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January 3, 2022

**VIA EMAIL**

Attorney General Aaron Frey  
Office of the Attorney General  
Consumer Protection Division  
Security Breach Notification  
111 Sewall Street, 6<sup>th</sup> Floor  
Augusta, ME 04330  
Email: breach.security@maine.gov

**Re: Notification of Data Security Incident**

Dear Attorney General Frey:

Lewis Brisbois Bisgaard & Smith LLP represents Advocates, Inc. (“Advocates”) in connection with a recent data security incident described in greater detail below. The purpose of this letter is to notify you of the incident in accordance with Maine data breach notification statute 10 Me. Rev. Stat. Ann. § 1346-1350B.

**1. Nature of the Security Incident**

Advocates is a Massachusetts based non-profit organization that provides a broad range of services for people experiencing life challenges including addiction, aging, autism, brain injury, intellectual disabilities, mental health, and behavioral health in Massachusetts.

On October 1, 2021, Advocates detected unusual activity in their digital environment. Upon discovering this activity, Advocates immediately took steps to secure its environment and engaged cybersecurity experts to assist with an investigation. The investigation determined that an unknown actor gained access to and obtained data from the Advocates network without authorization. The incident did not involve encryption, did not disrupt access to their network, and did not result in data loss.

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## **2. Type of Information and Number of Maine Residents Involved**

Advocates is providing two rounds of notification as the investigation progresses and Advocates identifies additional potentially impacted individuals. On December 6, 2021, Advocates determined that eighty-seven (87) Maine residents were included in the Round 1 data set.

In Round 1, and in an abundance of caution, Advocates is notifying all past and present employees as well as service recipients with personal information (“PI”), including personal health information (“PHI”), stored on the Advocates network, where address information is available. These individuals will receive a notification letter compliant with the requirements of the Health Insurance Portability and Accountability Act (HIPAA) or state data breach notification laws, as relevant.

To comply with HIPAA, substitute notice has been posted to the Advocates website. Additionally, in localities with more than 500 individuals involved, Advocates will be providing media notice in accordance with HIPAA.

For individuals potentially impacted in Round 1, the personal information impacted may have involved names, Social Security numbers, medical information, and health insurance information.

The Round 2 notification will be based on the results of a current data mining process, designed to extract PI and PHI from the Advocates network that may not have been included in Round 1. The Round 2 results will be deduplicated against the Round 1 list, so that each consumer only receives a single letter. The Round 2 data mining is underway, but there is currently no timeframe for completion of this Round 2 project.

## **3. Measures Taken to Address the Incident**

After discovering the incident, Advocates engaged industry-leading cybersecurity experts to investigate the incident. Advocates also implemented additional security features to reduce the risk of a similar incident occurring in the future. Additionally, Advocates has reported this incident to the Federal Bureau of Investigation and is assisting with the investigation.

On January 3, 2022, Advocates notified the eighty-seven (87) Maine residents about this event, and advised them about steps they can take to help protect their information. In addition, Advocates offered all impacted individuals complimentary credit monitoring and identity protection services for twelve (12) months through IDX. The identity monitoring services include Credit Monitoring, Web Watcher, Fraud Consultation, and Identity Theft Restoration.

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#### 4. Contact Information

Advocates is dedicated to protecting the sensitive information within its control. If you have any questions or need additional information regarding this incident, please do not hesitate to contact me directly at 971-334-7001 or [Donna.Maddux@lewisbrisbois.com](mailto:Donna.Maddux@lewisbrisbois.com).

Sincerely,

*Donna Maddux*

Donna Maddux of  
LEWIS BRISBOIS BISGAARD &  
SMITH LLP

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Enclosure:  
Adult Consumer Notification Letter