

August 30, 2017

RECEIVED

AUG 31 2017

CONSUMER PROTECTION

OVERNIGHT

Attorney General Joseph Foster
Office of the Attorney General
33 Capitol Street
Concord, NH 03301

Re: Notice of Data Incident

Dear Attorney General Joseph Foster:

Pursuant to N.H. Rev. Stat. Ann. section 359-C:20, and on behalf of my client Hand & Upper Extremity Centers dba Hand Rehabilitation Specialists, I am writing to notify you of a data incident potentially affecting two (2) New Hampshire residents.

NATURE OF THE UNAUTHORIZED ACCESS

On July 5, 2017, Hand Rehabilitation Specialists was informed that there may have been a breach in the security of their network. They immediately reported the notice to the Ventura County Sheriff's High Tech Task Force, who began a prompt forensic IT investigation into the matter in consultation with the FBI. This investigation is ongoing. To date, law enforcement has found no evidence of any information leaving their system. However, unauthorized access has not been ruled out, so out of an abundance of caution, Hand Rehabilitation Specialists is providing notice to all individuals who could be potentially affected and providing protective services to those who choose to take advantage of this service.

If the resident was a patient, the information may have included their: name, date of birth, address, phone number, Social Security number, dates of service, diagnoses, CPT (billing) codes, cost, amount of co-pay made by check, medical insurance company, insurance group number and contact information, check number, and Hand Rehabilitation Specialists' name and practice contact information.

If the resident was a financial guarantor of a patient, the information may have included their: name, date of birth, address, phone number, Social Security number, CPT (billing) codes, cost, amount of co-pay made by check, medical insurance company, insurance group number and contact information, check number, and Hand Rehabilitation Specialists' name and practice contact information.

Attorney General Joseph Foster
August 30, 2017
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NUMBER OF NEW HAMPSHIRE RESIDENTS AFFECTED

Two (2) New Hampshire residents are potentially affected as a result of the potential unauthorized access. The residents will be mailed a notification letter on Friday, September 1, 2017. Please see enclosed for a form version of the notices.

STEPS WE HAVE TAKEN RELATING TO THE INCIDENT

Hand Rehabilitation Specialists immediately reported the notice to the Ventura County Sheriff's High Tech Task Force, who began a prompt forensic IT investigation into the matter in consultation with the FBI. Their investigation is active and ongoing. Further, Hand Rehabilitation Specialists has notified all three credit bureaus, the applicable state agencies, and they are reviewing office policies and procedures to ensure all security measures are taken. In this endeavor, they hired IT consultants. Lastly, they have secured identity theft protection services through ID Experts® to provide residents 12 months of credit monitoring and a \$1,000,000 insurance reimbursement policy, and they are actively working with law enforcement in their investigation of the criminals.

OTHER NOTIFICATION AND CONTACT INFORMATION

Notification letters to the potentially impacted residents are being mailed on Friday, September 1, 2017, the applicable state Attorney General offices and consumer affairs agencies are being notified, and Hand Rehabilitation Specialists will continue to assist law enforcement in their investigation in any way they can.

For any further information, please contact Melanie Witte at (415) 477-5731, melanie.witte@troutmansanders.com, Troutman Sanders, 580 California Street, Suite 1100, San Francisco, CA 94104.

Sincerely,



Melanie Marie Witte

Enclosure



Hand Rehabilitation Specialists

[Name]
[Address1]
[Address2]
[City, State Zip]

To Enroll, Please Call:
TFN
Or Visit:
<https://ide.myidcare.com/handrehabspecialists>
Enrollment Code: [XXXXXXXX]

Date

NOTICE OF DATA BREACH

Dear [name]:

Hand Rehabilitation Specialists values and respects your privacy; accordingly, we are writing to advise you about the potential exposure of some of your information. Below, we've outlined steps we have undertaken, and provided guidance on general best practices for identity theft protection.

What Happened?

On July 5, 2017, we were informed that there may have been a breach in the security of our network. We immediately reported the notice to the Ventura County Sheriff's Office, who began a prompt forensic IT investigation into the matter in consultation with the FBI. To date, law enforcement has found no evidence of any information leaving our system. However, unauthorized access could not be ruled out, so out of an abundance of caution, we are providing notice to all individuals who could be potentially affected and providing protective services to those who choose to take advantage of this service.

What Information Was Involved?

The information may have included your: name, date of birth, address, phone number, Social Security number, dates of service, diagnoses, CPT (billing) codes, cost, amount of co-pay made by check, medical insurance company, insurance group number and contact information, check number, and our name and practice contact information.

What We Are Doing.

We immediately notified and have been working with the Ventura County Sheriff's Office, outside IT consultants, and applicable state agencies. Further, we are reviewing our security policies and procedures to ensure all appropriate steps have been taken.

As an added precaution, we are offering identity theft protection services through ID Experts®, a data breach and recovery services expert, to provide you with MyIDCare™. MyIDCare services include: 12 months of credit monitoring, a \$1,000,000 insurance reimbursement policy, exclusive educational materials and fully managed id theft recovery services. With this protection, MyIDCare will help you resolve issues if your identity is compromised.

What You Can Do.

We encourage you to contact ID Experts with any questions and to enroll in free MyIDCare services by calling toll free number (844) 402-8595 or going to <https://ide.myidcare.com/handrehabspecialists> and using the Enrollment Code provided above. MyIDCare experts are available Monday through Friday from 5 am - 5 pm Pacific Time. Please note the deadline to enroll is December 1, 2017.

Further, although there is no evidence that your information has been misused, we strongly recommend that you review the enclosed 'Recommended Steps to Help Protect Your Information' to safeguard your information and that you take full advantage of our ID Experts service offering. MyIDCare representatives have been versed on the incident and can answer questions or concerns you may have regarding protection of your personal information.

For More Information.

In our 15 years of business, this is our first direct encounter with cyber-crime. Protecting your information is incredibly important to us, as is addressing this incident with the information and assistance you may need. If you have any questions or concerns, please do not hesitate to call toll free number (844) 402-8595 Monday – Friday, 5 am to 5 pm PST, or 1-805-495-0516, or write us at 101 Hodencamp Road, Suite 100, Thousand Oaks, CA 91360. Further, you can go to <https://ide.myidcare.com/handrehabspecialists> for assistance or for any additional questions you may have.

Very truly yours,

Heidi Bowers-Dutra, OTR/L, CHT

Laurie Roundtree, OTR/L, CHT

Recommended Steps to Help Protect Your Information

Please Note: Minors, under the age of 18, should not have a credit history established and are under the age to secure credit. Therefore credit monitoring may not be applicable at this time. All other services provided in the membership will apply. No one is allowed to place a fraud alert on your credit report except you, please follow the instructions below to place the alert.

1. Website and Enrollment. Go to <https://ide.myidcare.com/handrehabspecialists> and follow the instructions for enrollment using your Enrollment Code provided at the top of the letter. Once you have completed your enrollment, you will receive a welcome letter by email (or by mail if you do not provide an email address when you sign up). The welcome letter will direct you to the exclusive MyIDCare Member Website where you will find other valuable educational information.

2. Activate the credit monitoring provided as part of your MyIDCare membership, which is paid for by Hand & Upper Extremity Centers. Credit monitoring is included in the membership, but you must personally activate it for it to be effective. Note: You must have established credit and access to a computer and the internet to use this service. If you need assistance, MyIDCare will be able to assist you.

3. Telephone. Contact MyIDCare at (844) 402-8595 to gain additional information about this event and speak with knowledgeable representatives about the appropriate steps to take to protect your credit identity.

4. Review your credit reports. We recommend that you remain vigilant by reviewing account statements and monitoring credit reports. Under federal law, you also are entitled every 12 months to one free copy of your credit report from each of the three major credit reporting companies. To obtain a free annual credit report, go to www.annualcreditreport.com or call 1-877-322-8228. You may wish to stagger your requests so that you receive a free report by one of the three credit bureaus every four months.

If you discover any suspicious items and have enrolled in MyIDCare, notify them immediately by calling or by visiting their Member website and filing a theft report.

If you file a theft report with MyIDCare, you will be contacted by a member of our ID Care team who will help you determine the cause of the suspicious items. In the unlikely event that you fall victim to identity theft as a consequence of this incident, you will be assigned an ID Care Specialist who will work on your behalf to identify, stop and reverse the damage quickly.

You should also know that you have the right to file a police report if you ever experience identity fraud. Please note that in order to file a crime report or incident report with law enforcement for identity theft, you will likely need to provide some kind of proof that you have been a victim. A police report is often required to dispute fraudulent items. You can report suspected incidents of identity theft to local law enforcement or to the Attorney General.

5. Place Fraud Alerts. There are also two types of fraud alerts that you can place on your credit report to put your creditors on notice that you may be a victim of fraud: an initial alert and an extended alert. You may ask that an initial fraud alert be placed on your credit report if you suspect you have been, or are about to be, a victim of identity theft. An initial fraud alert stays on your credit report for at least 90 days. You may have an extended alert placed on your credit report if you have already been a victim of identity theft with the appropriate documentary proof. An extended fraud alert stays on your credit report for seven years. You can place a fraud alert on your credit report by calling the toll-free fraud number of any of the three national credit reporting agencies listed below.

Equifax: 1-888-766-0008, P.O. Box 740241, Atlanta, GA 30374

- <https://www.alerts.equifax.com/AutoFraudOnline/jsp/fraudAlert.jsp>

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

- <https://www.experian.com/fraud/center.html>

TransUnion: 1-800-680-7289, P.O. Box 2000, Chester, PA, 19022, fraud.transunion.com

- <http://www.transunion.com/fraud-victim-resource/place-fraud-alert>

If you choose to place a fraud alert, we recommend you do this after activating your credit monitoring.

6. Security Freeze. You may have the right to put 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 a freeze. A credit freeze is designed to prevent potential credit grantors from accessing your credit report without your consent. If you place a credit freeze, potential creditors and other third parties will not be able to get access to your credit report unless you temporarily lift the freeze. Therefore, using a credit freeze may delay your ability to obtain credit. In addition, you may incur fees to place, lift and/or remove a credit freeze. Credit freeze laws vary from state to state. The cost of placing, temporarily lifting, and removing a credit freeze also varies by state, generally \$5 to \$20 per action at each credit reporting company. *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 as specified below to find out more information:

Equifax: P.O. Box 105788, Atlanta, GA 30348, www.equifax.com
Experian: P.O. Box 9554, Allen, TX 75013, www.experian.com
TransUnion LLC: P.O. Box 2000, Chester, PA, 19022-2000, freeze.transunion.com

You can obtain more information about fraud alerts and credit freezes by contacting the FTC or one of the national credit reporting agencies listed below.

7. You can obtain additional information about the steps you can take to avoid identity theft from the following agencies. The Federal Trade Commission also encourages those who discover that their information has been misused to file a complaint with them.

- **California Residents:** Visit the California Office of Privacy Protection (www.privacy.ca.gov) for additional information on protection against identity theft.
- **Kentucky Residents:** Office of the Attorney General of Kentucky, 700 Capitol Avenue, Suite 118 Frankfort, Kentucky 40601, www.ag.ky.gov, Telephone: 1-502-696-5300.
- **Maryland Residents:** Office of the Attorney General of Maryland, Consumer Protection Division 200 St. Paul Place Baltimore, MD 21202, www.oag.state.md.us/Consumer, Telephone: 1-888-743-0023.
- **North Carolina Residents:** Office of the Attorney General of North Carolina, 9001 Mail Service Center Raleigh, NC 27699-9001, www.ncdoj.com/, Telephone: 1-919-716-6400 / 1-877-5-NO-SCAM
- **Oregon Residents:** Oregon Department of Justice, 1162 Court Street NE, Salem, OR 97301-4096, www.doj.state.or.us/, Telephone: 877-877-9392
- **Rhode Island Residents:** Office of the Attorney General, 150 South Main Street, Providence, Rhode Island 02903, www.riag.ri.gov, Telephone: 401-274-4400

All US Residents: Identity Theft Clearinghouse, Federal Trade Commission, 600 Pennsylvania Avenue, NW Washington, DC 20580, www.consumer.gov/idtheft, 1-877-IDTHEFT (438-4338), TDD: 1-202-326-2502.



Hand Rehabilitation Specialists

[Name]
[Address1]
[Address2]
[City, State Zip]

To Enroll, Please Call:
TFN
Or Visit:
<https://ide.myidcare.com/handrehabspecialists>
Enrollment Code: [XXXXXXXX]

Date

NOTICE OF DATA BREACH

Dear [name]:

We are writing to notify you of a potential data incident at Hand Rehabilitation Specialists. You are receiving this letter out of an abundance of caution because you were a guarantor of a patient seen at this practice. Below, we've outlined steps we have undertaken, and provided guidance on general best practices for identity theft protection.

What Happened?

On July 5, 2017, we were informed that there may have been a breach in the security of our network. We immediately reported the notice to the Ventura County Sheriff's Office, who began a prompt forensic IT investigation into the matter in consultation with the FBI. To date, law enforcement has found no evidence of any information leaving our system. However, unauthorized access could not be ruled out, so out of an abundance of caution, we are providing notice to all individuals who could be potentially affected and providing protective services to those who choose to take advantage of this service.

What Information Was Involved?

As a guarantor of a patient seen at this practice, the information in our system may have included your: name, date of birth, address, phone number, Social Security number, CPT (billing) codes, cost, amount of co-pay made by check, medical insurance company, insurance group number and contact information, check number, and our name and practice contact information.

What We Are Doing.

We immediately notified and have been working with the Ventura County Sheriff's Office, outside IT consultants, and applicable state agencies. Further, we are reviewing our security policies and procedures to ensure all appropriate steps have been taken.

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|-----------------|--|
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- **North Carolina Residents:** Office of the Attorney General of North Carolina, 9001 Mail Service Center Raleigh, NC 27699-9001, www.ncdoj.com/, Telephone: 1-919-716-6400 / 1-877-5-NO-SCAM
- **Oregon Residents:** Oregon Department of Justice, 1162 Court Street NE, Salem, OR 97301-4096, www.doj.state.or.us/, Telephone: 877-877-9392
- **Rhode Island Residents:** Office of the Attorney General, 150 South Main Street, Providence, Rhode Island 02903, www.riag.ri.gov, Telephone: 401-274-4400

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