STATE OF NH
DEPT OF JUSTICE
2020 MAR 23 PM 3: 02

MULLEN COUGHLIN LLC
ATTORNEYS AT LAW

Brian F. Fox
Office: 267-930-4777
Fax: 267-930-4771
Email: bfox@mullen.law

1275 Drummers Lane, Suite 302
Wayne, PA 19087

March 13, 2020

INTENDED FOR ADDRESSEE(S) ONLY

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

Re: Supplemental Notice of Data Event

Dear Sir or Madam:

We continue to represent Arizona Dental Insurance Service, Inc. d/b/a/ Delta Dental of Arizona ("DDAZ") located at 5656 W. Talavi Blvd, Glendale, AZ 85306. We write to supplement our November 8, 2019 notice to your office, a copy of which is attached here as ***Exhibit A***. By providing this notice, DDAZ 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.

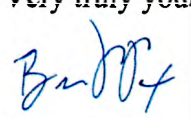
Since providing the initial notice on or about November 8, 2019 to impacted individuals and your office, DDAZ identified nine (9) additional affected New Hampshire residents. The total number of affected New Hampshire residents is nineteen (19). The personal information impacted for these individuals included the following types of information: name and Social Security number. Notice to the additional affected individuals was mailed between January 3, 2020 and March 10, 2020, after DDAZ confirmed the individuals' mailing addresses. The notice was provided in substantially the same form as the letter attached here as ***Exhibit B***.

While DDAZ is not aware of any attempted or actual misuse of personal information, DDAZ is providing the impacted individuals access to credit monitoring and identity theft restoration services for one (1) year through Experian at no cost to these individuals. Additionally, DDAZ 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. DDAZ 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.

Should you have any questions regarding this notification or other aspects of the data security event, please contact us at (267) 930-4777.

Very truly yours,



Brian F. Fox of
MULLEN COUGHLIN LLC

BFF/dle
Enclosures

Exhibit A

MULLEN
COUGHLIN

1275 Drummers Lane, Suite 302
Wayne, Pennsylvania 19087

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

MULLEN COUGHLIN LLC
ATTORNEYS AT LAW

Brian F. Fox
Office: 267-930-4777
Fax: 267-930-4771
Email: bfox@mullen.law

1275 Drummers Lane, Suite 302
Wayne, PA 19087

November 8, 2019

INTENDED FOR ADDRESSEE(S) ONLY

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 Arizona Dental Insurance Service, Inc. d.b.a. Delta Dental of Arizona ("DDAZ"), 5656 W. Talavi Blvd Glendale, Arizona 85306, and write to notify your office of an incident that may affect the security of some personal information relating to 10 New Hampshire residents. The investigation into this event is ongoing and this notice will be supplemented with any new significant facts learned subsequent to its submission. By providing this notice, DDAZ 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 around July 8, 2019, DDAZ became aware of suspicious activity related to an employee's email account. DDAZ immediately commenced an investigation, working with third party forensic investigators, to assess the nature and scope of the email account activity. The investigation confirmed that the employee fell victim to an email phishing scheme that allowed an unauthorized individual to gain access to the email account on July 8, 2019. While DDAZ has no evidence of actual or attempted misuse of any information present in the email account, it could not rule out the possibility of access to data present in the account. DDAZ undertook a lengthy and labor-intensive process to identify the personal information contained in the affected account. While the investigation was unable to confirm whether any information was actually accessed by the unauthorized individual, in an abundance of caution, DDAZ is notifying those individuals whose personal information was present within the affected email account. The types of personal information present within the email account include the following: name and Social Security number. The impacted data elements were not the same for each affected individual.

Notice to New Hampshire Residents

On or about November 8, 2019, DDAZ began mailing written notice of this incident to all affected individuals, which includes 10 New Hampshire residents. Written notice to the individuals 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 this incident, DDAZ promptly began an investigation with the assistance of a third-party forensic investigator to determine the nature and scope of this incident, including identifying the individuals who may be affected, putting in place resources to assist them, and providing them with notice of this incident. DDAZ immediately reset the affected email account password, is reviewing its existing policies and procedures, implemented additional safeguards, and enabled multi-factor authentication for employee email.

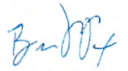
While DDAZ is not aware of any attempted or actual misuse of personal information, DDAZ is providing affected individuals access to twelve (12) months of credit monitoring and identity restoration services, through Experian.

Additionally, DDAZ is providing 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 identity theft and fraud by reviewing account statements, explanation of benefits forms, 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. DDAZ 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").

Contact Information

Should you have any questions regarding this notification or other aspects of the data security event, please contact us at (267) 930-4777.

Very truly yours,



Brian Fox of
MULLEN COUGHLIN LLC

BFF:gcl
Enclosure

Exhibit A

DELTA DENTAL

Return Mail Processing
PO Box 589
Claysburg, PA 16625-0589

November 8, 2019

F0478-L01-0000001 P001 T00002 **********MIXED AADC 159
SAMPLE A SAMPLE - ADULT
APT 123
123 ANY ST
ANYTOWN, US 12345-6789

RE: Notice of Data Privacy Incident

Dear Sample A Sample:

Delta Dental of Arizona is writing to inform you of a data privacy incident that may affect the security of your personal health information. We take this incident very seriously and are providing you with information and access to resources so that you can protect your personal information, should you feel it is appropriate to do so.

What Happened? On or around July 8, 2019, Delta Dental of Arizona became aware of suspicious activity related to an employee's email account. We immediately commenced an investigation, working with third party forensic investigators, to assess the nature and scope of the email account activity. The investigation confirmed that the employee fell victim to an email phishing scheme that allowed an unauthorized individual to gain access to the email account on July 8, 2019. While Delta Dental of Arizona has no evidence of actual or attempted misuse of any information present in the email account, it could not rule out the possibility of access to data present in the account. Delta Dental of Arizona undertook a lengthy and labor-intensive process to identify the personal information contained in the affected account.

What Information Was Involved? Delta Dental of Arizona was unable to confirm whether your information was actually accessed by the unauthorized individual. However, our investigation revealed that the email account contained your first and last name and exposed element 1, exposed element 2, exposed element 3, exposed element 4, exposed element 5, exposed element 6, exposed element 7, exposed element 8, exposed element 9, exposed element 10.

What Is Delta Dental of Arizona Doing? Upon learning of this incident, we immediately took steps to ensure the security of our email environment and investigated the activity. Since the incident, we have implemented additional security measures to increase the security of our email environment and we continue to assess our email environment to identify further security enhancements. We are also reviewing our existing policies and procedures, and will be reporting this incident to relevant state and federal regulators, as required.

While we have no indication that any actual or attempted misuse of information has or will result from this incident, we take the security of personal information in our care very seriously. In an abundance of caution, we are offering you access to 12 months of credit monitoring and identity theft restoration services at no cost to you through Experian. The identity protection services start on the date of this notice and you can use them at any time during the next 12 months. More information on these services and the steps to enroll in these services may be found in the enclosed "Steps You Can Take to Protect Your Information."

Delta Dental of Arizona
5656 W. Talavi Blvd. Glendale, AZ 85306 | P.O. Box 43000, Phoenix, AZ 85080-3000
Local: 602.938.3131 | Toll-free: 800.352.6132 | Fax: 602.588.3636

What You Can Do? You can enroll to receive the free credit monitoring and identity restoration services. You can also review the enclosed "Steps You Can Take to Protect Your Information." As an added precaution, we also encourage you to review your account statements, health insurance account records, and explanation of benefits forms for suspicious activity, and report all suspicious activity to the institution that issued the record immediately. In addition, we advise you to report suspected incidents of identity theft to local law enforcement or the Attorney General.

For More Information. We understand that you may have questions about this incident that are not addressed in this letter. We've set up a dedicated assistance line to answer your privacy questions. Please call us toll-free at 1-833-281-4828, 7:00 am to 9:00 pm MST, Monday through Friday and 9:00 am to 6:00 pm MST, Saturday and Sunday (excluding some U.S. national holidays) if you have additional questions or concerns.

Delta Dental of Arizona takes the privacy and security of the personal information in our care very seriously. We sincerely regret any concern or inconvenience this incident has caused you.

Sincerely,

Leslie R. Hess
General Counsel, Chief Compliance and Risk Management Officer
Delta Dental of Arizona

STEPS YOU CAN TAKE TO PROTECT YOUR INFORMATION

Credit Monitoring

To help protect your identity, we are offering a complimentary one-year membership of Experian's® IdentityWorks℠. This product provides you with superior identity detection and resolution of identity theft. To activate your membership and start monitoring your personal information please follow the steps below:

- Ensure that you **enroll by**: **April 30, 2020** (Your code will not work after this date.)
- **Visit** the Experian IdentityWorks website to enroll: **https://www.experianidworks.com/credit**
- Provide your **activation code**: **ABCDEFGHI**

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 1-833-281-4828 by April 30, 2020. Be prepared to provide engagement number **DB16070** as proof of eligibility for the identity restoration services by Experian.

ADDITIONAL DETAILS REGARDING YOUR 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.*
- **Credit Monitoring:** Actively monitors Experian file for indicators of fraud.
- **Identity Restoration:** Identity Restoration agents 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 Insurance**:** 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 1-877-890-9332.

Monitor Accounts

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

TransUnion
P.O. Box 2000
Chester, PA 19016
1-888-909-8872
www.transunion.com/credit-freeze

Equifax
PO 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 (5) years, provide 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, include 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 1-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 2002
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-victimresource/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); or 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 North Carolina residents, the Attorney General may be contacted at: 9001 Mail Service Center, Raleigh, NC 27699-9001; 1-877-566-7226 or 1-919-716-6400; or www.ncdoj.gov. **For Maryland residents**, the Attorney General may be contacted at: 200 St. Paul Place, 16th Floor, Baltimore, MD 21202; 1-888-743-0023; or www.oag.state.md.us. **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 violators. 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 Rhode Island Attorney General may be reached at: 150 South Main Street, Providence, Rhode Island 02903; www.riag.ri.gov; or 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 approximately 2 Rhode Island residents whose information may have been present in the relevant emails. **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; https://ag.ny.gov/.

DELTA DENTAL

Return Mail Processing
PO Box 589
Claysburg, PA 16625-0589

November 8, 2019

F0478-L02-0000004 P001 T00002 **********MIXED AADC 159
TO THE PARENT OR GUARDIAN OF:
SAMPLE A SAMPLE - MINOR
APT 123
123 ANY ST
ANYTOWN, US 12345-6789

RE: Notice of Data Privacy Incident

To the Parent or Guardian of Sample A Sample:

Delta Dental of Arizona is writing to inform you of a data privacy incident that may affect the security of your minor's personal health information. We take this incident very seriously and are providing you with information and access to resources so that you can protect your minor's personal information, should you feel it is appropriate to do so.

What Happened? On or around July 8, 2019, Delta Dental of Arizona became aware of suspicious activity related to an employee's email account. We immediately commenced an investigation, working with third party forensic investigators, to assess the nature and scope of the email account activity. The investigation confirmed that the employee fell victim to an email phishing scheme that allowed an unauthorized individual to gain access to the email account on July 8, 2019. While Delta Dental of Arizona has no evidence of actual or attempted misuse of any information present in the email account, it could not rule out the possibility of access to data present in the account. Delta Dental of Arizona undertook a lengthy and labor-intensive process to identify the personal information contained in the affected account.

What Information Was Involved? Delta Dental of Arizona was unable to confirm whether your minor's information was actually accessed by the unauthorized individual. However, our investigation revealed that the email account contained your minor's first and last name and exposed element 1, exposed element 2, exposed element 3, exposed element 4, exposed element 5, exposed element 6, exposed element 7, exposed element 8, exposed element 9, exposed element 10.

What Is Delta Dental of Arizona Doing? Upon learning of this incident, we immediately took steps to ensure the security of our email environment and investigated the activity. Since the incident, we have implemented additional security measures to increase the security of our email environment and we continue to assess our email environment to identify further security enhancements. We are also reviewing our existing policies and procedures, and will be reporting this incident to relevant state and federal regulators, as required.

While we have no indication that any actual or attempted misuse of information has or will result from this incident, we take the security of personal information in our care very seriously. In an abundance of caution, we are offering your minor access to 12 months of minor identity monitoring services at no cost through Experian. Your minor's services start on the date of this notice and you can use them at any time during the next 12 months. More information on these services and the steps to enroll your minor may be found in the enclosed "Steps You Can Take to Protect Your Information."

0000004

What You Can Do? You can enroll your minor to receive the free identity monitoring services. You can also review the enclosed "Steps You Can Take to Protect Your Information." As an added precaution, we also encourage you to review your minor's account statements, health insurance account records, and explanation of benefits forms for suspicious activity, and report all suspicious activity to the institution that issued the record immediately. In addition, we advise you to report suspected incidents of identity theft to local law enforcement or the Attorney General.

For More Information. We understand that you may have questions about this incident that are not addressed in this letter. We've set up a dedicated assistance line to answer your privacy questions. Please call us toll-free at 1-833-281-4828, 7:00 am to 9:00 pm MST, Monday through Friday and 9:00 am to 6:00 pm MST, Saturday and Sunday (excluding some U.S. national holidays) if you have additional questions or concerns.

Delta Dental of Arizona takes the privacy and security of the personal information in our care very seriously. We sincerely regret any concern or inconvenience this incident has caused you.

Sincerely,

Leslie R. Hess
General Counsel, Chief Compliance and Risk Management Officer
Delta Dental of Arizona

STEPS YOU CAN TAKE TO PROTECT YOUR INFORMATION

Minor Monitoring

To help protect your minor's identity, we are offering a complimentary one-year membership of Experian's® IdentityWorks℠. This product provides your minor with superior identity detection and resolution of identity theft. To activate your membership and start monitoring your minor's personal information please follow the steps below:

- Ensure that you **enroll by**: **April 30, 2020** (Your code will not work after this date.)
- **Visit** the Experian IdentityWorks website to enroll: **https://www.experianidworks.com/minorplus**
- Provide your **activation code**: **ABCDEFGHI**

If you have questions about the product or would like an alternative to enrolling in Experian IdentityWorks online, please contact Experian's customer care team at 1-833-281-4828 by April 30, 2020. Be prepared to provide engagement number **DB16300** as proof of eligibility for the minor identity restoration services by Experian.

Monitor Your Minor's Accounts

We encourage you to remain vigilant against incidents of identity theft and fraud, to review your minor's account statements, and to monitor your minor's credit reports for suspicious activity. Under U.S. law your minor is entitled to one free credit report annually from each of the three major credit reporting bureaus. To order your minor's 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 minor's credit report.

You have the right to place a "security freeze" on your minor's credit report, which will prohibit a consumer reporting agency from releasing information in your minor's 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 minor's 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 minor's credit report. Should you wish to place a security freeze, please contact the major consumer reporting agencies listed below:

Experian	**TransUnion**	**Equifax**
PO Box 9554	P.O. Box 2000	PO Box 105788
Allen, TX 75013	Chester, PA 19016	Atlanta, GA 30348-5788
1-888-397-3742	1-888-909-8872	1-800-685-1111
www.experian.com/freeze/center.html	www.transunion.com/credit-freeze	www.equifax.com/personal/credit-report-services

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

1. Your minor's full name (including middle initial as well as Jr., Sr., II, III, etc.);
2. Social Security number;
3. Date of birth;
4. If your minor has moved in the past five (5) years, provide 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 your minor is a victim of identity theft, include 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 minor's file at no cost. An initial fraud alert is a 1-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 your minor is 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 on behalf of your minor, please contact any one of the agencies listed below:

Experian	**TransUnion**	**Equifax**
P.O. Box 2002	P.O. Box 2000	P.O. Box 105069
Allen, TX 75013	Chester, PA 19106	Atlanta, GA 30348
1-888-397-3742	1-800-680-7289	1-888-766-0008
www.experian.com/fraud/center.html	www.transunion.com/fraud-victim-resource/place-fraud-alert	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 your minor, 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); 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 your minor ever experiences 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 your minor has 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 North Carolina residents, the Attorney General may be contacted at: 9001 Mail Service Center, Raleigh, NC 27699-9001; 1-877-566-7226 or 1-919-716-6400; or www.ncdoj.gov. **For Maryland residents**, the Attorney General may be contacted at: 200 St. Paul Place, 16th Floor, Baltimore, MD 21202; 1-888-743-0023; or www.oag.state.md.us. **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 violators. 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 Rhode Island Attorney General may be reached at: 150 South Main Street, Providence, Rhode Island 02903; www.riag.ri.gov; or 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 approximately 2 Rhode Island residents whose information may have been present in the relevant emails. **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; https://ag.ny.gov/.

DELTA DENTAL

Return Mail Processing
PO Box 589
Claysburg, PA 16625-0589

November 8, 2019

F0478-L01-0000001 P001 T00002 **********MIXED AADC 159
SAMPLE A SAMPLE - ADULT
APT 123
123 ANY ST
ANYTOWN, US 12345-6789

RE: Notice of Data Privacy Incident

Dear Sample A Sample:

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What Is Delta Dental of Arizona Doing? Upon learning of this incident, we immediately took steps to ensure the security of our email environment and investigated the activity. Since the incident, we have implemented additional security measures to increase the security of our email environment and we continue to assess our email environment to identify further security enhancements. We are also reviewing our existing policies and procedures, and will be reporting this incident to relevant state and federal regulators, as required.

While we have no indication that any actual or attempted misuse of information has or will result from this incident, we take the security of personal information in our care very seriously. In an abundance of caution, we are offering you access to 12 months of credit monitoring and identity theft restoration services at no cost to you through Experian. The identity protection services start on the date of this notice and you can use them at any time during the next 12 months. More information on these services and the steps to enroll in these services may be found in the enclosed "Steps You Can Take to Protect Your Information."

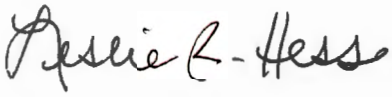
0000001

What You Can Do? You can enroll to receive the free credit monitoring and identity restoration services. You can also review the enclosed "Steps You Can Take to Protect Your Information." As an added precaution, we also encourage you to review your account statements, health insurance account records, and explanation of benefits forms for suspicious activity, and report all suspicious activity to the institution that issued the record immediately. In addition, we advise you to report suspected incidents of identity theft to local law enforcement or the Attorney General.

For More Information. We understand that you may have questions about this incident that are not addressed in this letter. We've set up a dedicated assistance line to answer your privacy questions. Please call us toll-free at 1-833-281-4828, 7:00 am to 9:00 pm MST, Monday through Friday and 9:00 am to 6:00 pm MST, Saturday and Sunday (excluding some U.S. national holidays) if you have additional questions or concerns.

Delta Dental of Arizona takes the privacy and security of the personal information in our care very seriously. We sincerely regret any concern or inconvenience this incident has caused you.

Sincerely,



Leslie R. Hess
General Counsel, Chief Compliance and Risk Management Officer
Delta Dental of Arizona

STEPS YOU CAN TAKE TO PROTECT YOUR INFORMATION

Credit Monitoring

To help protect your identity, we are offering a complimentary one-year membership of Experian's® IdentityWorks℠. This product provides you with superior identity detection and resolution of identity theft. To activate your membership and start monitoring your personal information please follow the steps below:

- Ensure that you **enroll by**: **April 30, 2020** (Your code will not work after this date.)
- **Visit** the Experian IdentityWorks website to enroll: **https://www.experianidworks.com/credit**
- Provide your **activation code**: **ABCDEFGHI**

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 1-833-281-4828 by April 30, 2020. Be prepared to provide engagement number **DB16070** as proof of eligibility for the identity restoration services by Experian.

ADDITIONAL DETAILS REGARDING YOUR 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.*
- **Credit Monitoring:** Actively monitors Experian file for indicators of fraud.
- **Identity Restoration:** Identity Restoration agents 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 Insurance**:** 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 1-877-890-9332.

Monitor Accounts

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

TransUnion
P.O. Box 2000
Chester, PA 19016
1-888-909-8872
www.transunion.com/credit-freeze

Equifax
PO 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 (5) years, provide 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, include 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 1-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
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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-victimresource/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); or 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 North Carolina residents, the Attorney General may be contacted at: 9001 Mail Service Center, Raleigh, NC 27699-9001; 1-877-566-7226 or 1-919-716-6400; or www.ncdoj.gov. **For Maryland residents,** the Attorney General may be contacted at: 200 St. Paul Place, 16th Floor, Baltimore, MD 21202; 1-888-743-0023; or www.oag.state.md.us. **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 violators. 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 Rhode Island Attorney General may be reached at: 150 South Main Street, Providence, Rhode Island 02903; www.riag.ri.gov; or 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 approximately 2 Rhode Island residents whose information may have been present in the relevant emails. **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; https://ag.ny.gov/.

DELTA DENTAL

Return Mail Processing
PO Box 589
Claysburg, PA 16625-0589

November 8, 2019

F0478-L02-0000004 P001 T00002 **********MIXED AADC 159
TO THE PARENT OR GUARDIAN OF:
SAMPLE A SAMPLE - MINOR
APT 123
123 ANY ST
ANYTOWN, US 12345-6789

RE: Notice of Data Privacy Incident

To the Parent or Guardian of Sample A Sample:

Delta Dental of Arizona is writing to inform you of a data privacy incident that may affect the security of your minor's personal health information. We take this incident very seriously and are providing you with information and access to resources so that you can protect your minor's personal information, should you feel it is appropriate to do so.

What Happened? On or around July 8, 2019, Delta Dental of Arizona became aware of suspicious activity related to an employee's email account. We immediately commenced an investigation, working with third party forensic investigators, to assess the nature and scope of the email account activity. The investigation confirmed that the employee fell victim to an email phishing scheme that allowed an unauthorized individual to gain access to the email account on July 8, 2019. While Delta Dental of Arizona has no evidence of actual or attempted misuse of any information present in the email account, it could not rule out the possibility of access to data present in the account. Delta Dental of Arizona undertook a lengthy and labor-intensive process to identify the personal information contained in the affected account.

What Information Was Involved? Delta Dental of Arizona was unable to confirm whether your minor's information was actually accessed by the unauthorized individual. However, our investigation revealed that the email account contained your minor's first and last name and exposed element 1, exposed element 2, exposed element 3, exposed element 4, exposed element 5, exposed element 6, exposed element 7, exposed element 8, exposed element 9, exposed element 10.

What Is Delta Dental of Arizona Doing? Upon learning of this incident, we immediately took steps to ensure the security of our email environment and investigated the activity. Since the incident, we have implemented additional security measures to increase the security of our email environment and we continue to assess our email environment to identify further security enhancements. We are also reviewing our existing policies and procedures, and will be reporting this incident to relevant state and federal regulators, as required.

While we have no indication that any actual or attempted misuse of information has or will result from this incident, we take the security of personal information in our care very seriously. In an abundance of caution, we are offering your minor access to 12 months of minor identity monitoring services at no cost through Experian. Your minor's services start on the date of this notice and you can use them at any time during the next 12 months. More information on these services and the steps to enroll your minor may be found in the enclosed "Steps You Can Take to Protect Your Information."

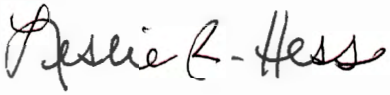
Delta Dental of Arizona
5656 W. Talavi Blvd. Glendale, AZ 85306 | P.O. Box 43000, Phoenix, AZ 85080-3000
Local: 602.938.3131 | Toll-free: 800.352.6132 | Fax: 602.588.3636

What You Can Do? You can enroll your minor to receive the free identity monitoring services. You can also review the enclosed "Steps You Can Take to Protect Your Information." As an added precaution, we also encourage you to review your minor's account statements, health insurance account records, and explanation of benefits forms for suspicious activity, and report all suspicious activity to the institution that issued the record immediately. In addition, we advise you to report suspected incidents of identity theft to local law enforcement or the Attorney General.

For More Information. We understand that you may have questions about this incident that are not addressed in this letter. We've set up a dedicated assistance line to answer your privacy questions. Please call us toll-free at 1-833-281-4828, 7:00 am to 9:00 pm MST, Monday through Friday and 9:00 am to 6:00 pm MST, Saturday and Sunday (excluding some U.S. national holidays) if you have additional questions or concerns.

Delta Dental of Arizona takes the privacy and security of the personal information in our care very seriously. We sincerely regret any concern or inconvenience this incident has caused you.

Sincerely,



Leslie R. Hess
General Counsel, Chief Compliance and Risk Management Officer
Delta Dental of Arizona

STEPS YOU CAN TAKE TO PROTECT YOUR INFORMATION

Minor Monitoring

To help protect your minor's identity, we are offering a complimentary one-year membership of Experian's® IdentityWorks℠. This product provides your minor with superior identity detection and resolution of identity theft. To activate your membership and start monitoring your minor's personal information please follow the steps below:

- Ensure that you **enroll by**: **April 30, 2020** (Your code will not work after this date.)
- **Visit** the Experian IdentityWorks website to enroll: **https://www.experianidworks.com/minorplus**
- Provide your **activation code**: **ABCDEFGHI**

If you have questions about the product or would like an alternative to enrolling in Experian IdentityWorks online, please contact Experian's customer care team at 1-833-281-4828 by April 30, 2020. Be prepared to provide engagement number **DB16300** as proof of eligibility for the minor identity restoration services by Experian.

Monitor Your Minor's Accounts

We encourage you to remain vigilant against incidents of identity theft and fraud, to review your minor's account statements, and to monitor your minor's credit reports for suspicious activity. Under U.S. law your minor is entitled to one free credit report annually from each of the three major credit reporting bureaus. To order your minor's 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 minor's credit report.

You have the right to place a "security freeze" on your minor's credit report, which will prohibit a consumer reporting agency from releasing information in your minor's 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 minor's 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 minor's credit report. Should you wish to place a security freeze, please contact the major consumer reporting agencies listed below:

Experian	**TransUnion**	**Equifax**
PO Box 9554	P.O. Box 2000	PO Box 105788
Allen, TX 75013	Chester, PA 19016	Atlanta, GA 30348-5788
1-888-397-3742	1-888-909-8872	1-800-685-1111
www.experian.com/freeze/center.html	www.transunion.com/credit-freeze	www.equifax.com/personal/credit-report-services

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

1. Your minor's full name (including middle initial as well as Jr., Sr., II, III, etc.);
2. Social Security number;
3. Date of birth;
4. If your minor has moved in the past five (5) years, provide 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.);
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P.O. Box 2002	P.O. Box 2000	P.O. Box 105069
Allen, TX 75013	Chester, PA 19106	Atlanta, GA 30348
1-888-397-3742	1-800-680-7289	1-888-766-0008
www.experian.com/fraud/center.html	www.transunion.com/fraud-victim-resource/place-fraud-alert	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 your minor, 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); 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 your minor ever experiences 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 your minor has 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.

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Exhibit B

DELTA DENTAL

Return Mail Processing
PO Box 589
Claysburg, PA 16625-0589

November 8, 2019

F0478-L01-0000001 P001 T00002 **********MIXED AADC 159
SAMPLE A SAMPLE - ADULT
APT 123
123 ANY ST
ANYTOWN, US 12345-6789

RE: Notice of Data Privacy Incident

Dear Sample A Sample:

Delta Dental of Arizona is writing to inform you of a data privacy incident that may affect the security of your personal health information. We take this incident very seriously and are providing you with information and access to resources so that you can protect your personal information, should you feel it is appropriate to do so.

What Happened? On or around July 8, 2019, Delta Dental of Arizona became aware of suspicious activity related to an employee's email account. We immediately commenced an investigation, working with third party forensic investigators, to assess the nature and scope of the email account activity. The investigation confirmed that the employee fell victim to an email phishing scheme that allowed an unauthorized individual to gain access to the email account on July 8, 2019. While Delta Dental of Arizona has no evidence of actual or attempted misuse of any information present in the email account, it could not rule out the possibility of access to data present in the account. Delta Dental of Arizona undertook a lengthy and labor-intensive process to identify the personal information contained in the affected account.

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Delta Dental of Arizona
5656 W. Talavi Blvd. Glendale, AZ 85306 | P.O. Box 43000, Phoenix, AZ 85080-3000
Local: 602.938.3131 | Toll-free: 800.352.6132 | Fax: 602.588.3636

What You Can Do? You can enroll to receive the free credit monitoring and identity restoration services. You can also review the enclosed "Steps You Can Take to Protect Your Information." As an added precaution, we also encourage you to review your account statements, health insurance account records, and explanation of benefits forms for suspicious activity, and report all suspicious activity to the institution that issued the record immediately. In addition, we advise you to report suspected incidents of identity theft to local law enforcement or the Attorney General.

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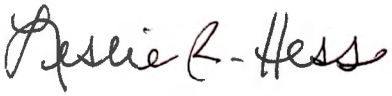

Leslie R. Hess
General Counsel, Chief Compliance and Risk Management Officer
Delta Dental of Arizona

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- Provide your **activation code**: **ABCDEFGHI**

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

TransUnion
P.O. Box 2000
Chester, PA 19016
1-888-909-8872
www.transunion.com/credit-freeze

Equifax
PO 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 (5) years, provide 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, include 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 1-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 2002
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-victimresource/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); or 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 North Carolina residents, the Attorney General may be contacted at: 9001 Mail Service Center, Raleigh, NC 27699-9001; 1-877-566-7226 or 1-919-716-6400; or www.ncdoj.gov. **For Maryland residents**, the Attorney General may be contacted at: 200 St. Paul Place, 16th Floor, Baltimore, MD 21202; 1-888-743-0023; or www.oag.state.md.us. **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 violators. 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 Rhode Island Attorney General may be reached at: 150 South Main Street, Providence, Rhode Island 02903; www.riag.ri.gov; or 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 approximately 2 Rhode Island residents whose information may have been present in the relevant emails. **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; https://ag.ny.gov/.

DELTA DENTAL

Return Mail Processing
PO Box 589
Claysburg, PA 16625-0589

November 8, 2019

F0478-L02-0000004 P001 T00002 **********MIXED AADC 159
TO THE PARENT OR GUARDIAN OF:
SAMPLE A SAMPLE - MINOR
APT 123
123 ANY ST
ANYTOWN, US 12345-6789

RE: Notice of Data Privacy Incident

To the Parent or Guardian of Sample A Sample:

Delta Dental of Arizona is writing to inform you of a data privacy incident that may affect the security of your minor's personal health information. We take this incident very seriously and are providing you with information and access to resources so that you can protect your minor's personal information, should you feel it is appropriate to do so.

What Happened? On or around July 8, 2019, Delta Dental of Arizona became aware of suspicious activity related to an employee's email account. We immediately commenced an investigation, working with third party forensic investigators, to assess the nature and scope of the email account activity. The investigation confirmed that the employee fell victim to an email phishing scheme that allowed an unauthorized individual to gain access to the email account on July 8, 2019. While Delta Dental of Arizona has no evidence of actual or attempted misuse of any information present in the email account, it could not rule out the possibility of access to data present in the account. Delta Dental of Arizona undertook a lengthy and labor-intensive process to identify the personal information contained in the affected account.

What Information Was Involved? Delta Dental of Arizona was unable to confirm whether your minor's information was actually accessed by the unauthorized individual. However, our investigation revealed that the email account contained your minor's first and last name and exposed element 1, exposed element 2, exposed element 3, exposed element 4, exposed element 5, exposed element 6, exposed element 7, exposed element 8, exposed element 9, exposed element 10.

What Is Delta Dental of Arizona Doing? Upon learning of this incident, we immediately took steps to ensure the security of our email environment and investigated the activity. Since the incident, we have implemented additional security measures to increase the security of our email environment and we continue to assess our email environment to identify further security enhancements. We are also reviewing our existing policies and procedures, and will be reporting this incident to relevant state and federal regulators, as required.

While we have no indication that any actual or attempted misuse of information has or will result from this incident, we take the security of personal information in our care very seriously. In an abundance of caution, we are offering your minor access to 12 months of minor identity monitoring services at no cost through Experian. Your minor's services start on the date of this notice and you can use them at any time during the next 12 months. More information on these services and the steps to enroll your minor may be found in the enclosed "Steps You Can Take to Protect Your Information."

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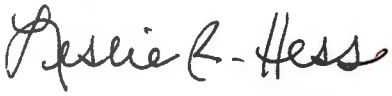
What You Can Do? You can enroll your minor to receive the free identity monitoring services. You can also review the enclosed "Steps You Can Take to Protect Your Information." As an added precaution, we also encourage you to review your minor's account statements, health insurance account records, and explanation of benefits forms for suspicious activity, and report all suspicious activity to the institution that issued the record immediately. In addition, we advise you to report suspected incidents of identity theft to local law enforcement or the Attorney General.

For More Information. We understand that you may have questions about this incident that are not addressed in this letter. We've set up a dedicated assistance line to answer your privacy questions. Please call us toll-free at 1-833-281-4828, 7:00 am to 9:00 pm MST, Monday through Friday and 9:00 am to 6:00 pm MST, Saturday and Sunday (excluding some U.S. national holidays) if you have additional questions or concerns.

Delta Dental of Arizona takes the privacy and security of the personal information in our care very seriously. We sincerely regret any concern or inconvenience this incident has caused you.

Sincerely,



Leslie R. Hess
General Counsel, Chief Compliance and Risk Management Officer
Delta Dental of Arizona

STEPS YOU CAN TAKE TO PROTECT YOUR INFORMATION

Minor Monitoring

To help protect your minor's identity, we are offering a complimentary one-year membership of Experian's® IdentityWorks℠. This product provides your minor with superior identity detection and resolution of identity theft. To activate your membership and start monitoring your minor's personal information please follow the steps below:

- Ensure that you **enroll by**: **April 30, 2020** (Your code will not work after this date.)
- **Visit** the Experian IdentityWorks website to enroll: **https://www.experianidworks.com/minorplus**
- Provide your **activation code**: **ABCDEFGHI**

If you have questions about the product or would like an alternative to enrolling in Experian IdentityWorks online, please contact Experian's customer care team at 1-833-281-4828 by April 30, 2020. Be prepared to provide engagement number **DB16300** as proof of eligibility for the minor identity restoration services by Experian.

Monitor Your Minor's Accounts

We encourage you to remain vigilant against incidents of identity theft and fraud, to review your minor's account statements, and to monitor your minor's credit reports for suspicious activity. Under U.S. law your minor is entitled to one free credit report annually from each of the three major credit reporting bureaus. To order your minor's 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 minor's credit report.

You have the right to place a "security freeze" on your minor's credit report, which will prohibit a consumer reporting agency from releasing information in your minor's 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 minor's 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 minor's credit report. Should you wish to place a security freeze, please contact the major consumer reporting agencies listed below:

Experian	**TransUnion**	**Equifax**
PO Box 9554	P.O. Box 2000	PO Box 105788
Allen, TX 75013	Chester, PA 19016	Atlanta, GA 30348-5788
1-888-397-3742	1-888-909-8872	1-800-685-1111
www.experian.com/freeze/center.html	www.transunion.com/credit-freeze	www.equifax.com/personal/credit-report-services

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

1. Your minor's full name (including middle initial as well as Jr., Sr., II, III, etc.);
2. Social Security number;
3. Date of birth;
4. If your minor has moved in the past five (5) years, provide 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 your minor is a victim of identity theft, include 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 minor's file at no cost. An initial fraud alert is a 1-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 your minor is 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 on behalf of your minor, please contact any one of the agencies listed below:

Experian	**TransUnion**	**Equifax**
P.O. Box 2002	P.O. Box 2000	P.O. Box 105069
Allen, TX 75013	Chester, PA 19106	Atlanta, GA 30348
1-888-397-3742	1-800-680-7289	1-888-766-0008
www.experian.com/fraud/center.html	www.transunion.com/fraud-victim-resource/place-fraud-alert	www.equifax.com/personal/credit-report-services

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