

WILMERHALE

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CONSUMER PROTECTION

February 17, 2023

VIA U.S. MAIL

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

Re: Security Breach Notification

Dear Attorney General Formella:

Pursuant to N.H. Rev. Stat. Ann. § 359-C:20, we are writing to notify you of a data security incident involving eleven (11) New Hampshire residents.

Identification of Parties

Wilmer Cutler Pickering Hale and Dorr LLP (“WilmerHale”) is reporting this incident on behalf of 3D Diagnostix, Inc. (“3DDX”), a provider of digital support services to dentists and CT scanning centers.

Nature of the Data Security Incident

On or about January 3, 2023, 3DDX discovered that certain company servers were accessed by an unauthorized third-party beginning on or about October 15, 2022.

The specific data that was accessible by the unauthorized party included personal information of owners or employees of dental clinics, labs, and imaging centers that set up accounts with 3DDX.

Based on the company’s investigation, the unauthorized party potentially accessed or acquired information that was provided in connection with 3DDX accounts,

Number of Residents Affected

The eleven (11) New Hampshire residents impacted will shortly receive notice via U.S. Mail in substantially the same form as the letter in **Attachment A**.

Wilmer Cutler Pickering Hale and Dorr LLP, 1875 Pennsylvania Avenue NW, Washington, DC 20006

Beijing Berlin Boston Brussels Denver Frankfurt London Los Angeles New York Palo Alto San Francisco Washington

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Steps Taken Relating to the Incident

As soon as 3DDX became aware that an unauthorized party accessed its system, 3DDX began responding to the incident and took significant measures to secure its systems, including:

- restricting system access and resetting credentials;
- eliminating the issue that raised the concern;
- retaining outside counsel to assist in investigating this matter;
- activating through counsel Stroz Friedberg, a leading global cybersecurity firm, to conduct a thorough forensic review; and
- reviewing the potentially affected documents to identify what information was potentially accessed.

The issue underlying the unauthorized access has been remediated. Stroz Friedberg validated that there are no indications of continued unauthorized access at this time. As such, 3DDX has no reason to believe that the former issue can be used to enable any future unauthorized access.

3DDX will also be offering one (1) year of credit monitoring services to impacted residents. Further detail on this offering is set forth below.

Credit Monitoring

3DDX is offering all affected individuals a one (1) year membership for Experian's® IdentityWorksSM credit monitoring services free of charge. Experian call centers can be contacted by all affected residents immediately regarding any fraud issues, and affected residents have access to all of the following features once enrolled in Experian IdentityWorks:

- **Experian credit report at signup:** Daily credit reports are available.
- **Credit Monitoring:** Actively monitors Experian file for indicators of fraud.
- **Identity Restoration:** Identity Restoration agents are immediately available to help affected individuals address credit and non-credit related fraud.
- **Experian IdentityWorks ExtendCARE:** Affected individuals receive the same high-level of Identity Restoration even after their Experian IdentityWorks membership has expired.
- **Up to \$1 Million Identity Theft Insurance:** Provides coverage for certain costs and unauthorized electronic fund transfers.

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Contact Information.

For additional information, please contact:

* * *

3DDX does not intend to, and does not, waive any applicable privilege or other legal basis under which information may not be subject to production. If it were found that any of the information provided constitutes disclosure of otherwise privileged matters such disclosure would be inadvertent.

Best regards,

Kirk J. Naha
Wilmer Cutler Pickering Hale and Dorr LLP

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Attachment A
FORM OF INDIVIDUAL NOTICE LETTER

security measures, internal controls, and safeguards, and made changes to our policies and procedures to prevent a similar occurrence in the future.

Additionally, to help protect your identity, we are providing ## months of identity theft prevention and mitigation services from Experian, including credit monitoring, at no cost to you. To activate your membership and start monitoring your personal information please follow the steps below:

- Ensure that you **enroll by:** [REDACTED] (Your code will not work after this date.)
- **Visit** the Experian IdentityWorks website to enroll: <https://www.experianidworks.com/credit>
- Provide your **activation code:** [REDACTED]
- Be prepared to provide your engagement number [REDACTED]

If you have questions about the product, need assistance with identity restoration or would like an alternative to enrolling in Experian IdentityWorks online, please contact Experian's customer care team at (833) 575-2860 from Monday through Friday 8 am – 10 pm CST, Saturday and Sunday 10 am – 7 pm CST (excluding major U.S. holidays) by [REDACTED]. Be prepared to provide engagement number [REDACTED] as proof of eligibility for the identity restoration services by Experian.

ADDITIONAL DETAILS REGARDING YOUR ##-MONTH EXPERIAN IDENTITYWORKS MEMBERSHIP:

A credit card is **not** required for enrollment in Experian IdentityWorks.

You can contact Experian **immediately** regarding any fraud issues, and have access to the following features once you enroll in Experian IdentityWorks:

- **Experian credit report at signup:** See what information is associated with your credit file. Daily credit reports are available for online members only.¹
- **Credit Monitoring:** Actively monitors Experian file for indicators of fraud.
- **Identity Restoration:** Identity Restoration specialists are immediately available to help you address credit and non-credit related fraud.
- **Experian IdentityWorks ExtendCARE™:** You receive the same high-level of Identity Restoration support even after your Experian IdentityWorks membership has expired.
- **Up to \$1 Million Identity Theft Insurance²:** Provides coverage for certain costs and unauthorized electronic fund transfers.

If you believe there was fraudulent use of your information and would like to discuss how you may be able to resolve those issues, please reach out to an Experian agent at (833) 575-2860. If, after discussing your situation with an agent, it is determined that Identity Restoration support is needed, then an Experian Identity Restoration agent is available to work with you to investigate and resolve each incident of fraud that occurred (including, as appropriate, helping you with contacting credit grantors to dispute charges and close accounts; assisting you in placing a freeze on your credit file with the three major credit bureaus; and assisting you with contacting government agencies to help restore your identity to its proper condition).

¹ Offline members will be eligible to call for additional reports quarterly after enrolling.

² The Identity Theft Insurance is underwritten and administered by American Bankers Insurance Company of Florida, an Assurant company. Please refer to the actual policies for terms, conditions, and exclusions of coverage. Coverage may not be available in all jurisdictions.

Please note that this Identity Restoration support is available to you for ## months from the date of this letter and does not require any action on your part at this time. The Terms and Conditions for this offer are located at www.ExperianIDWorks.com/restoration. You will also find self-help tips and information about identity protection at this site.

What You Can Do

To further protect your information, you can take steps to monitor your accounts, obtain your credit reports, or place a fraud alert or security freeze on your credit account. For information on each of these steps, please review **Attachment A**. Depending on your jurisdiction, you may also have additional rights available to you, which you can review in **Attachment B**.

For More Information

On behalf of the entire 3DDX team, we sincerely regret that this incident occurred. Should you have any questions about how to sign up for Experian's identity theft prevention and mitigation services or about the incident, please reach out to Experian at

Sincerely,

Khaled Elsaid
Chief Executive Officer



Attachment A: Additional Information on Protecting Your Information

Experian Identity Theft Prevention and Mitigation Services

We are providing free identity theft prevention and mitigation services from Experian, including credit monitoring, for one year to any individual whose information was exposed by the incident. Details about how you can enroll in these services is provided earlier in this letter.

You should always remain vigilant for incidents of fraud and identity theft by reviewing account statements and monitoring free credit reports to detect errors resulting from the incident.

Monitor Your Accounts

We recommend that you regularly review statements from your accounts and periodically obtain your credit report from one or more of the national credit reporting companies. You may obtain a free copy of your credit report online at www.annualcreditreport.com, by calling toll-free 1-877-322-8228, or by mailing an Annual Credit Report Request Form (available at www.annualcreditreport.com) to Annual Credit Report Request Service, P.O. Box 105281, Atlanta, GA, 30348-5281. You may also purchase a copy of your credit report by contacting one or more of the three national credit reporting agencies listed below.

Equifax®
P.O. Box 740241
Atlanta, GA 30374-0241
1-800-685-1111
www.equifax.com

Experian
P.O. Box 9701
Allen, TX 75013-9701
1-888-397-3742
www.experian.com

TransUnion®
P.O. Box 1000
Chester, PA 19016-1000
1-800-888-4213
www.transunion.com

When you receive your credit reports, review them carefully. Look for accounts or creditor inquiries that you did not initiate or do not recognize. Look for information, such as home address and Social Security number that is not accurate. If you see anything you do not understand, call the credit reporting agency at the telephone number on the report.

Credit Freeze

You have the right to put a security freeze, also known as a credit freeze, on your credit file, so that no new credit can be opened in your name without the use of a Personal Identification Number (PIN) that is issued to you when you initiate a freeze. A credit freeze is designed to prevent potential credit grantors from accessing your credit report without your consent. If you place a credit freeze, potential creditors and other third parties will not be able to access your credit report unless you temporarily lift the freeze. Therefore, using a credit freeze may delay your ability to obtain credit. Pursuant to federal law, you cannot be charged to place or lift a credit freeze on your credit report. Should you wish to place a credit freeze, please contact all three major consumer reporting agencies listed below.

Equifax®
P.O. Box 105788
Atlanta, GA 30348-5788
1-888-378-4329
www.equifax.com/personal/credit-report-services/credit-freeze/

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

TransUnion®
P.O. Box 160
Woodlyn, PA 19094-0160
1-888-916-8800
www.transunion.com/credit-freeze

You must separately place a credit freeze on your credit file at each credit reporting agency. The following information should be included when requesting a credit freeze:

- 1) Full name, with middle initial and any suffixes;
- 2) Social Security number;
- 3) Date of birth (month, day, and year);
- 4) Current address and previous addresses for the past five (5) years;
- 5) Proof of current address, such as a current utility bill or telephone bill;
- 6) Other personal information as required by the applicable credit reporting agency;

If you request a credit freeze online or by phone, then the credit reporting agencies have one (1) business day after receiving your request to place a credit freeze on your credit file report. If you request a lift of the credit freeze online or by phone, then the credit reporting agency must lift the freeze within one (1) hour. If you request a credit freeze or lift of a credit freeze by mail, then the credit agency must place or lift the credit freeze no later than three (3) business days after getting your request.

Fraud Alerts

You also have the right to place an initial or extended fraud alert on your file at no cost. An initial fraud alert lasts 1-year and 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 7 years. Should you wish to place a fraud alert, please contact any one of the agencies listed below. The agency you contact will then contact the other two credit agencies.

Equifax®
P.O. Box 105069
Atlanta, GA 30348-5069
1-888-378-4329
www.equifax.com/personal/credit-report-services/credit-fraud-alerts/

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

TransUnion®
P.O. Box 2000
Chester, PA 19016-2000
1-800-916-8800
www.transunion.com/fraud-alerts

Additional Information

You can further educate yourself regarding identity theft and the steps you can take to protect yourself, by contacting your state Attorney General or the Federal Trade Commission. Instances of known or suspected identity theft should be reported to law enforcement, your Attorney General, and the FTC.

The Federal Trade Commission
600 Pennsylvania Avenue
NW Washington, DC 20580
1-877-ID-THEFT (1-877-438-4338)
TTY: 1-866-653-4261
www.ftc.gov/idtheft



Attachment B: Additional State Law Information

For residents of the District of Columbia, Iowa, Maryland, New York, North Carolina, Oregon, and Rhode Island

You may contact your Attorney General for additional information about avoiding identity theft. If you are a Rhode Island resident, you may also file a police report by contacting local or state law enforcement agencies. You may use the following information to contact your attorney general:

Office of the Attorney General
Office of Consumer Protection
400 6th Street NW
Washington, DC 20001
(202) 442-9828
www.oag.dc.gov

Office of the Iowa
Attorney General
Hoover State Office Building
1305 E. Walnut Street
Des Moines, IA 50319
(515) 281-5926 / (888) 777-4590
www.iowaattorneygeneral.gov

Maryland Office of
the Attorney General
Consumer Protection Division
200 St. Paul Place
Baltimore, MD 21202
410-528-8662
www.marylandattorneygeneral.gov

New York Attorney General
Consumer Frauds & Protection
Bureau
120 Broadway, 3rd Floor
New York, NY 10271
(800) 771-7755
www.ag.ny.gov

New York Department of
State
Division of Consumer
Protection
99 Washington Avenue
Suite 650
Albany, New York 12231
(800) 697-1220
www.dos.ny.gov

North Carolina
Department of Justice
9001 Mail Service Center
Raleigh, NC 27699-9001
(919) 716-6000
www.ncdoj.gov

Oregon Department of Justice
1162 Court Street NE
Salem, OR 97301-4096
1-877-877-9392
www.doj.state.or.us

Rhode Island Office of
the Attorney General
Consumer Protection Division
150 South Main Street
Providence, RI 02903
1 (401) 274-4400
www.riag.ri.gov

For residents of Massachusetts:

Under Massachusetts law, you have the right to obtain any police report filed in connection to the incident. If you are the victim of identity theft, you also have the right to file a police report and obtain a copy of it.

For residents of New Mexico:

You have rights under the federal Fair Credit Reporting Act (FCRA). These include, among others, the right to know what is in your file; to dispute incomplete or inaccurate information; and to have consumer reporting agencies correct or delete inaccurate, incomplete, or unverifiable information. For more information about the FCRA, please visit:

https://files.consumerfinance.gov/f/201504_cfpb_summary_your-rights-under-fcra.pdf or www.ftc.gov.