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March 3, 2025

VIA ONLINE SUBMISSION

Attorney General Mike Hilgers
Office of the Attorney General
Consumer Protection Division
2115 State Capital
Lincoln, NE 68509
Email: ago.consumer@nebraska.gov

Re: Notice of Data Security Incident

Dear Attorney General Hilgers:

Constangy, Brooks, Smith & Prophete, LLP, represents Bay Cove Human Services, Inc. ("Bay Cove"), a residential, day, outpatient, and educational human services provider based in Boston, Massachusetts. Bay Cove 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 Bay Cove because personal information for one (1) Nebraska residents could have been involved in the data security incident.

1. Nature of the Security Incident

On December 30, 2024, Bay Cove learned of unusual activity in its network. In response, it immediately took measures to terminate the activity, secure its systems, and engage cybersecurity experts to investigate. The investigation determined that data may have been accessed or downloaded without authorization from certain Bay Cove systems but could not identify the specific data involved. As a result, Bay Cove has elected to notify all potentially affected clients and employees whose information could have been involved.

The potentially affected information may have included individuals' names, Social Security number, driver's license information, financial account information, diagnosis or treatment information, and/or other health- or employment-related information.

2. Number of Nebraska Residents Affected

Bay Cove notified one (1) Nebraska residents within the potentially affected population on March 3, 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 Bay Cove 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 affected. Bay Cove has implemented additional safeguards to enhance the security of its systems and to reduce the risk of a similar incident occurring in the future.

Bay Cove has established a toll-free call center through IDX to answer questions about the incident and address related concerns. Additionally, Bay Cove is providing notified individuals with free IDX identity protection services. These identity protection services include: 12 months of credit and/or CyberScan monitoring, a \$1,000,000 insurance reimbursement policy, and fully managed identity theft recovery services.

4. Contact Information

If you have any questions or need additional information, please do not hesitate to contact me at 215-770-4234 or aweaver@constangy.com.

Sincerely,

A handwritten signature in black ink, appearing to read 'Aubrey L. Weaver', with a stylized, flowing script.

Aubrey L. Weaver
Partner, Constangy Cyber Team

Attachment: Sample Notification Letter



P.O. Box 989728
West Sacramento, CA 95798-9728

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

Enrollment Code: <<ENROLLMENT>>

To Enroll, Scan the QR Code Below:



Or Visit:

<https://response.idx.us/BayCove>

March 3, 2025

Subject: Notice of Data Security Incident

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

We are writing to inform you of a data security incident that may have involved your personal or protected health information. Bay Cove Human Services, Inc. ("Bay Cove") is committed to maintaining our <<Variable Text 1:clients OR employees>>' trust and demonstrating our commitment to data privacy and security. This letter has information about the incident and steps you can take to protect your information, including enrolling in the complimentary credit monitoring and identity protection services we are making available to you.

What happened? On December 30, 2024, Bay Cove learned of unusual activity in our network. In response, we immediately took measures to terminate the activity and secure our systems. In addition, we engaged cybersecurity experts to investigate. Our investigation determined that data may have been accessed or downloaded without authorization from certain Bay Cove systems but could not identify the specific data involved. As a result, we are providing notice to all Bay Cove <<Variable Text 1:clients OR employees>> whose information could have been involved.

What Information Was Involved? Because our investigation was not able to identify the specific data that may have been accessed or downloaded, we are providing all <<Variable Text 1:clients OR employees>> with notice that their information could have been involved. This information may include information such as your <<Variable Text 2: Data Elements>>.

What We Are Doing: As soon as Bay Cove discovered the incident, we took the steps described above. We also performed a thorough review of our systems to investigate the incident and enhance our systems' security. Bay Cove also implemented additional security measures to protect our digital environment and minimize the likelihood of future incidents.

In addition, we are offering identity theft protection services through IDX, A ZeroFox Company, a data breach and recovery services expert. IDX identity protection services include <<12/24>> months of credit and CyberScan monitoring¹, a \$1,000,000 insurance reimbursement policy, and fully managed id theft recovery services. With this protection, IDX will help you resolve issues if your information is compromised.

What You Can Do: We encourage you to contact IDX with any questions and to enroll in free identity protection services at no cost to you by calling 1-877-554-5774, going to <https://response.idx.us/BayCove>, or scanning the QR

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

image and using the Enrollment Code provided above. IDX representatives are available Monday through Friday from 9:00 am – 9:00 pm Eastern Time. Please note the deadline to enroll is June 3, 2025.

You can also review the guidance included with this letter about how to protect your information. We also encourage you to review any account statements and explanation of benefits forms and report any errors or activity you do not recognize to your insurance carrier.

For More Information: If you have any questions about this letter, please contact our dedicated call center for this incident at toll-free Monday through Friday from 9:00 am – 9:00 pm Eastern time (excluding major U.S. holidays). Support is also available in multiple languages, as needed.

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

Sincerely,

Bay Cove Human Services, Inc.
66 Canal Street
Boston, Massachusetts

ADDITIONAL STEPS YOU CAN TAKE TO FURTHER 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 (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 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 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
www.marylandattorneygeneral.gov/Pages/CPD
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

Iowa Attorney General

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

Kentucky Attorney General

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

New York Attorney General

The Capitol
Albany, NY 12224
800-771-7755
ag.ny.gov

NY Bureau of Internet and Technology

28 Liberty Street
New York, NY 10005
www.dos.ny.gov/consumerprotection/
212.416.8433

NC Attorney General

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

Rhode Island Attorney General

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

Washington D.C. Attorney General

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

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.