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December 12, 2023

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

Re: Notice of Data Security Incident

Dear Attorney General Frey:

Constangy, Brooks, Smith and Prophete LLP (“Constangy”) represents Regional Family Medicine (“Regional Family”) in connection with an incident described in greater detail below.

1. Nature of Incident

On June 26, 2023, Regional Family experienced an IT outage that disrupted access to certain local systems. After detecting and promptly containing the incident, Regional Family launched an investigation with the support of external cybersecurity experts to learn more about the scope of the incident and any impact to data. Through that investigation, Regional Family learned of information suggesting that an unknown actor gained unauthorized access to its network between June 8 and June 26, 2023 and potentially acquired certain files, some of which may have contained personal information of its employees and patients. On or about October 13, 2023, Regional Family completed its review of the impacted information. Regional Family then took steps to obtain addresses for those individuals whose information was involved.

The potentially affected information varied by individual but may include the following: individuals’ names, Social Security numbers, driver’s license or state identification numbers, dates of birth, biometric data, medical information, health insurance information, account numbers, and workplace evaluations.

2. Number of Maine residents affected

Regional Family notified 22 Maine residents of the incident via first class U.S. mail on December 12, 2023. A sample copy of the notification letter is included with this correspondence.

3. Steps taken relating to the incident

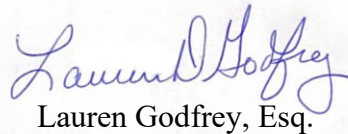
Upon discovering the issue, Regional Family took the steps described above. Regional Family also provided notice of the incident to potentially impacted individuals on December 12, 2023.

In addition, Regional Family is offering affected individuals, whose social security numbers were impacted, complimentary credit monitoring and identity protection services through IDX, A ZeroFox Company, the data breach and recovery services expert. These services include 12 months of credit monitoring, identity protection, and fully managed identity theft recovery services. With this protection, IDX will help them resolve issues if their identity is affected.

4. Contact information

If you have any questions or need additional information, please do not hesitate to contact me at 412.870.4129 or lgodfrey@constangy.com.

Very truly yours,



Lauren Godfrey, Esq.

Encl.: Sample Consumer Notification Letter



PO Box 480149
Niles, IL 60714

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

Enrollment Code: <<XXXXXXXX>>

To Enroll, Scan the QR Code Below:



Or Visit:

<https://response.idx.us/RFM>

December 12, 2023

Subject: Notice of Data <<Subject Line Variation>>

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

The purpose of this communication is to notify you of a data security incident experienced by Regional Family Medicine ("Regional Family") which may have affected your personal information. Regional Family is committed to maintaining the trust of our employees and patients, and the privacy and security of all information in our possession is a top priority. That is why we are notifying you of the event and providing you with resources to help protect your information. We encourage you to read this letter carefully and follow the steps outlined below.

What Happened: On June 26, 2023, we experienced an IT outage that disrupted access to certain local systems. After detecting and promptly containing the incident, we launched an investigation with the support of external cybersecurity experts to learn more about the scope of the incident and any impact to data. Through that investigation, we learned of information suggesting that an unknown actor gained unauthorized access to our network between June 8 and June 26, 2023 and potentially acquired certain files, some of which may have contained personal information of our employees and patients. On or about October 13, 2023, Regional Family learned that your personal information may have been impacted in connection with the incident which is the reason for this notification. Regional Family then took steps to obtain addresses for those individuals whose information was involved.

What Information Was Involved? We believe that the information involved in this incident may have included your name along with your <<Variable Text>>.

What We Are Doing: As soon as we discovered this incident, we launched an investigation and took steps to secure our IT environment, including implementing enhanced security measures to help prevent a similar incident from occurring in the future. Regional Family also notified the Federal Bureau of Investigation, Homeland Security, and Arkansas State Police of this incident and will provide whatever cooperation is necessary to hold the perpetrator(s) of the incident accountable.

Regional Family is also offering you complimentary credit monitoring and identity theft protection services through IDX, A ZeroFox Company, the data breach and recovery services expert.

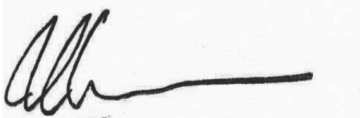
IDX identity protection services include: <<Credit Monitoring>> months of credit and CyberScan monitoring, a \$1,000,000 insurance reimbursement policy, and fully managed identity theft recovery services. To enroll, please call 1-888-799-4808, go to <https://response.idx.us/RFM>, or scan the QR image and use the Enrollment Code provided above. IDX representatives are available Monday through Friday from 9 am - 9 pm Eastern Time. Please note the deadline to enroll is March 12, 2024.

What You Can Do: We encourage you to enroll in the complimentary credit protection services we are offering. With this protection, IDX can help you resolve issues if your identity is compromised. Please also review the guidance at the end of this letter which includes additional resources you may utilize to help protect your information.

For More Information: If you have questions or need assistance, please contact 1-888-799-4808, Monday through Friday from 9 am - 9 pm Eastern Time, excluding major U.S. holidays. IDX representatives are fully versed on this incident and can help answer questions you may have regarding the protection of your information.

Please accept our sincere apologies and know that we deeply regret any worry or inconvenience that this may cause you.

Very truly yours,

A handwritten signature in black ink, appearing to read 'John G. Elders', followed by a long horizontal line.

Dr. John G. Elders
Regional Family Medicine
630 Burnett Drive
Mountain Home, Arkansas 72653

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 (888) 378-4329
www.equifax.com

Experian

P.O. Box 9532
Allen, TX 75013
1-888-397-3742
www.experian.com

TransUnion

P.O. Box 1000
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 <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, and
www.ftc.gov/idtheft
1-877-438-4338

Maryland Attorney General

200 St. Paul Place
Baltimore, MD 21202
oag.state.md.us
1-888-743-0023

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
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
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>

