

October 24, 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, represents North River Co. ("North River") in connection with a recent data security incident described in greater detail below. North River takes the protection of all information within its possession very seriously and has taken measures to reduce the likelihood of a similar incident reoccurring. This notice is being sent because personal information for Maine residents may have been involved in the incident.

1. Nature of the Security Incident

On September 4, 2023, North River became aware of unusual network activity and immediately took steps to secure our systems. North River engaged cybersecurity experts to assist with the process. The investigation determined that certain North River data may have been acquired without authorization in early September. After undertaking a review of the potentially affected files, North River identified certain personal information was involved. This review concluded on October 9, 2023 and revealed the individuals whose personal information could have been involved. North River thereafter worked to gather outstanding information needed to provide individual notification.

2. Number of Maine Residents Involved

On October 24, 2023, North River notified nineteen (19) Maine residents of this data security incident via U.S. First-Class Mail. A sample copy of the notification letter sent to the impacted individuals is included with this correspondence.

The personal information involved in this incident includes individuals' names, Social Security numbers, and financial account information such as would appear on K-1 forms or other tax-related documents.

3. Steps Taken to Address the Incident

As soon as North River discovered this unusual network activity, it took steps to secure the affected systems and launched an investigation to determine whether, and to what extent, individual information had been accessed or acquired without authorization. North River has also implemented additional security measures in an effort to prevent a similar incident from occurring in the future. Further, as referenced in the sample consumer notification letter, North River has offered individuals 24 months of complimentary services through Kroll, which include Credit Monitoring, \$1 Million Identity Fraud Loss Reimbursement, Fraud Consultation, and Identity Theft Restoration.

North River has established a toll-free call center through Kroll to answer questions about the incident and address related concerns.

4. Contact Information

North River 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 aweaver@constangy.com.

Sincerely,



Aubrey Weaver
Partner

Constangy, Brooks, Smith & Prophete, LLP

Enclosure: Sample Notification Letter