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August 29, 2023

**VIA ONLINE SUBMISSION**

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

Re: Notice of Data Security Incident

Dear Attorney General Frey:

Constangy, Brooks, Smith & Prophete LLP ("Constangy") represents Cornwell Quality Tools ("Cornwell") in connection with a recent data security incident described in greater detail below.

**1. Nature of the security incident.**

On or around September 22, 2022, Cornwell became aware of unusual activity on its network. In response, Cornwell took immediate steps to secure its digital environment and engaged a leading cybersecurity firm to conduct an investigation to determine whether any sensitive information may have been accessed or acquired during the incident. Through the investigation, Cornwell learned that certain systems may have been accessed without authorization. Following this confirmation, Cornwell engaged a vendor to conduct a comprehensive review of the potentially affected data and on August 23, 2023, Cornwell determined that personal information belonging to certain Maine residents may have been impacted in connection with this incident. Cornwell then worked diligently to obtain contact information to effectuate notification to potentially affected individuals.

Cornwell is notifying all potentially impacted individuals of this incident, providing them with steps they can take to protect their personal information, and offering them free credit and identity monitoring services.

Please note that we have no current evidence to suggest misuse or attempted misuse of any personal information in conjunction with this incident.

**2. Number of Maine residents affected.**

Cornwell notified seventy-four (74) Maine residents of this incident via first class U.S. mail on August 29, 2023. The information potentially impacted in connection with this incident includes name, Social Security number, and driver's license number.

A sample copy of the notification letter is included with this correspondence.

**3. Steps taken relating to the Incident.**

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As soon as Cornwell discovered this incident, Cornwell took steps to secure its network environment and launched an investigation to determine what happened and the scope of personal information potentially impacted. Cornwell implemented measures to enhance the security of its environment in an effort to minimize the risk of a similar incident occurring in the future. In addition, Cornwell also notified the Federal Bureau of Investigation of the incident and will provide any cooperation necessary to help hold the perpetrator(s) accountable

Further, Cornwell has established a toll-free call center through IDX, a leader in risk mitigation and response, to answer any questions about the incident and address related concerns. The call center is available at 1-888-939-4170 from 8:00 A.M. to 8:00 P.M. CST on Monday through Friday (excluding holidays). In addition, while Cornwell is not aware of the misuse of any information as a result of this incident, out of an abundance of caution, Cornwell is also providing complimentary credit and identity protection services to notified individuals.

#### **4. Contact information.**

Cornwell remains dedicated to protecting the personal information in its control. If you have any questions or need additional information, please do not hesitate to contact Constangy.

Best regards,

**/s/ Julie Hess**

Julie Hess

CONSTANGY, BROOKS, SMITH & PROPHETE LLP

Enclosure: Sample Notification Letter



P.O. Box 989728  
West Sacramento, CA 95798-9728

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

Enrollment Code: <<Enrollment Code>>

To Enroll, Scan the QR Code Below:



Or Visit:

<https://app.idx.us/account-creation/protect>

August 29, 2023

Subject: Notice of Data <<Variable Text 1>>

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

I am writing to inform you of a data security incident that may have affected your personal information. At Cornwell, we take the privacy and security of personal information very seriously. This is why we are informing you of the incident, providing you with steps you can take to protect your personal information, and offering you free credit monitoring and identity protection services.

**What Happened.** On September 22, 2022, Cornwell experienced a network disruption. Immediately, we launched an investigation and took steps to secure our network. We also engaged independent, cybersecurity experts to assist with the investigation and determine what happened and whether any sensitive information may have been impacted during the incident. Through the course of our investigation, we learned that some files may have been accessed or acquired without authorization that potentially contained borrower-related personal information. A comprehensive review of the types of personal information involved, the identification of potentially impacted individuals, and verification of current mailing addresses for those individuals was then conducted. On August 23, 2023, we determined that your personal information may have been impacted. Therefore, we are notifying you about this incident and providing you with complimentary credit and identity monitoring services.

**What Information Was Involved.** The information that may have included your name, as well as your <<Variable Text 2>>.

**What Are We Doing.** As soon as Cornwell discovered the incident, we took the steps described above. In addition, we implemented measures to enhance the security of our network and minimize the risk of a similar incident occurring in the future.

We are also offering you complimentary credit monitoring and identity theft protection services through IDX, a leader in consumer identity protection. These services include: <<12/24>> months of credit monitoring, identity protection through CyberScan, a \$1,000,000 identity fraud loss reimbursement policy, and fully managed identity theft recovery services.

**What Can You Do.** You can follow the recommendations on the following page to help protect your personal information. You can also enroll in the complimentary services offered to you through IDX by contacting 1-888-933-0606 or visiting <https://app.idx.us/account-creation/protect> or scanning the QR image and providing the enrollment code at the top of the first page. Please note that the deadline to enroll is November 29, 2023.

*Cornwell Quality Tools  
667 Seville Road  
Wadsworth, OH 44281*

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.

**For More Information.** Further information about how to protect your personal information appears on the following page. If you have questions or need assistance, please contact 1-888-933-0606, Monday through Friday from 9 a.m. to 9 p.m. Eastern Time, excluding major U.S. holidays.

We take your trust in us and this matter very seriously. Please accept our sincere apologies for any worry or inconvenience this may cause.

Sincerely,

***Bob Studenic***

Bob Studenic  
President  
Cornwell Quality Tools

## 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](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.

**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

### **California Attorney General**

Attn: Public Inquiry Unit  
P.O. Box 944255  
Sacramento, CA 94244-2550  
<https://oag.ca.gov/contact>  
1-916-210-6276

### **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>.

