



Todd Rowe
Constangy, Brooks, Smith & Prophete, LLP
Cybersecurity & Data Privacy Team
20 North Wacker, Suite 4120
Chicago, IL 60606
trowe@constangy.com
773.558.2363

November 17, 2025

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:

Constangy, Brooks, Smith & Prophete, LLP, represents NAHGA Claims Services (“NAHGA”) in connection with a recent data security incident. NAHGA takes the protection of all information within its possession very seriously and has taken measures to reduce the likelihood of a similar incident reoccurring. This notice is being sent on behalf of NAHGA because personal information for 176 Maine residents could have been involved in the data security incident.

1. Nature of the Security Incident

On April 10, 2025, NAHGA became aware of unusual activity involving its network systems. NAHGA engaged independent cybersecurity experts to assist with a comprehensive investigation of the activity. The investigation determined that certain files may have been acquired without authorization between April 8, 2025 and April 11, 2025. NAHGA thereafter undertook comprehensive review of all potentially affected emails to identify individuals whose information may have been involved and gather contact information needed to provide notice. This process concluded on October 17, 2025, at which time NAHGA arranged to provide notification to affected individuals.

The potentially affected personal information varied for each individual, but may have included individuals’ names, dates of birth, Social Security number, driver’s license number, passport number, treatment or diagnosis information, and/or health insurance information.

2. Number of Maine Residents Affected

NAHGA notified 176 Maine residents within the potentially affected population whose personal information may have been involved on November 14, 2025, via USPS First-Class Mail. A sample copy of the notification letter sent to the potentially affected individuals is included with this correspondence.

3. Steps Taken Relating to the Incident

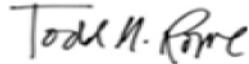
As soon as NAHGA discovered the unusual network activity, it took steps to secure its systems and launched an investigation to learn more about what happened and what information could have been involved. NAHGA has also implemented security measures to further enhance its network security and reduce the likelihood of a similar incident occurring in the future

NAHGA has established a toll-free call center through IDX to answer questions about the incident and address related concerns. Additionally, NAHGA is providing notified individuals with access to 12 months of free credit monitoring and identity protection services through IDX.

4. Contact Information

If you have any questions or need additional information, please do not hesitate to contact me at 773.558.2363 or trowe@constangy.com.

Sincerely,



Todd Rowe

Partner, Constangy Cyber Team

Attachment: Sample Notification Letter



Return Mail Processing Center:
P.O. Box 1907
Suwanee, GA 30024

<<First Name>> <<Last Name>>
<<Address1>>, <<Address 2>>
<<City>>, <<State>> <<Zip Code>>

Enrollment Code: <<XXXXXXXX>>
Enrollment Deadline: February 14, 2026

To Enroll, Scan the QR Code Below:



Or Visit:
<https://app.idx.us/account-creation/protect>

November 14, 2025

Subject: Notice of Data <<Variable 1 – Breach/Security Incident>>

Dear <<First Name>> <<Last Name>>:

NAHGA Claims Services (“NAHGA”) is writing to inform you of a data security incident that may have affected your personal information. This letter has information about the incident and steps you can take to help protect your information.

What Happened. On April 10, 2025, NAHGA became aware of unusual activity involving our network systems. We engaged independent cybersecurity experts to assist with a comprehensive investigation of the activity. The investigation determined that certain files may have been acquired without authorization between April 8, 2025 and April 11, 2025. As a result, we conducted a review of the potentially affected files and, in October 2025, learned that some of your information was contained within the potentially affected data.

What Information Was Involved. The potentially affected information may have included your name and the following:
<<Variable 3 Data Elements>>.

What We Are Doing. As soon as NAHGA discovered the incident, we took the steps described above and implemented measures to enhance security and minimize the risk of a similar incident occurring in the future.

Additionally, to help relieve concerns and restore confidence following this incident, we are offering identity theft protection services through IDX, a data breach and recovery services expert. IDX identity protection services include <<12/24>> months of credit and CyberScan monitoring,¹ a \$1,000,000 insurance reimbursement policy, and fully managed identity theft recovery services. With this protection, IDX will help you resolve issues if your information is compromised.

To enroll in the free identity protection services, please call 1-844-274-4845 or go to <https://app.idx.us/account-creation/protect> and use the Enrollment Code provided above. Representatives are available Monday through Friday from 9 am - 9 pm Eastern Time. Please note the deadline to enroll is February 14, 2026.

What You Can Do. You can follow the best practices on the following page to help protect your information. We also encourage you to activate your complimentary credit monitoring services using the enrollment code provided above.

¹ Minors are eligible for the following services: CyberScan monitoring, a \$1,000,000 insurance reimbursement policy, and fully managed identity theft recovery services.

For More Information. Further information about how to protect your personal information appears on the following page. If you have questions or need assistance, please call our dedicated team at 1-844-274-4845 Monday through Friday from 9 am – 9 pm Eastern Time, excluding holidays.

Please accept our sincere apologies for any worry or inconvenience this may cause.

Sincerely,

NAHGA Claims Services
88 Main Street
Bridgton, ME 04009

Steps You Can Take to Help Protect Your Personal 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 (the “FTC”).

Personal Information of a Minor: You can request that each of the three national consumer reporting agencies perform a manual search for a minor’s Social Security number to determine if there is an associated credit report. Copies of identifying information for the minor and parent/guardian may be required, including birth or adoption certificate, Social Security card, and government issued identification card. If a credit report exists, you should request a copy of the report and immediately report any fraudulent accounts to the consumer reporting agency. You can also report any misuse of a minor’s information to the FTC at <https://www.identitytheft.gov/>. For more information about Child Identity Theft and instructions for requesting a manual Social Security number search, visit www.consumer.ftc.gov/articles/0040-child-identity-theft. Contact information for the three national credit reporting agencies is below.

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 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 2000
Chester, PA 19016
1-833-799-5355
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 www.annualcreditreport.com.

Security Freeze: You have the right to put a security freeze on your credit file 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
877-438-4338

Maryland Attorney General
200 St. Paul Place
Baltimore, MD 21202
<https://oag.maryland.gov>
888-743-0023

Oregon Attorney General
1162 Court St., NE
Salem, OR 97301
www.doj.state.or.us/consumer-protection
877-877-9392

California Attorney General
1300 I Street
Sacramento, CA 95814
www.oag.ca.gov/privacy
800-952-5225

New York Attorney General
The Capitol
Albany, NY 12224
800-771-7755
ag.ny.gov

Rhode Island Attorney General
150 South Main Street
Providence, RI 02903
www.riag.ri.gov
401-274-4400

Iowa Attorney General
1305 E. Walnut Street
Des Moines, Iowa 50319
www.iowaattorneygeneral.gov
888-777-4590

NY Bureau of Internet and Technology
28 Liberty Street
New York, NY 10005
www.dos.ny.gov/consumerprotection/
212.416.8433

Washington D.C. Attorney General
400 S 6th Street, NW
Washington, DC 20001
oag.dc.gov/consumer-protection
202-442-9828

Kentucky Attorney General
700 Capitol Avenue, Suite 118
Frankfort, Kentucky 40601
www.ag.ky.gov
502-696-5300

NC Attorney General
9001 Mail Service Center
Raleigh, NC 27699
ncdoj.gov/protectingconsumers/
877-566-7226

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 www.consumer.ftc.gov/sites/default/files/articles/pdf/pdf-0096-fair-credit-reporting-act.pdf.