

EXHIBIT 1

This notice will be supplemented with any new significant facts learned subsequent to its submission. By providing this notice, BGA does not waive any rights or defenses regarding the applicability of Massachusetts law, the applicability of the Massachusetts data event notification statute, or personal jurisdiction.

Nature of the Data Event

On or about September 9, 2022, BGA discovered unusual activity within its environment. BGA promptly took steps to secure its systems, and with the assistance of third-party forensic specialists, conducted an investigation to confirm the nature and scope of the incident. Through the investigation, BGA identified unauthorized access within its environment between August 31, 2022 and September 10, 2022. BGA undertook a thorough review of the potentially affected files to determine whether any potentially sensitive information was present within them. On September 21, 2022, BGA confirmed the population of individuals whose information was included in the affected files.

On October 13, 2022, BGA notified relevant brokers that certain information may have been impacted. After confirming with its brokers, BGA then proceeded promptly with direct notifications to individuals for whom address information was available. On November 30, 2022, BGA learned that Massachusetts residents were impacted by this event. Although BGA has no indication of any misuse of personal information as a result of this event, out of an abundance of caution, BGA is providing notice to individuals who may have been impacted.

The information that could have been subject to unauthorized access includes name and Social Security number.

Notice to Massachusetts Residents

On or about December 5, 2022, BGA provided written notice of this incident on behalf of its' broker clients to approximately eight (8) Massachusetts residents. Written notice is being provided in substantially the same form as the letter attached here as *Exhibit A*.

Please be advised that, pursuant to G.L. c. 93H § 3(b), BGA maintains a written information security program (WISP) for the protection of personal information of residents of Massachusetts.

Other Steps Taken and To Be Taken

Upon discovering the event, BGA moved quickly to investigate and respond to the incident, assess the security of BGA systems, and identify potentially affected individuals. Further, BGA notified federal law enforcement regarding the event. BGA is also working to implement additional safeguards and training to its employees. BGA is providing access to credit monitoring services for 2 years, through IDX, to Massachusetts residents whose personal information was potentially affected by this incident, at no cost to these individuals.

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

BGA 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



To Enroll, Please Call:
[TFN]
Or Visit:
<https://response.idx.us/customending>
Enrollment Code: [XXXXXXXXXX]

[Return Address]

[First Name] [Last Name]

[Address 1]

[Address 2]

[City], [State] [Zip]

[Date]

Dear <<Name 1>> <<Name 2>>:

Black, Gould & Associates, Inc. (“BGA”) is writing to inform you of a recent incident that may impact the privacy of some of your personal information. BGA is a full-service general agency offering services to agents and brokers. Due to requirements imposed by Massachusetts law, we are unable to provide further detail about the nature of this incident, but you may obtain additional information by calling the assistance line below.

Although at this time there is no evidence of identity theft or fraud in connection with this incident, BGA is providing this notice as a precaution.

We take this incident and the security of personal information in our care very seriously. In response to the security incident, we promptly took steps to secure the environment, including by rotating passwords, and conducting a diligent investigation aided by third-party forensic specialists, to confirm the full nature and scope of the event. Further, as part of our ongoing commitment to the privacy of information in our care, we implemented additional technical security measures designed to mitigate recurrence of this type of incident. We are also reviewing and enhancing existing data privacy policies and procedures.

As an added precaution, we are also providing you with access to 24 months of complimentary identity monitoring and restoration services through IDX, along with guidance on how to better protect against the possibility of information misuse. We are covering the cost of these services, but due to privacy restrictions, you will need to complete the activation process yourself using the enrollment instructions below.

1. Website and Enrollment. Go to <https://response.idx.us/customending> 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 [TFN] to gain additional information about this event and speak with knowledgeable representatives about the appropriate steps to take to protect your credit identity.

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:

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:

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

Under Massachusetts law, you have the right to obtain any police report filed in regard to this incident. If you are the victim of identity theft, you also have the right to file a police report and obtain a copy of it.

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.

We understand that you may have questions about this incident that are not addressed in this letter. If you have additional questions, please call [call center toll-free number], [call center hours], excluding U.S. holidays. You may also write to us at: Compliance Department, Black, Gould & Associates, Inc., 3800 N. Central Avenue, 9th Floor, Phoenix, Arizona 85012.

We apologize for any inconvenience this incident may cause you and remain committed to the privacy of information in our possession.

Sincerely,

Donald W. Baker

Donald W. Baker
President
Black, Gould & Associates, Inc.