MULLEN COUGHLIN LLC
ATTORNEYS AT LAW

Christopher J. DiIenno
Office: (267) 930-4775
Fax: (267) 930-4771
Email: cdiienno@mullen.law

426 W. Lancaster Avenue, Suite 200
Devon, PA 19333

March 10, 2022

**VIA E-MAIL**

Office of the Attorney General
Attn: Security Breach Notification
200 St. Paul Place
Baltimore, MD 21202
E-mail: idtheft@oag.state.md.us

**Re: Notice of Data Event**

Dear Sir or Madam:

We represent Bridge Senior Living, LLC and its affiliated entities ("Bridge") located at 1000 Legion Place, Suite 1600, Orlando, FL 32801, and are writing to notify your office of an incident that may affect the security of some personal information relating to three (3) Maryland residents. This notice may be supplemented with any new significant facts learned subsequent to its submission. By providing this notice, Bridge does not waive any rights or defenses regarding the applicability of Maryland law, the applicability of the Maryland data event notification statute, or personal jurisdiction.

## Nature of the Data Event

On October 1, 2020, Bridge became aware of unusual activity in one of its business email accounts. Upon discovery, Bridge launched an investigation, with the assistance of third-party forensic specialists, to determine the nature and scope of the activity. Bridge's investigation determined that there was unauthorized access to Bridge email accounts between April 14, 2020 and October 8, 2020. Bridge reviewed the contents of the affected accounts and on July 21, 2021 identified potentially impacted individuals whose sensitive information was contained in the accounts. Bridge then had to undertake a labor intensive and lengthy search of its internal records to locate address information for the potentially impacted individuals. The information that could have been subject to unauthorized access includes name, Social Security number, financial account information, government-issued identification number, medical information, and health insurance information.

**Notice to Maryland Residents**

On or about March 10, 2022, Bridge provided written notice of this incident to affected individuals which includes three (3) Maryland residents. 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 the event, Bridge moved quickly to investigate and respond to the incident, assess the security of its systems, and notify potentially affected individuals. Bridge also worked to implement additional safeguards and training to its employees. Bridge is providing individuals whose personal information was potentially affected by this incident with access to credit monitoring services for two (2) years through Experian at no cost to the individuals.

Additionally, Bridge is providing impacted individuals 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. Bridge is providing individuals with information on how to place a fraud alert and security freeze on one's credit file, 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. Bridge is also notifying regulators as required.

**Contact Information**

Should you have any questions regarding this notification or other aspects of the data security event, please contact us at (267) 930-4775.

Very truly yours,

Christopher J. DiIenno of
MULLEN COUGHLIN LLC

CJD:bwt
Enclosure

# EXHIBIT A

Return Mail Processing
PO Box 999
Suwanee, GA 30024

March 7, 2022

7 1 1263 ************************************SNGLP
SAMPLE A. SAMPLE - L01
APT ABC
123 ANY ST
ANYTOWN, US 12345-6789

Dear Sample A. Sample:

Bridge Senior Living, LLC ("BSL") writes to make you aware of a data security incident that may affect some of your information. Although we have no evidence of actual or attempted misuse of your information, we want to provide you with information about the event, our response, and should you feel it necessary, the steps you may take to better protect yourself against potential misuse of your information. Please know the security of your information remains our top priority at BSL.

**What Happened?** BSL was the subject of an isolated cyber event called a phishing incident, in which unauthorized individual(s) accessed certain BSL email accounts by masquerading as a reputable and recognized person to gain user credentials. On October 1, 2020, BSL became aware of suspicious activity in an employee's email account and immediately initiated an investigation.

As part of our initial investigation, and with the help of third-party forensic specialists, it was determined that BSL email accounts were subject to unauthorized access between April 14, 2020, and October 8, 2020. BSL undertook a lengthy and labor-intensive review of the contents of each identified account to determine what information may have been accessible to the unauthorized individual(s). As a result of our efforts, we are providing you notice that our investigation determined information related to you was present in the relevant emails at the time of the incident, and thus potentially accessible. Our investigation confirmed BSL's electronic medical records and data management systems were not impacted by this incident.

**What Information Was Involved?** Although we have no evidence to suggest your information was actually viewed by the unauthorized individual(s), our investigation confirmed impacted e-mail accounts contained the following information related to you: [Extra1]. No other information was impacted, and our investigation confirmed electronic medical records were not affected by this incident.

**What We Are Doing.** BSL takes the security of information in its care very seriously. Upon learning of this incident, we immediately took steps to secure the email accounts by forcing a password reset and conducted a diligent investigation to confirm the nature and scope of the incident. As technologies and our understanding of cyber threats evolves, we are continuing to take steps to implement additional safeguards and strengthen our existing policies and procedures to protect our organization.

As an added precaution, BSL is offering you access to two (2) years of complimentary credit monitoring and identity protection services through Experian. The cost of this service will be paid for by BSL. Instructions on how to enroll in the credit monitoring and identity protection services can be found in the enclosure.

**What You Can Do.** We encourage you to remain vigilant against incidents of identity theft and fraud by reviewing your account statements and monitoring your free credit reports for suspicious activity and to detect errors. You can also review the enclosed *Steps You Can Take to Protect Personal Information* for further guidance.

**For More Information.** We understand you may have questions about the incident that are not addressed in this letter. If you have questions, please call (888) 401-0574 Monday through Friday from 9:00 am to 11:00 pm or Saturday and Sunday from 11:00 am to 8:00 pm Eastern Time (excluding major US Holidays).  You may also write to BSL at 1000 Legion Place, Suite 1600, Orlando, FL 32801.

We apologize for this incident and regret any concern or inconvenience this may have caused you.

Sincerely,

Robert Goyette
Chief Operations Officer
Bridge Senior Living, LLC

## Steps You Can Take to Protect Personal Information

**Enroll in credit monitoring**

To help protect your identity, we are offering a complimentary two (2) year membership of Experian's® IdentityWorks℠. This product provides you with superior identity detection and resolution of identity theft. To activate your membership and start monitoring your personal information please follow the steps below:

- Ensure that you **enroll by**: **June 30, 2022** (Your code will not work after this date.)
- **Visit** the Experian IdentityWorks website to enroll: https://www.experianidworks.com/credit
- Provide your **activation code**: **ABCDEFGHI**

If you have questions about the product, need assistance with identity restoration or would like an alternative to enrolling in Experian IdentityWorks online, please contact Experian's customer care team at (888) 401-0574 by **June 30, 2022.** Be prepared to provide engagement number **[Engagement Number]** as proof of eligibility for the identity restoration services by Experian.

## ADDITIONAL DETAILS REGARDING YOUR TWO (2) YEAR EXPERIAN IDENTITYWORKS MEMBERSHIP:

A credit card is **not** required for enrollment in Experian IdentityWorks.

You can contact Experian **immediately** regarding any fraud issues, and have access to the following features once you enroll in Experian IdentityWorks:

- **Experian credit report at signup:** See what information is associated with your credit file. Daily credit reports are available for online members only.*
- **Credit Monitoring:** Actively monitors Experian file for indicators of fraud.
- **Identity Restoration:** Identity Restoration agents are immediately available to help you address credit and non-credit related fraud.
- **Experian IdentityWorks ExtendCARE™**: You receive the same high-level of Identity Restoration support even after your Experian IdentityWorks membership has expired.
- **Up to $1 Million Identity Theft Insurance**:** Provides coverage for certain costs and unauthorized electronic fund transfers.

**Monitor Your Accounts**

Under U.S. law, a consumer is entitled to one free credit report annually from each of the three major credit reporting bureaus, Equifax, Experian, and TransUnion. To order your free credit report, visit www.annualcreditreport.com or call, toll-free, 1-877-322-8228. You may also directly contact the three major credit reporting bureaus listed below to request a free copy of your credit report.

Consumers have the right to place an initial or extended "fraud alert" on a credit file at no cost. An initial fraud alert is a 1-year alert that is placed on a consumer's credit file. Upon seeing a fraud alert display on a consumer's credit file, a business is required to take steps to verify the consumer's identity before extending new credit. If you are a victim of identity theft, you are entitled to an extended fraud alert, which is a fraud alert lasting seven years. Should you wish to place a fraud alert, please contact any one of the three major credit reporting bureaus listed below.

* Offline members will be eligible to call for additional reports quarterly after enrolling

** The Identity Theft Insurance is underwritten and administered by American Bankers Insurance Company of Florida, an Assurant company. Please refer to the actual policies for terms, conditions, and exclusions of coverage. Coverage may not be available in all jurisdictions.

As an alternative to a fraud alert, consumers have the right to place a "credit freeze" on a credit report, which will prohibit a credit bureau from releasing information in the credit report without the consumer's express authorization. The credit freeze is designed to prevent credit, loans, and services from being approved in your name without your consent. However, you should be aware that using a credit freeze to take control over who gets access to the personal and financial information in your credit report may delay, interfere with, or prohibit the timely approval of any subsequent request or application you make regarding a new loan, credit, mortgage, or any other account involving the extension of credit. Pursuant to federal law, you cannot be charged to place or lift a credit freeze on your credit report. To request a security freeze, you will need to provide the following information:

1. Full name (including middle initial as well as Jr., Sr., II, III, etc.);
2. Social Security number;
3. Date of birth;
4. Addresses for the prior two to five years;
5. Proof of current address, such as a current utility bill or telephone bill;
6. A legible photocopy of a government-issued identification card (state driver's license or ID card, etc.); and
7. A copy of either the police report, investigative report, or complaint to a law enforcement agency concerning identity theft if you are a victim of identity theft.

Should you wish to place a credit freeze, please contact the three major credit reporting bureaus listed below:

| **Equifax** | **Experian** | **TransUnion** |
|---|---|---|
| https://www.equifax.com/personal/credit-report-services/ | https://www.experian.com/help/ | https://www.transunion.com/credit-help |
| 1-888-298-0045 | 1-888-397-3742 | 1-833-395-6938 |
| Equifax Fraud Alert, P.O. Box 105069 Atlanta, GA 30348-5069 | Experian Fraud Alert, P.O. Box 9554, Allen, TX 75013 | TransUnion Fraud Alert, P.O. Box 2000, Chester, PA 19016 |
| Equifax Credit Freeze, P.O. Box 105788 Atlanta, GA 30348-5788 | Experian Credit Freeze, P.O. Box 9554, Allen, TX 75013 | TransUnion Credit Freeze, P.O. Box 160, Woodlyn, PA 19094 |

**Additional Information**

You may further educate yourself regarding identity theft, fraud alerts, credit freezes, and the steps you can take to protect your personal information by contacting the consumer reporting bureaus, the Federal Trade Commission, or your state Attorney General. The Federal Trade Commission may be reached at: 600 Pennsylvania Avenue NW, Washington, DC 20580; www.identitytheft.gov; 1-877-ID-THEFT (1-877-438-4338); and TTY: 1-866-653-4261. The Federal Trade Commission also encourages those who discover that their information has been misused to file a complaint with them. You can obtain further information on how to file such a complaint by way of the contact information listed above. You have the right to file a police report if you ever experience identity theft or fraud. Please note that in order to file a report with law enforcement for identity theft, you will likely need to provide some proof that you have been a victim. Instances of known or suspected identity theft should also be reported to law enforcement and your state Attorney General. This notice has not been delayed by law enforcement.

*For District of Columbia residents*, the District of Columbia Attorney General may be contacted at: 400 6th Street, NW, Washington, DC 20001; 202-727-3400; and oag@dc.gov.

*For Maryland residents*, the Maryland Attorney General may be contacted at: 200 St. Paul Place, 16th Floor, Baltimore, MD 21202; 1-410-528-8662 or 1-888-743-0023; and www.oag.state.md.us.

*For New Mexico residents*, you have rights pursuant to the Fair Credit Reporting Act, such as the right to be told if information in your credit file has been used against you, the right to know what is in your credit file, the right to ask for your credit score, and the right to dispute incomplete or inaccurate information. Further, pursuant to the Fair Credit Reporting Act, the consumer reporting bureaus must correct or delete inaccurate, incomplete, or unverifiable information; consumer reporting agencies may not report outdated negative information; access to your file is limited; you must give your consent for credit reports to be provided to employers; you may limit "prescreened" offers of credit and insurance you get based on information in your credit report; and you may seek damages from violator. You may have additional rights under the Fair Credit Reporting Act not summarized here. Identity theft victims and active duty military personnel have specific additional rights pursuant to the Fair Credit Reporting Act. We encourage you to review your rights pursuant to the Fair Credit Reporting Act by visiting www.consumerfinance.gov/f/201504_cfpb_summary_your-rights-under-fcra.pdf, or by writing Consumer Response Center, Room 130-A, Federal Trade Commission, 600 Pennsylvania Ave. N.W., Washington, D.C. 20580.

*For New York residents,* the New York Attorney General may be contacted at: Office of the Attorney General, The Capitol, Albany, NY 12224-0341; 1-800-771-7755; or https://ag.ny.gov/.

*For North Carolina residents*, the North Carolina Attorney General may be contacted at: 9001 Mail Service Center, Raleigh, NC 27699-9001; 1-877-566-7226 or 1-919-716-6000; and www.ncdoj.gov.

*For Rhode Island residents*, the Rhode Island Attorney General may be reached at: 150 South Main Street, Providence, RI 02903; www.riag.ri.gov; and 1-401-274-4400. Under Rhode Island law, you have the right to obtain any police report filed in regard to this incident. There are 11 Rhode Island residents impacted by this incident.