



MULLEN
COUGHLIN_{LLC}
ATTORNEYS AT LAW

RECEIVED
SEP 21 2020
CONSUMER PROTECTION

Kevin Mekler
Office: (267) 930-2190
Fax: (267) 930-4771
Email: Kmekler@mullen.law

30725 US Hwy 19 N #337
Palm Harbor, FL 34684

September 11, 2020

VIA U.S. MAIL

Consumer Protection Bureau
Office of the New Hampshire Attorney General
33 Capitol Street
Concord, NH 03301

Re: Notice of Data Event

Dear Sir or Madam:

We represent Specialized Alternatives for Families & Youth of America, Inc. ("SAFY") located at 10100 Elida Rd, Delphos, OH 45833, and are writing to notify your office of an incident that may affect the security of personal information relating to three (3) New Hampshire residents. This notice may be supplemented if any new significant facts are learned subsequent to its submission. By providing this notice, SAFY does not waive any rights or defenses regarding the applicability of New Hampshire law or personal jurisdiction.

Nature of the Data Event

Earlier this year, SAFY learned of a potential scam that involved the posting of fictitious job openings at SAFY via the employment clearinghouse website *Indeed.com*. Upon learning of this activity, SAFY conducted an extensive investigation, with the assistance of third-party computer forensic specialists, to determine the nature and scope of the reports.

On July 2, 2020, the investigation confirmed that an unknown actor had access to certain email accounts for employees of SAFY and its affiliates between February 25, 2020 and June 23, 2020. The investigation did not reveal the full extent of information that the unknown actor accessed. In an abundance of caution, SAFY worked with third-party specialists to perform a comprehensive review of all information stored in the impacted email accounts at the time of incident to identify the individuals whose information may have been accessible to the unknown actor. On August 12, 2020, SAFY received the results of the third-party audit. SAFY immediately began reviewing the results of the audit to determine the identities and contact information for potentially impacted individuals.

Mullen.law

On or about August 27, 2020, SAFY confirmed the identities of the individuals who may have had information impacted by this incident.

Although the types of personal information potentially impacted varies by individual, the types of personal information potentially impacted for New Hampshire residents includes name, address, and Social Security number. There is no indication this information was misused by the unknown actor, and SAFY is providing this notice in an abundance of caution.

Notice to New Hampshire Residents

On September 11, 2020, SAFY began providing written notice of this incident to affected individuals, which includes three (3) New Hampshire residents. Written notice was provided to affected individuals in substantially the same form as the letters attached here as ***Exhibit A***. SAFY also provided notice of this event on its website in substantially the same form as the notice attached here as ***Exhibit B***.

Other Steps Taken and To Be Taken

Upon discovering the potential unauthorized access to the email accounts, SAFY moved quickly to identify those that may be affected, put in place resources to assist them, and provide them with notice of this incident. SAFY is also working to implement additional safeguards to protect the security of information in its systems.

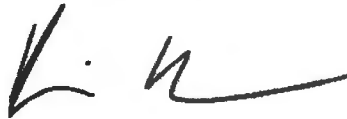
SAFY is providing written notice to those individuals who may be affected by this incident. This notice includes an offer of complimentary access to credit monitoring and identity restoration services through TransUnion or minor monitoring services through Equifax, as well as the contact information for a dedicated assistance line for potentially affected individuals to contact with questions or concerns regarding this incident. Additionally, SAFY is providing potentially impacted individuals with guidance on how to better protect against identity theft and fraud, including 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. SAFY is also providing written notice of this incident to other regulators, as necessary.

Office of the New Hampshire Attorney General
September 11, 2020
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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 (267) 930-2190.

Very truly yours,

A handwritten signature in black ink, appearing to read 'K. H.', with a long horizontal flourish extending to the right.

Kevin Mekler of
MULLEN COUGHLIN LLC

KMK/zlg
Enclosure

EXHIBIT A



Return Mail Processing Center
P.O. Box 6336
Portland, OR 97228-6336

<<Mail ID>>

<<Name 1>>

<<Name 2>>

<<Address 1>>

<<Address 2>>

<<Address 3>>

<<Address 4>>

<<Address 5>>

<<City>><<State>><<Zip>>

<<Country>>

<<Date>>

Re: Notice of Data Breach

Dear <<Name 1>>:

Specialized Alternatives for Families & Youth of America, Inc. ("SAFY") is writing to inform you of a recent event that may impact the security of some of your information. SAFY receives records related to individuals from several state affiliates who provide numerous services to individuals and families, including adoption, foster care, family preservation services, and behavioral, cognitive and mental health services. Although we are unaware of any actual misuse of your information, we are providing you with information about the event, our response, and steps you may take to better protect against the possibility of identity theft and fraud, should you feel it is necessary to do so.

What Happened? Earlier this year, SAFY was notified of a potential scam that involved the posting of fictitious job openings at SAFY via the employment clearinghouse website Indeed.com. Upon learning of this activity, SAFY conducted an extensive investigation, with the assistance of third-party computer forensic specialists, to determine the nature and scope of the reports.

On July 2, 2020, the investigation confirmed certain SAFY employee email accounts were accessible by an unknown actor between February 25, 2020 and June 23, 2020. The investigation was unable to determine the full extent of information that was accessed by the unknown actor. In an abundance of caution, we performed a comprehensive review of all information stored in the impacted email accounts at the time of the event to identify the individuals whose information may have been accessible to the unknown actor. On August 12, 2020, we received the results of the third-party audit. We immediately began reviewing the results of the audit to determine the identities and contact information for potentially impacted individuals.

What Information Was Involved. On August 27, 2020, we determined the following types of information relating to you was present in the email account and accessible to the unknown actor during this event: full name and <<data elements>>. There is no evidence the unknown actor misused this information, and SAFY is providing this notice in an abundance of caution.

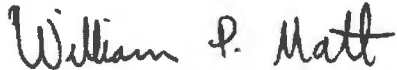
What We Are Doing. We take this incident and the security of your personal information seriously. Upon learning of this incident, we took steps to investigate the activity and further secure the affected email accounts. As part of our ongoing commitment to the privacy of personal information in our care, we are working to review our existing policies and procedures and to implement additional safeguards to further secure the information in our systems. SAFY also notified the U.S. Department of Health and Human Services and other government regulators, as required. While we are unaware of any misuse of your information as a result of this incident, we are offering you access to 12 months of credit monitoring and identity restoration services through TransUnion.

What You Can Do. You can find out more about how to protect against potential identity theft and fraud in the enclosed *Steps You Can Take to Protect Your Information*. We encourage you to remain vigilant against incidents of identity theft and fraud, to review your account statements and explanations of benefits, and to monitor your credit reports for suspicious activity. You may also enroll in the complimentary credit monitoring services described above. Enrollment instructions are attached to this letter.

For More Information. If you have additional questions, please call our dedicated assistance line at 888-490-0692, Monday through Friday (excluding U.S. holidays), during the hours of 9:00 a.m. to 9:00 p.m., Eastern Time. You may also write to SAFY at Steve Mansfield's attention at 10100 Elida Rd, Delphos, OH 45833.

We sincerely regret any inconvenience or concern this incident may cause.

Sincerely,

A handwritten signature in cursive script that reads "William P. Matt".

William P. Matt
President and Chief Executive Officer
Specialized Alternatives for Families & Youth of America, Inc.

STEPS YOU CAN TAKE TO PROTECT YOUR INFORMATION

Enrollment Instructions

Complimentary 12-Month *myTrueIdentity* Credit Monitoring Service

As a safeguard, we have arranged for you to enroll, at no cost to you, in an online credit monitoring service (*myTrueIdentity*) for one year provided by TransUnion Interactive, a subsidiary of TransUnion,[®] one of the three nationwide credit reporting companies.

How to Enroll: You can sign up online or via U.S. mail delivery

- To enroll in this service, go to the *myTrueIdentity* website at **www.MyTrueIdentity.com** and, in the space referenced as “Enter Activation Code,” enter the 12-letter Activation Code <<**12-letter Activation Code**>> and follow the three steps to receive your credit monitoring service online within minutes.
- If you do not have access to the Internet and wish to enroll in a similar offline, paper-based credit monitoring service, via U.S. mail delivery, please call the TransUnion Fraud Response Services toll-free hotline at **1-855-288-5422**. When prompted, enter the six-digit telephone passcode <<**Telephone Pass Code**>> and follow the steps to enroll in the offline credit monitoring service, add an initial fraud alert to your credit file, or to speak to a TransUnion representative if you believe you may be a victim of identity theft.

You can sign up for the online or offline credit monitoring service anytime between now and <<**Enrollment Deadline**>>. Due to privacy laws, we cannot register you directly. Please note that credit monitoring services might not be available for individuals who do not have a credit file with TransUnion or an address in the United States (or its territories) and a valid Social Security number. Enrolling in this service will not affect your credit score.

ADDITIONAL DETAILS REGARDING YOUR 12-MONTH COMPLIMENTARY CREDIT MONITORING SERVICE:

- Once you are enrolled, you will be able to obtain one year of unlimited access to your TransUnion credit report and credit score.
- The daily credit monitoring service will notify you if there are any critical changes to your credit file at TransUnion, including fraud alerts, new inquiries, new accounts, new public records, late payments, changes of address, and more.
- The service also includes access to an identity restoration program that provides assistance in the event that your identity is compromised and up to \$1,000,000 in identity theft insurance with no deductible. (Policy limitations and exclusions may apply.)

Monitor Your Accounts

We encourage you to remain vigilant against incidents of identity theft and fraud, to review your account statements, and to monitor your credit reports for suspicious activity. Under U.S. law you are entitled to one free credit report annually from each of the three major credit reporting bureaus. To order your free credit report, visit www.annualcreditreport.com or call, toll-free, 1-877-322-8228. You may also contact the three major credit bureaus directly to request a free copy of your credit report.

You have the right to place a “security freeze” on your credit report, which will prohibit a consumer reporting agency from releasing information in your credit report without your express authorization. The security freeze is designed to prevent credit, loans, and services from being approved in your name without your consent. However, you should be aware that using a security freeze to take control over who gets access to the personal and financial information in your credit report may delay, interfere with, or prohibit the timely approval of any subsequent request or application you make regarding a new loan, credit, mortgage, or any other account involving the extension of credit. Pursuant to federal law, you cannot be charged to place or lift a security freeze on your credit report. Should you wish to place a security freeze, please contact the major consumer reporting agencies listed below:

Experian
P.O. Box 9554
Allen, TX 75013
1-888-397-3742
www.experian.com/freeze/center.html

TransUnion
P.O. Box 160
Chester, PA 19016
1-888-909-8872
www.transunion.com/credit-freeze

Equifax
P.O. Box 105788
Atlanta, GA 30348-5788
1-800-685-1111
www.equifax.com/personal/credit-report-services

In order to request a security freeze, you will need to provide the following information:

1. Your full name (including middle initial, as well as Jr., Sr., II, III, etc.);
2. Social Security number;
3. Date of birth;
4. If you have moved in the past five years, the addresses where you have lived over the prior 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, military identification, etc.);
7. If you are a victim of identity theft, a copy of either the police report, investigative report, or complaint to a law enforcement agency concerning identity theft.

As an alternative to a security freeze, you have the right to place an initial or extended "fraud alert" on your file at no cost. An initial fraud alert is a one-year 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 you are a victim of identity theft, you are entitled to an extended fraud alert, which is a fraud alert lasting seven years. Should you wish to place a fraud alert, please contact any one of the agencies listed below:

Experian
P.O. Box 9554
Allen, TX 75013
1-888-397-3742
www.experian.com/fraud/center.html

TransUnion
P.O. Box 2000
Chester, PA 19016
1-800-680-7289
www.transunion.com/fraud-victim-resource/place-fraud-alert

Equifax
P.O. Box 105069
Atlanta, GA 30348
1-888-766-0008
www.equifax.com/personal/credit-report-services

Additional Information

You can further educate yourself regarding identity theft, fraud alerts, security freezes, and the steps you can take to protect yourself by contacting the consumer reporting agencies, the Federal Trade Commission, or your state Attorney General.

The Federal Trade Commission can be reached at: 600 Pennsylvania Avenue NW, Washington, DC 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. You can obtain further information on how to file such a complaint by way of the contact information listed above. You have the right to file a police report if you ever experience identity theft or fraud. Please note that in order to file a report with law enforcement for identity theft, you will likely need to provide some proof that you have been a victim. Instances of known or suspected identity theft should also be reported to law enforcement and your state Attorney General. This notice has not been delayed by law enforcement.

For Maryland residents: The Attorney General may be contacted at 200 St. Paul Place, 16th Floor, Baltimore, MD 21202; 1-410-528-8662; and www.oag.state.md.us.

For North Carolina residents: The 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. You can obtain information from the Attorney General or the Federal Trade Commission about preventing identity theft.

For New Mexico residents: You have rights pursuant to the Fair Credit Reporting Act, such as the right to be told if information in your credit file has been used against you, the right to know what is in your credit file, the right to ask for your credit score, and the right to dispute incomplete or inaccurate information. Further, pursuant to the Fair Credit Reporting Act, the consumer reporting agencies must correct or delete inaccurate, incomplete, or unverifiable information; consumer reporting agencies may not report outdated negative information; access to your file is limited; you must give your consent for credit reports to be provided to employers; you may limit "prescreened" offers of credit and insurance you get based on information in your credit report; and you may seek damages from violator. You 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 you to review your 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 Rhode Island residents: The Attorney General may be contacted at: 150 South Main Street, Providence, Rhode Island 02903; www.riag.ri.gov; and 1-401-274-4400. Under Rhode Island law, you have the right to obtain any police report filed in regard to this incident. There are # Rhode Island residents impacted by this incident.

For New York residents: The Attorney General may be contacted at: Office of the Attorney General, The Capitol, Albany, NY 12224-0341; 1-800-771-7755; and <https://ag.ny.gov/>.

For Washington, D.C. residents: The Attorney General may be contacted at: Office of the Attorney General, 441 4th Street, NW, Washington, DC 20001; (202) 727-3400; and www.oag@dc.gov.



Return Mail Processing Center
P.O. Box 6336
Portland, OR 97228-6336

<<Mail ID>>
Parent or Guardian of

<<Name 1>>

<<Name 2>>

<<Address 1>>

<<Address 2>>

<<Address 3>>

<<Address 4>>

<<Address 5>>

<<Date>>

<<City>><<State>><<Zip>>

<<Country>>

Re: Notice of Data Breach

Dear Parent or Guardian of <<Name 1>>:

Specialized Alternatives for Families & Youth of America, Inc. ("SAFY") is writing to inform you of a recent event that may impact the security of some of your minor child's information. SAFY receives records related to individuals from several state affiliates who provide numerous services to individuals and families, including adoption, foster care, family preservation services, and behavioral, cognitive and mental health services. Although we are unaware of any actual misuse of your minor child's information, we are providing you with information about the event, our response, and steps you may take to better protect against the possibility of identity theft and fraud, should you feel it is necessary to do so.

What Happened? Earlier this year, SAFY was notified of a potential scam that involved the posting of fictitious job openings at SAFY via the employment clearinghouse website Indeed.com. Upon learning of this activity, SAFY conducted an extensive investigation, with the assistance of third-party computer forensic specialists, to determine the nature and scope of the reports.

On July 2, 2020, the investigation confirmed certain SAFY employee email accounts were accessible by an unknown actor between February 25, 2020 and June 23, 2020. The investigation was unable to determine the full extent of information that was accessed by the unknown actor. In an abundance of caution, we performed a comprehensive review of all information stored in the impacted email accounts at the time of the incident to identify the individuals whose information may have been accessible to the unknown actor. On August 12, 2020, we received the results of the third-party audit. We immediately began reviewing the results of the audit to determine the identities and contact information for potentially impacted individuals.

What Information Was Involved. On August 27, 2020, we determined the following types of information relating to your minor child was present in the email account and accessible to the unknown actor during this incident: full name and <<data elements>>. There is no evidence the unknown actor misused this information, and SAFY is providing this notice in an abundance of caution.

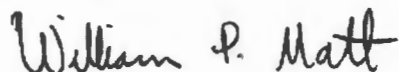
What We Are Doing. We take this event and the security of your minor child's personal information seriously. Upon learning of this event, we took steps to investigate the activity and further secure the affected email accounts. As part of our ongoing commitment to the privacy of personal information in our care, we are working to review our existing policies and procedures and to implement additional safeguards to further secure the information in our systems. SAFY also notified the U.S. Department of Health and Human Services and other government regulators, as required. While we are unaware of any misuse of your minor child's information as a result of this incident, we are offering you access to 12 months of minor monitoring services through Equifax.

What You Can Do. You can find out more about how to protect against potential identity theft and fraud in the enclosed *Steps You Can Take to Protect Your Child's Information*. We encourage you to remain vigilant against incidents of identity theft and fraud and review your minor's account statements and credit reports, if available, for suspicious activity. You may also enroll in the complimentary minor monitoring services described above. Enrollment instructions are attached to this letter.

For More Information. If you have additional questions, please call our dedicated assistance line at 888-490-0692, Monday through Friday (excluding U.S. holidays), during the hours of 9:00 a.m. to 9:00 p.m., Eastern Time. You may also write to SAFY at Steve Mansfield's attention at 10100 Elida Rd, Delphos, OH 45833.

We sincerely regret any inconvenience or concern this incident may cause.

Sincerely,

A handwritten signature in black ink that reads "William P. Matt". The signature is written in a cursive, flowing style.

William P. Matt
President and Chief Executive Officer
Specialized Alternatives for Families & Youth of America, Inc.

STEPS YOU CAN TAKE TO PROTECT YOUR MINOR CHILD'S INFORMATION

Product Information

Activation Code: << *ACTIVATION CODE* >>

Equifax Child Identity Monitoring will scan the Equifax credit database for any instances of the minor's social security number and look for a copy of the minor's Equifax credit file.

- If no SSN match is found and no Equifax credit file exists, Equifax will create an Equifax credit file in the minor's name and immediately "lock" the Equifax credit file. This will prevent access to the minor's Equifax credit file in the future. If Equifax receives a request for your minor's Equifax credit report, you will receive an email alert.
- If there is a match and an Equifax credit file exists, Equifax will immediately "lock" the file and alert you to activity against the file, such as an attempt to open a new line of credit.
- The minor's Equifax credit file will be locked for 12 months from date of activation. After that time, the minor's Equifax credit file will be deleted from our credit database if it contains no credit data.

Enrollment Instructions

To enroll in Equifax Child Identity Monitoring go to http://myservices.equifax.com/efx1_brminor and follow the instructions below:

1. **Welcome Page:** Enter the Activation Code provided at the top of this page in the "Activation Code" box and click the "Submit" button.
2. **Register:** Complete the form with **YOUR** contact information first (name, gender, home address, date of birth, Social Security Number and telephone number) and click the "Continue" button.
3. **Create Account:** Complete the form with your email address, create a User Name and Password, after reviewing the Terms of Use, check the box to accept the Terms of Use and click the "Continue" button.
4. **Verify ID:** The system will then ask you up to four security questions to verify your identity. Please answer the questions and click the "Submit Order" button.
5. **Order Confirmation:** This page shows you your completed enrollment. Please click the "View My Product" button to access the product features.
6. **Click the orange button "Enroll Child"** to enter your child's information (child's name, Date of Birth and Social Security Number). Note: if you enter the child's SSN incorrectly, you will need to remove the minor by going to your Member Center and clicking on "My Account" to remove the minor from the account. You may then re-enroll the minor with the correct SSN.
7. **Check the box confirming you are the child's parent or guardian.**
8. **Click "Submit"** to enroll your child.

Monitor Your Minor Child's Accounts

We encourage you to remain vigilant against incidents of identity theft and fraud, to review your minor child's account statements, and to monitor your minor's credit reports for suspicious activity and to detect errors.

While minors under the age of 18 typically do not have credit files, the following information relates to protecting one's credit once established.

We encourage you to remain vigilant against incidents of identity theft and fraud, to review your account statements, and to monitor your credit reports for suspicious activity. Under U.S. law you are entitled to one free credit report annually from each of the three major credit reporting bureaus. To order your free credit report, visit www.annualcreditreport.com or call, toll-free, 1-877-322-8228. You may also contact the three major credit bureaus directly to request a free copy of your credit report.

You have the right to place a "security freeze" on your credit report, which will prohibit a consumer reporting agency from releasing information in your credit report without your express authorization. The security freeze is designed to prevent credit, loans, and services from being approved in your name without your consent. However, you should be aware that using a security freeze to take control over who gets access to the personal and financial information in your credit report may delay, interfere with, or prohibit the timely approval of any subsequent request or application

you make regarding a new loan, credit, mortgage, or any other account involving the extension of credit. Pursuant to federal law, you cannot be charged to place or lift a security freeze on your credit report. Should you wish to place a security freeze, please contact the major consumer reporting agencies listed below:

Experian

P.O. Box 9554
Allen, TX 75013
1-888-397-3742
www.experian.com/freeze/center.html

TransUnion

P.O. Box 160
Chester, PA 19016
1-888-909-8872
www.transunion.com/credit-freeze

Equifax

P.O. Box 105788
Atlanta, GA 30348-5788
1-800-685-1111
www.equifax.com/personal/credit-report-services

In order to request a security freeze, you will need to provide the following information:

1. Your full name (including middle initial, as well as Jr., Sr., II, III, etc.);
2. Social Security number;
3. Date of birth;
4. If you have moved in the past five years, the addresses where you have lived over the prior 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, military identification, etc.);
7. If you are a victim of identity theft, a copy of either the police report, investigative report, or complaint to a law enforcement agency concerning identity theft.

As an alternative to a security freeze, you have the right to place an initial or extended "fraud alert" on your file at no cost. An initial fraud alert is a one-year 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 you are a victim of identity theft, you are entitled to an extended fraud alert, which is a fraud alert lasting seven years. Should you wish to place a fraud alert, please contact any one of the agencies listed below:

Experian

P.O. Box 9554
Allen, TX 75013
1-888-397-3742
www.experian.com/fraud/center.html

TransUnion

P.O. Box 2000
Chester, PA 19016
1-800-680-7289
www.transunion.com/fraud-victim-resource/place-fraud-alert

Equifax

P.O. Box 105069
Atlanta, GA 30348
1-888-766-0008
www.equifax.com/personal/credit-report-services

Additional Information

You can further educate yourself regarding identity theft, fraud alerts, security freezes, and the steps you can take to protect yourself by contacting the consumer reporting agencies, the Federal Trade Commission, or your state Attorney General.

The Federal Trade Commission can be reached at: 600 Pennsylvania Avenue NW, Washington, DC 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. You can obtain further information on how to file such a complaint by way of the contact information listed above. You have the right to file a police report if you ever experience identity theft or fraud. Please note that in order to file a report with law enforcement for identity theft, you will likely need to provide some proof that you have been a victim. Instances of known or suspected identity theft should also be reported to law enforcement and your state Attorney General. This notice has not been delayed by law enforcement.

For Maryland residents: The Attorney General may be contacted at 200 St. Paul Place, 16th Floor, Baltimore, MD 21202; 1-410-528-8662; and www.oag.state.md.us.

For North Carolina residents: The 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. You can obtain information from the Attorney General or the Federal Trade Commission about preventing identity theft.

For New Mexico residents: You have rights pursuant to the Fair Credit Reporting Act, such as the right to be told if information in your credit file has been used against you, the right to know what is in your credit file, the right to ask for your credit score, and the right to dispute incomplete or inaccurate information. Further, pursuant to the Fair Credit Reporting Act, the consumer reporting agencies must correct or delete inaccurate, incomplete, or unverifiable information; consumer reporting agencies may not report outdated negative information; access to your file is limited; you must give your consent for credit reports to be provided to employers; you may limit

“prescreened” offers of credit and insurance you get based on information in your credit report; and you may seek damages from violator. You 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 you to review your 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 Rhode Island residents: The Attorney General may be contacted at: 150 South Main Street, Providence, Rhode Island 02903; www.riag.ri.gov; and 1-401-274-4400. Under Rhode Island law, you have the right to obtain any police report filed in regard to this incident. There are # Rhode Island residents impacted by this incident.

For New York residents: The Attorney General may be contacted at: Office of the Attorney General, The Capitol, Albany, NY 12224-0341; 1-800-771-7755; and <https://ag.ny.gov/>.

For Washington, D.C. residents: The Attorney General may be contacted at: Office of the Attorney General, 441 4th Street, NW, Washington, DC 20001; (202) 727-3400; and www.oag@dc.gov.

EXHIBIT B

SAFY - HIPAA Website Notice

September 11, 2020 – Specialized Alternatives for Families & Youth of America, Inc. (“SAFY”) is issuing notice of a recent data security event that may impact the confidentiality and security of personal information of certain individuals. Although SAFY is unaware of any actual misuse of this information, we are providing information about the event, our response, and steps affected individuals may take to better protect against the possibility of identity theft and fraud, should affected individuals feel it is necessary to do so.

What Happened? Earlier this year, SAFY was notified of a potential scam that involved the posting of fictitious job openings at SAFY via the employment clearinghouse website *Indeed.com*. Upon learning of this activity, SAFY conducted an extensive investigation, with the assistance of third-party computer forensic specialists, to determine the nature and scope of the reports

On July 2, 2020, the investigation confirmed certain SAFY employee email accounts were accessible by an unknown actor between February 25, 2020 and June 23, 2020. The investigation was unable to determine the full extent of information that was accessed by the unknown actor. In an abundance of caution, we performed a comprehensive review of all information stored in the impacted email accounts at the time of the event to identify the individuals whose information may have been accessible to the unknown actor. On August 12, 2020, SAFY received the results of the third-party audit. We immediately began reviewing the results of the audit to determine the identities and contact information for potentially impacted individuals. On August 27, 2020, we confirmed the identities of potentially affected individuals.

What Information was Affected. The email accounts contained certain types of information, such as full name, address, date of birth, driver's license number, Social Security number, tax identification number, passport number, financial account number, payment card number, Medicaid ID, group number, clinical information, diagnosis, doctor's name, health insurance member number, patient account number, medical record number, medical procedure information, prescription information, treatment type or location, and username and password. Not all of this information is present for every potentially impacted individual, and we are unaware that any of the information was actually accessed or acquired by the unknown actor. SAFY takes this incident and the security of the information in its care very seriously, and is therefore providing this notice in an abundance of caution.

What We are Doing. As part of SAFY's ongoing commitment to privacy of the personal information in our care, we are working to review our existing policies and procedures and to implement additional safeguards to further secure the information in our systems. We also notified the U.S. Department of Health and Human Services and other government regulators, as required.

What Affected Individuals Can Do. While we are unaware of any misuse of any personal information contained within the impacted accounts, individuals are encouraged to remain vigilant against incidents of identity theft by reviewing account statements and explanations of benefits for unusual activity and report any suspicious activity immediately to your insurance company, health care provider, or financial institution. Additional detail can be found below in the *Steps You Can Take to Protect Your Information*. We are also offering affected adults access to complimentary credit monitoring and identity restoration services through TransUnion and affected minors monitoring services through Equifax. Additional detail can be found below and in the letters affected individuals will receive by mail.

For More Information. If you have additional questions, a dedicated toll-free assistance line has been established. Individuals may call the assistance line at 888-490-0692, Monday through Friday (excluding U.S. holidays), during the hours of 9:00 a.m. to 9:00 p.m., Eastern Time. You may also write to SAFY at Steve Mansfield's attention at 10100 Elida Rd, Delphos, OH 45833.

Steps You Can Take To Protect Your Information

While we are unaware of any misuse of the personal information in the affected system, we encourage you to remain vigilant against incidents of identity theft and fraud, to review your account statements, and to monitor your credit reports for suspicious activity. Under U.S. law, you are entitled to one free credit report annually from each of the three major credit reporting bureaus. To order your free credit report, visit www.annualcreditreport.com or call, toll-free, 1-877-322-8228. You may also contact the three major credit bureaus directly to request a free copy of your credit report.

If you wish to enroll with the TransUnion adult credit monitoring and identity restoration services or Equifax minor monitoring services, please contact our dedicated assistance line to verify that your information was contained within the impacted email accounts. After confirmation that you were included, a representative will provide guidance for enrolling in the adult credit or minor monitoring services.

You have the right to place a “security freeze” on your credit report, which will prohibit a consumer reporting agency from releasing information in your credit report without your express authorization. The security freeze is designed to prevent credit, loans, and services from being approved in your name without your consent. However, you should be aware that using a security freeze to take control over who gets access to the personal and financial information in your credit report may delay, interfere with, or prohibit the timely approval of any subsequent request or application you make regarding a new loan, credit, mortgage, or any other account involving the extension of credit. Pursuant to federal law, you cannot be charged to place or lift a security freeze on your credit report. Should you wish to place a security freeze, please contact the major consumer reporting agencies listed below:

Experian

P.O. Box 9554
Allen, TX 75013
1-888-397-3742

www.experian.com/freeze/center.html

TransUnion

P.O. Box 160
Chester, PA 19016
1-888-909-8872

www.transunion.com/credit-freeze

Equifax

P.O. Box 105788
Atlanta, GA 30348-5788
1-800-685-1111

www.equifax.com/personal/credit-report-services

In order to request a security freeze, you will need to provide the following information:

1. Your full name (including middle initial, as well as Jr., Sr., II, III, etc.);
2. Social Security number;
3. Date of birth;
4. If you have moved in the past five years, the addresses where you have lived over the prior 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, military identification, etc.); and
7. If you are a victim of identity theft, a copy of either the police report, investigative report, or complaint to a law enforcement agency concerning identity theft.

As an alternative to a security freeze, you have the right to place an initial or extended “fraud alert” on your file at no cost. An initial fraud alert is a one-year 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 you are a victim of identity theft, you are entitled to an extended fraud alert, which

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is a fraud alert lasting seven years. Should you wish to place a fraud alert, please contact any one of the agencies listed below:

Experian

P.O. Box 9554
Allen, TX 75013
1-888-397-3742

www.experian.com/fraud/center.html

TransUnion

P.O. Box 2000
Chester, PA 19016
1-800-680-7289

www.transunion.com/fraud-victim-resource/place-fraud-alert

Equifax

P.O. Box 105069
Atlanta, GA 30348
1-888-766-0008

www.equifax.com/personal/credit-report-services

Additional Information

You can further educate yourself regarding identity theft, fraud alerts, security freezes, and the steps you can take to protect yourself by contacting the consumer reporting agencies, the Federal Trade Commission, or your state Attorney General.

The Federal Trade Commission can be reached at: 600 Pennsylvania Avenue NW, Washington, DC 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. You can obtain further information on how to file such a complaint by way of the contact information listed above. You have the right to file a police report if you ever experience identity theft or fraud. Please note that in order to file a report with law enforcement for identity theft, you will likely need to provide some proof that you have been a victim. Instances of known or suspected identity theft should also be reported to law enforcement and your state Attorney General. This notice has not been delayed by law enforcement.

For Maryland residents: The Attorney General may be contacted at 200 St. Paul Place, 16th Floor, Baltimore, MD 21202; 1-410-528-8662; and www.oag.state.md.us.

For North Carolina residents: The 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. You can obtain information from the Attorney General or the Federal Trade Commission about preventing identity theft.

For New Mexico residents: You have rights pursuant to the Fair Credit Reporting Act, such as the right to be told if information in your credit file has been used against you, the right to know what is in your credit file, the right to ask for your credit score, and the right to dispute incomplete or inaccurate information. Further, pursuant to the Fair Credit Reporting Act, the consumer reporting agencies must correct or delete inaccurate, incomplete, or unverifiable information; consumer reporting agencies may not report outdated negative information; access to your file is limited; you must give your consent for credit reports to be provided to employers; you may limit "prescreened" offers of credit and insurance you get based on information in your credit report; and you may seek damages from violator. You 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 you to review your 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 Rhode Island residents: The Attorney General may be contacted at: 150 South Main Street, Providence,

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Rhode Island 02903; www.riag.ri.gov; and 1-401-274-4400. Under Rhode Island law, you have the right to obtain any police report filed in regard to this incident. There are [x] Rhode Island residents impacted by this incident.

For New York residents: The Attorney General may be contacted at: Office of the Attorney General, The Capitol, Albany, NY 12224-0341; 1-800-771-7755; and <https://ag.ny.gov/>.

For Washington, D.C. residents: The Attorney General may be contacted at: Office of the Attorney General, 441 4th Street, NW, Washington, DC 20001; (202) 727-3400; and www.oag@dc.gov.