



Todd Rowe, Partner
20 North Wacker
Suite 4120
Chicago, IL 60606
Tel.: 773.558.2363
trowe@constangy.com

January 11, 2024

VIA ONLINE SUBMISSION

Attorney General Aaron Frey
Office of the Attorney General
Consumer Protection Division
Security Breach Notification
111 Sewall Street, 6th Floor
Augusta, ME 04330

Dear Attorney General Frey:

Constangy, Brooks, Smith and Prophete LLP (“Constangy”) represents Golf & Ski Warehouse, Inc.’s (“GSW”)³ in connection with an incident experienced by GSW’s third-party payroll vendor, Paycor, and is described in greater detail below. No GSW’s systems were impacted by the event, which was limited to Paycor’s environment.

1. Nature of Incident

Paycor provides payroll services for multiple companies, including GSW. Recently, Paycor informed us that its MOVEit file transfer server was compromised by an unknown actor, along with hundreds of other MOVEit servers around the world, involving millions of exposed records. Paycor has subsequently implemented measures to fix the MOVEit software vulnerability, and, following its investigation, informed us that certain current and former employee information was potentially accessed or acquired without authorization.

The potentially impacted information included individuals’ names, Social Security numbers, dates of birth, and health insurance information.

2. Number of Maine residents affected

GSW notified 28 Maine residents of the incident via first class U.S. mail on January 11, 2024. A sample copy of the notification letter is included with this correspondence.

3. Steps taken relating to the incident

GSW has provided notice of the incident to potentially impacted individuals on January 11, 2024. In addition, GSW is offering affected individuals complimentary credit monitoring and identity protection services through Experian, a data breach and recovery services expert. Experian IdentityWorksSM services include: 12 months of credit monitoring, Experian credit report, identity restoration, Experian IdentityWorks ExtendCARETM, and \$1 Million Identity Theft Insurance. With this protection, Experian will help them resolve issues if their identity is affected.

³ On June 20, 2023, GSW was purchased by Worldwide Golf Shops.

4. Contact information

If you have any questions or need additional information, please do not hesitate to contact me at 773.558.2363 or trowe@constangy.com.

Very truly yours,

A handwritten signature in black ink that reads "Todd N. Rowe". The signature is written in a cursive, slightly slanted style.

Todd Rowe of
Constangy, Brooks, Smith & Prophete, LLP

Encl.: Sample Consumer Notification Letter



Return Mail Processing
PO Box 999
Suwanee, GA 30024

1 1 122 *****SNGLP

SAMPLE A. SAMPLE - L01

APT ABC



123 ANY ST

ANYTOWN, US 12345-6789



January 11, 2024

Subject: Notice of Data Security Incident

Dear Sample A. Sample:

We are writing to inform you of a potential data security incident involving a third-party payroll vendor, Paycor, that may have exposed some of your information. No Golf & Ski Warehouse, Inc.'s ("GSW") systems were impacted by the event, which was limited to Paycor's environment. Please read this letter carefully as it contains information regarding the incident and steps that you can take to help protect your information, along with an offer of free credit and identity monitoring services.

What Happened: Paycor provides payroll services for multiple companies, including GSW. Recently, Paycor informed us that its MOVEit file transfer server was compromised by an unknown actor, along with hundreds of other MOVEit servers around the world, involving millions of exposed records. Paycor has subsequently implemented measures to fix the MOVEit software vulnerability, and, following its investigation, informed us that certain current and former employee information was potentially accessed or acquired without authorization.

What Information Was Involved? We do not have any evidence of actual or suspected misuse of this information, and as stated above no GSW systems were accessed or compromised, as this incident occurred on Paycor's systems. Paycor has informed us that the affected personal information may have included your name, [Extra1].

What We Are Doing: After Paycor informed us of the potential risk to our data, we worked to identify potentially impacted individuals, and to arrange for an offer of complimentary credit monitoring and identity theft protection services through Experian IdentityWorksSM for [Extra2] months.

If you believe there was fraudulent use of your information as a result of this incident and would like to discuss how you may be able to resolve those issues, please reach out to an Experian agent. If, after discussing your situation with an agent, it is determined that identity restoration support is needed then an Experian Identity Restoration agent is available to work with you to investigate and resolve each incident of fraud that occurred from the date of the incident (including, as appropriate, helping you with contacting credit grantors to dispute charges and close accounts; assisting you in placing a freeze on your credit file with the three major credit bureaus; and assisting you with contacting government agencies to help restore your identity to its proper condition).

Please note that Identity Restoration is available to you for [Extra2] months from the date of this letter and does not require any action on your part at this time. The Terms and Conditions for this offer are located at www.ExperianIDWorks.com/restoration.

While identity restoration assistance is immediately available to you, we also encourage you to activate the fraud detection tools available through Experian IdentityWorks as a complimentary [Extra2]-month membership. This product provides you with superior identity detection and resolution of identity theft. To start monitoring your personal information, please follow the steps below:

- Ensure that you **enroll by** April 1, 2024 (Your code will not work after this date.)
- **Visit** the Experian IdentityWorks website to enroll: <https://www.experianidworks.com/credit>
- Provide your **activation code**: ABCDEFGHI

If you have questions about the product, need assistance with Identity Restoration that arose as a result of this incident, or would like an alternative to enrolling in Experian IdentityWorks online, please contact Experian's customer care team at 1-866-578-5412 by April 1, 2024. Be prepared to provide engagement number [Engagement Number] as proof of eligibility for the Identity Restoration services by Experian.

What You Can Do: We encourage you to enroll in the complimentary credit protection services we are offering. With this protection, Experian can help you resolve issues if your identity is compromised. Please also review the guidance at the end of this letter which includes additional resources you may utilize to help protect your information.

For More Information: If you have questions or need assistance, please contact 1-866-578-5412 toll-free Monday through Friday from 9 am – 9 pm Eastern Time (excluding major U.S. holidays). Experian representatives are fully versed on this incident and can help answer questions you may have regarding the protection of your information.

Please accept our sincere apologies and know that we deeply regret any worry or inconvenience that this may cause you.

Very truly yours,



Ned Waters
Chief Operating and Financial Officer
Golf & Ski Warehouse, Inc.
290 Plainfield Road
West Lebanon, NH 03784

STEPS YOU CAN TAKE TO HELP PROTECT YOUR 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

Experian

P.O. Box 9532
Allen, TX 75013
1-888-397-3742
www.experian.com

TransUnion

P.O. Box 1000
Chester, PA 19016
1-800-916-8800
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, and
www.ftc.gov/idtheft
1-877-438-4338

Maryland Attorney General

200 St. Paul Place
Baltimore, MD 21202
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

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

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>