Jason Cherry, Partner
Cybersecurity & Data Privacy Team
2029 Century Park East, Suite 1100
Los Angeles, CA 90067
jcherry@constangy.com
Telephone: 207.745.1397
www.constangy.com
Emergency: BreachResponse@constangy.com
Hotline: 877-382-2724 (877-DTA-BRCH)

October 20, 2025

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
Tel: 207-626-8800

Re: Notification of Data Security Incident

To Whom It May Concern:

Constangy, Brooks, Smith & Prophete, LLP represents the Worcester Regional Retirement System ("WRRS") in conjunction with their response to a recent data event involving information for Maine residents. The purpose of this letter is to notify you of the incident in accordance with Maine's data breach notification statute. WRRS does not waive any rights or defenses regarding the applicability of Maine law or personal jurisdiction.

1. Nature of the Security Incident

On or about June 10, 2025, WRRS experienced a network disruption and promptly took steps to secure our environment and immediately initiated an investigation of the matter. WRRS engaged independent cybersecurity experts to assist with this process. As a result of the investigation, on or around September 15, 2025 WRRS determined that certain may have been accessed and acquired without authorization. WRRS engaged a third-party vendor to complete a comprehensive and thorough review of the data potentially involved to identity what personal information may have been impacted and to whom it belonged. WRRS then identified and confirmed contact information to notify the potentially impacted individuals. This process was completed on October 10, 2025.

2. Number of Affected Maine Residents & Information Involved

The incident involved information for approximately 150 Maine residents. The information involved in the incident for Maine residents varied per individual but may include names, driver's license or state ID numbers, Social Security numbers, medical information and/or insurance information.

3. Notification to Affected Individuals

On October 20, 2025 WRRS notified Maine residents by USPS First Class Mail. The notification letter provides resources and steps individuals can take to help protect their information. The notification letter also offers the opportunity to enroll in complimentary identity protection services including 12 months of credit monitoring, dark web monitoring, $1 million identity fraud loss reimbursement policy, and fully managed identity theft recovery services. A sample notification letter is enclosed.

4. Measures Taken to Address the Incident

Upon discovering this incident, WRRS conducted an immediate and comprehensive investigation to confirm the scope of the event to secure its network and to notify affected individuals. WRRS established a toll-free call center through IDX to answer questions about the incident and to address related concerns. WRRS continues to review policies and procedures and so it can implement additional measures as appropriate.

5. Contact Information

If you have any questions or need additional information regarding this incident, please do not hesitate to contact me at jcherry@constangy.com or 207.745.1397.

Sincerely,

Jason Cherry

Jason Cherry
Partner, Constangy Cyber Team

Encl.: Sample Notification Letter

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

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

Enrollment Code: <<ENROLLMENT>>
Enrollment Deadline: January 20, 2026
To Enroll, Scan the QR Code Below:

SCAN ME

Or Visit:
https://app.idx.us/account-creation/protect

October 20, 2025

Subject: Notice of <<Variable Text 1: Data Security Incident / Data Breach>>

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

I am writing to inform you of a recent data security incident that may have affected your personal information. The Worcester Regional Retirement System ("WRRS") takes the privacy and security of all information within its possession very seriously. Please read this letter carefully as it contains information regarding the incident and steps that you can take to help protect your personal information.

What Happened. On or around June 10, 2025, WRRS experienced a network disruption and immediately initiated an investigation of the matter. WRRS engaged independent cybersecurity experts to assist with the process. As a result of the investigation, on or around September 15, 2025 WRRS determined that certain information may have been accessed and acquired without authorization. WRRS undertook a comprehensive review of those files and, on or about October 10, 2025 learned that some of your personal information was contained within the potentially affected data which is the reason for this notification. Please note that WRRS has no evidence of the misuse, or attempted misuse, of any potentially impacted information.

What Information Was Involved. The information varied per individual but may have included your name, Social Security number, driver's license or state ID number, medical information, or insurance information.

What We Are Doing. As soon as WRRS discovered this incident, we took the steps described above and implemented measures to enhance security and minimize the risk of a similar incident occurring in the future. WRRS is also offering you complimentary identity protection services through IDX, a leader in consumer identity protection. These services include <<12/24>> months of credit monitoring[1], dark web monitoring, a $1 million identity fraud loss reimbursement policy, and fully managed identity theft recovery services. The deadline to enroll in these services is January 20, 2026.

What You Can Do. We encourage you to contact IDX with any questions and to enroll in the free identity protection services by calling 1-833-687-1461, going to https://app.idx.us/account-creation/protect, or scanning the QR image and using the Enrollment Code provided above. IDX representatives are available Monday through Friday from 9 a.m. to 9 p.m. Eastern Time.

[1] 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 call 1-833-687-1461 Monday through Friday from 9 a.m. to 9 p.m. Eastern Time, excluding 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,

Worcester Regional Retirement System
23 Midstate Drive, Suite 106
Midstate Office Park
Auburn, MA, 01501

Steps You Can Take to Help Protect Your Personal 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 (the "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 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 2000
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 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
877-438-4338

Maryland Attorney General
200 St. Paul Place
Baltimore, MD 21202
https://oag.maryland.gov
888-743-0023

Oregon Attorney General
1162 Court St., NE
Salem, OR 97301
www.doj.state.or.us/consumer-protection
877-877-9392

California Attorney General
1300 I Street
Sacramento, CA 95814
www.oag.ca.gov/privacy
800-952-5225

New York Attorney General
The Capitol
Albany, NY 12224
800-771-7755
ag.ny.gov

Rhode Island Attorney General
150 South Main Street
Providence, RI 02903
www.riag.ri.gov
401-274-4400

Iowa Attorney General
1305 E. Walnut Street
Des Moines, Iowa 50319
www.iowaattorneygeneral.gov
888-777-4590

NY Bureau of Internet and Technology
28 Liberty Street
New York, NY 10005
www.dos.ny.gov/consumerprotection/
212.416.8433

Washington D.C. Attorney General
400 S 6th Street, NW
Washington, DC 20001
oag.dc.gov/consumer-protection
202-442-9828

Kentucky Attorney General
700 Capitol Avenue, Suite 118
Frankfort, Kentucky 40601
www.ag.ky.gov
502-696-5300

NC Attorney General
9001 Mail Service Center
Raleigh, NC 27699
ncdoj.gov/protectingconsumers/
877-566-7226

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 www.consumer.ftc.gov/sites/default/files/articles/pdf/pdf-0096-fair-credit-reporting-act.pdf.