



Maria Efaplatidis
77 Water Street, Suite 2100
New York, NY 10005
Maria.Efaplatidis@lewisbrisbois.com
Direct: 212.232.1366

October 19, 2022

VIA EMAIL

Attorney General John Formella
Consumer Protection Bureau
Office of the Attorney General
33 Capitol Street
Concord, NH 03301
attorneygeneral@doj.nh.gov

Re: Notice of Data Security Incident

Dear Attorney General Formella:

Lewis Brisbois Bisgaard & Smith LLP represents Country Doctor Community Health Clinic (“CDCHC”) in connection with a recent data security incident described in greater detail below. The purpose of this letter is to notify you of the incident.

1. Nature of the Incident

On January 6, 2022, CDCHC discovered unusual activity in its digital environment. Upon learning this, CDCHC immediately took steps to secure its digital environment and investigate. It also engaged independent cybersecurity experts to conduct an investigation. As a result of this investigation, CDCHC learned that an unauthorized actor accessed certain files and stored data within its systems. On October 14, 2022, CDCHC determined that the personal and protected health information of New Hampshire residents may have been impacted by this incident. The information affected varies by individual, but may have included residents’ names, dates of birth, Social Security numbers, medical information, and medical record number. Notably, there is no evidence that the information has been misused.

2. Type of Information and Number of New Hampshire Residents Involved

On October 14, 2022, Country Doctor notified three (3) New Hampshire residents of this data security incident via first class U.S. mail. A sample copy of the notification letter sent to the impacted individuals is included with this correspondence.

3. Measures Taken to Address the Incident

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To help prevent something like this from happening again, CDCHC is implementing additional technical security measures. It has taken important steps to minimize the chances of the data being misused as a result of this incident. Nonetheless, CDCHC is providing individuals with information about steps that you can take to help protect your personal information. As a further precaution, it is also offering individuals whose Social Security numbers may have been accessed 12 months of complimentary credit and identity monitoring services through IDX. This product helps detect possible misuse of information and provides individuals with identity protection support.

4. Contact Information

Country Doctor remains dedicated to protecting the information in its control. If you have any questions or need additional information, please do not hesitate to contact me at 212.232.1366 or Maria.Efaplatidis@lewisbrisbois.com.

Sincerely,

Maria Efaplatidis of
LEWIS BRISBOIS BISGAARD &
SMITH LLP

Enclosure: Sample Notification Letter



P.O. Box 1907
Suwanee, GA 30024

To Enroll, Please Visit:
<https://app.idx.us/account-creation/protect>
Or Call:
1-833-875-0659
Enrollment Code: <<XXXXXXXXXX>>

<<First Name>> <<Last Name>>
<<Address 1>>
<<Address 2>>
<<City>>, <<State>> <<Zip>>

October 19, 2022

Subject: Notice of Data <<Variable Text 1>>

Dear <FNAME> <LNAME>:

I am writing to inform you of a recent data security incident experienced by Country Doctor Community Health Clinic (“CDCHC”) that may have involved some of your information. We are notifying you of the incident, offering you complimentary credit monitoring and identity protection services, and informing you about steps you can take to help protect your personal information.

What Happened: On January 6, 2022, CDCHC discovered unusual activity in our digital environment. Upon learning this, we immediately took steps to secure our digital environment and investigate. We also engaged independent cybersecurity experts to help us to conduct an investigation. As a result of this investigation, we learned that an unauthorized actor accessed certain files and stored data within our systems. On October 14, 2022, we determined that your personal information may have been impacted by this incident. Notably, there is no evidence that your personal information has been misused. However, out of an abundance of caution, we are notifying you about the incident and providing you with complimentary credit monitoring and identity protection services.

What Information Was Involved: The data that may have been accessed by the unauthorized party included your: <<Variable 2>>.

What We Are Doing: To help prevent something like this from happening again, we are implementing additional technical security measures. We have taken important steps to minimize the chances of your data being misused as a result of this incident. Nonetheless, we are providing you with information about steps that you can take to help protect your personal information. As a further precaution, we are also offering you <<12/24>> months of complimentary credit and identity monitoring services through IDX. This product helps detect possible misuse of your information and provides you with identity protection support.

What You Can Do: You can follow the recommendations included with this letter to help protect your information. In addition, you can enroll in IDX’s credit and identity monitoring services free of charge. To enroll, visit the link above and insert the noted code or call the number noted above. The deadline to enroll in services is January 19, 2023.

For More Information: If you have any questions regarding the incident or would like assistance with enrolling in the services offered, please call 1-833-875-0659 between 6 am – 6 pm PST.

The security of your information is a top priority for CDCHC. We take your trust in us and this matter very seriously and we deeply regret any worry or inconvenience that this may cause you.

Sincerely,

Brandy Taylor
Country Doctor Community Health Clinic
500 19th Ave E.
Seattle, WA 98112

Steps You Can Take to Protect Your Personal Information

Review Your Account Statements and Notify Law Enforcement of Suspicious Activity: As a precautionary measure, we recommend that you remain vigilant by reviewing your account statements and credit reports closely. If you detect any suspicious activity on an account, you should promptly notify the financial institution or company with which the account is maintained. You also should promptly report any fraudulent activity or any suspected incidence of identity theft to proper law enforcement authorities, your state attorney general, and/or the Federal Trade Commission (FTC).

Copy of Credit Report: You may obtain a free copy of your credit report from each of the three major credit reporting agencies once every 12 months by visiting <http://www.annualcreditreport.com/>, calling toll-free 1-877-322-8228, or by completing an Annual Credit Report Request Form and mailing it to Annual Credit Report Request Service, P.O. Box 105281, Atlanta, GA 30348. You also can contact one of the following three national credit reporting agencies:

Equifax

P.O. Box 105788
Atlanta, GA 30348
1-888-378-4329
www.equifax.com

Experian

P.O. Box 9532
Allen, TX 75013
1-800-831-5614
www.experian.com

TransUnion

P.O. Box 1000
Chester, PA 19016
1-800-916-8800
www.transunion.com

Fraud Alert: You may want to consider placing a fraud alert on your credit report. An initial fraud alert is free and will stay on your credit file for at least one year. The alert informs creditors of possible fraudulent activity within your report and requests that the creditor contact you prior to establishing any accounts in your name. To place a fraud alert on your credit report, contact any of the three credit reporting agencies identified above. Additional information is available at <http://www.annualcreditreport.com>.

Security Freeze: You have the right to put a security freeze on your credit file for up to one year at no cost. This will prevent new credit from being opened in your name without the use of a PIN number that is issued to you when you initiate the freeze. A security freeze is designed to prevent potential creditors from accessing your credit report without your consent. As a result, using a security freeze may interfere with or delay your ability to obtain credit. You must separately place a security freeze on your credit file with each credit reporting agency. In order to place a security freeze, you may be required to provide the consumer reporting agency with information that identifies you including your full name, Social Security number, date of birth, current and previous addresses, a copy of your state-issued identification card, and a recent utility bill, bank statement or insurance statement.

Additional Free Resources: You can obtain information from the consumer reporting agencies, the FTC, or from your respective state Attorney General about fraud alerts, security freezes, and steps you can take toward preventing identity theft. You may report suspected identity theft to local law enforcement, including to the FTC or to the Attorney General in your state.

Federal Trade Commission

600 Pennsylvania Ave, NW
Washington, DC 20580
consumer.ftc.gov
1-877-438-4338

Maryland Attorney General

St. Paul Plaza
200 St. Paul Place
Baltimore, MD 21202
marylandattorneygeneral.gov
1-888-743-0023

New York Attorney General

Bureau of Internet and Technology
Resources
28 Liberty Street
New York, NY 10005
ag.ny.gov
1-212-416-8433 / 1-800-771-7755

North Carolina Attorney General

9001 Mail Service Center
Raleigh, NC 27699
ncdoj.gov
1-877-566-7226

Washington D.C. Attorney General

400 S 6th Street, NW
Washington, DC 20001
oag.dc.gov
1-202-727-3400

You also have certain rights under the Fair Credit Reporting Act (FCRA): These rights include to know what is in your file; to dispute incomplete or inaccurate information; to have consumer reporting agencies correct or delete inaccurate, incomplete, or unverifiable information; as well as other rights. For more information about the FCRA, and your rights pursuant to the FCRA, please visit https://files.consumerfinance.gov/f/201504_cfpb_summary_your-rights-under-fcra.pdf.