

150 N. Riverside Plaza, Suite 3000, Chicago, IL 60606 • (312) 819-1900

November 7, 2022

Michael Waters 312-463-6212 312-819-1910 mwaters@polsinelli.com

## VIA E-MAIL (SECURITYBREACH@ATG.WA.GOV)

Attorney General Bob Ferguson Office of the Attorney General Consumer Protection Division 800 5<sup>th</sup> Avenue, Suite 2000 Seattle, Washington 98104

Re: Notification of Data Security Incident

Dear Attorney General Ferguson:

We represent CWGS Group ("CWGS"), 250 Parkway Drive, Suite 270, Lincolnshire, Illinois 60069 in connection with an incident that may have involved the personal information of five hundred forty-nine (549) Washington residents. CWGS is reporting the incident pursuant to WASH. REV. CODE § 19.255.030(1). This notice will be supplemented, if necessary, with any new significant facts discovered subsequent to this submission. While CWGS is notifying you of this incident, CWGS does not waive any rights or defenses relating to the incident, this notice, or the applicability of Washington law on personal jurisdiction.

## NATURE OF THE INCIDENT

On February 9, 2022, CWGS learned of suspicious activity on its network. Upon discovering the incident, CWGS promptly began an internal investigation and engaged a forensic security firm to investigate and secure its computer systems. The investigation determined that an unknown third party accessed CWGS's systems from January 14, 2022 to February 13, 2022 and that certain personal information may have been accessed and/or acquired from its systems as a part of the incident. CWGS conducted a comprehensive review of the involved data to determine if it contained any personal information. On July 20, 2022, CWGS determined that the data contained the name, date of birth, Social Security number, driver's license/state ID number, military ID number, passport number, digital/electronic signature, financial account number, and/or debit/credit card number with and without CVV and/or expiration date of Washington residents. At this point, CWGS is not aware of any fraud or identity theft to any individual as a result of this incident.



November 7, 2022 Page 2

## NUMBER OF RESIDENTS NOTIFIED

On July 20, 2022, CWGS determined that the personal information of five hundred forty-nine (549) Washington residents may have been involved in the incident. As noted in our email to your office on July 28, 2022 and as discussed during our teleconference on August 1, 2022, CWGS has been cooperating with federal law enforcement's investigation of the incident and, at the request of the Department of Justice, CWGS delayed notification while its investigation was ongoing. CWGS now has permission from law enforcement to provide notification of the incident. CWGS is notifying the residents of the incident by letter today, November 7, 2022. The notification letter will include an offer for twelve (12) months of complimentary credit monitoring and identity theft protection to the individuals that had their Social Security number, driver's license/state ID number, and/or passport number potentially involved. Enclosed is a copy of the notice that is being sent to the residents via first-class United States mail.

## STEPS TAKEN RELATING TO THE INCIDENT

Upon learning of the incident, CWGS promptly controlled the incident by preventing further access to the system. It also engaged a forensic security firm to investigate and confirm the security of its computer systems. CWGS is undertaking efforts to reduce the risk of a similar incident occurring in the future, including enhancing its technical security measures. CWGS also cooperated with law enforcement's investigation of the incident and delayed notification while its investigation was ongoing. Finally, as discussed above, CWGS is notifying the potentially involved individuals, providing free credit monitoring services to the individuals that had their Social Security number, driver's license/state ID number, and/or passport number potentially involved, and providing individuals with information on how they can protect themselves against fraudulent activity and identity theft.

## **CONTACT INFORMATION**

Please contact me if you have any questions or if I can provide you with any further information concerning this matter.

Very truly yours,

Michael J. Waters

Enclosure

# CAMPING WORLD good sam

Return Mail Processing Center P.O. Box 6336 Portland, OR 97228-6336



<<Date>>

RE: NOTICE OF A DATA BREACH

Dear << Name 1>>:

Camping World and Good Sam value and respect the privacy of your information, which is why we are writing to advise you of an incident that may have involved some of your personal information. While we have no reason to believe that your information has been misused for the purpose of committing fraud or identity theft, we are writing in accordance with relevant law to advise you about the incident and to provide you with guidance on what you can do to protect yourself, should you feel it is appropriate to do so.

What Happened? On February 9, 2022, we learned of suspicious activity on our network. Upon discovering the incident, we promptly began an internal investigation and engaged a forensic security firm to investigate and secure our computer systems. The investigation determined that an unknown third party accessed our systems from January 14, 2022 to February 13, 2022 and that certain personal information may have been accessed and/or acquired from our systems as a part of the incident. We also have been cooperating with law enforcement's investigation of the incident and, at the request of law enforcement, we delayed notification while their investigation was ongoing. We now have permission from law enforcement to provide you with this notification.

What Information Was Involved? We conducted a comprehensive review of the involved data to determine if it contained any personal information. On July 20, 2022, we determined that the data contained personal information that included your name, together with your

What We Are Doing. In addition to the actions described above, we have taken steps to reduce the risk of this type of incident occurring in the future, including enhancing our technical security measures. We are also offering a complimentary one-year membership of Equifax Credit Watch<sup>TM</sup> Gold. This product helps detect possible misuse of your personal information and provides you with identity protection services focused on immediate identification and resolution of identity theft. Equifax Credit Watch<sup>TM</sup> Gold is completely free to you, and enrolling in this program will not hurt your credit score. For more information on identity theft prevention and Equifax Credit Watch<sup>TM</sup> Gold, including instructions on how to activate your complimentary one-year membership, please see the additional information provided in this letter.

What You Can Do. We encourage you to take advantage of the complimentary credit monitoring included in this letter. You can also find more information on steps to protect yourself against possible identity theft or fraud in the *Additional Important Information* section below.

**For More Information.** We value the trust you place in us to protect your privacy, take our responsibility to safeguard your personal information seriously, and apologize for any inconvenience or concern this incident might cause. For further information and assistance, please call 855-846-4844 from 8:00 AM - 8:00 PM Central, Monday through Friday.

Sincerely,

Camping World and Good Sam





## Equifax Credit Watch™ Gold

\*Note: You must be over age 18 with a credit file to take advantage of the product

#### **Key Features**

- Credit monitoring with email notifications of key changes to your Equifax credit report
- Daily access to your Equifax credit report
- WebScan notifications<sup>1</sup> when your personal information, such as Social Security Number, credit/debit card or bank account numbers are found on fraudulent Internet trading sites
- Automatic fraud alerts<sup>2</sup>, which encourages potential lenders to take extra steps to verify your identity before extending credit, plus blocked inquiry alerts and Equifax credit report lock<sup>3</sup>
- Identity Restoration to help restore your identity should you become a victim of identity theft, and a dedicated Identity Restoration Specialist to work on your behalf
- Up to \$1,000,000 of identity theft insurance coverage for certain out of pocket expenses resulting from identity theft<sup>4</sup>

#### **Enrollment Instructions**

## Go to www.equifax.com/activate

Enter your unique Activation Code of << Enrollment Code>> then click "Submit" and follow these 4 steps:

#### 1 Register

Complete the form with your contact information and click "Continue".

If you already have a myEquifax account, click the 'Sign in here' link under the "Let's get started" header. Once you have successfully signed in, you will skip to the Checkout Page in Step 4.

## 2. Create Account:

Enter your email address, create a password, and accept the terms of use.

#### 3. Verify Identity:

To enroll in your product, we will ask you to complete our identity verification process.

#### Checkout:

Upon successful verification of your identity, you will see the Checkout Page.

Click 'Sign Me Up' to finish enrolling.

### You're done!

The confirmation page shows your completed enrollment.

Click "View My Product" to access the product features.

<sup>&</sup>lt;sup>1</sup>WebScan searches for your Social Security Number, up to 5 passport numbers, up to 6 bank account numbers, up to 6 credit/debit card numbers, up to 6 email addresses, and up to 10 medical ID numbers. WebScan searches thousands of Internet sites where consumers' personal information is suspected of being bought and sold, and regularly adds new sites to the list of those it searches. However, the Internet addresses of these suspected Internet trading sites are not published and frequently change, so there is no guarantee that we are able to locate and search every possible Internet site where consumers' personal information is at risk of being traded.

<sup>&</sup>lt;sup>2</sup>The Automatic Fraud Alert feature is made available to consumers by Equifax Information Services LLC and fulfilled on its behalf by Equifax Consumer Services LLC.

<sup>&</sup>lt;sup>3</sup>Locking your Equifax credit report will prevent access to it by certain third parties. Locking your Equifax credit report will not prevent access to your credit report at any other credit reporting agency. Entities that may still have access to your Equifax credit report include: companies like Equifax Global Consumer Solutions, which provide you with access to your credit report or credit score, or monitor your credit report as part of a subscription or similar service; companies that provide you with a copy of your credit report or credit score, upon your request; federal, state and local government agencies and courts in certain circumstances; companies using the information in connection with the underwriting of insurance, or for employment, tenant or background screening purposes; companies that have a current account or relationship with you, and collection agencies acting on behalf of those whom you owe; companies that authenticate a consumer's identity for purposes other than granting credit, or for investigating or preventing actual or potential fraud; and companies that wish to make pre-approved offers of credit or insurance to you. To opt out of such pre-approved offers, visit www.optoutprescreen.com.

<sup>&</sup>lt;sup>4</sup>The Identity Theft Insurance benefit is underwritten and administered by American Bankers Insurance Company of Florida, an Assurant company, under group or blanket policies issued to Equifax, Inc., or its respective affiliates for the benefit of its Members. Please refer to the actual policies for terms, conditions, and exclusions of coverage. Coverage may not be available in all jurisdictions.

## **Additional Important Information**

As a precautionary measure, we recommend that you remain vigilant to protect against potential fraud and/or identity theft by, among other things, reviewing your account statements and monitoring 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 should also promptly report any fraudulent activity or any suspected incidents of identity theft to proper law enforcement authorities, including the police and your state's attorney general, as well as the Federal Trade Commission ("FTC").

You may wish to review the tips provided by the FTC on fraud alerts, security/credit freezes and steps you can take to avoid identity theft. For more information and to contact the FTC, please visit www.ftc.gov/idtheft or call 1-877-ID-THEFT (1-877-438-4338). You may also contact the FTC at Federal Trade Commission, 600 Pennsylvania Avenue, NW, Washington, DC 20580.

<u>Credit Reports:</u> You may obtain a free copy of your credit report once every 12 months from each of the three national credit reporting agencies by visiting www.annualcreditreport.com, by 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 can print a copy of the request form at https://www.annualcreditreport.com/manualRequestForm.action.

Alternatively, you may elect to purchase a copy of your credit report by contacting one of the three national credit reporting agencies. Contact information for the three national credit reporting agencies for the purpose of requesting a copy of your credit report or for general inquiries is as follows:

Equifax 1-866-349-5191 www.equifax.com P.O. Box 740241 Atlanta, GA 30374 Experian 1-888-397-3742 www.experian.com P.O. Box 2002 Allen, TX 75013 TransUnion 1-800-888-4213 www.transunion.com P.O. Box 2000 Chester, PA 19016

**Fraud Alerts:** You may want to consider placing a fraud alert on your credit report. A fraud alert is free and will stay on your credit report for one (1) year. The alert informs creditors of possible fraudulent activity within your report and requests that the creditor contact you prior to establishing any new accounts in your name. To place a fraud alert on your credit report, contact any of the three national credit reporting agencies using the contact information listed above. Additional information is available at www.annualcreditreport.com.

<u>Credit and Security Freezes</u>: You may have the right to place a credit freeze, also known as a security freeze, on your credit file, so that no new credit can be opened in your name without the use of a Personal Identification Number (PIN) that is issued to you when you initiate the freeze. A credit freeze can be placed without any charge and is designed to prevent potential credit grantors from accessing your credit report without your consent. If you place a credit freeze, potential creditors and other third parties will not be able to get access to your credit report unless you temporarily lift the freeze. Therefore, using a credit freeze may delay your ability to obtain credit. Unlike a fraud alert, you must separately place a credit freeze on your credit file at each credit reporting company. As the instructions for how to establish a credit freeze differ from state to state, please contact the three major credit reporting companies below to find out more information:

Equifax Security Freeze 1-888-298-0045 www.equifax.com P.O. Box 105788 Atlanta, GA 30348 Experian Security Freeze 1-888-397-3742 www.experian.com P.O. Box 9554 Allen, TX 75013 TransUnion Security Freeze 1-888-909-8872 www.transunion.com P.O. Box 160 Woodlyn, PA 19094

Individuals interacting with credit reporting agencies have rights under the Fair Credit Reporting Act. We encourage you to review your rights under the Fair Credit Reporting Act by visiting <a href="https://files.consumerfinance.gov/f/documents/bcfp\_consumer-rights-summary\_2018-09.pdf">https://files.consumerfinance.gov/f/documents/bcfp\_consumer-rights-summary\_2018-09.pdf</a>, or by requesting information in writing from the Consumer Financial Protection Bureau, 1700 G Street N.W., Washington, DC 20552.

<u>Iowa Residents</u>: Iowa residents can contact the Office of the Attorney general to obtain information about steps to take to avoid identity theft from the Iowa Attorney General's office at: Office of the Attorney General of Iowa, Hoover State Office Building, 1305 E. Walnut Street, Des Moines IA 50319, 515-281-5164.

<u>Maryland Residents</u>: Maryland residents can contact the Office of the Attorney General to obtain information about steps you can take to avoid identity theft from the Maryland Attorney General's office at: Office of the Attorney General, 200 St. Paul Place, Baltimore, MD 21202, (888) 743-0023, <a href="https://www.marylandattorneygeneral.gov/">https://www.marylandattorneygeneral.gov/</a>.

<u>New York State Residents</u>: New York residents can obtain information about preventing identity theft from the New York Attorney General's Office at: Office of the Attorney General for the State of New York, Bureau of Consumer Frauds & Protection, The Capitol, Albany, New York 12224-0341; <a href="https://ag.ny.gov/consumer-frauds/identity-theft">https://ag.ny.gov/consumer-frauds/identity-theft</a>; (800) 771-7755.

North Carolina Residents: North Carolina residents can obtain information about preventing identity theft from the North Carolina Attorney General's Office at: North Carolina Attorney General's Office, Consumer Protection Division, 9001 Mail Service Center, Raleigh, NC 27699-9001; 877-5-NO-SCAM (Toll-free within North Carolina); 919-716-6000; <a href="https://www.ncdoj.gov">www.ncdoj.gov</a>.

Rhode Island Residents: We believe that this incident affected Rhode Island residents. Rhode Island residents can contact the Office of the Attorney general at: Rhode Island Office of the Attorney General, 150 South Main Street, Providence, RI 02903, (401) 274-4400, <a href="www.riag.ri.gov">www.riag.ri.gov</a>. You have the right to obtain any police report filed in regard to this incident. If you are the victim of identity theft, you also have the right to file a police report and obtain a copy of it.

<u>Vermont Residents:</u> If you do not have internet access but would like to learn more about how to place a security freeze on your credit report, contact the Vermont Attorney General's Office at 802-656-3183 (800-649-2424 toll free in Vermont only).