue, NW Washington, DC 20580, www.consumer.gov/idtheft, 1-877-IDTHEFT (438-4338), TTY: 1-866-653-4261.