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March 8, 2019

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**VIA E-MAIL (ATTORNEYGENERAL@DOJ.NH.GOV)**  
**AND FEDERAL EXPRESS**

The Honorable Gordon MacDonald  
Attorney General of the State of New Hampshire  
Office of the Attorney General  
33 Capitol Street  
Concord, NH 03301

***Re: Notification of a Data Security Incident***

Dear Attorney General MacDonald:

We represent Emerson Hospital in connection with an incident that involved the personal information of one hundred thirty-two (132) New Hampshire residents and provide this notice on behalf of Emerson Hospital pursuant to N.H. REV. STAT. ANN. § 359-C:20. This notice will be supplemented, if necessary, with any new significant facts discovered subsequent to its submission. While Emerson Hospital is notifying you of this incident, Emerson Hospital does not waive any rights or defenses relating to the incident or this notice, or the applicability of New Hampshire law on personal jurisdiction.

**NATURE OF THE SECURITY BREACH OR UNAUTHORIZED USE OR ACCESS**

MiraMed Global Services provides payment collection services to Emerson Hospital. On November 27, 2018, MiraMed notified Emerson Hospital that a MiraMed employee transmitted electronic files to an unauthorized third-party between May 9-17, 2018. Since first learning of the incident, Emerson Hospital has been working with MiraMed to investigate the matter and confirm which Emerson Hospital patients may have been impacted and what information may have disclosed. On February 19, 2019, Emerson Hospital received final information from MiraMed related to the incident and completed its process of identifying potentially impacted patients. Emerson Hospital has been advised by MiraMed that it conducted a detailed forensic investigation that showed the file that contained the information contained incomplete or poor quality data and the data was not usable by the third-party; nevertheless, Emerson Hospital is notifying potentially impacted individuals.

The incident may have disclosed certain personal information of Emerson Hospital patients, including name, address, Social Security number, and insurance policy number. The disclosure did not include any information related to physical or mental health conditions or the provision of health care.

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### **NUMBER OF NEW HAMPSHIRE RESIDENTS AFFECTED**

Emerson Hospital determined that one hundred thirty-two (132) New Hampshire residents may have been impacted by this incident. Emerson Hospital will be notifying impacted individuals of the situation by letter on March 8, 2019. Enclosed is a copy of the notice that is being sent to the impacted individuals.

### **STEPS TAKEN RELATING TO THE INCIDENT**

Upon learning of the incident, Emerson Hospital promptly launched an investigation and worked with MiraMed understand the situation. Emerson Hospital is working with MiraMed to take steps to ensure this type of incident will not occur in the future and understands that MiraMed terminated the employee at issue. Emerson Hospital is also providing impacted individuals with two-years of complimentary identity theft prevention services.

### **CONTACT INFORMATION**

Please contact me if you have any questions or if I can provide you with any further information concerning this matter.

Very truly yours,

A handwritten signature in black ink, appearing to read "Michael J. Waters".

Michael J. Waters

MJW:adb  
enclosure



133 Old Road to Nine Acre Corner  
Concord, MA 01742

Friday, March 8, 2019

<< Name>> CODE

<<Address>>

<<City>>, <<State>><<Zip Code>>

Dear <<Name>>,

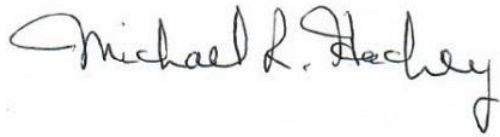
We are sending this letter to you as part of Emerson Hospital's commitment to patient privacy and information security. We take patient privacy and security very seriously, and it is important to us that you are made fully aware of a potential issue involving your personal data.

On November 27, 2018, we received a letter from Virtual Recovery, LLC, an affiliate of MiraMed Global Services, Inc. (MiraMed). We use this company to assist us with payment collection for some of our patient accounts. In this letter, MiraMed provided us with initial information about an incident involving the transmission of electronic files by a MiraMed employee to an unauthorized third party between May 9-17, 2018. Since receiving notification from MiraMed, we have been working with them to obtain additional information about the event. We have learned that some of your personal information was in the transmission, including your name, address, and insurance policy number (which contained your Social Security number). The disclosure did not include *any* information related to physical or mental health conditions or the provision of health care, nor did the disclosure include any other financial information, such as credit card information.

MiraMed's detailed forensic investigation showed that the electronic files included invalid data and the files were of such poor quality that the third party did not find the data useful. Nevertheless, as a precaution, we feel it is important to notify you of this incident. We are offering you a complimentary two-year membership of Experian IdentityWorks<sup>SM</sup> Credit 3B. This service helps detect possible misuse of your personal information and provides you with identity protection services focused on immediate identification and resolution of identity theft. IdentityWorks Credit 3B is completely free to you. Enrolling in this program will not hurt your credit score. **For more information on identity theft prevention and IdentityWorks Credit 3B, including instructions on how to activate your complimentary two-year membership, please see the additional information provided in this letter.**

We sincerely apologize and regret that this situation occurred. We want to assure you that the MiraMed employee at issue was terminated and law enforcement was contacted to investigate the case. We are continually working to protect the privacy and security of your information. For further information and assistance, please call 1-855-657-2227 from 8:00 a.m. to 5:00 p.m. ET Monday through Friday.

Sincerely,

A handwritten signature in black ink that reads "Michael R. Hachey". The signature is written in a cursive style with a prominent loop at the end of the last name.

Michael R. Hachey, CPA  
Senior Vice President & Chief Financial Officer

To help protect your identity, we are offering a **complimentary** two-year membership of Experian IdentityWorks<sup>SM</sup> Credit 3B. This service helps detect possible misuse of your personal information and provides you with superior identity protection support focused on immediate identification and resolution of identity theft.

### Activate IdentityWorks Credit 3B Now in Three Easy Steps

1. ENROLL by: **6.26.19** (Your code will not work after this date.)
2. VISIT the **Experian IdentityWorks website** to enroll:  
<https://www.experianidworks.com/3bcredit>
3. PROVIDE the **Activation Code**: [Code]

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 877-288-8057. Be prepared to provide engagement number [REDACTED] as proof of eligibility for the identity restoration services by Experian.

### ADDITIONAL DETAILS REGARDING YOUR 24-MONTH EXPERIAN IDENTITYWORKS CREDIT 3B MEMBERSHIP:

A credit card is **not** required for enrollment in Experian IdentityWorks Credit 3B.

You can contact Experian **immediately without needing to enroll in the product** regarding any fraud issues. Identity Restoration specialists are available to help you address credit and non-credit related fraud.

Once you enroll in Experian IdentityWorks, you will have access to the following additional features:

- **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, Equifax and Transunion files for indicators of fraud.
- **Experian IdentityWorks ExtendCARE™:** You receive the same high-level of Identity Restoration support even after your Experian IdentityWorks membership has expired.
- **\$1 Million Identity Theft Insurance\*\*:** Provides coverage for certain costs and unauthorized electronic fund transfers.
- **Activate your membership today at <https://www.experianidworks.com/3bcredit> or call 877-288-8057 to register with the activation code above.**

**What you can do to protect your information:** There are additional actions you can consider taking to reduce the chances of identity theft or fraud on your account(s). Please refer to [www.ExperianIDWorks.com/restoration](http://www.ExperianIDWorks.com/restoration) for this information. If you have any questions about IdentityWorks, need help understanding something on your credit report or suspect that an item on your credit report may be fraudulent, please contact Experian's customer care team at 877-288-8057.

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

\*\* Identity theft insurance is underwritten by insurance company subsidiaries or affiliates of American International Group, Inc. (AIG). The description herein is a summary and intended for informational purposes only and does not include all terms, conditions and exclusions of the policies described. Please refer to the actual policies for terms, conditions, and exclusions of coverage. Coverage may not be available in all jurisdictions.

### Additional Important Information

As a precautionary measure, we recommend that you remain vigilant to protect against potential fraud and/or identity theft by, among other things, reviewing your account statements and monitoring 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 should also promptly report any fraudulent activity or any suspected incidents of identity theft to proper law enforcement authorities, including the police and your state's attorney general, as well as the Federal Trade Commission ("FTC"). Massachusetts residents also have a right to obtain a police report.

You may wish to review the tips provided by the FTC on fraud alerts, security/credit freezes and steps to you can take to avoid identity theft. For more information and to contact the FTC, please visit [www.ftc.gov/idtheft](http://www.ftc.gov/idtheft) or call 1-877-ID-THEFT (1-877-438-4338). You may also contact the FTC at: Federal Trade Commission, 600 Pennsylvania Avenue, NW, Washington, DC 20580.

**Credit Reports:** You may obtain a free copy of your credit report once every 12 months from each of the three national credit reporting agencies by visiting <http://www.annualcreditreport.com>, by 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 can print a copy of the request form at <https://www.annualcreditreport.com/cra/requestformfinal.pdf>.

Alternatively, you may elect to purchase a copy of your credit report by contacting one of the three national credit reporting agencies. Contact information for the three national credit reporting agencies for the purpose of requesting a copy of your credit report or for general inquiries, including obtaining information about fraud alerts and placing a security freeze on your credit files, is as follows:

Equifax	Experian	TransUnion
1-800-349-9960	1-888-397-3742	1-888-909-8872
<a href="http://www.equifax.com">www.equifax.com</a>	<a href="http://www.experian.com">www.experian.com</a>	<a href="http://www.transunion.com">www.transunion.com</a>
P.O. Box 105788	P.O. Box 9554	P.O. Box 2000
Atlanta, GA 30348	Allen, TX 75013	Chester, PA 19022

**Fraud Alerts:** 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 90 days. The alert informs creditors of possible fraudulent activity within your report and requests that the creditor contact you prior to establishing any new accounts in your name. To place a fraud alert on your credit report, contact any of the three national credit reporting agencies using the contact information listed above. Additional information is available at <http://www.annualcreditreport.com>.

**Credit and Security Freezes:** You may have the right to place a credit freeze, also known as a security freeze, on your credit file, so that no new credit can be opened in your name without the use of a PIN number that is issued to you when you initiate the 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 get access to your credit report unless you temporarily lift the freeze. Therefore, using a credit freeze may delay your ability to obtain credit. Unlike a fraud alert, you must separately place a credit freeze on your credit file at each credit reporting company. Since the instructions for how to establish a credit freeze differ from state to state, please contact the three major credit reporting companies using the contact information above.

In order to request a security freeze, you may 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;

The credit reporting agencies have three (3) business days after receiving your request to place a security freeze on your credit report. The credit bureaus must also send written confirmation to you within five (5) business days and provide you with a unique personal identification number (PIN) or password, or both that can be used by you to authorize the removal or lifting of the security freeze.

To remove the security freeze or lift the freeze in order to allow a specific entity or individual access to your credit report, you must call or send a written request to the credit reporting agencies by mail and include proper identification (name, address, and social security number) **and** the PIN number or password provided to you when you placed the security freeze as well as the identities of those entities or individuals you would like to receive your credit report or the specific period of time you want the credit report available. The credit reporting agencies have three (3) business days after receiving your request to remove or lift the security freeze for those identified entities or for the specified period of time.

Individuals interacting with credit reporting agencies have rights under the Fair Credit Reporting Act. We encourage you to review your rights under the Fair Credit Reporting Act by visiting [www.consumerfinance.gov/f/201504\\_cfpb\\_summary\\_your-rights-under-fcra.pdf](http://www.consumerfinance.gov/f/201504_cfpb_summary_your-rights-under-fcra.pdf), or by requesting information in writing from the Consumer Response Center, Room 130-A, Federal Trade Commission, 600 Pennsylvania Ave. NW, Washington, DC 20580.

**Vermont Residents:** If you do not have internet access but would like to learn more about how to place a security freeze on your credit report, contact the Vermont Attorney General's Office at 802-656-3183 (800-649-2424 toll free in Vermont only).



**Iowa Residents:** Iowa residents can contact the Office of the Attorney general to obtain information about steps to take to avoid identity theft from the Iowa Attorney General's office at: Office of the Attorney General of Iowa, Hoover State Office Building, 1305 E. Walnut Street, Des Moines IA 50319, 515-281-5164.

**Maryland Residents:** Maryland residents can contact the Office of the Attorney General to obtain information about steps you can take to avoid identity theft from the Maryland Attorney General's office at: Office of the Attorney General, 220 St. Paul Place, Baltimore, MD 21202, (888) 743-0023.

**North Carolina Residents:** North Carolina residents can obtain information about preventing identity theft from the North Carolina Attorney General's Office at: North Carolina Attorney General's Office, 9001 Mail Service Center, Raleigh, NC 27699-9001, (877) 566-7226.

**Rhode Island Residents:** We believe that this incident affected ten (10) Rhode Island residents. . Rhode Island residents can contact the Office of the Attorney general at: Rhode Island Office of the Attorney General, 150 South Main Street, Providence, RI 02903, (401) 274-4400.