



Alyssa R. Watzman
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Direct: 720.292.2052

October 5, 2022

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:

Lewis Brisbois Bisgaard & Smith LLP ("Lewis Brisbois") represents Valle del Sol, Inc. ("Valle del Sol"), a non-profit healthcare services organization based in Phoenix, Arizona, in connection with a data security incident described in greater detail below.

1. Nature of the security incident.

On January 25, 2022, Valle del Sol detected unusual activity within its network. In response, Valle del Sol took immediate steps to secure its environment and promptly engaged an independent digital forensics and incident response firm to investigate what happened and identify any information that may have been impacted. As a result, Valle del Sol learned that personal information of certain Valle del Sol patients may have been accessed or acquired without authorization. Upon learning this, Valle del Sol undertook a comprehensive review of the potentially impacted data to determine the specific nature of the information and individuals involved. Upon completion of that review, on July 18, 2022, Valle del Sol worked to gather contact information for purposes of providing notification to potentially impacted patients. Valle del Sol completed its address identification efforts on September 1, 2022, after which Valle del Sol arranged for notification letters to be sent to the potentially impacted patients.

The information pertaining to Valle del Sol patients that may have been accessed or acquired by the malicious actor(s) responsible for this incident includes name, Social Security number and driver's license number.

2. Number of Maine residents affected.

On October 5, 2022, Valle del Sol will be notifying two (2) Valle del Sol patients residing in Maine whose personal information may have been impacted. A sample copy of the notification letter is enclosed.

3. Steps taken relating to the Incident.

As soon as Valle del Sol discovered this incident, Valle del Sol took steps to secure its network and launched an investigation to determine what happened and whether personal information may have been accessed or acquired without authorization. Valle del Sol also implemented additional safeguards to help ensure the

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security of its environment and reduce the risk of a similar incident occurring in the future, including hiring additional personnel to oversee its information security program. Valle del Sol also reported this incident to the Federal Bureau of Investigation and will provide any cooperation necessary to help hold the perpetrator(s) accountable.

Valle del Sol has also established a toll-free call center through Epiq, a leader in risk mitigation and response, to answer any questions about the incident and address related concerns. In addition, while Valle del Sol is not aware of the misuse of any information as a result of this incident, out of an abundance of caution, Valle del Sol is also providing complimentary credit monitoring and identity protection services to notified individuals.

4. Contact information.

Valle del Sol remains dedicated to protecting the personal information in its control. If you have questions or need additional information, please do not hesitate to contact me.

Best regards,



Alyssa R. Watzman

LEWIS BRISBOIS BISGAARD & SMITH LLP

Enclosure: Sample Notification Letter



Return Mail Processing Center
P.O. Box 6336
Portland, OR 97228-6336

<<Mail ID>>

<<Name 1>>

<<Name 2>>

<<Address 1>>

<<Address 2>>

<<Address 3>>

<<Address 4>>

<<Address 5>>

<<City>><<State>><<Zip>>

<<Country>>

<<Date>>

Re: <<Variable Header>>

Dear <<Name1>>,

I am writing to inform you of a data security incident experienced by Valle del Sol, Inc. (“Valle del Sol”) that may have involved your personal and/or protected health information. Valle del Sol takes the privacy and security of all information within its possession very seriously. That is why I am writing to notify you of the incident, offer you complimentary credit monitoring and identity protection services, and provide you with information about steps you can take to help protect your information.

What Happened: On January 25, 2022, Valle del Sol detected unusual activity within its network. Upon discovery, Valle del Sol immediately took steps to secure its network and enlisted a leading, independent digital forensics and incident response firm to investigate what happened and whether any Valle del Sol data may have been impacted. As a result, Valle del Sol learned that certain data may have been accessed or acquired by an unauthorized actor and later learned that some of that data may have included personal and/or protected health information of some Valle del Sol patients. Valle del Sol then undertook a comprehensive review of the potentially impacted data to identify the patients and information involved, which concluded on July 18, 2022. Valle then immediately began collecting contact information in order to provide notice of the incident to potentially impacted individuals. The address collection process was completed on September 1, 2022, after which Valle del Sol arranged for notification letters to be sent.

What Information Was Involved: The potentially affected information may have included your name, <<Breached Elements>>. Please note that Valle del Sol is not aware of any instance of attempted or successful misuse of this information.

What Are We Doing: As soon as Valle del Sol discovered the incident, Valle del Sol took the steps described above and implemented measures to enhance the security of its network to help prevent a similar incident from occurring in the future. Valle del Sol also notified the Federal Bureau of Investigation of the incident and will provide any cooperation necessary to help hold the perpetrator(s) accountable. Further, out of an abundance of caution, Valle del Sol is offering you complimentary credit monitoring and identity protection services through Experian, a national leader in risk mitigation and response services. These services include <<CM Length>> months of credit and dark web monitoring, a \$1,000,000 insurance reimbursement policy, and fully managed identity theft recovery services. With this protection, Experian will help you to resolve issues if your identity is compromised.

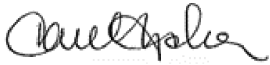
What You Can Do: Valle del Sol encourages you to follow the recommendations on the following page to help protect your information and to enroll in the complimentary services being offered to you through Experian. To enroll, please visit <https://www.experianidworks.com/3bcredit> or call 1-877-288-8057 and provide the following enrollment code: <<Activation Code>>. Be prepared to provide engagement number <<Engagement Number>> as proof of eligibility for the identity restoration services by Experian. Please note that the deadline to enroll is <<Enrollment Deadline>>.¹

For More Information: If you have any questions regarding the incident or would like assistance with enrolling in the services offered, please call 1-877-563-4009 Monday through Friday from 7:00 A.M. to 7:00 P.M. Mountain Time (excluding holidays). Call center representatives are fully versed on this incident and can answer any questions you may have.

¹ To receive credit monitoring services, you must be over the age of 18, 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.

The security of your information is a top priority for Valle del Sol. Please accept our sincere apologies and know that Valle del Sol deeply regrets any worry or inconvenience that this may cause you.

Sincerely,

A handwritten signature in black ink, appearing to read "Carmen Heredia". The signature is fluid and cursive, with a large initial "C" and a long, sweeping tail.

Carmen Heredia
Chief Executive Officer
Valle del Sol, Inc.

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
1-800-525-6285
www.equifax.com

Experian

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

TransUnion

P.O. Box 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

North Carolina Attorney General

9001 Mail Service Center
Raleigh, NC 27699
877-566-7226 (Toll-free within North Carolina)
919-716-6000
ncdoj.gov

New York Attorney General

Bureau of Internet and
Technology Resources
28 Liberty Street
New York, NY 10005
1-212-416-8433

Arizona Attorney General

Consumer Protection Division
2005 N Central Avenue
Phoenix, AZ 85004

Washington D.C. Attorney General

441 4th Street, NW
Washington, DC 20001
oag.dc.gov
1-202-727-3400

Rhode Island Attorney General

150 South Main Street
Providence, RI 02903
<http://www.riag.ri.gov>
1-401-274-4400

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>.



Valle del Sol
COMMUNITY HEALTH

Return Mail Processing Center
P.O. Box 6336
Portland, OR 97228-6336

<<Mail Date>>

Ref.: <<SP Variable Header>>

Estimado(a) <<Name 1>>:

Le escribo para informarle sobre un incidente de seguridad de datos experimentado por Valle del Sol, Inc. ("Valle del Sol") que puede haber involucrado su información personal y/o información médica protegida. Valle del Sol se toma muy en serio la privacidad y seguridad de toda la información que tiene en su poder. Es por esto que le escribo para notificarle acerca del incidente, ofrecerle servicios de monitoreo de crédito y protección de identidad sin cargo, y brindarle información sobre las medidas que puede tomar para ayudar a proteger su información.

Qué ocurrió: El 25 de enero de 2022, Valle del Sol detectó actividad inusual dentro de su red. Tras el descubrimiento, Valle del Sol tomó medidas de inmediato para resguardar su red y contrató a una firma líder e independiente de análisis forense digital y respuesta a incidentes para investigar lo que sucedió y si algún dato de Valle del Sol podría haberse visto afectado. En consecuencia, Valle del Sol se enteró de que un actor no autorizado pudo haber accedido o adquirido ciertos datos y, luego, se enteró de que algunos de esos datos pueden haber incluido información personal o información médica protegida de algunos pacientes de Valle del Sol. A continuación, Valle del Sol llevó a cabo una revisión integral de los datos potencialmente afectados para identificar a los pacientes y la información involucrada, que concluyó el 18 de julio de 2022. Luego, Valle comenzó a recopilar información de contacto de inmediato para notificar el incidente a las personas potencialmente afectadas. El proceso de recopilación de direcciones se completó el 1 de septiembre de 2022, después de lo cual Valle del Sol organizó el envío de cartas de notificación.

Qué información se vio involucrada: La información potencialmente afectada puede haber incluido su nombre, <<SP Breached Elements>>. Tenga en cuenta que Valle del Sol no tiene conocimiento de ningún caso de intento o uso indebido exitoso de esta información.

Qué estamos haciendo: Apenas Valle del Sol descubrió el incidente, tomó las medidas descritas anteriormente e implementó medidas para mejorar la seguridad de su red y ayudar a evitar que ocurra un incidente similar en el futuro. Valle del Sol también notificó el incidente a la Oficina Federal de Investigación y proporcionará cualquier cooperación necesaria para ayudar a responsabilizar al/los autor(es). Además, por precaución, Valle del Sol le ofrece servicios gratuitos de monitoreo de crédito y protección de identidad a través de Experian, un líder nacional en servicios de mitigación y respuesta de riesgos. Estos servicios incluyen <<CM Length>> meses de monitoreo de crédito y de la web oscura, una póliza de reembolso de seguro de \$1,000,000 y servicios de recuperación de robo de identidad completamente administrados. Con esta protección, Experian le ayudará a resolver los problemas si su identidad se ve comprometida.


Qué puede hacer usted: Valle del Sol lo alienta a seguir las recomendaciones de la siguiente página para ayudar a proteger su información e inscribirse en los servicios sin cargo que se le ofrecen a través de Experian. Para inscribirse, visite <https://www.experianidworks.com/3bcredit> o llame al 1-877-288-8057 y proporcione el siguiente código de inscripción: <<Activation Code>>. Esté preparado para brindar el número <<Engagement Number>> como prueba de elegibilidad para recibir los servicios de restauración de identidad proporcionados por Experian. Tenga en cuenta que la fecha límite para inscribirse es el <<SP Enrollment Deadline>>.¹

Para obtener más información: Si tiene alguna pregunta con respecto al incidente o desea recibir asistencia para inscribirse en los servicios ofrecidos, llame al 877-563-4009 de lunes a viernes, de 7:00 a. m. a 7:00 p. m., hora de la montaña (excepto los días feriados). Los representantes del centro de llamadas tienen pleno conocimiento de este incidente y pueden responder cualquier pregunta que pueda tener.

¹ Para recibir los servicios de monitoreo de crédito, debe ser mayor de 18 años y tener crédito establecido en los EE. UU., contar con un número de Seguro Social registrado a su nombre y una dirección de residencia en los EE. UU. asociada a su archivo de crédito.

La seguridad de su información es una prioridad principal para Valle del Sol. Le pedimos sinceras disculpas y sepa que Valle del Sol lamenta profundamente cualquier preocupación o inconveniente que esto pueda causarle.

Atentamente,

A handwritten signature in black ink, appearing to read 'Carmen Heredia', written in a cursive style.

Carmen Heredia
Directora ejecutiva
Valle del Sol, Inc.

Medidas que puede tomar para ayudar a proteger su información

Revise sus estados de cuenta y notifique a las autoridades policiales y judiciales acerca de cualquier actividad sospechosa: Como medida preventiva, le recomendamos que permanezca atento y revise detenidamente sus estados de cuenta e informes de crédito. Si detecta cualquier actividad sospechosa en una cuenta, debe notificar de inmediato a la institución financiera o empresa con la que mantiene la cuenta. También, debe informar cualquier actividad fraudulenta o sospecha de incidente de robo de identidad a las autoridades policiales y judiciales pertinentes, al fiscal general de su estado o a la Comisión Federal de Comercio (Federal Trade Commission, FTC).

Copia del informe de crédito: Usted puede obtener una copia gratuita de su informe de crédito de cada una de las tres agencias de informes de crédito principales una vez cada 12 meses visitando <http://www.annualcreditreport.com/>, llamando sin cargo al 1-877-322-8228 o completando un Formulario de solicitud de informe de crédito anual y enviándolo por correo postal a Annual Credit Report Request Service, P.O. Box 105281, Atlanta, GA 30348. También puede comunicarse con una de las tres siguientes agencias de informes de crédito nacionales:

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 1000
Chester, PA 19016
1-800-916-8800
www.transunion.com

Alerta de fraude: Es posible que desee considerar colocar una alerta de fraude en su informe de crédito. La alerta de fraude inicial es gratuita y permanecerá en su informe de crédito durante al menos un año. Esta alerta informa a las entidades crediticias sobre posibles actividades fraudulentas dentro de su informe y solicita que estas se comuniquen con usted antes de crear cualquier cuenta a su nombre. Para colocar una alerta de fraude en su informe de crédito, comuníquese con cualquiera de las tres agencias de informes de crédito enumeradas anteriormente. La información adicional está disponible en <http://www.annualcreditreport.com>.

Bloqueo de seguridad: Usted tiene derecho a colocar un bloqueo de seguridad en su archivo de crédito por un máximo de un año, sin cargo. Esto impedirá que se abra crédito nuevo a su nombre sin el uso de un número de PIN que se le emite a usted al iniciar el bloqueo. El bloqueo de seguridad está diseñado para impedir que posibles entidades crediticias accedan a su informe de crédito sin su consentimiento. En consecuencia, el uso de un bloqueo de seguridad puede interferir con su capacidad para obtener crédito o demorarlo. Usted debe colocar un bloqueo de seguridad en su archivo de crédito con cada agencia de informes de crédito por separado. Para colocar un bloqueo de seguridad, es posible que usted deba proporcionar a la agencia de informes del consumidor información que lo identifica, que incluye su nombre completo, número de Seguro Social, fecha de nacimiento, domicilios anteriores y actuales, una copia de su tarjeta de identificación emitida por el estado y una factura de servicios públicos reciente o un estado de cuenta bancario o de seguros.

Recursos gratuitos adicionales: Usted puede obtener información de las agencias de informe del consumidor, la FTC o del Fiscal General del Estado donde reside acerca de alertas de fraude, bloqueos de seguridad y las medidas que puede tomar para evitar el robo de identidad. Usted puede informar una sospecha de robo de identidad a la autoridad policial y judicial local, incluida la FTC y el Fiscal General de su estado.

**Comisión Federal de Comercio
(Federal Trade Commission)**
600 Pennsylvania Ave, NW
Washington, DC 20580
consumer.ftc.gov y
www.ftc.gov/idtheft
1-877-438-4338

**Fiscal General de Carolina del Norte
(North Carolina Attorney General)**
9001 Mail Service Center
Raleigh, NC 27699
877-566-7226 (línea gratuita dentro de
Carolina del Norte)
919-716-6000
ncdoj.gov

**Fiscal General de Nueva York
(New York Attorney General)**
Oficina de Internet y Recursos
Tecnológicos (Bureau of Internet
and Technology Resources)
28 Liberty Street
New York, NY 10005
1-212-416-8433

**Fiscal General de Arizona
(Arizona Attorney General)**
División de Protección al Consumidor
(Consumer Protection Division)
2005 N Central Avenue
Phoenix, AZ 85004

**Fiscal General de Washington D.C.
(Washington D.C. Attorney General)**
441 4th Street, NW
Washington, DC 20001
oag.dc.gov
1-202-727-3400

**Fiscal General de Rhode Island
(Rhode Island Attorney General)**
150 South Main Street
Providence, RI 02903
<http://www.riag.ri.gov>
1-401-274-4400

Usted también tiene ciertos derechos según la Ley de Informes de Crédito Justos (Fair Credit Reporting Act, FCRA): Estos derechos incluyen, entre otros, el derecho de saber lo que contiene su archivo, reclamar por información incompleta o inexacta, hacer que las agencias de informes del consumidor corrijan o eliminen información inexacta, incompleta o que no se pueda verificar. Para obtener más información acerca de la ley FCRA y sus derechos conforme a la ley FCRA, visite <https://www.consumer.ftc.gov/articles/pdf-0096-fair-credit-reporting-act.pdf>.