MULLEN COUGHLIN LLC
ATTORNEYS AT LAW

Edward J. Finn
Office: (267) 930-4776
Fax: (267) 930-4771
Email: efinn@mullen.law

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

October 28, 2020

INTENDED FOR ADDRESSEE(S) ONLY

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 write on behalf of Jewish Home Lifecare d/b/a The New Jewish Home, located at 120 West 106th Street, New York, NY 10025, and write, on behalf of The New Jewish Home, to notify your Office of an incident that may affect the security of certain personal information of approximately three (3) New Hampshire residents. The New Jewish Home is the parent organization of The New Jewish Home, Manhattan; The New Jewish Home, Sarah Neuman; The New Jewish Home, Home Care; The New Jewish Home, University Avenue Assisted Living; Jewish Home Lifecare, Home Assistance Personnel, Inc.; The New Jewish Home, Corporate Services, as well as The Fund for the Aged (collectively, "The New Jewish Home"). The New Jewish Home reserves the right to supplement this response with any new significant facts learned subsequent to its submission. By providing this notice, The New Jewish Home does not waive any rights or defenses regarding the applicability of New Hampshire law, the New Hampshire data breach notification statute, or personal jurisdiction.

Nature of the Data Event

On Thursday, July 16, 2020, The New Jewish Home was among many organizations across the country notified that one of its third-party vendors, Blackbaud, Inc. ("Blackbaud"), was the target of a cyber incident. Blackbaud is one of the most commonly utilized cloud computing providers that offers customer relationship management and financial services tools for many independent schools, universities, and non-profit organizations. The New Jewish Home itself was not the target of this incident and did not experience any internal breach of data including medical records, which remain secure. The Fund for the Aged is the entity that uses the Blackbaud software in order to coordinate fundraising for The New Jewish Home.

Blackbaud reported that, in May 2020, it experienced a ransomware incident that resulted in encryption of certain Blackbaud systems. Blackbaud reported the incident to law enforcement and worked with forensic

investigators to determine the nature and scope of the incident. Following its investigation, Blackbaud notified its customers that an unknown actor may have accessed or acquired certain Blackbaud customer data. Blackbaud reported that the data was exfiltrated by the threat actor at some point before Blackbaud locked the threat actor out of the environment on May 20, 2020. Unfortunately, Blackbaud's incident impacted a significant number of these organizations, including The New Jewish Home.

Blackbaud has provided the following link for additional information on this incident: https://www.blackbaud.com/securityincident.

Upon learning of the Blackbaud incident, The New Jewish Home immediately commenced an investigation to determine what, if any, sensitive The New Jewish Home data was potentially involved. This investigation included working diligently to gather further information from Blackbaud to understand the scope of the incident. On August 14, 2020, The New Jewish Home received further information from Blackbaud that allowed it to confirm that the information potentially affected may have contained personal information for some individuals associated with The New Jewish Home.

Thereafter, The New Jewish Home undertook a comprehensive review of the information stored in the Blackbaud modules to identify what personal information was stored within them and to whom that information related. The New Jewish Home continued to analyze the data file and on or about October 5th, 2020 confirmed the individuals to whom notice was required and the types of information potentially impacted. The investigation determined that the following types of personal information as defined by applicable law, may have been accessible within the impacted modules: name, and bank account information.

Notice to New Hampshire Residents

On September 14, 2020, The New Jewish Home posted notice of this incident on its website at https://jewishhome.org/. On October 28, 2020, The New Jewish Home began mailing notice letters to potentially affected individuals, including approximately three (3) New Hampshire residents who were notified in accordance with New Hampshire law. Written notice is being provided in substantially the same form as the letter attached here as ***Exhibit A***.

Other Steps Taken and To Be Taken

The New Jewish Home takes the security of information entrusted to it very seriously and apologizes for the inconvenience this incident has caused. As part of its ongoing commitment to the security of information in its care, The New Jewish Home is working to review its existing policies and procedures regarding its third-party vendors, and is working with Blackbaud to evaluate additional measures and safeguards to protect against this type of incident in the future. The New Jewish Home is also notifying state and federal regulators, where required. Blackbaud has advised The New Jewish Home that the data potentially obtained by the attacker through this event was destroyed and that they have implemented additional security measures.

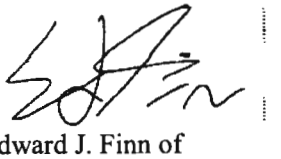
Additionally, The New Jewish Home is providing potentially impacted individuals whose Social Security numbers were affected with complimentary access to identity monitoring, fraud consultation, and identity theft restoration services through ID Experts. The New Jewish Home is providing potentially affected individuals with guidance on how to better protect against identity theft and fraud, including 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.

Contact Information

Should you have any questions regarding this notification or other aspects of the data security event, please contact us at (267) 930-4776.

Very truly yours,



Edward J. Finn of
MULLEN COUGHLIN LLC

EJF/crm
Enclosure

EXHIBIT A

THE NEW JEWISH HOME
AGE LIKE A NEW YORKER

C/O IDX
P.O. Box 1907
Suwanee, GA 30024

[Name]
[Address 1]
[Address 2]
[City], [State] [Zip]

October 28, 2020

Dear [Name],

I am writing to let you know that an incident occurred through one of our third-party vendors, Blackbaud, Inc. ("Blackbaud") which may have involved your personal information. Blackbaud is a leading provider of cloud software and data management used widely by organizations and universities. We take the security of information entrusted to us very seriously and we want to be transparent and proactively notify you of the situation.

This notice provides information about the incident, our response, and resources available to you to help protect your information from possible misuse, should you feel it necessary to do so. The New Jewish Home is the parent organization of The New Jewish Home, Manhattan; The New Jewish Home, Sarah Neuman; The New Jewish Home, Home Care; The New Jewish Home, University Avenue Assisted Living; Jewish Home Lifecare, Home Assistance Personnel, Inc.; The New Jewish Home, Corporate Services, as well as The Fund for the Aged (collectively, "The New Jewish Home").

What Happened? On Thursday, July 16, 2020, The New Jewish Home was among many organizations across the country notified that one of its third-party vendors, Blackbaud, was the target of a cyber incident. The Fund for the Aged is the entity that uses the Blackbaud software in order to coordinate fundraising for The New Jewish Home. Blackbaud is one of the most commonly utilized cloud computing providers that offers customer relationship management and financial services tools for many independent schools, universities, and non-profit organizations. The New Jewish Home itself was not the target of this incident and did not experience any internal breach of data, including medical records, which remain secure.

Blackbaud reported that, in May 2020, it experienced a ransomware incident that resulted in encryption of certain Blackbaud systems. Blackbaud reported the incident to law enforcement and worked with forensic investigators to determine the nature and scope of the incident. Following its investigation, Blackbaud notified its customers that an unknown actor may have accessed or acquired certain Blackbaud customer data. Blackbaud reported that the data was exfiltrated by the threat actor at some point before Blackbaud locked the threat actor out of the environment on May 20, 2020. Unfortunately, Blackbaud's incident impacted a significant number of these organizations, including The New Jewish Home.

Blackbaud has provided the following link for additional information on this incident: https://www.blackbaud.com/securityincident.

Upon learning of the Blackbaud incident, we immediately commenced an investigation to determine what, if any, sensitive The New Jewish Home data was potentially involved. This investigation included working diligently to gather further information from Blackbaud to understand the scope of the incident. On August 14, 2020, we received further information from Blackbaud that allowed us to confirm that the information potentially affected may have contained personal information for some individuals associated with The New Jewish Home.

What Information is Involved? The information related to you and maintained by Blackbaud that may have been impacted includes your name and bank account information. According to Blackbaud, based on the nature of the incident, their research, and third-party (including law enforcement) investigation, they have no reason to believe that any data went beyond the cybercriminal, was or will be misused, or will be disseminated or otherwise be made available publicly.

What Are We Doing? As part of our ongoing commitment to the security of information in our care, The New Jewish Home is working to review our existing policies and procedures regarding our third-party vendors, and we are working with Blackbaud to evaluate additional measures and safeguards to protect against this type of incident in the future. We are also notifying state and federal regulators, where required. Blackbaud has advised The New Jewish Home that the data potentially obtained by the attacker through this event was destroyed and that they have implemented additional security measures. We sincerely apologize for the inconvenience this incident has caused.

What You Can Do. As a best practice, we encourage you to remain vigilant against incidents of identity theft and fraud, to review your account statements, explanation of benefits, and credit reports for suspicious activity. You may also review the information contained in the attached *Steps You Can Take to Protect Personal Information*.

For More Information. We understand that you may have questions about this incident that are not addressed in this letter. If you have additional questions, please call our dedicated assistance line at (212) 870-5041, Monday through Friday, during the hours of 9:00 a.m.– 9:00 p.m. Eastern Time (excluding U.S. holidays). You may also write to The New Jewish Home at: 120 West 106th Street, New York, NY 10025.

Sincerely,

Dana Penny
Chief Compliance Officer
Jewish Home Lifecare d/b/a The New Jewish Home

Steps You Can Take to Protect Personal Information

Monitor Accounts

We encourage you to remain vigilant against incidents of identity theft and fraud, to review your account statements, and to monitor your credit reports for suspicious activity. Under U.S. law you are entitled to one free credit report annually from each of the three major credit reporting bureaus. To order your free credit report, visit www.annualcreditreport.com or call, toll-free, 1-877-322-8228. You may also contact the three major credit bureaus directly to request a free copy of your credit report.

You have the 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. The security 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 security 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 security freeze on your credit report. Should you wish to place a security freeze, please contact the major consumer reporting agencies listed below:

Experian	**TransUnion**	**Equifax**
PO Box 9554	P.O. Box 160	PO Box 105788
Allen, TX 75013	Woodlyn, PA 19094	Atlanta, GA 30348-5788
1-888-397-3742	1-888-909-8872	1-800-685-1111
www.experian.com/freeze/center.html	www.transunion.com/credit-freeze	www.equifax.com/personal/credit-report-services

In order to request a security freeze, you will need to provide the following information:

1. Your full name (including middle initial as well as Jr., Sr., II, III, etc.);
2. Social Security number;
3. Date of birth;
4. If you have moved in the past five (5) years, provide the addresses where you have lived over the prior 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.);
7. If you are a victim of identity theft, include a copy of either the police report, investigative report, or complaint to a law enforcement agency concerning identity theft.

As an alternative to a security freeze, you have the right to place an initial or extended "fraud alert" on your file at no cost. An initial fraud alert is a 1-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 agencies listed below:

Experian	**TransUnion**	**Equifax**
P.O. Box 9554	P.O. Box 2000	P.O. Box 105069
Allen, TX 75013	Chester, PA 19016	Atlanta, GA 30348
1-888-397-3742	1-800-680-7289	1-888-766-0008
www.experian.com/fraud/center.html	www.transunion.com/fraud-victim-resource/place-fraud-alert	www.equifax.com/personal/credit-report-services

Additional Information

You can further educate yourself regarding identity theft, fraud alerts, security freezes, and the steps you can take to protect yourself by contacting the consumer reporting agencies, the Federal Trade Commission, or your state Attorney General.

The Federal Trade Commission can 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 Maryland residents, the Attorney General can be contacted at 200 St. Paul Place, 16th Floor, Baltimore, MD 21202, 1-410-528-8662, www.oag.state.md.us.

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 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 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 North Carolina residents, the Attorney General can be contacted at 9001 Mail Service Center, Raleigh, NC 27699-9001, 1-877-566-7226 or 1-919-716-6000, www.ncdoj.gov. You can obtain information from the Attorney General or the Federal Trade Commission about preventing identity theft.

For Rhode Island Residents, the Rhode Island Attorney General can be reached at: 150 South Main Street, Providence, Rhode Island 02903; www.riag.ri.gov, 1-401-274-4400. Under Rhode Island law, you have the right to obtain any police report filed in regard to this incident. There are 8 Rhode Island residents impacted by this incident.

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

For Oregon residents, Oregon Department of Justice, 1162 Court Street NE, Salem, OR 97301-4096, www.doj.state.or.us/; 877-877-9392.

For Kentucky residents, Office of the Attorney General of Kentucky, 700 Capitol Avenue, Suite 118 Frankfort, Kentucky 40601, www.ag.ky.gov; 1-502-696-5300.

For District of Columbia residents, the Office of the District of Columbia Attorney General can be contacted at 400 6th Street, NW, Washington, DC 20001; Phone (202) 727-3400; Fax: (202) 347-8922; TTY: (202) 727-3400; Email: oag@dc.gov; or you may visit the website of the Office of the District of Columbia Attorney General at https://oag.dc.gov/.