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May 19, 2022

**VIA Online Submission**

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:

We represent M3 Accounting Systems (“M3”), a hotel accounting software based in Lawrenceville, Georgia. This letter is being submitted because the personal information of certain Maine residents may have been affected by a recent data security incident experienced by M3. The incident may have involved unauthorized access to such residents’ names and Social Security numbers.

On October 19, 2021, M3 detected unusual activity affecting certain network services. Upon discovering this activity, M3 launched an internal review and enlisted the assistance of cybersecurity and other experts to investigate the matter. As a result of this investigation, M3 learned that certain M3 systems had been accessed without authorization between approximately October 13, 2021, and October 19, 2021. M3 then conducted a comprehensive review of the contents of the accounts and, on March 14, 2022, substantially completed this process and learned that the impacted systems contained personal information belonging to certain individuals. On or around April 4, 2022, M3 notified its employer-customers of the incident and subsequently began taking additional steps to identify address information. On April 22, 2022, M3 obtained approval from employer-customers to directly notify impacted individuals. In connection therewith, M3 determined that personal information belonging to certain Maine residents was contained in the affected accounts. M3 then worked diligently to provide notification.

M3 notified one (1) potentially affected Maine resident of this incident via the attached sample letter, or a substantially similar version, on May 19, 2022. In so doing, M3 offered twelve (12) months of complimentary credit monitoring and identity theft restoration services through IDX, a global leader in risk mitigation and response. These services include: credit and CyberScan monitoring, a \$1,000,000 insurance reimbursement policy, and fully managed identity theft recovery services.

Please contact me should you have any questions.

Sincerely,

A handwritten signature in blue ink that reads "Tara Aaron-Stelluto". The signature is written in a cursive style with a large initial 'T'.

Tara Aaron-Stelluto of  
LEWIS BRISBOIS BISGAARD & SMITH LLP

Encl: Sample Consumer Notification Letter



M3 Accounting Systems  
10300 SW Greenburg Rd. Suite 570  
Portland, OR 97223

To Enroll, Please Call:  
1-833-903-3648  
Or Visit:  
<https://app.idx.us/account-creation/protect>  
Enrollment Code: <<XXXXXXXXXX>>

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

May 19, 2022

**Re: Notice of Data Security Incident**

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

We are writing to provide you with information about a data security incident that may have impacted your personal information. M3 Accounting Systems (“M3”) is a provider of hotel accounting software based in Lawrenceville, Georgia. We are writing to notify you of this incident, to offer you complimentary credit monitoring and identity theft restoration services, and to inform you about steps that can be taken to help safeguard your personal information.

**What Happened?** On October 19, 2021, we learned of unusual activity affecting certain network services. We immediately launched an internal review and enlisted the assistance of cybersecurity and other experts to investigate the matter. That investigation subsequently determined that there was unauthorized access to certain M3 systems. After a comprehensive analysis, which was completed on March 14, 2022, we determined that some of your information resided on the affected systems and may have been impacted. While we are unaware of any fraud resulting from this incident, we are providing you with this notification to help protect your personal information.

**What Information Was Involved?** The information that was located on the impacted systems includes your name and Social Security Number. Based on our review, we believe there is a low probability that the data could have been compiled and exported in a useable fashion. We are notifying you now out of an abundance of caution.

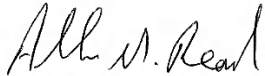
**What We Are Doing.** As soon as we discovered this incident, we launched an investigation and took steps to secure our environment, including by implementing enhanced security measures to help prevent a similar incident from occurring in the future. We also notified the Federal Bureau of Investigation and will fully cooperate with any investigation. Additionally, we are providing you with information on steps you can take to help protect your personal information, and offering you identity monitoring and protection services through IDX, a data security and recovery services expert. Your complimentary IDX identity monitoring and protection services include: credit and CyberScan monitoring, a \$1,000,000 insurance reimbursement policy, and fully managed identity theft recovery services. Additional information about these services is included with this letter. To take advantage of these services, you must follow the instructions in this letter to enroll.

**What You Can Do.** Please review the recommendations included in this letter to help protect your personal information. You can also enroll in the IDX identity monitoring and protection services being provided to you, at no cost, through IDX. To enroll, please visit the IDX website at <https://app.idx.us/account-creation/protect> or call 1-833-903-3648 and provide your enrollment code located at the top of this page. Please note that the deadline to enroll is August 19, 2022. Additional information describing the IDX identity monitoring and protection services, along with other recommendations to protect your personal information, is included with this letter.

**For More Information.** If you have any questions or need assistance, please call 1-833-903-3648 Monday through Friday from 9 am to 9 pm ET. Our representatives are fully versed on this incident and can answer any questions you may have regarding how to help safeguard your personal information.

Thank you for your patience and understanding. We take your trust in us and this matter very seriously. Please accept our sincere apologies for any worry or inconvenience that this may cause you.

Sincerely,

A handwritten signature in black ink, appearing to read "Alh. M. Read". The signature is written in a cursive style with a large initial "A" and a distinct "M".

M3 Accounting Systems

## Additional Steps You Can Take to 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](http://www.equifax.com)

**Experian**

P.O. Box 9532  
Allen, TX 75013  
1-888-397-3742  
[www.experian.com](http://www.experian.com)

**TransUnion**

P.O. Box 1000  
Chester, PA 19016  
1-800-916-8800  
[www.transunion.com](http://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](http://consumer.ftc.gov), and [www.ftc.gov/idtheft](http://www.ftc.gov/idtheft)  
1-877-438-4338

**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>.



## **Enrollment in IDX Identity Protection**

**Website and Enrollment.** Please visit <https://app.idx.us/account-creation/protect> and follow the instructions for enrollment using your Enrollment Code included with this letter.

**Activate the credit monitoring** provided as part of your IDX membership. The monitoring included in the membership must be activated to be effective. Note: You must have established credit and access to a computer and the internet to use this service. If you need assistance, IDX will be able to assist you.

**Telephone.** Contact IDX at **1-833-903-3648** to speak with knowledgeable representatives about the appropriate steps to take to protect your credit identity.

### **This IDX enrollment will include enrollment into:**

**SINGLE BUREAU CREDIT MONITORING** - Monitoring of credit bureau for changes to the member's credit file such as new credit inquires, new accounts opened, delinquent payments, improvements in the member's credit report, bankruptcies, court judgments and tax liens, new addresses, new employers, and other activities that affect the member's credit record.

**CYBERSCAN™** - Dark Web monitoring of underground websites, chat rooms, and malware, 24/7, to identify trading or selling of personal information like SSNs, bank accounts, email addresses, medical ID numbers, driver's license numbers, passport numbers, credit and debit cards, phone numbers, and other unique identifiers.

**IDENTITY THEFT INSURANCE** - Identity theft insurance will reimburse members for expenses associated with restoring their identity should they become a victim of identity theft. If a member's identity is compromised, the policy provides coverage for up to \$1,000,000, with no deductible, from an A.M. Best "A-rated" carrier. Coverage is subject to the terms, limits, and/or exclusions of the policy.

**FULLY-MANAGED IDENTITY RECOVERY** - IDX fully-managed recovery service provides restoration for identity theft issues such as (but not limited to): account creation, criminal identity theft, medical identity theft, account takeover, rental application, tax fraud, benefits fraud, and utility creation. This service includes a complete triage process for affected individuals who report suspicious activity, a personally assigned IDX Specialist to fully manage restoration of each case, and expert guidance for those with questions about identity theft and protective measures.