



James M. Paulino, Esq.  
Innovation Square  
100 S. Clinton Ave., Ste. 1620  
Rochester, New York 14604  
jpaulino@constangy.com  
Mobile: 585.281.3000

February 10, 2024

**VIA ONLINE SUBMISSION**

Attorney General Aaron Frey  
Maine Attorney General's Office  
Consumer Protection Division  
6 State House Station  
Augusta, ME 04333

Dear Attorney General Frey:

Constangy, Brooks, Smith & Prophete, LLP ("Constangy") represents Trendium Pool Products, Inc. ("Trendium"), in connection with a recent data security incident described in greater detail below. The purpose of this letter is to notify you, in accordance with Maine's statute, that this incident may have affected the personal information of two (2) Maine residents. Trendium hereby reserves all rights and defenses in connection herewith.

**1. Nature of the Security Incident**

On November 21, 2023, Trendium experienced a system disruption. Upon discovery, Trendium immediately took steps to secure its network and initiated an investigation to determine the full nature and scope of the issue. The investigation revealed that certain Trendium data may have been acquired without authorization sometime on or around November 20, 2023. Trendium then undertook a comprehensive review of the potentially impacted data and on January 8, 2024 determined that the data contained personal information regarding Maine residents. The personal information involved in this incident includes names, credit card numbers, and expiration dates.

**2. Number of Affected Maine Residents**

On February 8, 2024, Trendium notified two (2) Maine residents of this data security incident via First-Class Mail. A sample copy of the notification letter sent to the impacted individuals is included with this correspondence.

**3. Steps Taken to Address the Incident**

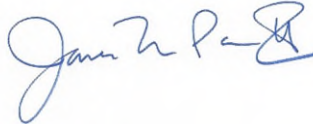
As soon as Trendium discovered the system disruption, it took steps to secure the affected systems and launched an investigation to determine whether, and to what extent, personal information had been accessed or acquired without authorization. Trendium has also implemented additional security measures in an effort to prevent a similar incident from occurring in the future.

Trendium reported the matter to the FBI and Canadian law enforcement, and will provide whatever cooperation is necessary to hold the perpetrator accountable. In addition, Trendium notified its payment card processor, Chase Paymentech, along with Visa and Mastercard of the incident.

**4. Contact Information**

Trendium remains dedicated to protecting the information in its control. If you have any questions or need additional information, please do not hesitate to contact me at [JPaulino@constangy.com](mailto:JPaulino@constangy.com) or 585.281.3000.

Sincerely,

A handwritten signature in blue ink, appearing to read "James M. Paulino". The signature is stylized and cursive.

James M. Paulino, Esq. of  
CONSTANGY, BROOKS, SMITH & PROPHETE LLP

Enclosure: Consumer Notification Letter



February 8, 2024

<< First Name>> << Last Name>>  
<<Address>>  
<<City>>, <<State>> <<Zip>>

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

I am writing to inform you of a recent incident at Trendium Pool Products, Inc. (“Trendium”) that may have affected your personal information. Please read this letter carefully as it contains information regarding the incident and steps that you can take to help protect your information,

**What Happened?** On November 21, 2023, Trendium experienced a system disruption. Upon discovery, we immediately took steps to secure our network and initiated an investigation to determine the full nature and scope of the issue. The investigation revealed that certain Trendium data may have been acquired without authorization sometime on or around November 20, 2023. Trendium then undertook a comprehensive review of the potentially impacted data and identified that some of your information may have been involved, and to prepare and send notifications.

**What Information Was Involved?** The affected information may have included your name, credit card number, and expiration date.

**What Did We Do?** As soon as Trendium discovered the incident, we took the steps described above and implemented measures to enhance our network security and minimize the risk of a similar incident occurring in the future. We also reported the matter to the FBI and will provide whatever cooperation is necessary to hold the perpetrator accountable.

**What You Can Do:** We encourage you to monitor your accounts and to immediately report suspicious activity to your financial institution. You can also review the enclosed *Steps You Can Take to Help Protect Personal Information* for additional information on how to safeguard your personal information.

**For More Information:** Further information about how to protect your personal information appears on the following pages. If you have questions or need assistance, please contact Trendium at 514-363-3232, Monday through Friday from 9:00 a.m. to 5:00 p.m. Eastern Time.

We thank you for your understanding in this matter.

Very truly yours,

Trendium Pool Products, Inc.  
7050 Saint Patrick  
Lasalle, QC H8N 1V2

## STEPS YOU CAN TAKE TO HELP PROTECT PERSONAL INFORMATION

**Review Your Account Statements and Notify Law Enforcement of Suspicious Activity:** As a precautionary measure, we recommend that you remain vigilant by reviewing your account statements and credit reports closely. If you detect any suspicious activity on an account, you should promptly notify the financial institution or company with which the account is maintained. You also should promptly report any fraudulent activity or any suspected incidence of identity theft to proper law enforcement authorities, your state attorney general, and/or the Federal Trade Commission (FTC).

**Copy of Credit Report:** You may obtain a free copy of your credit report from each of the three major credit reporting agencies once every 12 months by visiting <http://www.annualcreditreport.com/>, calling toll-free 1-877-322-8228, or by completing an Annual Credit Report Request Form and mailing it to Annual Credit Report Request Service, P.O. Box 105281, Atlanta, GA 30348. You also can contact one of the following three national credit reporting agencies:

**Equifax**

P.O. Box 105851  
Atlanta, GA 30348  
1-800-525-6285  
[www.equifax.com](http://www.equifax.com)

**Experian**

P.O. Box 9532  
Allen, TX 75013  
1-888-397-3742  
[www.experian.com](http://www.experian.com)

**TransUnion**

P.O. Box 1000  
Chester, PA 19016  
1-800-916-8800  
[www.transunion.com](http://www.transunion.com)

**Fraud Alert:** You may want to consider placing a fraud alert on your credit report. An initial fraud alert is free and will stay on your credit file for at least one year. The alert informs creditors of possible fraudulent activity within your report and requests that the creditor contact you prior to establishing any accounts in your name. To place a fraud alert on your credit report, contact any of the three credit reporting agencies identified above. Additional information is available at <http://www.annualcreditreport.com>.

**Security Freeze:** You have the right to put a security freeze on your credit file for up to one year at no cost. This will prevent new credit from being opened in your name without the use of a PIN number that is issued to you when you initiate the freeze. A security freeze is designed to prevent potential creditors from accessing your credit report without your consent. As a result, using a security freeze may interfere with or delay your ability to obtain credit. You must separately place a security freeze on your credit file with each credit reporting agency. In order to place a security freeze, you may be required to provide the consumer reporting agency with information that identifies you including your full name, Social Security number, date of birth, current and previous addresses, a copy of your state-issued identification card, and a recent utility bill, bank statement or insurance statement.

**Internal Revenue Service Identity Protection PIN (IP PIN):** You may also obtain an Identity Protection PIN (IP PIN) from the Internal Revenue Service, a six-digit number that prevents someone else from filing a tax return using your Social Security number or Individual Taxpayer Identification Number. The IP PIN is known only to you and the IRS, and helps the IRS verify your identity when you file your electronic or paper tax return. Even though you may not have a filing requirement, an IP PIN still protects your account. If you do not already have an IP PIN, you may get an IP PIN as a proactive step to protect yourself from tax-related identity theft either online, by paper application or in-person. Information about the IP PIN program can be found here: <https://www.irs.gov/identity-theft-fraud-scams/get-an-identity-protection-pin>.

**Additional Free Resources:** You can obtain information from the consumer reporting agencies, the FTC, or from your respective state Attorney General about fraud alerts, security freezes, and steps you can take toward preventing identity theft. You may report suspected identity theft to local law enforcement, including to the FTC or to the Attorney General in your state.

**Federal Trade Commission**

600 Pennsylvania Ave, NW  
Washington, DC 20580  
[consumer.ftc.gov](http://consumer.ftc.gov), and  
[www.ftc.gov/idtheft](http://www.ftc.gov/idtheft)  
1-877-438-4338

**Maryland Attorney General**

200 St. Paul Place  
Baltimore, MD 21202  
[oag.state.md.us](http://oag.state.md.us)  
1-888-743-0023

**New York Attorney General**

Bureau of Internet and Technology  
Resources  
28 Liberty Street  
New York, NY 10005  
1-212-416-8433

**North Carolina Attorney General**

9001 Mail Service Center  
Raleigh, NC 27699  
[ncdoj.gov](http://ncdoj.gov)  
1-877-566-7226

**Rhode Island Attorney General**

150 South Main Street  
Providence, RI 02903  
<http://www.riag.ri.gov>  
1-401-274-4400

**Washington D.C. Attorney General**

441 4th Street, NW  
Washington, DC 20001  
[oag.dc.gov](http://oag.dc.gov)  
1-202-727-3400

**You also have certain rights under the Fair Credit Reporting Act (FCRA):** These rights include to know what is in your file; to dispute incomplete or inaccurate information; to have consumer reporting agencies correct or delete inaccurate, incomplete, or unverifiable information; as well as other rights. For more information about the FCRA, and your rights pursuant to the FCRA, please visit <https://www.consumer.ftc.gov/articles/pdf-0096-fair-credit-reporting-act.pdf>