Appendix

On November 27, 2022, Gunster detected a data security incident. Gunster immediately took measures to contain the incident and securely restore its network. A thorough investigation was conducted. Gunster determined from the investigation that there was unauthorized access to its document management file system over the weeks leading up to the discovery of the incident. After Gunster identified the files involved, it began a process to review those files to identify the content. Gunster also notified federal law enforcement.

Based on that review, Gunster began mailing notifications to individuals in April 2023 and, on August 4, 2023, provided substitute notice via nationwide media and a post on Gunster's website. The file review continued, and, on October 15, 2023, the review process generated a preliminary list of individuals whose information was contained in the files. Gunster then worked to review the list and supplement it with addresses and other information to be able to identify individuals to notify. The review confirmed that the files contained information related to 8,605 California residents, including the individuals' name and one or more of the following data elements: Social Security number, driver's license number, financial account number, payment card number, passport number, medical treatment information, health insurance information, username and password and/or email address and password. The review process is ongoing and, if additional California residents are notified, Gunster will update your office when the notifications are complete.

On December 1, 2023, Gunster began mailing additional notification letters via United States Postal Service First-Class mail to the individuals, including California residents, whose information was involved in accordance with Cal. Civ. Code § 1798.82(j)(4). A sample copy of the notification letter is enclosed. Gunster is offering the residents a complimentary membership to credit monitoring and identity protection services through Kroll. Gunster also has established a dedicated, toll-free call center to answer questions the individuals may have.

To help prevent this type of incident from happening again, Gunster has implemented additional measures to further strengthen the security of its network.