



April 2, 2024

VIA ELECTRONIC MAIL

Attorney General John Formella
Office of the Attorney General
Consumer Protection Bureau
33 Capitol Street
Concord, NH 03301
Email: DOJ-CPB@doj.nh.gov

Re: Notice of Data Security Incident

Dear Attorney General Formella:

Constangy, Brooks, Smith & Prophete, LLP represents a sole proprietor doing business as Oxford Investment Group (“Oxford Investment”), a provider of financial advisory services based out of North Carolina, in connection with a recent data security incident described in greater detail below. The purpose of this letter is to notify you of the incident in accordance with New Hampshire’s data breach notification statute.

Nature of the Security Incident

On or around January 8, 2024, Oxford Investment became aware of suspicious activity in its email environment. In response, Oxford Investment immediately took steps to secure its environment and launch an investigation to determine whether sensitive or personal information may have been accessed or acquired during the incident. As a result of the investigation, Oxford Investment identified that the contents of one (1) employee’s mailbox may have been acquired without authorization. Oxford Investment then engaged an independent team to conduct a comprehensive review of all data within that employee’s mailbox, and on March 14, 2024, that review identified that the personal information of certain clients may have been affected. Oxford Investment then worked diligently to locate relevant address information to effectuate notification to such individuals. This process was completed on March 22, 2024.

The information affected varied between individuals but may have included . Please note that we have no current evidence to suggest misuse or attempted misuse of personal information involved in the incident.

Number of New Hampshire Residents Involved

On April 2, 2024, Oxford Investment notified one (1) New Hampshire resident of this data security incident via U.S. First-Class Mail. A sample copy of the notification letter sent to the impacted individual is included with this correspondence.

Steps Taken to Address the Incident

In response to the incident, Oxford Investment is providing individuals with information about steps that they can take to help protect their personal information, and, out of an abundance of caution, it is also offering individuals complimentary credit monitoring and identity protection services through IDX by Zerofox. This includes of credit and CyberScan dark web monitoring, a \$1,000,000 insurance reimbursement policy, and fully managed identity theft recovery services. Additionally, to help reduce the risk of a similar future incident, Oxford Investment has implemented additional technical security measures throughout the environment.

Contact Information

Oxford Investment 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

Sincerely,

Laura K. Funk
Partner
CONSTANGY, BROOKS, SMITH & PROPHETE,
LLP

Enclosure: Sample Notification Letter

OXFORD INVESTMENT GROUP

Return to IDX
4145 SW Watson Avenue
Suite 400
Beaverton, OR 97005

<<First Name>> <<Last Name>>
<<Address1>>
<<Address2>>
<<City>>, <<State>> <<Zip>>

April 2, 2024

Re: Notice of Data <<Variable Data 1 – Subject Line>>

Dear <<First Name>> <<Last Name>>,

We are writing to inform you of a recent data security incident experienced by a sole proprietor doing business as Oxford Investment Group (“Oxford Investment”) that may have involved your personal information. At Oxford Investment, we take the privacy and security of all information within our possession very seriously. This is why we are notifying you of the incident, providing you with steps you can take to help protect your personal information, and offering you the opportunity to enroll in complimentary credit monitoring and identity protection services.

What Happened. On or around January 8, 2024, Oxford Investment became aware of suspicious activity in our email environment. We immediately took steps to ensure the security of our email and launched an investigation to determine what happened and whether sensitive or personal information may have been accessed or acquired during the incident. As a result of the investigation, we identified that the contents of one individual’s mailbox may have been acquired without authorization. Oxford Investment then engaged an independent team to conduct a comprehensive review of all potentially affected data within the mailbox, and on March 14, 2024, that review determined that the personal information of certain clients may have been affected. Oxford Investment then worked diligently to identify contact information to effectuate notification to these individuals and prepare the services being offered to affected individuals, as provided in more detail below. This process was completed on March 22, 2024.

What Information Was Involved. The information involved may have included your name, <<Variable Data 2>>. **Please note that we have no current evidence to suggest the misuse or attempted misuse of your personal information.** Nonetheless, out of an abundance of caution, we are notifying you of this incident and offering resources to help you protect your personal information.

What We Are Doing. As soon as Oxford Investment learned of the incident, we took the measures described above and implemented additional security features to reduce the risk of a similar incident occurring in the future. We are also providing you with information about steps you can take to help protect your personal information.

Additionally, we are offering you the opportunity to enroll in credit monitoring and identity protection services through IDX at no cost to you. The IDX services, which are free to you upon enrollment, include <<12/24>> months of credit and CyberScan dark web monitoring, a \$1,000,000 insurance reimbursement policy, and fully managed identity theft recovery services. With this protection, IDX will help you resolve issues if your identity is compromised.

What You Can Do. Please review this letter carefully, along with the guidance included with this letter about additional steps you can take to protect your information. In addition, we encourage you to enroll in the credit monitoring and identity theft protection services we are offering through IDX at no cost to you. To receive credit monitoring 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.

You can enroll in the IDX identity protection services by calling 1-800-939-4170 or going to <https://app.idx.us/account-creation/protect> or scanning the QR code and using the Enrollment Code provided above. IDX representatives are available Monday through Friday from 9:00 a.m. to 9:00 p.m. Eastern Time. Please note the deadline to enroll is July 2, 2024.

For More Information. If you have questions about the incident, please call IDX at 1-800-939-4170, Monday through Friday from 9:00 a.m. to 9:00 p.m. Eastern Time. IDX representatives are fully versed on this incident and can answer questions you may have regarding the protection of your personal information.

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

Sincerely,

Corey Lewis
Sole Proprietor
d/b/a Oxford Investment Group
1210 Arendell St Ste A
Morehead City, NC 28557

ADDITIONAL STEPS YOU CAN TAKE TO FURTHER 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 monitoring free credit reports closely for errors and by taking other steps appropriate to protect accounts, including promptly changing passwords. If you detect any suspicious activity on an account, you should promptly notify the financial institution or company with which the account is maintained for remediation assistance or contact a remediation service provider. 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). You should also contact your local law enforcement authorities and file a police report. Obtain a copy of the police report in case you are asked to provide copies to creditors to correct your records. Contact information for the Federal Trade Commission is as follows:

- *Federal Trade Commission*, Consumer Response Center, 600 Pennsylvania Ave, NW, Washington, DC 20580, 1-877-IDTHEFT (438-4338), www.consumer.ftc.gov, www.ftc.gov/idtheft.

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 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 can print this form at <https://www.annualcreditreport.com/cra/requestformfinal.pdf>. You also can contact one of the following three national credit reporting agencies:

- *Equifax*, P.O. Box 740241, Atlanta, GA 30374, 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 Alerts: There are two kinds of general fraud alerts you can place on your credit report—an initial alert and an extended alert. You may want to consider placing either or both fraud alerts on your credit report. An initial fraud alert is free and will stay on your credit file for at least 90 days. 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. You may have an extended alert placed on your credit report if you have already been a victim of identity theft and provide the appropriate documentary proof. An extended fraud alert is also free and will stay on your credit report for seven years. 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>. Military members may also place an Active-Duty Military Fraud Alert on their credit reports while deployed. An Active-Duty Military Fraud Alert lasts for one year and can be renewed for the length of your deployment.

Credit or Security Freezes: Under U.S. law, you have the right to put a credit freeze, also known as a security freeze, on your credit file, for up to one year at no cost. The freeze 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. There is no fee to place or lift a security freeze. For information and instructions on how to place a security freeze, contact any of the credit reporting agencies or the Federal Trade Commission identified above. 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. After receiving your freeze request, each credit bureau will provide you with a unique PIN or password. Keep the PIN or password in a safe place as you will need it if you choose to lift the freeze.

A freeze remains in place until you ask the credit bureau to temporarily lift it or remove it altogether. If the request is made online or via phone, a credit bureau must lift the credit freeze within an hour. If the request is made by mail, then the bureau must lift the freeze no later than three business days after receiving your request.

IRS Identity Protection PIN: You can obtain an identity protection PIN (IP PIN) from the IRS that prevents someone else from filing a tax return using your Social Security 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. You can learn more and obtain your IP PIN here: <https://www.irs.gov/identity-theft-fraud-scams/get-an-identity-protection-pin>.

You also have certain rights under the Fair Credit Reporting Act (FCRA): These rights include the right 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. For more information about the FCRA, and your rights pursuant to the FCRA, please visit http://files.consumerfinance.gov/f/201504_cfpb_summary_your-rights-under-fcra.pdf.

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.

Additional information:

District of Columbia: The Office of the Attorney General for the District of Columbia can be reached at 400 6th Street, NW, Washington, DC 20001; 202-727-3400; oag@dc.gov

California: California Attorney General can be reached at: 1300 "I" Street, Sacramento, CA 95814-2919; 800-952-5225; <http://oag.ca.gov/>

Maine: Maine Attorney General can be reached at: 6 State House Station Augusta, ME 04333; 207-626-8800; <https://www.maine.gov/ag/>

Maryland: Maryland Attorney General can be reached at: 200 St. Paul Place, Baltimore, MD 21202; 888-743-0023; <https://www.marylandattorneygeneral.gov/>

Missouri: Missouri Attorney General can be reached at: 207 W. High Street, P.O. Box 899, Jefferson City, MO 65102; 573-751-3321; <https://ago.mo.gov/>

North Carolina: North Carolina Attorney General's Office, Consumer Protection Division, can be reached at: 9001 Mail Service Center Raleigh, NC 27699-9001; 877-5-NO-SCAM (Toll-free within North Carolina); 919-716-6000; www.ncdoj.gov

New York: New York Attorney General can be reached at: Bureau of Internet and Technology Resources, 28 Liberty Street, New York, NY 10005; 212-416-8433; <https://ag.ny.gov/>

Rhode Island: Rhode Island Attorney General can be reached at: 150 South Main Street Providence, RI 02903, <http://www.riag.ri.gov>

Texas: Texas Attorney General can be reached at: 300 W. 15th Street, Austin, Texas 78701; 800-621-0508; texasattorneygeneral.gov/consumer-protection/

Vermont: Vermont Attorney General's Office can be reached at: 109 State Street, Montpelier, VT 05609; 802-828-3171; ago.info@vermont.gov