INTEGRATED PRACTICE SOLUTIONS, INC.
9265 Sky Park CT STE 200
San Diego, CA 92123

May 22, 2018

VIA EMAIL

Joseph Foster, Attorney General
NH Office of the Attorney General
attorneygeneral@doj.nh.gov

Re: Notice of Data Breach

Dear Attorney General Foster:

Integrated Practice Solutions, Inc. ("IPS") is writing on behalf of Taylor Chiropractic, regarding an incident involving IPS's SmartCloud technology, to provide notice of a data breach incident in compliance with N.H. Rev. Stat. Ann. § 359-C:20.

On February 1, 2018, IPS learned that because of a configuration error, certain links used by patients and chiropractic practices to access IPS's SmartCloud platform were exposed and made searchable on the internet. Immediately upon learning of the incident, an additional layer of security was added and a leading forensics firm was engaged to assist with identifying the individuals affected. After a thorough forensic investigation, on April 11, 2018, IPS learned that an exposed link contained the protected health information of one New Hampshire resident. On May 22, 2018, IPS sent written notice of this incident to the one New Hampshire resident who may potentially be affected. A copy of the notice is enclosed herein.

Based on IPS's extensive forensic investigation to date, which included a leading outside forensics firm expert in these matters, the information contained in the compromised links may have included: full name; Social Security Number; address; date of birth; medications; care provider; medical history and other health information. We expect that for most of the people affected by this incident some but not all of these data elements may have been accessed. As of the date of this letter, we do not have any evidence that any information has been misused.

Immediately upon learning of the incident, an additional layer of security was added to prevent similar instances from occurring in the future. We are evaluating our systems to ensure the privacy and confidentiality of sensitive information.

IPS is providing the New Hampshire residents whose information may potentially be affected, without charge, with an online credit monitoring service (*my*TrueIdentity) for one year provided by TransUnion Interactive, a subsidiary of TransUnion®, one of the three nationwide credit reporting companies.

This report is not, and does not constitute, a waiver of personal jurisdiction, or any rights or defenses under applicable law.

Please do not hesitate to contact me if you require additional information or to address any questions with regard to this incident.

Sincerely,

Stan Tims
Senior Vice President, Business Operations
(650) 305-0557
stims@chirotouch.com

Encl: Notification of Data Breach

Cc: Paul W. Anderson, Kirkland & Ellis, LLP

INTEGRATED PRACTICE SOLUTIONS, INC.
9265 Sky Park CT STE 200
San Diego, CA 92123

[Individual's name]
[Street address]
[City, state, and postal code]

[Date]

Re: Notice of Data Breach

Dear [Individual's first name]:

Integrated Practice Solutions, Inc. is contacting you to inform you of a data breach involving your protected health information at the request of your doctor at [Practice Name]. Integrated Practice Solutions, Inc.'s SmartCloud platform was used by your chiropractic practice, [Practice Name], at the time of the data breach. The SmartCloud platform was used to schedule appointments and manage certain back-office administrative functions. We take this very seriously and sincerely apologize.

What Happened

On February 1, 2018, we learned that because of a configuration error, certain unprotected links used by patients and chiropractic practices to access our SmartCloud platform were exposed and made searchable on the internet. Immediately upon learning of the incident, an additional layer of security was added and a leading forensics firm was engaged to assist with identifying the individuals affected. After a thorough forensic investigation, on April 11, 2018, we learned that an exposed link contained your protected health information.

What Information Was Involved

Based on our extensive forensic investigation to date, which included a leading outside forensics firm expert in these matters, the information contained in the compromised links may have included your: full name; Social Security Number; address; date of birth; medications; care provider; medical history and other health information. We expect that for most of the people affected by this incident some but not all of these data elements may have been accessed. However, out of an abundance of caution we want to alert you to the possibility that these data elements may have been compromised. We respect your privacy and deeply regret that this incident occurred.

What We Are Doing

Complimentary Credit Monitoring Service

As a safeguard, we have arranged for you to enroll, at no cost to you, in an online credit monitoring service (*my*TrueIdentity) for one year provided by TransUnion Interactive, a subsidiary of TransUnion®, one of the three nationwide credit reporting companies.

To enroll in this service, go to the *my*TrueIdentity website at www.mytrueidentity.com and in the space referenced as "Enter Activation Code", enter the following 12-letter Activation Code [Insert Unique

12- letter Activation Code] and follow the three steps to receive your credit monitoring service online within minutes.

If you do not have access to the Internet and wish to enroll in a similar offline, paper-based, credit monitoring service, via U.S. Mail delivery, please call the TransUnion Fraud Response Services toll-free hotline at 1-855-288-5422. When prompted, enter the following 6-digit telephone pass code 697645 and follow the steps to enroll in the offline credit monitoring service, add an initial fraud alert to your credit file, or to speak to a TransUnion representative if you believe you may be a victim of identity theft.

You can sign up for the online or offline credit monitoring service anytime between now and August 31, 2018. Due to privacy laws, we cannot register you directly. Please note that credit monitoring services might not be available for individuals who do not have a credit file with TransUnion, or an address in the United States (or its territories) and a valid Social Security Number. Enrolling in this service will not affect your credit score.

Once you are enrolled, you will be able to obtain one year of unlimited access to your TransUnion credit report and credit score. The daily credit monitoring service will notify you if there are any critical changes to your credit file at TransUnion, including fraud alerts, new inquiries, new accounts, new public records, late payments, change of address and more. The service also includes access to an identity restoration program that provides assistance in the event that your identity is compromised to help you restore your identity and up to $1,000,000 in identity theft insurance with no deductible. (Policy limitations and exclusions may apply.)

What You Can Do

Additional steps may be required by you in order to protect your personal information.

Fraud Alert Information

Whether or not you enroll in credit monitoring, we recommend that you place a "Fraud Alert" on your credit file. Fraud Alert messages notify potential credit grantors to verify your identification before extending credit in your name in case someone is using your information without your consent. A Fraud Alert can make it more difficult for someone to get credit in your name; however, please be aware that it also may delay your ability to obtain credit. Call only one of the following three nationwide credit reporting companies to place your Fraud Alert: TransUnion, Equifax, or Experian. As soon as the credit reporting company confirms your Fraud Alert, they will also forward your alert request to the other two nationwide credit reporting companies so you do not need to contact each of them separately. The contact information for the three nationwide credit reporting companies is:

Equifax
PO Box 740256
Atlanta, GA 30374
www.equifax.com
1-800-525-6285

TransUnion
PO Box 2000
Chester, PA 19016
www.transunion.com/fraud
1-800-680-7289

Experian
PO Box 9554
Allen, TX 75013
www.experian.com
1-888-397-3742

Free Credit Report Information

Under federal law, you are also entitled to one free credit report once every 12 months from each of the above three major nationwide credit reporting companies. Call 1-877-322-8228 or make a request online at www.annualcreditreport.com. Even if you do not find any suspicious activity on your initial credit reports, the Federal Trade Commission (FTC) recommends that you check your credit reports periodically. Victim information sometimes is held for use or shared among a group of thieves at different times. Checking your credit reports periodically can help you spot problems and address them quickly.

If you find suspicious activity on your credit reports or have reason to believe your information is being misused, call your local law enforcement agency and file a police report. Get a copy of the report; many creditors want the information it contains to absolve you of the fraudulent debts. You also should file a complaint with the Federal Trade Commission (FTC) at www.identitytheft.gov or at 1-877-ID-THEFT (1-877-438-4338). Your complaint will be added to the FTC's Identity Theft Data Clearinghouse, where it will be accessible to law enforcers for their investigations. Also visit the FTC's website at www.ftc.gov/idtheft to review their free identity theft resources such as their comprehensive step-by-step guide "*Identity Theft - A Recovery Plan*".

Security Freeze Information

You can request a "Security Freeze" on your credit file by sending a request in writing, by mail, to each of the three nationwide credit reporting companies. When a Security Freeze is added to your credit report, all third parties, such as credit lenders or other companies, whose use is not exempt under law will not be able to access your credit report without your consent. The Security Freeze may delay, interfere with or prohibit the timely approval of any subsequent request or application you make that involves access to your credit report. This may include, but is not limited to, new loans, credit, mortgages, insurance, rental housing, employment, investments, licenses, cellular phone service, utility service, digital signature service, Internet credit card transactions and extension of credit at point of sale. There may be a fee for placing, temporarily lifting, or removing a Security Freeze with each of the nationwide consumer reporting companies, although that fee is waived if you send the credit reporting company proof of eligibility by mailing a copy of a valid identity theft report, or other valid report from a law enforcement agency to show you are a victim of identity theft and are eligible for free Security Freeze services.

To place a Security Freeze on your credit files at all three nationwide credit reporting companies, write to the addresses below and include the following information:

Equifax Security Freeze
PO Box 105788
Atlanta, GA 30348
https://www.freeze.equifax.com
1-800-685-1111

TransUnion Security Freeze
PO Box 2000
Chester, PA 19016
http://transunion.com/freeze
1-888-909-8872

Experian Security Freeze
PO Box 9554
Allen, TX 75013
http://experian.com/freeze
1-888-397-3742

Your full name (first, middle, last including applicable generation, such as JR., SR., II, III, etc.)

Your Social Security Number

Your date of birth (month, day and year)

Your complete address including proof of current address, such as a current utility bill bank or insurance statement or telephone bill

If you have moved in the past 2 years, give your previous addresses where you have lived for the past 2 years

A legible photocopy of a government issued identification card (state driver's license or ID card, military identification, etc.)

Include applicable fee. Call or visit each of the credit reporting company websites listed above for information on fees for Security Freeze services. Forms of payment are check, money order, or credit card (American Express, Discover, MasterCard and Visa), or a copy of a valid identity theft report, or other valid report from a law enforcement agency to show you are a victim of identity theft and are eligible for free Security Freeze services.

Within 5 business days of receiving your request for a security freeze, the consumer credit reporting company will provide you with a personal identification number (PIN) or password to use if you choose to remove the freeze on your consumer credit report or to authorize the release of your consumer credit report to a specific party or for a specified period of time after the freeze is in place.

Special note for minors affected by this incident

The same services referred to above may not be available to affected minors. As an alternative, parents/legal guardians can check to see if your child may be a victim of identity theft by using TransUnion's secure online form at www.transunion.com/childidentitytheft to submit your information so TransUnion can check their database for a credit file with your child's Social Security Number. After TransUnion's search is complete, they will respond to you at the email address you provide. If they locate a file in your child's name, they will ask you for additional information in order to proceed with steps to protect your child from any impact associated with this fraudulent activity.

Other Important Information

We are committed to protecting all of your sensitive information and are implementing additional security measures to prevent similar incidents from occurring in the future. Further, we are continuing to evaluate all of our systems to ensure the protection and privacy of sensitive information.

For More Information

If you have questions or concerns regarding this incident or would like additional information, please contact us toll free at 855-648-7532.

We sincerely apologize for this incident and deeply regret any inconvenience it may cause you.

Sincerely,

Stan Tims
Senior Vice President, Business Operations