

November 10, 2023

**VIA WEBSITE PORTAL**

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 & Prophete, LLP, represents the International Association of Sheet Metal Air Rail Transportation Workers (“SMART”) in connection with a recent data security incident described in greater detail below. 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 9, 2023, SMART became aware of unusual network activity and immediately took steps to secure its systems. SMART engaged cybersecurity experts to assist with the process. The investigation determined that certain SMART data may have been acquired without authorization in early September. After undertaking a review of the potentially affected files, SMART identified certain personal information that may have been involved. SMART’s review concluded on October 10, 2023, and revealed the individuals whose personal information could have been involved. SMART thereafter worked to gather contact information needed to provide individual notification.

**2. Number of Maine Residents Involved**

Beginning November 10, 2023, SMART notified 132 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/or financial account information.

**3. Steps Taken to Address the Incident**

As soon as SMART discovered this unusual network activity, it took steps to secure the affected systems and launched an investigation to determine whether, and to what extent, personal

information had been accessed or acquired without authorization. SMART 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, SMART has offered individuals 12 months of complimentary services through Kroll, which include Credit Monitoring, \$1 Million Identity Fraud Loss Reimbursement, Fraud Consultation, and Identity Theft Restoration.

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

#### **4. Contact Information**

SMART 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](mailto:aweaver@constangy.com).

Sincerely,



Aubrey Weaver  
Partner

Constangy, Brooks, Smith & Prophete, LLP

Enclosure: Sample Notification Letter