

April 25, 2022

Office of the Attorney General
The State of Maine

RE: Data Incident Notification

To Whom It May Concern:

Liberty Partners Financial Services, LLC (“Liberty Partners”) located at 119 Simmons St, Mount Pleasant, South Carolina, 29464, and provides this notification to you of a recent data security incident. By providing this notice, Liberty Partners does not waive any rights or defenses under Maine law, including the data breach notification statute.

On or about September 17, 2021, Liberty Partners identified unusual activity in an employee’s email account. Liberty Partners immediately began an investigation, which included working with third-party specialists to determine the full nature and scope of the activity. The investigation determined there was unauthorized access to five (5) employee email accounts. Therefore, in an abundance of caution, Liberty Partners conducted a review of the contents of the email accounts to determine the types of information contained therein. On February 7, 2022, the review was completed and Liberty Partners began their research regarding contact information to notify potentially impacted individuals. On March 30, 2022, that time consuming review was completed and Liberty Partners then worked to confirm contact information to notify potentially impacted individuals. The type of information identified in the account related to the Maine residents included their name, Social Security number, financial account information, driver’s license/state identification number, and passport number.

On April 22, 2022, Liberty Partners provided written notice of this incident to the 47 Maine residents via mail. A copy of the notice is attached as **Exhibit A**. Although Liberty Partners has no evidence to suggest actual or attempted misuse of information as a result of this incident, Liberty Partners is providing potentially impacted residents access to 12 months of credit monitoring and identity protection services.

In response to this incident, Liberty Partners reset email account passwords, implemented multi-factor authentication, as well as Zix secure email throughout their email environment. Liberty Partners continues to review its policies and procedures related to data security.

Exhibit A



P.O. Box 989728
West Sacramento, CA 95798-9728

To Enroll, Please Call:
1-833-940-2300
Or Visit:
<https://response.idx.us/libertypartners>
Enrollment Code: <<ENROLLMENT>>

<<FIRST NAME>> <<LAST NAME>>
<<ADDRESS1>>
<<ADDRESS2>>
<<CITY>>, <<STATE>> <<ZIP>>

April 22, 2022

Dear <<FIRST NAME>> <<LAST NAME>>:

Liberty Partners Financial Services, LLC writes to notify you of an incident that may impact the privacy of certain information provided to us. We take this incident very seriously and are providing you information about the incident, our response, and steps you can take to help protect your information.

On September 17, 2021, we identified unusual activity in an employee's email account. We immediately began an investigation, which included working with third-party forensic specialists to determine the full nature and scope of the activity. The investigation determined there was unauthorized access to additional employee email accounts. Therefore, in an abundance of caution, together with outside consultants, we conducted a review of the contents of the impacted email accounts to determine the types of information contained therein and to whom the information related. On March 30, 2022, that time consuming review was completed and we then worked to confirm contact information to notify potentially impacted individuals. The information present in the accounts at the time of the unauthorized access included your name in combination with the following: <<data elements>>.

In response to this incident, we enhanced our user log-in security protocol, changed all user email account passwords and are reviewing our policies and procedures related to data security. Additionally, although we have no evidence of actual or attempted misuse of any information as a result of this incident, we are providing you access to <<12/24>> months of credit monitoring and identity protection services at no cost to you. Instructions about how to enroll in these services as well as additional resources available to you are included in the enclosed "*Steps You Can Take to Help Protect Your Information.*"

We understand you may have questions about this incident. You may contact our dedicated assistance line at 1-833-940-2300, Monday through Friday from 9 am – 9 pm ET (excluding major U.S. holidays), or write to us at 119 Simmons St, Mount Pleasant, South Carolina, 29464.

We sincerely regret any concern this incident may cause you. The privacy and security of information is important to us, and we will continue to take steps to protect information in our care.

Sincerely,

Liberty Partners Financial Services, LLC

STEPS YOU CAN TAKE TO HELP PROTECT YOUR INFORMATION

Enroll in Credit Monitoring / Identity Protection

1. Website and Enrollment. Go to <https://response.idx.us/libertypartners> and follow the instructions for enrollment using your Enrollment Code provided at the top of the letter. Please note the deadline to enroll is July 22, 2022.

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 1-833-940-2300 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. We recommend that you remain vigilant by reviewing account statements and monitoring credit reports. 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 the IDX 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.

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 Experian's or Equifax's website. 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.

Monitor Your Accounts

We encourage you to remain vigilant against incidents of identity theft and fraud by reviewing your credit reports/account statements and explanation of benefits forms for suspicious activity and to detect errors. Under U.S. law, you are entitled to one free credit report annually from each of the three major credit reporting bureaus, TransUnion, Experian, and Equifax. To order your free credit report, visit www.annualcreditreport.com or call 1-877-322-8228. Once you receive your credit report, review it for discrepancies and identify any accounts you did not open or inquiries from creditors that you did not authorize. If you have questions or notice incorrect information, contact the credit reporting bureau.

You 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, 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 lasting seven years. Should you wish to place a fraud alert, please contact any of the three credit reporting bureaus listed below.

As an alternative to a fraud alert, you 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 your 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 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 credit freeze, you will need to provide the following information:

1. Full name (including middle initial as well as Jr., Sr., III, etc.);
2. Social Security number;
3. Date of birth;
4. Address for the prior two to five years;
5. Proof of current address, such as a current utility or telephone bill;
6. A legible photocopy of a government-issued identification card (e.g., state driver's license or identification card); 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:

<p>TransUnion 1-800-680-7289 www.transunion.com</p> <p>TransUnion Fraud Alert P.O. Box 2000 Chester, PA 19016-2000</p> <p>TransUnion Credit Freeze P.O. Box 160 Woodlyn, PA 19094</p>	<p>Experian 1-888-397-3742 www.experian.com</p> <p>Experian Fraud Alert P.O. Box 9554 Allen, TX 75013</p> <p>Experian Credit Freeze P.O. Box 9554 Allen, TX 75013</p>	<p>Equifax 1-888-298-0045 www.equifax.com</p> <p>Equifax Fraud Alert P.O. Box 105069 Atlanta, GA 30348-5069</p> <p>Equifax Credit Freeze P.O. Box 105788 Atlanta, GA 30348-5788</p>
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Additional Information

You can further educate yourself regarding identity theft, fraud alerts, credit freezes, and the steps you can take to protect your personal information by contacting the credit reporting bureaus, the Federal Trade Commission (FTC), or your state Attorney General. The FTC also encourages those who discover that their information has been misused to file a complaint with them. The FTC may be reached at 600 Pennsylvania Ave. NW, Washington, D.C. 20580; www.identitytheft.gov; 1-877-ID-THEFT (1-877-438-4338); and TTY: 1-866-653-4261.

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, your state Attorney General, and the FTC. This notice has not been delayed by law enforcement.

For Maryland residents, the Maryland Attorney General may be contacted at 200 St. Paul Place, 16th Floor, Baltimore, MD 21202; 1-888-743-0023; and www.oag.state.md.us. Liberty Partners may be contacted at 119 Simmons St, Mount Pleasant, South Carolina, 29464.

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: (i) the consumer reporting agencies must correct or delete inaccurate, incomplete, or unverifiable information; (ii) the consumer reporting agencies may not report outdated negative information; (iii) access to your file is limited; (iv) you must give consent for credit reports to be provided to employers; (v) you may limit "prescreened" offers of credit and insurance you get based on information in your credit report; (vi) 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 by visiting https://files.consumerfinance.gov/f/201504_cfpb_summary_your-rights-under-fcra.pdf, or by writing Consumer Response Center, Room 130-A, FTC, 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 contacted at 150 South Main Street, Providence, RI 02903; 1-401-274-4400; and www.riag.ri.gov. Under Rhode Island law, you have the right to obtain any police report filed in regard to this incident. There are 17 Rhode Island residents impacted by this incident.

For Washington, D.C. residents, the District of Columbia Attorney General may be contacted at 441 4th Street NW #1100, Washington, D.C. 20001; 202-727-3400, and <https://oag.dc.gov/consumer-protection>. Liberty Partners may be contacted at 119 Simmons St, Mount Pleasant, South Carolina, 29464.