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November 18, 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 Gateway Rehabilitation Center ("Gateway Rehab"), a non-profit organization that provides drug and alcohol rehabilitation services throughout the greater Pittsburg region, in connection with a data security incident described in greater detail below.

1. Nature of the security incident.

On June 13, 2022, Gateway Rehab discovered that it had experienced an incident disrupting access to certain of its systems. Gateway Rehab took immediate steps to secure these systems and promptly launched an investigation. Gateway Rehab engaged independent digital forensics and incident response experts to determine what happened and to identify any information that may have been accessed or acquired without authorization as a result. As a result of that investigation, Gateway Rehab confirmed on July 8, 2022 that data potentially containing personal information may have been impacted, and began a comprehensive review process to discern the exact nature of the information and the individuals involved. That review concluded on September 21, 2022 and confirmed that certain personal information of Gateway Rehab current and former patients may have been in the data that was compromised. Gateway Rehab arranged for notification letters to be sent to the potentially impacted patients as soon as possible thereafter.

The information pertaining to Gateway Rehab patients that may have been accessed or acquired by the malicious actor(s) responsible for this incident includes name as well as Social Security number.

2. Number of Maine residents affected.

On November 18, 2022, Gateway Rehab will be notifying twelve (12) Maine residents whose personal information may have been impacted via U.S. mail. A sample copy of the notification letter is enclosed.

3. Steps taken relating to the Incident.

As soon as Gateway Rehab discovered this incident, Gateway Rehab took steps to secure its network and launched an investigation to determine what happened and whether personal information may have been

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accessed or acquired without authorization. Gateway Rehab also implemented additional safeguards to help ensure the security of its environment and reduce the risk of a similar incident occurring in the future. Gateway Rehab also reported this incident to the Federal Bureau of Investigation and will provide any cooperation necessary to help hold the perpetrator(s) accountable.

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

4. Contact information.

Gateway Rehab 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,

/s/ David McMillan

David M. McMillan of
LEWIS BRISBOIS BISGAARD & SMITH LLP

Enclosure: Sample Notification Letter

LEWIS BRISBOIS BISGAARD & SMITH LLP

www.lewisbrisbois.com



Return to IDX:
P.O Box 989728
West Sacramento, CA 95798-9728

To Enroll, Please Call:
1-833-896-4861
Or Visit:
<https://app.idx.us/account-creation/protect>
Enrollment Code: <<Enrollment Code>>

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

November 18, 2022

Subject: Notice of Data <<Variable Text 1: Breach or Security Incident>>

Dear <<First Name>> <<Last Name>>,

I am writing to inform you of a recent data security incident experienced by Gateway Rehabilitation Center (“Gateway Rehab”) that may have involved your personal and/or protected information. Gateway Rehab is committed to maintaining your trust and demonstrating our commitment to the privacy and security of all information in our possession. That is why we are contacting you to notify you that this incident occurred and to provide you with resources to assist. We encourage you to read this information carefully.

What Happened? On June 13, 2022, Gateway Rehab discovered that it had experienced an incident disrupting access to certain of its systems. Gateway Rehab took immediate steps to secure these systems and promptly launched an investigation. In so doing, Gateway Rehab engaged independent digital forensics and incident response experts to determine what happened and to identify any information that may have been accessed or acquired without authorization. As a result of that investigation, Gateway Rehab confirmed on July 8, 2022 that data potentially containing personal and/or protected health information may have been impacted, and began a comprehensive review process to discern the exact nature of the information and the individuals involved. That review concluded on September 21, 2022 and confirmed that your personal and/or protected health information may have been in the data that was compromised, which is the reason for this notification.

What Information Was Involved? The information potentially impacted in connection with this incident included your name as well as your <<Variable Text 2: Potentially Impacted Data Sets>>.

What Are We Doing? As soon as Gateway Rehab discovered this incident, Gateway Rehab took steps to secure its systems and engaged an independent digital forensics firm to conduct an investigation. Gateway Rehab also reported the incident to the Federal Bureau of Investigation and will cooperate with any resulting investigation. In addition, Gateway Rehab has implemented measures to enhance the security of its digital environment to minimize the risk of a similar incident occurring in the future.

Please note that Gateway Rehab has no evidence that any of the potentially impacted information has been misused. Nevertheless, out of an abundance of caution, Gateway Rehab is providing you with information about steps you can take to help protect your information and is offering you complimentary identity protection services through IDX – a data breach and recovery services expert. These services include <<12/24>> months of credit¹ and dark web monitoring, a \$1 million identity fraud loss reimbursement policy, and fully managed identity theft recovery services. With this protection, IDX will help to resolve issues if your identity is compromised. The deadline to enroll in these services is February 18, 2023.

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

What You Can Do: Gateway Rehab encourages you to enroll in the complementary services being offered to you through IDX by using the enrollment code provided above. You can also follow the recommendations on the following page to help protect your information.

For More Information: If you have questions or need assistance, please call IDX at 1-833-896-4861 from 9:00 A.M. to 9:00 P.M. Eastern Time, Monday through Friday (excluding holidays). IDX call center representatives are fully versed on this incident and can answer any questions that you may have.

Please accept my sincere apologies and know that Gateway Rehab takes this matter very seriously and deeply regrets any worry or inconvenience that this may cause you.

Sincerely,

A handwritten signature in black ink that reads "James Troup". The signature is written in a cursive, slightly slanted style.

James Troup, President and Chief Executive Officer
Gateway Rehabilitation Services
100 Moffet Road Run
Aliquippa, Pennsylvania 15001

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

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>.