



FOUNTAIN HEALTH

October 5, 2023

Office of the Attorney General
33 Capitol Street
Concord, NH 03301

RECEIVED

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CONSUMER PROTECTION

Dear Sirs:

With this letter, Fountain Health wants to ensure your awareness of an information security incident impacting residents in your state. In particular, in a communication dated July 17, 2023, Fountain Health inadvertently transmitted a list containing of 2 New Hampshire residents to 23 individuals. Please note that the count of 23 individuals *includes* each of the impacted individuals in your state (who also received a copy of their own information).

Upon discovery of the incident, Fountain Health subsequently communicated with the impacted Massachusetts residents as follows:

- On July 28, Fountain Health mailed a letter describing the incident and notifying the individual that their social security number had been inadvertently disclosed.
- On September 15, Fountain Health mailed a letter offering credit monitoring and identity theft protection services at no cost to the impacted residents.

Fountain Health has taken additional steps to mitigate and respond to this incident by requesting each recipient destroy the inadvertently disclosed information, and by modifying its internal processes relating to the mailings in questions.

Please feel free to contact me with any questions.

Sincerely,

James E. Pool, CFO

9132 Strada Place, #200, Naples, FL 34108
care@fountainhealth.com | 239.221.2601
fountainhealth.com



Thursday, July 27, 2023

To: [REDACTED]

Re: Notification Regarding Disclosure Incident

Dear [REDACTED]:

We are sending this letter to you as part of Fountain Health's commitment to privacy for its Members. Fountain Health takes our Members' privacy very seriously, and it is important to us that you are made fully aware of the recent disclosure incident. We have confirmed the following:

- Fountain Health's gym membership benefit is a direct reimbursement to Members on a quarterly basis. As Fountain Health reimbursed 23 Members for the most recent quarter, an Accounts Payable employee processed the reimbursements in bulk, which requires a tax identification number (for individuals, social security numbers).
- Each of 23 Members who were reimbursed had their social security numbers inadvertently disclosed to the other 22 members who were getting reimbursed. Our external vendor, Bill.com, provides supporting documentation with each individual check. The list of 23 Members and their social security numbers were disclosed as part of the supporting documentation.

We understand this is concerning and commit to taking the following actions immediately:

- Please destroy the supporting check stub documentation you received that contains social security numbers.
- Fountain Health will provide credit monitoring for [REDACTED].
- Fountain Health has changed our internal processes for directly reimbursing Members to ensure this does not recur in the future.
 - Going forward, individual requests, not bulk requests, for gym reimbursements will be processed through Bill.com.
 - Modification of supporting documentation for gym reimbursement excluding social security numbers will be required.
 - Fountain Health is requiring the entire Accounting team to retake the privacy and security training courses.

Fountain Health is sincerely sorry for this inadvertent disclosure of personal information. If you have any questions, please contact me, Chief Financial Officer James Pool at [REDACTED].

[REDACTED] It is our honor to have you as our member and we thank you for your understanding.

Sincerely,

James E. Pool, CFO

Cc: Jay Muller, SVP Sales

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FOUNTAIN HEALTH

September 15, 2023

[REDACTED]

Dear [REDACTED]

COMPLIMENTARY SERVICE OFFER: At our expense, the CyEx team at Pango would like to offer you a free subscription to Identity Defense Total, a credit monitoring and identity theft protection service. Identity Defense Total provides essential monitoring and protection of not only credit data, but also monitors the Dark Web and alerts you if your Social Security number, credit cards, and bank account numbers are found in unsecure online locations.

IDENTITY DEFENSE TOTAL features include:

- Dark Web Monitoring
- High Risk Transaction Monitoring
- Customer Support & Victim Assistance
- 3-Bureau Credit Monitoring
- \$1 Million Identity Theft Insurance*
- Monthly Credit Score
- Identity & Authentication Alerts
- Security Freeze Capability

If you wish to take advantage of this monitoring service, you must enroll by

ENROLLMENT PROCEDURE: To activate this coverage please visit the website listed below and enter the activation code. The activation code is required for enrollment and can only be used one time by the individual addressed.

Website: <https://app.identitydefense.com/enrollment/activate/>

Activation Code [REDACTED]

In order to enroll, you will need to provide the following personal information:

- Mailing Address
- Social Security Number
- E-mail Address
- Phone Number
- Date of Birth
- Activation Code

This service is complimentary; no method of payment will be collected during enrollment and there is no need to cancel. We apologize for any inconvenience and urge you to enroll today. If you have any further questions regarding this incident, please call the CyEx team at Pango at 1.888.217.0379.

Sincerely,

James E. Pool

Chief Financial Officer

*Identity Theft Insurance underwritten by insurance company subsidiaries or affiliates of American International Group, Inc. The description herein is a summary and intended for informational purposes only and does not include all terms, conditions and exclusions of the policies described. Please refer to the actual policies for terms, conditions, and exclusions of coverage. Coverage may not be available in all jurisdictions.

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