



309 Fellowship Road, Suite 200
Mt. Laurel, NJ 08054

February 23, 2024

VIA E-MAIL

Office of the New Hampshire Attorney General
Consumer Protection & Antitrust Bureau
33 Capitol Street
Concord, NH 03301
E-mail: DOJ-CPB@doj.nh.gov

Re: Notice of Data Event

To Whom It May Concern:

We represent NewGen Administrative Services, LLC (“NewGen”) located at 9526 W. Pico Boulevard, Los Angeles, California 90035, and are writing to notify your office of an incident that may affect the security of certain personal information relating to six (6) New Hampshire residents. This notice will be supplemented with any new significant facts learned subsequent to its submission. By providing this notice, NewGen does not waive any rights or defenses regarding the applicability of New Hampshire law, the applicability of the New Hampshire data event notification statute, or personal jurisdiction.

Nature of the Data Event

On or about September 14, 2023, a managed services provider that hosted servers that stored some of NewGen’s data, notified NewGen that on September 13, 2023, it had determined that a security incident occurred involving the potential unauthorized access to certain data. Unfortunately, despite best efforts, NewGen was not able to confirm what, if any, information stored on the impacted server was accessed or acquired without authorization. Therefore, out of an abundance of caution, NewGen provided notice to all data owners whose data may have resided on the impacted servers and, thus, may be potentially impacted by this event. Additionally, NewGen is notifying impacted individuals on behalf of those data owners, which include: S&F Market Street Healthcare, LLC; Windsor Care Center National City, Inc.; Windsor Cheviot Hills, LLC; Windsor Country Drive Care Center, LLC; Windsor Court Assisted Living, LLC; Windsor Cypress Gardens Healthcare, LLC; Windsor El Camino Care Center, LLC; Windsor Elk Grove and Rehabilitation

Center, LLC; Windsor Elmhaven Care Center, LLC; Windsor Gardens Convalescent Hospital, Inc.; Windsor Hampton Care Center, LLC; Windsor Hayward Estates, LLC; Windsor Monterey Care Center, LLC; Windsor Rosewood Care Center, LLC; Windsor Sacramento Estates, LLC; Windsor Skyline Care Center, LLC; Windsor Terrace Healthcare, LLC; Windsor The Ridge Rehabilitation Center, LLC and Windsor Vallejo Care Center, LLC.

The information that could have been subject to unauthorized access includes

Notice to New Hampshire Residents

On or about February 23, 2024, NewGen provided written notice of this incident to six (6) New Hampshire 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, NewGen moved quickly to investigate and respond to the incident, assess the security of NewGen systems, and identify potentially affected individuals. NewGen is also working to evaluate the safeguards, policies and procedures it has in place for its vendors. NewGen is providing access to credit monitoring services for _____, through Transunion, to individuals whose personal information was potentially affected by this incident, at no cost to these individuals.

Additionally, NewGen 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. NewGen 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.

NewGen 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. NewGen is also notifying the U.S. Department of Health and Human Services and prominent media pursuant to the Health Insurance Portability and Accountability Act (HIPAA).

Office of the New Hampshire Attorney General

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Contact Information

Should you have any questions regarding this notification or other aspects of the data security event, please contact us at .

Very truly yours,

Vincent F. Regan of
MULLEN COUGHLIN LLC

VFR:ncl
Enclosure

EXHIBIT A

Windsor Cheviot Hills, LLC
c/o Cyberscout
PO Box 1286
Dearborn, MI 48120-9998

[FIRST NAME] [LAST NAME]
[STREET ADDRESS 1]
[STREET ADDRESS 2]
[CITY], [STATE] [ZIP CODE]

February 23, 2024

NOTICE OF SECURITY INCIDENT

Dear [FIRST NAME] [LAST NAME]:

Windsor Cheviot Hills, LLC is contacting you to notify you of an incident that may affect some of your personal information held on servers managed by a third-party provider. We are providing you with this notice to make you aware of this incident, the steps we have taken in response, and additional steps you may want to take to help protect your personal information, should you feel it is appropriate to do so.

What Happened? On or about September 14, 2023, a managed services provider that hosted servers that stored some of our data, notified our administrative services company that on September 13, 2023, it had determined that a security incident occurred involving the potential unauthorized access to certain data. Unfortunately, despite our best efforts, we have not been able to confirm what, if any, information stored on the impacted server was accessed or acquired without authorization. Therefore, out of an abundance of caution, we are providing notice to all individuals whose information may have resided on the impacted servers and, thus, may be potentially impacted by this event.

What Information Was Involved? It was determined that the following types of personal information *may* have been accessed without authorization: your

What We Are Doing. We take this incident and the security of personal information entrusted to us and our vendors very seriously. Upon notification of this incident, we took immediate steps to attempt to determine the nature and scope of the incident. We are also making regulatory notifications to the extent required. As an added precaution, we are offering you complimentary access to _____ of credit monitoring services through Transunion. You will need to enroll yourself in these services if you wish to do so, as we are not able to activate them on your behalf. Please review the instructions contained in the attached *Steps You Can Take to Help Protect Your Information* for additional detail on these services.

What You Can Do. We encourage you to remain vigilant for instances of identity theft and fraud over the next twelve to twenty-four months by reviewing your account statements and immediately reporting any suspicious activity or incidents of suspected identity theft or fraud to your bank. We also encourage you to review the enclosed *Steps You Can Take to Protect Personal Information* and enroll in the credit monitoring services being offered to you. In addition, we encourage you to promptly report any suspected incidents of identity theft to local law enforcement, the Federal Trade Commission, and/or your state Attorney General.

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For More Information. If you have questions that are not answered by this letter, you may call our dedicated assistance line at 1-833-778-2386, available Monday through Friday, from 8:00 a.m. to 8:00 p.m., Eastern Time, excluding holidays. Additionally, you can write to us at Windsor Cheviot Hills, LLC, 3533 Motor Avenue, Los Angeles, CA 90034.

We sincerely regret any inconvenience this incident may cause you, and we remain steadfast in our commitment to protect your personal information.

Sincerely,

Windsor Cheviot Hills, LLC

STEP YOU CAN TAKE TO PROTECT PERSONAL INFORMATION

Enroll in Monitoring Services

In response to the incident, we are providing you with access to **Single Bureau Credit Monitoring/Single Bureau Credit Report/Single Bureau Credit Score** services at no charge. These services provide you with alerts for from the date of enrollment when changes occur to your credit file. This notification is sent to you the same day that the change or update takes place with the bureau. Finally, we are providing you with proactive fraud assistance to help with any questions that you might have or in event that you become a victim of fraud. These services will be provided by Cyberscout through Identity Force, a TransUnion company specializing in fraud assistance and remediation services.

To enroll in Credit Monitoring services at no charge, please log on to **<https://secure.identityforce.com/benefit/newgen>** and follow the instructions provided. When prompted please provide the following unique code to receive services: [CODE]

In order for you to receive the monitoring services described above, you must enroll within 90 days from the date of this letter. The enrollment requires an internet connection and e-mail account and may not be available to minors under the age of 18 years of age. Please note that when signing up for monitoring services, you may be asked to verify personal information for your own protection to confirm your identity.

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 a free credit report, visit www.annualcreditreport.com or call, toll-free, 1-877-322-8228. Consumers may also directly contact the three major credit reporting bureaus listed below to request a free copy of their 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 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 consumers are the victim of identity theft, they are entitled to an extended fraud alert, which is a fraud alert lasting seven years. Should consumers wish to place a fraud alert, please contact any of the three major credit reporting bureaus listed below.

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 a consumer’s name without consent. However, consumers should be aware that using a credit freeze to take control over who gets access to the personal and financial information in their credit report may delay, interfere with, or prohibit the timely approval of any subsequent request or application they make regarding a new loan, credit, mortgage, or any other account involving the extension of credit. Pursuant to federal law, consumers cannot be charged to place or lift a credit freeze on their credit report. To request a credit freeze, individuals may need to provide some or all of 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 they are a victim of identity theft.

Should consumers wish to place a credit freeze or fraud alert, 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	1-800-916-8800
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

Consumers may further educate themselves regarding identity theft, fraud alerts, credit freezes, and the steps they can take to protect your personal information by contacting the consumer reporting bureaus, the Federal Trade Commission, or their state Attorney General. The Federal Trade Commission may be reached at: 600 Pennsylvania Avenue NW, Washington, D.C. 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. Consumers can obtain further information on how to file such a complaint by way of the contact information listed above. Consumers have the right to file a police report if they ever experience identity theft or fraud. Please note that in order to file a report with law enforcement for identity theft, consumers will likely need to provide some proof that they have been a victim. Instances of known or suspected identity theft should also be reported to law enforcement and the relevant state Attorney General. This notice has not been delayed by law enforcement. You may also write to us at Windsor Cheviot Hills, LLC, 3533 Motor Avenue, Los Angeles, CA 90034.

For District of Columbia residents, the District of Columbia Attorney General may be contacted at: 400 6th Street, NW, Washington, D.C. 20001; (202) 442-9828; and oag.dc.gov.

For Maryland residents, the Maryland Attorney General may be contacted at: 200 St. Paul Place, 16th Floor, Baltimore, MD 21202; 1-410-576-6300 or 1-888-743-0023; and <https://www.marylandattorneygeneral.gov/>.

For New Mexico residents, consumers have rights pursuant to the Fair Credit Reporting Act, such as the right to be told if information in their credit file has been used against them, the right to know what is in their credit file, the right to ask for their 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 consumers' files is limited; consumers must give consent for credit reports to be provided to employers; consumers may limit "prescreened" offers of credit and insurance based on information in their credit report; and consumers may seek damages from violators. Consumers 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 consumers to review their 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, individuals have the right to obtain any police report filed in regard to this event. There are approximately 0 Rhode Island residents that may be impacted by this event.