

BakerHostetler

Baker&Hostetler LLP

2929 Arch Street
Cira Centre, 12th Floor
Philadelphia, PA 19104-2891

T 215.568.3100
F 215.568.3439
www.bakerlaw.com

Sara Goldstein
direct dial: 215.564.1572
sgoldstein@bakerlaw.com

May 26, 2021

VIA E-MAIL (DOJ-CPB@DOJ.NH.GOV)

Attorney General Gordon MacDonald
Office of the Attorney General
33 Capitol Street
Concord, NH 03301

Re: Incident Notification

Dear Attorney General MacDonald:

We are writing on behalf of our client, HealthcareSource HR, Inc. (“HealthcareSource”), who in turn is writing on behalf of its client entities, to notify you of a data security incident.

HealthcareSource provides comprehensive talent management solutions to support the healthcare industry, including talent management software which allows prospective employees to apply for jobs with HealthcareSource’s healthcare clients.

On April 21, 2021, HealthcareSource discovered a misconfiguration in its talent management software, which temporarily allowed job applicants to potentially view other applicants’ information. Upon learning of this incident, HealthcareSource promptly corrected the software misconfiguration and launched an investigation. HealthcareSource’s investigation was unable to rule out the possibility that information relating to certain job applicants may have been viewable by other applicants between April 20, 2021 and April 21, 2021 due to the misconfiguration on its talent management software.

While the information potentially involved varied by applicant, HealthcareSource’s investigation determined that the viewable personal information relating to a New Hampshire resident may have included their name and Social Security number. To date, HealthcareSource is unaware of any misuse of any information as a result of this incident.

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Beginning on May 26, 2021, HealthcareSource will mail a notification letter via United States Postal Service First-Class mail to the one applicant who is a New Hampshire resident, in accordance with N.H. Rev. Stat. Ann. § 359-C:20. A copy of the notification letter is enclosed.¹ HealthcareSource has established a toll-free, incident response line to answer questions about the incident from notice letter recipients. HealthcareSource is also offering notice recipients whose Social Security numbers or driver's license numbers may have been involved complimentary memberships to Experian, which include credit monitoring and fraud protection services.

To help prevent something like this from happening in the future, HealthcareSource is taking steps to further protect applicant information and is working to enhance its security practices.

Sincerely,



Sara M. Goldstein
Partner

Enclosure

¹ This report does not waive HealthcareSource's objection that New Hampshire lacks personal jurisdiction over it related to any claims that may arise from this incident.



<<Date>> (Format: Month Day, Year)

<<first_name>> <<middle_name>> <<last_name>> <<suffix>>
<<address_1>>
<<address_2>>
<<city>>, <<state_province>> <<postal_code>>
<<country >>

Dear <<first_name>> <<middle_name>> <<last_name>> <<suffix>>:

HealthcareSource HR, Inc. (“HealthcareSource”) is committed to protecting the privacy and security of the information we maintain. HealthcareSource provides talent management software services to healthcare organizations. We are writing to notify you of a technical issue that may have involved some of the information you submitted when you applied for a job opening at <<b2b_text_1(ImpactedData1)>>, which uses HealthcareSource’s talent management software. This notice explains the technical issue, measures we have taken since and steps you may take in response.

What Happened: On April 21, 2021, HealthcareSource discovered a misconfiguration in our talent management software, which allowed job applicants to view other applicants’ information. Upon learning of this incident, HealthcareSource promptly corrected the software misconfiguration and launched an investigation. Through our investigation, we determined that the misconfiguration existed on our talent management software between the dates of April 20, 2021 and April 21, 2021. Our investigation could not rule out the possibility that some of your information may have been viewable to other job applicants during that time.

What Information Was Involved: Our investigation determined that the viewable information may have included your name in combination with your <<b2b_text_2(ImpactedData2)>>.

What We Are Doing: Upon learning of this, HealthcareSource promptly corrected the software misconfiguration. HealthcareSource is taking steps to further protect applicant information and is working to enhance our security practices.

What You Can Do: We encourage you to remain vigilant by reviewing your financial account statements for any unauthorized activity. If you see charges or activity you did not authorize, you should contact your financial institution immediately. Additionally, as a precaution, we have secured the services of Experian® to offer you a complimentary one-year membership of Experian’s IdentityWorksSM. This product helps detect possible misuse of your information and provides you with identity protection support focused on immediate identification and resolution of identity theft. IdentityWorks is completely free and enrolling in this program will not hurt your credit score. **For more information on IdentityWorks, including instructions on how to activate your complimentary one-year membership, as well as some additional steps you can take to protect your information, please see the pages that follow this letter.**

For More Information: We deeply regret any inconvenience or concern this may cause. If you have any questions, please contact our dedicated assistance line at **1-855-537-2078**, Monday through Friday, between 9:00 am and 6:30 pm Eastern Time (except for some major U.S. holidays).

Sincerely,

Sarah Joyce
Chief Client Officer

To help protect your identity, we are offering a **complimentary** one-year membership of Experian IdentityWorksSM Credit 3B. This product 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: <<b2b_text_3(EnrollmentDeadline)>> (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**: <<Member ID>>

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 <<b2b_text_4(Engagement#)>> as proof of eligibility for the identity restoration services by Experian.

ADDITIONAL DETAILS REGARDING YOUR 12-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 ExtendCARETM:** 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 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.

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

ADDITIONAL STEPS YOU CAN TAKE

We remind you it is always advisable to be vigilant for incidents of fraud or identity theft by reviewing your account statements and free credit reports for any unauthorized activity. You may obtain a copy of your credit report, free of charge, once every 12 months from each of the three nationwide credit reporting companies. To order your annual free credit report, please visit www.annualcreditreport.com or call toll free at 1-877-322-8228. Contact information for the three nationwide credit reporting companies is as follows:

Equifax, PO Box 740241, Atlanta, GA 30374, www.equifax.com, 1-800-685-1111

Experian, PO Box 2002, Allen, TX 75013, www.experian.com, 1-888-397-3742

TransUnion, PO Box 2000, Chester, PA 19016, www.transunion.com, 1-800-916-8800

If you believe you are the victim of identity theft or have reason to believe your personal information has been misused, you should immediately contact the Federal Trade Commission and/or the Attorney General's office in your state. You can obtain information from these sources about steps an individual can take to avoid identity theft as well as information about fraud alerts and security freezes. You should also contact your local law enforcement authorities and file a police report. Obtain a copy of the police report in case you are asked to provide copies to creditors to correct your records. Contact information for the Federal Trade Commission is as follows:

Federal Trade Commission, Consumer Response Center, 600 Pennsylvania Avenue NW, Washington, DC 20580, 1-877-IDTHEFT (438-4338), www.ftc.gov/idtheft

Fraud Alerts: There are two types of general fraud alerts 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 one year. 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. To place a fraud alert on your credit reports, contact one of the nationwide credit bureaus. A fraud alert is free. The credit bureau you contact must tell the other two, and all three will place an alert on their versions of your report. For those in the military who want to protect their credit while deployed, an Active Duty Military Fraud Alert lasts for one year and can be renewed for the length of your deployment. The credit bureaus will also take you off their marketing lists for pre-screened credit card offers for two years, unless you ask them not to.

Credit or Security Freezes: You have the right to put a credit freeze, also known as a security freeze, on your credit file, free of charge, which makes it more difficult for identity thieves to open new accounts in your name. That's because most creditors need to see your credit report before they approve a new account. If they can't see your report, they may not extend the credit.

How do I place a freeze on my credit reports? There is no fee to place or lift a security freeze. Unlike a fraud alert, you must separately place a security freeze on your credit file at each credit reporting company. For information and instructions to place a security freeze, contact each of the credit reporting agencies at the addresses below:

- **Experian Security Freeze**, PO Box 9554, Allen, TX 75013, www.experian.com
- **TransUnion Security Freeze**, PO Box 2000, Chester, PA 19016, www.transunion.com
- **Equifax Security Freeze**, PO Box 105788, Atlanta, GA 30348, www.equifax.com

You'll need to supply your name, address, date of birth, Social Security number and other personal information. After receiving your freeze request, each credit bureau will provide you with a unique PIN (personal identification number) or password. Keep the PIN or password in a safe place. You will need it if you choose to lift the freeze.

How do I lift a freeze? A freeze remains in place until you ask the credit bureau to temporarily lift it or remove it altogether. If the request is made online or by phone, a credit bureau must lift a freeze within one hour. If the request is made by mail, then the bureau must lift the freeze no later than three business days after getting your request. If you opt for a temporary lift because you are applying for credit or a job, and you can find out which credit bureau the business will contact for your file, you can save some time by lifting the freeze only at that particular credit bureau. Otherwise, you need to make the request with all three credit bureaus.

HealthcareSource's mailing address is 100 Sylvan Rd., Woburn, MA 01801 and its phone number is 800-869-5200. This notification was not delayed as a result of a law enforcement investigation.

Additional information for residents of the following states:

Maryland Residents: You may contact and obtain information from your state attorney general at: *Maryland Attorney General's Office*, 200 St. Paul Place, Baltimore, MD 21202, 1-888-743-0023 / 1-410-576-6300, www.oag.state.md.us

New York Residents: You may contact and obtain information from these state agencies: *New York Department of State Division of Consumer Protection*, One Commerce Plaza, 99 Washington Ave., Albany, NY 12231-0001, 518-474-8583 / 1-800-697-1220, <http://www.dos.ny.gov/consumerprotection>; and *New York State Office of the Attorney General*, The Capitol, Albany, NY 12224-0341, 1-800-771-7755, <https://ag.ny.gov>

North Carolina Residents: You may contact and obtain information from your state attorney general at: *North Carolina Attorney General's Office*, 9001 Mail Service Centre, Raleigh, NC 27699, 1-919-716-6000 / 1-877-566-7226, www.ncdoj.gov

Rhode Island Residents: This incident involves [2 individuals in Rhode Island](#). Under Rhode Island law, you have the right to file and obtain a copy of a police report. You also have the right to request a security freeze, as described above. You may contact and obtain information from your state attorney general at: *Rhode Island Attorney General's Office*, 150 South Main Street, Providence, RI 02903, 1-401-274-4400, www.riag.ri.gov

West Virginia Residents: You have the right to ask that nationwide consumer reporting agencies place fraud alerts in your file to let potential creditors and others know that you may be a victim of identity theft, as described above. You also have a right to place a security freeze on your credit report, as described above.

A Summary of Your Rights Under the Fair Credit Reporting Act: The federal Fair Credit Reporting Act (FCRA) promotes the accuracy, fairness, and privacy of information in the files of consumer reporting agencies. There are many types of consumer reporting agencies, including credit bureaus and specialty agencies (such as agencies that sell information about check writing histories, medical records, and rental history records). Your major rights under the FCRA are summarized below. For more information, including information about additional rights, go to www.consumerfinance.gov/learnmore or write to: Consumer Financial Protection Bureau, 1700 G Street N.W., Washington, DC 20552.

- You must be told if information in your file has been used against you.
- You have the right to know what is in your file.
- You have the right to ask for a credit score.
- You have the right to dispute incomplete or inaccurate information.
- 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 reports to be provided to employers.
- You may limit “prescreened” offers of credit and insurance you get based on information in your credit report.
- You have a 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.
- You may seek damages from violators.
- Identity theft victims and active duty military personnel have additional rights.