

Aubrey Weaver, Partner Cybersecurity & Data Privacy Team 1650 Market Street, Suite 3600 Philadelphia, PA 19103 aweaver@constangy.com

Direct: 215.770.4234

July 3, 2025

VIA ONLINE SUBMISSION

Attorney General Nick Brown Office of the Attorney General Consumer Protection Division 1125 Washington Street SE P.O. Box 40100 Olympia, WA 98504-0100

Email: SecurityBreach@atg.wa.gov

Re: Arbor Associates, Inc. - Notice of Data Event

To Whom It May Concern:

We represent Arbor Associates, Inc. ("Arbor"), located at 1349 US Highway 131, Suite C, Petoskey, Michigan 49770, and are writing to notify your office of an incident that may involve certain personal information relating to approximately 8,995 Washington residents. This notice may be supplemented with any new significant facts learned subsequent to its submission. By providing this notice, Arbor does not waive any rights or defenses regarding the applicability of Washington law, the applicability of the Washington data event notification statute, or personal jurisdiction.

1. Nature of the Data Event

On April 17, 2025, Arbor became aware of unusual network activity and immediately took steps to secure its systems and perform an investigation. Arbor engaged independent cybersecurity experts to assist with the process. The investigation determined that certain files may have been acquired without authorization between April 15, 2025 and April 17, 2025. As a result, Arbor undertook a comprehensive review of the potentially affected files those files and, in May 2025, learned that some personal or protected health information was contained within the potentially affected data. Arbor then contacted its appropriate covered entity clients and worked with them to provide appropriate notice to individuals. The information that could have been subject to unauthorized access includes first and last name, as well as contact information, age, biological sex, date of birth, service date, CPT or diagnosis code, medial record number, name of insurance, and/or doctor's name.

2. Notice to Washington Residents

On or about July 3, 2025, Arbor began providing written notice of this incident to approximately 8,995 Washington residents. Written notice is being provided in substantially the same form as the letter attached here as *Exhibit A*.

3. Other Steps Taken and To Be Taken

Upon discovering the event, Arbor moved quickly to investigate and respond to the incident, assess the security of Arbor environment and identify potentially affected individuals. Arbor also implemented additional safeguards and training. Arbor is providing impacted individuals with guidance on how to better protect against identity theft and fraud. Arbor 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.

Arbor is providing written notice of this incident to relevant state and federal regulators, as necessary, and to the three major credit reporting agencies, Equifax, Experian, and TransUnion.

4. Contact Information

Should you have any questions regarding this notification or other aspects of the data security event, please contact us at (215) 770-4234.

Very truly yours,

Aubrey Weaver of

Constangy, Brooks, Smith & Prophete LLP

Exhibit A







July 3, 2025

Arbor Associates, Inc. ("Arbor") is writing to inform you of a data security incident that may have affected your personal or protected health information. We work with healthcare providers, including as we collect patient survey analytics on their behalf. We take the privacy and security of all information in our possession very seriously. This letter has information about the incident and steps you can take to help protect your information.

What Happened. On April 17, 2025, Arbor became aware of unusual network activity and immediately took steps to secure our systems and perform an investigation. We engaged independent cybersecurity experts to assist with the process. The investigation determined that certain files may have been acquired without authorization between April 15, 2025 and April 17, 2025. As a result, we undertook a comprehensive review of the potentially affected files those files and, in May 2025, learned that some of your information was contained within the potentially affected data. We then contacted

What Information Was Involved. The potentially affected information may have included your first and last name, contact information, age, biological sex, date of birth, service date, CPT or diagnosis code, medial record number, name of insurance, and/or doctor's name.

What We Are Doing. As soon as Arbor 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.

What You Can Do. You can follow the best practices on the following page to help protect your information. As an additional best practice, we also encourage you to always review account statements and explanation of benefits forms and report any errors or activity you do not recognize.

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 1-833-367-8607 Monday through Friday from 8:00 a.m. to 8:00 p.m. Eastern time.

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

Sincerely,

Arbor Associates, Inc. 1349 US Highway 131, Suite C Petoskey, MI 49770 _

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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").

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
1-800-916-8800
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 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 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-prote
ction
877-877-9392

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

800-952-5225

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

New York Attorney General

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

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Washington D.C. Attorney

General

400 S 6th Street, NW

Washington, DC 20001

oag.dc.gov/consumer-protection 202-442-9828

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

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

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.







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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
1-800-916-8800
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.

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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-prote
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877-877-9392

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

800-952-5225

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

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Iowa Attorney General

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700 Capitol Avenue, Suite 118

Frankfort, Kentucky 40601

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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.