

# BakerHostetler

## Baker & Hostetler LLP

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New York, NY 10111

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October 14, 2016

### VIA OVERNIGHT MAIL

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

*Re: Incident Notification*

Dear Attorney General Foster:

Our client, Integrity Transitional Hospital (“Integrity”), is deeply committed to protecting the security and confidentiality of the information in its care. Integrity receives laboratory specimens from companies that work with various healthcare providers, and then submits these specimens to laboratories for testing. In the course of providing this service and for billing purposes, Integrity maintains certain patient information on specimens submitted by the healthcare providers.

On August 15, 2016, Integrity learned that suspicious activity on its network may have affected the systems related to its laboratory services. Integrity immediately began an investigation, with the assistance of an expert forensics company, to determine the scope of the incident. The investigation determined that an unauthorized individual potentially could have accessed some individuals’ lab results, lab testing information, health insurance information, and scanned driver’s license. The affected information did not include Social Security numbers or other financial or account information.

To date, Integrity has no evidence that there has been a disclosure of the affected data and it has received no reports of misuse of any of the information. However, as a precaution, beginning on October 14, 2016, Integrity is notifying 2 New Hampshire residents pursuant to the requirements of the Health Insurance Portability and Accountability Act (“HIPAA”), 45 C.F.R. §

Joseph Foster  
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164.404, in substantially the same form as the letter attached hereto.<sup>1</sup> These notification letters include an offer to enroll in one year of free credit monitoring and identity protection services. Integrity has also established a dedicated call center to answer any questions that individuals may have regarding the incident.

To help prevent a similar incident from reoccurring, Integrity is enhancing existing security on its systems related to the laboratory information it maintains.

Please do not hesitate to contact me if you have any questions regarding this matter.

Sincerely,



Theodore J. Kobus III  
Partner  
Enclosure

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<sup>1</sup> As Integrity does not conduct business in New Hampshire, this letter is not, and does not constitute, a waiver of personal jurisdiction.

# EXHIBIT A



October 14, 2016

██████████  
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████████████████████  
████████████████████

Dear ██████████:

Integrity Transitional Hospital ("Integrity") is deeply committed to protecting the security and confidentiality of the information in its care. Regrettably, we are writing to inform you of an incident involving some of that information.

Integrity receives laboratory specimens from companies that work with various healthcare providers, and then submits these specimens to laboratories for testing. In the course of providing this service and for billing purposes, Integrity maintains certain patient information on specimens submitted by the healthcare providers. On August 15, 2016, Integrity learned that suspicious activity on its network may have affected the systems related to its laboratory services. Integrity immediately began an investigation, with the assistance of an expert forensics company, to determine the scope of the incident. Our investigation has determined that an unauthorized individual potentially could have accessed your lab results, lab testing information, health insurance information, and scanned driver's license, if you provided one. The affected information did not include your Social Security number or other financial or account information.

We are notifying you about this incident so you may take appropriate steps to protect your information. We are offering a complimentary one-year membership to Experian's® ProtectMyID® Alert. 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. ProtectMyID Alert is completely free and enrolling in this program will not hurt your credit score. Unfortunately, due to privacy laws, we are not able to enroll you directly. **For more information on ProtectMyID Alert and instructions on how to activate your complimentary one-year membership, please see the next page of this letter.**

We deeply regret any inconvenience this may cause you. To help prevent a similar incident from reoccurring, we are enhancing existing security on our systems related to the laboratory information we maintain. If you have any questions, please call 1-866-313-2169, Monday through Friday, between 9:00 a.m. and 7:00 p.m. Eastern Time (closed on U.S. observed holidays).

Sincerely,

A handwritten signature in black ink, appearing to read "Clark Houser".

Clark Houser  
Chief Operating Officer

## Activate ProtectMyID Now in Three Easy Steps

1. ENSURE That You Enroll By: **01.19.2017** (Your code will not work after this date.)
2. VISIT the ProtectMyID Web Site to enroll: [www.protectmyid.com/redeem](http://www.protectmyid.com/redeem)
3. PROVIDE Your Activation Code: [REDACTED]

If you have questions or need an alternative to enrolling online, please call 877-288-8057 and provide engagement #: [REDACTED].

### ADDITIONAL DETAILS REGARDING YOUR ONE YEAR PROTECTMYID MEMBERSHIP:

A credit card is not required for enrollment.

Once your ProtectMyID membership is activated, you will receive the following features:

- **Free copy of your Experian credit report**
- **Surveillance Alerts for:**
  - **Daily Bureau Credit Monitoring:** Alerts of key changes & suspicious activity found on your Experian, Equifax<sup>®</sup> and TransUnion<sup>®</sup> credit reports.
- **Identity Theft Resolution & ProtectMyID ExtendCARE:** Toll-free access to US-based customer care and a dedicated Identity Theft Resolution agent who will walk you through the process of fraud resolution from start to finish for seamless service. They will investigate each incident; help with contacting credit grantors to dispute charges and close accounts including credit, debit and medical insurance cards; assist with freezing credit files; contact government agencies.
  - It is recognized that identity theft can happen months and even years after a data breach. To offer added protection, you will receive ExtendCARE<sup>™</sup>, which provides you with the same high-level of Fraud Resolution support even after your ProtectMyID membership has expired.
- **\$1 Million Identity Theft Insurance :** Immediately covers certain costs including, lost wages, private investigator fees, and unauthorized electronic fund transfers.

Once your enrollment in ProtectMyID is complete, you should carefully review your credit report for inaccurate or suspicious items. If you have any questions about ProtectMyID, 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.

Even if you choose not to take advantage of the identity theft protection services we are offering, we recommend that you remain vigilant to the possibility of fraud and identity theft by reviewing your credit card, bank, and other financial statements for any unauthorized activity. You may also obtain a copy of your credit report, free of charge, directly from each of the three nationwide credit reporting agencies once every 12 months. To order your credit report, please visit [www.annualcreditreport.com](http://www.annualcreditreport.com) or call toll free at 877-322-8228. Contact information for the three nationwide credit reporting agencies is as follows:

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\* Identity theft insurance is underwritten by insurance company subsidiaries or affiliates of 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.

**Equifax**  
P.O. Box 740241  
Atlanta, GA 30374  
[www.equifax.com](http://www.equifax.com)  
(800) 685-1111

**Experian**  
P.O. Box 2002  
Allen, TX 75013  
[www.experian.com](http://www.experian.com)  
(888) 397-3742

**TransUnion**  
P.O. Box 2000  
Chester, PA 19016  
[www.transunion.com](http://www.transunion.com)  
(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 contact the Federal Trade Commission and/or the Office of the Attorney General in your home state. Contact information for the Federal Trade Commission is as follows:

Federal Trade Commission  
600 Pennsylvania Avenue, NW  
Washington, DC 20580  
[www.ftc.gov/idtheft](http://www.ftc.gov/idtheft)  
(877) 438-4338

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.

# **EXHIBIT B**



October 14, 2016



Dear Parent or Guardian of [REDACTED]:

Integrity Transitional Hospital ("Integrity") is deeply committed to protecting the security and confidentiality of the information in its care. As a parent or guardian of a potentially affected child, we are writing to inform you of an incident involving some of your child's information.

Integrity receives laboratory specimens from companies that work with various healthcare providers, and then submits these specimens to laboratories for testing. In the course of providing this service and for billing purposes, Integrity maintains certain patient information on specimens submitted by the healthcare providers. On August 15, 2016, Integrity learned that suspicious activity on its network may have affected the systems related to its laboratory services. Integrity immediately began an investigation, with the assistance of an expert forensics company, to determine the scope of the incident. Our investigation has determined that an unauthorized individual potentially could have accessed your child's lab results, lab testing information, health insurance information, and scanned driver's license, if your child provided one. The affected information did not include your child's Social Security number or other financial or account information.

We are notifying you about this incident so you may take appropriate steps to protect your child's information. We are offering a complimentary one-year membership to Family Secure® from Experian® for your minor child. This product helps detect possible misuse of your child's personal information and provides your child with superior identity protection support focused on immediate identification and resolution of identity theft. Family Secure is completely free and enrolling in this program will not hurt your child's credit score. Unfortunately, due to privacy laws, we are not able to enroll your child directly. **For more information on Family Secure, including instructions on how to activate your child's complimentary one-year membership, please see the next page of this letter.**

We deeply regret any inconvenience this may cause you. To help prevent a similar incident from reoccurring, we are enhancing existing security on our systems related to the laboratory information we maintain. If you have any questions, please call 1-866-313-2169, Monday through Friday, between 9:00 a.m. and 7:00 p.m. Eastern Time (closed on U.S. observed holidays).

Sincerely,

A handwritten signature in black ink, appearing to read 'Clark Houser'.

Clark Houser  
Chief Operating Officer



To receive the complimentary Family Secure product, you as the parent must enroll at the web site with your activation code listed below. This activation code can only be used by the parent or guardian of the minor. Please keep in mind that once activated, the code cannot be re-used for another enrollment.

### **Activate Family Secure Now in Three Easy Steps**

- 1. ENSURE That You Enroll By: 01.19.2017** (Your code will not work after this date.)
- 2. Visit the Family Secure Web Site to enroll:** <http://www.familysecure.com/enroll>
- 3. PROVIDE Your Activation Code:** [REDACTED]

If you have questions or need an alternative to enrolling online, please call 877-288-8057 and provide engagement #: [REDACTED]

### **Your complimentary one-year Family Secure membership includes:**

#### **Parent or Legal Guardian:**

- Daily monitoring of your Experian credit report with email notification of key changes, as well as monthly "no-hit" reports
- 24/7 credit report access: Unlimited, on-demand Experian reports and scores
- Experian credit score illustrator to show monthly score trending and analysis.

#### **Children:**

- Monthly monitoring to determine whether enrolled minors in your household have an Experian credit report
- Alerts of key changes to your children's Experian credit report

#### **All Members:**

- Identity Theft Resolution assistance: Toll-free access to US-based customer care and a dedicated Identity Theft Resolution agent who will walk you through the process of fraud resolution from start to finish for seamless service. They will investigate each incident; help contacting credit grantors to dispute charges and close accounts including credit, debit and medical insurance cards; assist with freezing credit files; contact government agencies
- \$2,000,000 Product Guarantee\*

Once your enrollment in Family Secure is complete, you should carefully review your credit report for inaccurate or suspicious items. If you have any questions about Family Secure, 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.

Even if you choose not to take advantage of the identity theft protection services we are offering, we recommend that you remain vigilant to the possibility of fraud and identity theft by reviewing your credit card, bank, and other financial statements for any unauthorized activity. You may also obtain a copy of your credit report, free of charge, directly from each of the three nationwide credit reporting agencies once every 12 months. To order your credit report, please visit

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\* The Family Secure Product Guarantee is not available for Individuals who are residents of the state of New York.

[www.annualcreditreport.com](http://www.annualcreditreport.com) or call toll free at 877-322-8228. Contact information for the three nationwide credit reporting agencies is as follows:

<b>Equifax</b>	<b>Experian</b>	<b>TransUnion</b>
P.O. Box 740241	P.O. Box 2002	P.O. Box 2000
Atlanta, GA 30374	Allen, TX 75013	Chester, PA 19016
<u><a href="http://www.equifax.com">www.equifax.com</a></u>	<u><a href="http://www.experian.com">www.experian.com</a></u>	<u><a href="http://www.transunion.com">www.transunion.com</a></u>
(800) 685-1111	(888) 397-3742	(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 contact the Federal Trade Commission and/or the Office of the Attorney General in your home state. Contact information for the Federal Trade Commission is as follows:

Federal Trade Commission  
600 Pennsylvania Avenue, NW  
Washington, DC 20580  
[www.ftc.gov/idtheft](http://www.ftc.gov/idtheft)  
(877) 438-4338

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.