Re: Notice of Data Breach

Dear <<first_name>> <<middle_name>> <<last_name>> <<suffix>>:

Stephen Gould Corporation (“SGC”) is writing to notify you of an incident that may have impacted the security of some of your information. We want to provide you with information about the incident, our response, and steps you may take to better protect against possible misuse of your information, should you feel it necessary to do so.

What Happened? On September 19, 2020, SGC became aware of a malware incident impacting its systems. We immediately began working to restore our systems and launched an investigation to determine the nature and scope of the incident. Our investigation determined that certain SGC data was viewed or taken by an unauthorized actor. Therefore, we conducted a thorough and time-intensive review of the potentially impacted data to identify individuals with information at risk. On April 12, 2021, SGC finalized this review to confirm the nature and scope of all impacted data and the individuals to whom that data related. Although we are unaware of any actual or attempted misuse of your personal information, we are providing you this notice out of an abundance of caution.

What Information was Involved? The investigation determined that your <<2b_text_1(DataElements)>> may have been viewed or taken by an unauthorized individual.

What We Are Doing. We take this incident and the security of personal information in our care very seriously. Upon learning of this incident, we moved quickly to investigate and respond to this incident, assess the security of our systems, restore functionality to our environment, and notify potentially affected individuals. As part of our ongoing commitment to the security of information, we notified federal law enforcement and have significantly improved and augmented our policies and procedures addressing our network security.

As a precautionary measure, we are notifying potentially affected individuals, including you, so that you may take further steps to best protect your information, should you feel it is appropriate to do so.

We regret any inconvenience or concern this incident may cause. As an added precaution, SGC is offering you access to 12 months of free identity monitoring services through Kroll at no cost to you.

What You Can Do. Please review the enclosed Steps You Can Take to Help Protect Your Information, which contains information on what you can do to better protect against possible misuse of your information. We encourage you to remain vigilant against incidents of identity theft and fraud, to review your account statements, and to monitor your credit reports for suspicious activity. You will also find information on how to activate the identity monitoring services offered.

For More Information. We understand that you may have questions about this incident that are not addressed in this letter. If you have additional questions, please call the dedicated assistance line at 1-????-????-????, Monday through Friday from 8:00 a.m. to 5:30 p.m. Central Time excluding major U.S. holidays. Please have your membership number ready. Again, we take the privacy and security of personal information in our care seriously, and sincerely regret any inconvenience or concern this incident may cause you.

Sincerely,

STEPHEN GOULD CORPORATION
Steps You Can Take to Help Protect Your Information

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 <<IDMonitoringURL>> to activate and take advantage of your identity monitoring services.

You have until <<Date>> to activate your identity monitoring services.

Membership Number: <<Member ID>>

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 will 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 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:

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<thead>
<tr>
<th>Equifax</th>
<th>Experian</th>
<th>TransUnion</th>
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<tbody>
<tr>
<td>1-888-298-0045</td>
<td>1-888-397-3742</td>
<td>1-833-395-6938</td>
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<tr>
<td>Equifax Fraud Alert, P.O. Box 105069</td>
<td>Experian Fraud Alert, P.O. Box 9554, Allen, TX 75013</td>
<td>TransUnion Fraud Alert, P.O. Box 2000, Chester, PA 19016</td>
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<tr>
<td>Atlanta, GA 30348-5069</td>
<td>Experian Credit Freeze, P.O. Box 9554, Allen, TX 75013</td>
<td>TransUnion Credit Freeze, P.O. Box 160, Woodlyn, PA 19094</td>
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<tr>
<td>Equifax Credit Freeze, P.O. Box 105788</td>
<td>Experian Credit Freeze, P.O. Box 9554, Allen, TX 75013</td>
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<td>Atlanta, GA 30348-5788</td>
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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, 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.

For District of Columbia residents, the District of Columbia Attorney General may be contacted at: 400 6th Street, NW, Washington, D.C. 20001; 202-727-3400; and oag@dc.gov.
For Maryland residents, the Maryland Attorney General may be contacted at: 200 St. Paul Place, 16th Floor, Baltimore, MD 21202; 1-410-528-8662 or 1-888-743-0023; and www.oag.state.md.us. SGC is located at 35 South Jefferson Road, Whippany, NJ 07981.

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 reached at: 150 South Main Street, Providence, RI 02903; www.riag.ri.gov; and 1-401-274-4400. Under Rhode Island law, you have the right to obtain any police report filed in regard to this incident. There are [#] Rhode Island residents impacted by this incident.

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, the consumer reporting bureaus 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 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. We encourage you to review your rights pursuant to the Fair Credit Reporting Act by visiting www.consumerfinance.gov/f/201504_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.