

# **EXHIBIT 1**

This notice will be supplemented with any new significant facts learned subsequent to its submission. By providing this notice, Nowlin & Associates (“Nowlin”) does not waive any rights or defenses regarding the applicability of Maine law, the applicability of the Maine data event notification statute, or personal jurisdiction.

### **Nature of the Data Event**

On September 21, 2022, Nowlin became aware of unusual activity in an employee email account. In response, Nowlin immediately secured the email account, and began working with third-party specialists to investigate the nature and scope of the incident. On October 10, 2022, Nowlin’s investigation determined that there was unauthorized access by an unknown individual to an employee email account between September 7, 2022 and September 21, 2022. However, Nowlin’s investigation was unable to determine whether any specific emails were viewed in the account. Nowlin, with the assistance of third-party specialists, undertook an in-depth, lengthy, and labor-intensive process to identify whether sensitive information may have been contained in the email account, and identify the individuals whose information may have been impacted. Nowlin then worked to identify mailing address information for the potentially impacted individuals in order to provide notification. This process completed on January 4, 2023. The information that could have been subject to unauthorized access includes name and Social Security number.

### **Notice to Maine Resident**

On or about January 19, 2023, Nowlin provided written notice of this incident to one (1) Maine resident. Written notice is being provided in substantially the same form as the letter attached here as *Exhibit A*.

### **Other Steps Taken and To Be Taken**

Upon discovering the event, Nowlin moved quickly to investigate and respond to the incident, assess the security of Nowlin systems, and identify potentially affected individuals. Further, Nowlin notified federal law enforcement regarding the event. Nowlin is also working to implement additional safeguards and training to its employees. Nowlin is providing access to credit monitoring services for twelve (12) months through Kroll, to individuals whose personal information was potentially affected by this incident, at no cost to these individuals.

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

Nowlin is providing written notice of this incident to relevant state regulators, as necessary, and to the three major credit reporting agencies, Equifax, Experian, and TransUnion.

# **EXHIBIT A**



<<Date>> (Format: Month Day, Year)

<<first\_name>> <<middle\_name>> <<last\_name>> <<suffix>>  
<<address\_1>>  
<<address\_2>>  
<<city>>, <<state\_province>> <<postal\_code>>  
<<country>>

## RE: Notice of Security Incident

Dear <<First\_Name>> <<Last\_Name>>,

Nowlin & Associates (“Nowlin”) writes to notify you of a recent incident that may affect the security of some of your personal information. This letter provides you with information about the incident, our response thus far, and steps you may take to better protect your information, should you feel it appropriate to do so. The confidentiality, privacy, and security of information in Nowlin’s care is one of our highest priorities. While we do not currently have any reason to believe that any identity theft or fraud has occurred, we nonetheless want to keep you informed and this letter provides steps you may take to better protect your information, should you feel it is appropriate to do so. If you have any questions about the incident, please call us at 1-855-624-3919, Monday through Friday from 8:00 a.m. to 5:30 p.m. Central Time, excluding major U.S. holidays.

**What Happened?** On September 21, 2022, Nowlin became aware of unusual activity in an employee email account. In response, Nowlin immediately secured the email account, and began working with third-party specialists to investigate the nature and scope of the incident. On October 10, 2022, Nowlin’s investigation determined that there was unauthorized access by an unknown individual to an employee email account between September 7, 2022 and September 21, 2022. However, our investigation was unable to determine whether any specific emails were viewed in the account. Nowlin, with the assistance of third-party specialists, undertook an in-depth, lengthy, and labor-intensive process to identify whether sensitive information may have been contained in the email account, and identify the individuals whose information may have been impacted. Nowlin then worked to identify mailing address information for the potentially impacted individuals in order to provide notification. This process completed on January 4, 2023.

We have no evidence that this incident resulted in the actual or attempted misuse of your information. Nevertheless, we are providing notice out of an abundance of caution to individuals who were identified as having sensitive information included in the email account.

**What Information Was Involved?** The following personal information about you may have been present in the employee email account: <<b2b\_text\_1(Data Elements)>>.

**What We Are Doing.** We take this incident and the security of client information within our care very seriously. In addition to the steps described above, as part of our ongoing commitment to the privacy of personal information in our care, we are undertaking a review of our existing policies, procedures, and training programs and are looking into implementing additional safeguards to further secure the information in our systems.

As an added precaution, we are also offering 12 months of complimentary access to credit monitoring, fraud consultation, and identity theft restoration services. Individuals who wish to receive these services must activate by following the attached activation instructions.

**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 over the next 12 to 24 months. You can find out more about how to help protect against potential identity theft and fraud in the enclosed *Steps You Can Take to Help Protect Your Information*. There you will also find more information on the credit monitoring services we are offering and how to activate.

**For More Information.** We understand that you may have questions that are not addressed in this notice. If you have additional questions or concerns, please contact us at 1-855-624-3919, Monday through Friday from 8:00 a.m. to 5:30 p.m. Central Time, excluding major U.S. holidays.

We apologize for any inconvenience or concern this incident causes you.

Sincerely,

Nowlin & Associates

## STEPS YOU CAN TAKE TO HELP PROTECT YOUR INFORMATION

### **How to Activate Identity Monitoring Services**

To help relieve concerns and restore confidence following this incident, we have secured the services of Kroll to provide identity monitoring at no cost to you for one year. Kroll is a global leader in risk mitigation and response, and their team has extensive experience helping people who have sustained an unintentional exposure of confidential data. Your identity monitoring services include Credit Monitoring, Fraud Consultation, and Identity Theft Restoration.

Visit <https://enroll.krollmonitoring.com> to activate and take advantage of your identity monitoring services.

You have until <<b2b\_text\_6(ActivationDeadline)>> to activate your identity monitoring services.

Membership Number: <<Membership Number (S\_N)>>

For more information about Kroll and your Identity Monitoring services, you can visit [info.krollmonitoring.com](http://info.krollmonitoring.com).



### **TAKE ADVANTAGE OF YOUR IDENTITY MONITORING SERVICES**

You have been provided with access to the following services from Kroll:

#### **Single Bureau Credit Monitoring**

You will receive alerts when there are changes to your credit data—for instance, when a new line of credit is applied for in your name. If you do not recognize the activity, you'll have the option to call a Kroll fraud specialist, who will be able to help you determine if it is an indicator of identity theft.

#### **Fraud Consultation**

You have unlimited access to consultation with a Kroll fraud specialist. Support includes showing you the most effective ways to protect your identity, explaining your rights and protections under the law, assistance with fraud alerts, and interpreting how personal information is accessed and used, including investigating suspicious activity that could be tied to an identity theft event.

#### **Identity Theft Restoration**

If you become a victim of identity theft, an experienced Kroll licensed investigator will work on your behalf to resolve related issues. You will have access to a dedicated investigator who understands your issues and can do most of the work for you. Your investigator will be able to dig deep to uncover the scope of the identity theft, and then work to resolve it.

Kroll's activation website is only compatible with the current version or one version earlier of Chrome, Firefox, Safari and Edge.

To receive credit services, you must be over the age of 18 and have established credit in the U.S., have a Social Security number in your name, and have a U.S. residential address associated with your credit file.

### **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](http://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 one-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;
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, military identification, 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 fraud alert or credit freeze, please contact the three major credit reporting bureaus listed below:

<b>Equifax</b>	<b>Experian</b>	<b>TransUnion</b>
<a href="https://www.equifax.com/personal/credit-report-services/">https://www.equifax.com/personal/credit-report-services/</a>	<a href="https://www.experian.com/help/">https://www.experian.com/help/</a>	<a href="https://www.transunion.com/credit-help">https://www.transunion.com/credit-help</a>
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, D.C. 20580; [www.identitytheft.gov](http://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 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](http://www.ncdoj.gov).