



MULLEN
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ATTORNEYS AT LAW

RECEIVED

FEB 07 2022

CONSUMER PROTECTION

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426 W. Lancaster Avenue, Suite 200
Devon, PA 19333

February 3, 2022

VIA U.S. MAIL

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 Injured Workers Pharmacy (“IWP”) located at 300 Federal Street, Andover, MA 01810, and are writing to notify your office of an event that may affect the security of certain personal information relating to approximately one hundred forty-three (143) New Hampshire residents. This notice may be supplemented if new significant facts are learned subsequent to its submission. By providing this notice, IWP 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 May 11, 2021, IWP learned of suspicious activity related to an IWP employee email account. In response, IWP launched an investigation, with the assistance of third-party computer forensic specialists, to assess the security of its systems and to confirm the full nature and scope of the activity. This investigation revealed that an unknown actor accessed a total of seven (7) IWP e-mail accounts between January 16, 2021 and May 12, 2021. Accordingly, IWP, with the assistance of third-party data review specialists, undertook a comprehensive and time-intensive review of the contents of the affected email accounts to determine if they contained personal information and, if so, to whom the information related. IWP then worked to validate the results of the review and determine address information for impacted individuals. This review was completed on or around December 14, 2021.

The information that could have been subject to unauthorized access for New Hampshire residents includes name, address, and Social Security number.

Notice to New Hampshire Residents

On or about February 3, 2022, IWP began providing written notice of this event to affected individuals, which includes approximately one hundred forty-three (143) New Hampshire residents. Written notice was provided in substantially the same form as the letter attached hereto as *Exhibit A*.

Other Steps Taken and To Be Taken

Upon discovering the event, IWP moved quickly to investigate and respond, assess the security of its systems, and notify potentially affected individuals. IWP is also working to implement additional safeguards and training to its employees. IWP is providing access to credit monitoring and identity restoration services for twelve (12) months, through Experian, to individuals whose Social Security number was potentially affected by this event, at no cost to these individuals. IWP also established a dedicated toll-free assistance line to address any questions or concerns from notified individuals.

Additionally, IWP 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. IWP 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. IWP is also reporting this event to other appropriate state regulators.

Contact Information

Should you have any questions regarding this notification or other aspects of the data security event, please contact us at (267) 930-4802.

Very truly yours,



Samuel Sica, III of
MULLEN COUGHLIN LLC

EXHIBIT A



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

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

<<b2b_text_1(Re: Notice of Data Breach) - CA records only>>

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

Injured Workers Pharmacy (“IWP”) writes to notify you of a recent event that may affect the security of some of your information. Although there is no indication that your information has been misused in relation to this event, we are providing you with information about the event, our response to it, and what you may do to better protect your personal information, should you feel it appropriate to do so.

What Happened? On or about May 11, 2021, IWP learned of suspicious activity related to an IWP employee email account. In response, we launched an investigation to assess the security of our systems and to confirm the full nature and scope of the activity. This investigation revealed that an unknown actor accessed a total of seven (7) IWP e-mail accounts between January 16, 2021 and May 12, 2021. Accordingly, IWP, with the assistance of data review specialists, undertook a comprehensive and time-intensive review of the contents of the affected email accounts to determine if they contained personal information and, if so, to whom the information related. This review determined that the affected e-mail accounts contained patient information in IWP systems.

What Information was Involved? While we currently have no evidence that any information has been misused, the investigation determined the following types of your information were contained in an affected email account: your <<b2b_text_2(name, data elements)>><<b2b_text_4(name, data elements cont)>>.

What We Are Doing. Safeguarding the privacy of information held in our care and the security of our network are among IWP’s highest priorities. Upon learning of this event, we immediately reset passwords to impacted accounts, and investigated and remediated the event. We also took action to further enhance our security measures already in place to protect our email systems and data. IWP also reported this event to government regulators.

What You Can Do. IWP encourages you to remain vigilant against incidents of identity theft and fraud by reviewing your account statements and monitoring your credit reports for suspicious activity and to detect errors. Please review the enclosed *Steps You Can Take to Help Protect Your Personal Information* for useful information on what you can do to better protect against possible misuse of your information.

For More Information. If you have additional questions, you may our call center at (855) 545-2591 (toll free), Monday through Friday, 9:00 am to 6:30 pm Eastern Time, excluding U.S. holidays. You may also write to IWP at 300 Federal Street, Andover, MA 01810.

We sincerely regret any inconvenience or concern this may have caused you. IWP remains committed to safeguarding information in our care, and we will continue to take proactive steps to enhance the security of our systems.

Sincerely,

A handwritten signature in black ink, appearing to read "MG", with a stylized flourish at the end.

Michael Gavin
President and CEO
Injured Workers Pharmacy

Steps You Can Take to Help Protect Your Personal Information

Monitor Accounts

Under U.S. law, a consumer is entitled to one free credit report annually from each of the three major credit reporting bureaus, Equifax, Experian, and TransUnion. To order your free credit report, visit www.annualcreditreport.com or call, toll-free, 1-877-322-8228. You may also directly contact the three major credit reporting bureaus listed below to request a free copy of your credit report.

Consumers have the right to place an initial or extended “fraud alert” on a credit file at no cost. An initial fraud alert is a one-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 three major credit reporting bureaus listed below.

As an alternative to a fraud alert, consumers have the right to place a “credit freeze” on a credit report, which will prohibit a credit bureau from releasing information in the credit report without the consumer’s express authorization. The credit 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 credit 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 credit freeze on your credit report. To request a security freeze, you will need to provide the following information:

1. Full name (including middle initial as well as Jr., Sr., II, III, etc.);
2. Social Security number;
3. Date of birth;
4. Addresses for the prior two to 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.); and
7. A copy of either the police report, investigative report, or complaint to a law enforcement agency concerning identity theft if you are a victim of identity theft.

Should you wish to place a fraud alert or credit freeze, please contact the three major credit reporting bureaus listed below:

Equifax	Experian	TransUnion
https://www.equifax.com/personal/credit-report-services/	https://www.experian.com/help/	https://www.transunion.com/credit-help
888-298-0045	1-888-397-3742	833-395-6938
Equifax Fraud Alert, P.O. Box 105069 Atlanta, GA 30348-5069	Experian Fraud Alert, P.O. Box 9554, Allen, TX 75013	TransUnion Fraud Alert, P.O. Box 2000, Chester, PA 19016
Equifax Credit Freeze, P.O. Box 105788 Atlanta, GA 30348-5788	Experian Credit Freeze, P.O. Box 9554, Allen, TX 75013	TransUnion Credit Freeze, P.O. Box 160, Woodlyn, PA 19094

Additional Information

You may further educate yourself regarding identity theft, fraud alerts, credit freezes, and the steps you can take to protect your personal information by contacting the consumer reporting bureaus, the Federal Trade Commission, or your state Attorney General. The Federal Trade Commission may be reached at: 600 Pennsylvania Avenue NW, Washington, DC 20580; www.identitytheft.gov; 1-877-ID-THEFT (1-877-438-4338); and 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 District of Columbia residents, the District of Columbia Attorney General may be contacted at: 400 6th St. NW, Washington, D.C. 20001; 202-727-3400; and oag@dc.gov.

For Maryland residents, the Maryland Attorney General may be contacted at: 200 St. Paul Place, 16th Floor, Baltimore, MD 21202; 1-410-528-8662 or 1-888-743-0023; and www.oag.state.md.us. IWP is located at 300 Federal Street, Andover, MA 01810.

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 bureaus 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 violator. 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 New York residents, the New York Attorney General may be contacted at: Office of the Attorney General, The Capitol, Albany, NY 12224-0341; 1-800-771-7755; or <https://ag.ny.gov/>.

For North Carolina residents, the North Carolina Attorney General may be contacted at: 9001 Mail Service Center, Raleigh, NC 27699-9001; 1-877-566-7226 or 1-919-716-6000; and www.ncdoj.gov.

For Rhode Island residents, the Rhode Island Attorney General may be reached at: 150 South Main Street, Providence, RI 02903; www.riag.ri.gov; and 1-401-274-4400. Under Rhode Island law, you have the right to obtain any police report filed in regard to this event. There are 503 known Rhode Island residents impacted by this event.