January 14, 2021

**VIA E-MAIL:**

Office of the Maine Attorney General

Security Breach Notification

Consumer Protection Division

111 Sewall Street, 6th Floor

Augusta, ME 04330

E-mail: breach.security@maine.gov

**Re: Notice of Data Event**

Dear Sir or Madam:

We represent Spinnaker Management Group (“Spinnaker”) located at 10497 Town & Country Way, Suite 700 Houston, TX 77024, and are writing to notify your office of an incident that may affect the security of some personal information relating to one (1) Maine resident. The investigation into this matter is ongoing, and this notice will be supplemented with any new significant facts learned subsequent to its submission. By providing this notice, Spinnaker does not waive any rights or defenses regarding the applicability of Maine law, the applicability of the Maine data event notification statute, or personal jurisdiction.

**Nature of the Data Event**

On or about November 13, 2020, Spinnaker became aware of suspicious activity related to a certain Spinnaker email account. Spinnaker immediately launched an investigation, with the assistance of its third-party IT support team, to determine the nature and scope of the activity. Spinnaker’s investigation determined that there was unauthorized access to the affected email account from October 6, 2020 to November 12, 2020. Spinnaker reviewed the contents of the impacted account and, on December 31, 2020, confirmed the identities of impacted individuals whose sensitive information was contained in the account.

The information that could have been subject to unauthorized access includes name, address, and Social Security number.

**Notice to Maine Resident**

On or about January 14, 2021, Spinnaker began providing written notice of this incident to all affected individuals, which includes one (1) Maine resident. Written notice is being provided in substantially the same form as the letter attached here as ***Exhibit A***.

**Other Steps Taken and To Be Taken**

Upon discovering suspicious activity on one of its email accounts, Spinnaker moved quickly to investigate and respond to the incident, assess the security of Spinnaker email accounts, and notify potentially affected individuals. Spinnaker has instituted multi-factor authentication (“MFA”) for its Microsoft accounts. Spinnaker is also working to implement additional safeguards and training to its employees. Spinnaker is providing access to credit monitoring services for 24 months through Epiq, to individuals whose personal information was potentially affected by this incident, at no cost to these individuals.

Additionally, Spinnaker is providing the impacted individual with guidance on how to better protect against identity theft and fraud, including advising individuals to report any suspected incidents of identity theft or fraud to their credit card company and/or bank. Spinnaker is providing the individual with information on how to place a fraud alert and security freeze on one's credit file, information on protecting against tax fraud, the contact details for the national consumer reporting agencies, information on how to obtain a free credit report, a reminder to remain vigilant for incidents of fraud and identity theft by reviewing account statements and monitoring free credit reports, and encouragement to contact the Federal Trade Commission, their state Attorney General, and law enforcement to report attempted or actual identity theft and fraud.

**Contact Information**

Should you have any questions regarding this notification or other aspects of the data security event, please contact us at (267) 930-4842.

Very truly yours,

Vincent F. Regan of

MULLEN COUGHLIN LLC

VFR/bwt