

# ALSTON & BIRD

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Kimberly K. Peretti

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December 17, 2020

**CONFIDENTIAL  
VIA OVERNIGHT DELIVERY**

Consumer Protection Bureau  
Office of the New Hampshire Attorney General  
33 Capitol Street  
Concord, NH 03301

**RECEIVED**

**DEC 18 2020**

**CONSUMER PROTECTION**

Re: Notice of Data Security Incident

To the Office of the Attorney General:

We are writing at the request of our client, Mass General Brigham Incorporated (“Mass General Brigham”), to notify you of a data security incident which may have involved the personal information of residents in your state. A copy of the notification being sent to 179 New Hampshire residents via first-class mail on December 18, 2020 is attached to this letter.

On December 1, 2020, Mass General Brigham was notified by a third-party vendor providing software services that support its provider credentialing process that – as a result of human error – a file containing personal information belonging to some of Mass General Brigham’s credentialed providers was inadvertently posted to a public website for a 14-hour period between November 23-24, 2020. The vendor has informed Mass General Brigham that it immediately removed the file after discovering the error.

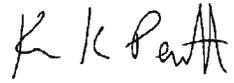
As soon as Mass General Brigham became aware of this incident, Mass General Brigham immediately began its own investigation and worked with the vendor to determine what information was potentially impacted. Additionally, Mass General Brigham is reviewing its relationship with the vendor and the vendor’s security controls and procedures as a result of this incident.

The affected information included names and Social Security numbers (SSN), and may also have included some combination of birthdate, email address, birthplace information, home address and other demographic information. *Importantly, Mass General Brigham is not aware of any misuse of personal information as a result of this incident.*

Mass General Brigham has arranged to offer credit monitoring services for two years to the impacted New Hampshire residents whose personal information may have been involved.

If you have any questions regarding this incident or if you desire further information or assistance, please email me at [Kimberly.Peretti@alston.com](mailto:Kimberly.Peretti@alston.com) or call my direct line at (202) 239-3720.

Sincerely,

A handwritten signature in black ink, appearing to read "K K Peretti". The signature is written in a cursive, slightly stylized font.

Kimberly K. Peretti

Enclosures

December 18, 2020

<<first\_name>> <<middle\_name>> <<last\_name>> <<suffix>>  
<<address\_1>>  
<<address\_2>>  
<<city>>, <<state\_province>> <<postal\_code>>  
<<country >>

### Notice of Data Breach

Dear <<first\_name>> <<middle\_name>> <<last\_name>> <<suffix>>,

Mass General Brigham Incorporated (“Mass General Brigham”) is deeply committed to protecting the security and confidentiality of personal information that we gather and maintain as part of our mission. Regrettably, we are writing to inform you of an incident involving some of your information.

#### **What Happened?**

On December 1, 2020, we were notified by a third-party vendor providing software services that support our provider credentialing process that – as a result of human error – a file containing personal information belonging to some of our credentialed providers was inadvertently posted to a public website for a 14-hour period between November 23-24, 2020. The vendor has informed us that it immediately removed the file after discovering the error.

#### **What Information Was Involved?**

The affected information included your name and Social Security number (SSN), and may also have included some combination of birthdate, email address, birthplace information, home address and other demographic information. *Importantly, we are not aware of any misuse of your personal information as a result of this incident.*

#### **What We Are Doing**

As soon as we became aware of this incident, we immediately began our own investigation and worked with the vendor to determine what information was potentially impacted. Additionally, Mass General Brigham is reviewing its relationship with the vendor and the vendor’s security controls and procedures as a result of this incident.

We are offering you free identity monitoring services for a period of two years through Kroll as an added precaution. If you wish to activate these services, you may follow the instructions included in the enclosed Reference Guide.

#### **What You Can Do**

In addition to activating the identity monitoring services, we encourage you to remain vigilant against incidents of identity theft and fraud, review your account statements, and monitor your credit reports for suspicious activity and to detect errors. The enclosed Reference Guide includes a list of steps that you can take to help protect against potential misuse of your personal information and to protect your identity.

#### **For More Information**

Mass General Brigham takes privacy and security very seriously, and we deeply regret any inconvenience this may cause you. If you have any questions, please call 1-???-???-????, Monday through Friday, between 9:00 a.m. and 6:30 p.m. Eastern Time (Closed on U.S. observed holidays). You may also write to us at 399 Revolution Drive, Suite 1225, Somerville, MA 02145. Please provide the following ten-digit reference number when calling: <<Member ID>>.

Sincerely,



Jigar A. Kadakia  
Chief Information Security Officer  
Mass General Brigham Incorporated

## Reference Guide

### STEPS YOU CAN TAKE TO PROTECT YOUR IDENTITY

**Review Your Account Statements.** As a precautionary measure, we recommend that you remain vigilant by reviewing your account statements and credit reports closely. If you detect any suspicious activity on an account, you should promptly notify the financial institution or company with which the account is maintained.

**Obtain and Check Your Free Credit Report.** Under U.S. law you are entitled to one free credit report annually from each of the three major credit reporting bureaus. We recommend periodically obtaining credit reports from each nationwide credit reporting agency. To order your free annual credit report, visit [www.annualcreditreport.com](http://www.annualcreditreport.com), call toll-free at (877) 322-8228, or complete the Annual Credit Report Request Form on the U.S. Federal Trade Commission's ("FTC") website at [www.ftc.gov](http://www.ftc.gov) and mail it to Annual Credit Report Request Service, P.O. Box 105281, Atlanta, GA 30348-5281. The three credit bureaus provide free annual credit reports only through the website, toll-free number or request form.

Upon receiving your credit report, review it carefully. Look for accounts you did not open. Look in the "inquiries" section for names of creditors from whom you have not requested credit. Some companies bill under names other than their store or commercial names; the credit bureau will be able to tell if this is the case. Look in the "personal information" section for any inaccuracies in information (such as home address and Social Security number).

If you see anything you do not understand, call the credit bureau at the telephone number on the report. Errors may be a warning sign of possible identity theft. You should notify the credit bureaus of any inaccuracies in your report, whether due to error or fraud, as soon as possible so the information can be investigated and, if found to be in error, corrected. If there are accounts or charges you did not authorize, immediately notify the appropriate credit bureau by telephone and in writing. Information that cannot be explained should also be reported to your local police or sheriff's office because it may signal criminal activity.

**Activate Your Free Identity Monitoring.** To help relieve concerns and restore confidence following this incident, we have secured the services of Kroll to provide identity monitoring at no cost to you for two years. Kroll is a global leader in risk mitigation and response, and their team has extensive experience helping people who have sustained an unintentional exposure of confidential data. Your identity monitoring services include Credit Monitoring, Fraud Consultation, and Identity Theft Restoration.

Visit <https://enroll.idheadquarters.com> to activate and take advantage of your identity monitoring services.

You have until **February 19, 2021** to activate your identity monitoring services.

Membership Number: <<Member ID>>

**Place a Fraud Alert on Your Credit File.** To protect yourself from possible identity theft, consider placing a fraud alert on your credit file. A fraud alert helps protect against the possibility of an identity thief opening new credit accounts in your name. When a credit grantor checks the credit history of someone applying for credit, the credit grantor gets a notice that the applicant may be the victim of identity theft. The alert notifies the credit grantor to take steps to verify the identity of the applicant. You can place a fraud alert on your credit report by calling any one of the toll-free fraud numbers provided below. You will reach an automated telephone system that allows flagging of your file with a fraud alert at all three credit bureaus.

#### **Experian**

P.O. Box 9554  
Allen, TX 75013  
1-888-397-3742

[www.experian.com/fraud/center.html](http://www.experian.com/fraud/center.html)

#### **TransUnion**

P.O. Box 2000  
Chester, PA 19016  
1-800-680-7289

[www.transunion.com/fraud-victim-resource/place-fraud-alert](http://www.transunion.com/fraud-victim-resource/place-fraud-alert)

#### **Equifax**

P.O. Box 105069  
Atlanta, GA 30348  
1-888-766-0008

[www.equifax.com/personal/credit-report-services](http://www.equifax.com/personal/credit-report-services)

**Security Freezes.** You have the right to request a credit freeze from a consumer reporting agency, free of charge, so that no new credit can be opened in your name without the use of a PIN number that is issued to you when you initiate a freeze. A security freeze is designed to prevent potential credit grantors from accessing your credit report without your consent. If you place a security freeze, potential creditors and other third parties will not be able to get access to your credit report unless you temporarily lift the freeze. Therefore, using a security freeze may delay your ability to obtain credit.

Unlike a fraud alert, you must separately place a security freeze on your credit file at each credit bureau. To place a security freeze on your credit report you must contact the credit reporting agency by phone, mail or secure electronic

means and provide proper identification of your identity. The following information must be included when requesting a security freeze (note that if you are requesting a credit report for your spouse, this information must be provided for him/her as well): (1) full name, with middle initial and any suffixes; (2) Social Security number; (3) date of birth; (4) current address and any previous addresses for the past five years; and (5) any applicable incident report or complaint with a law enforcement agency or the Registry of Motor Vehicles. The request must also include a copy of a government-issued identification card and a copy of a recent utility bill or bank or insurance statement. It is essential that each copy be legible, display your name and current mailing address, and the date of issue.

Below, please find relevant contact information for the three consumer reporting agencies:

**Experian**

P.O. Box 9554  
Allen, TX 75013  
1-888-397-3742

[www.experian.com/freeze/center.html](http://www.experian.com/freeze/center.html)

**TransUnion**

P.O. Box 160  
Woodlyn, PA 19094  
1-888-909-8872

[www.transunion.com/credit-freeze](http://www.transunion.com/credit-freeze)

**Equifax**

P.O. Box 105788  
Atlanta, GA 30348-5788  
1-800-685-1111

[www.equifax.com/personal/credit-report-services](http://www.equifax.com/personal/credit-report-services)

Once you have submitted your request, the credit reporting agency must place the security freeze no later than one business day after receiving a request by phone or secure electronic means, and no later than three business days after receiving a request by mail. No later than five business days after placing the security freeze, the credit reporting agency will send you confirmation and information on how you can remove the freeze in the future.

**Contact the Federal Trade Commission and Law Enforcement**

For more guidance on general steps you can take to protect your information, you can also contact the Federal Trade Commission. The Federal Trade Commission can be reached at: 600 Pennsylvania Avenue NW, Washington, DC 20580; [www.identitytheft.gov](http://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 Residents of the District of Columbia**

You may contact the D.C. Attorney General's Office to obtain information about steps to take to avoid identity theft:

D.C. Attorney General's Office, Office of Consumer Protection, 400 6th Street, NW, Washington DC 20001, 1-202-442-9828, [www.oag.dc.gov](http://www.oag.dc.gov).

**For Residents of Iowa**

You may contact law enforcement or the Iowa Attorney General's office to report suspected incidents of identity theft. The Iowa Attorney General's Office can be reached at:

Iowa Attorney General's Office, Director of Consumer Protection Division, 1305 E. Walnut Street, Des Moines, IA 50319, 1-515-281-5926, [www.iowaattorneygeneral.gov](http://www.iowaattorneygeneral.gov).

**For Residents of Maryland**

You may also obtain information about preventing and avoiding identity theft from the Maryland Office of the Attorney General:

Maryland Office of the Attorney General, Consumer Protection Division  
200 St. Paul Place, Baltimore, MD 21202, 1-888-743-0023, <http://www.marylandattorneygeneral.gov/>.

**For Residents of New Mexico**

New Mexico Consumers Have the Right to Obtain a Security Freeze or Submit a Declaration of Removal.

You may obtain a security freeze on your credit report to protect your privacy and ensure that credit is not granted in your name without your knowledge. You may submit a declaration of removal to remove information placed in your credit report as a result of being a victim of identity theft. You have a right to place a security freeze on your credit report or

submit a declaration of removal pursuant to the Fair Credit Reporting and Identity Security Act.

The security freeze will prohibit a consumer reporting agency from releasing any information in your credit report without your express authorization or approval.

The security freeze is designed to prevent credit, loans and services from being approved in your name without your consent. When you place a security freeze on your credit report, you will be provided with a personal identification number, password or similar device to use if you choose to remove the freeze on your credit report or to temporarily authorize the release of your credit report to a specific party or parties or for a specific period of time after the freeze is in place. To remove the freeze or to provide authorization for the temporary release of your credit report, you must contact the consumer reporting agency and provide all of the following:

- (1) the unique personal identification number, password or similar device provided by the consumer reporting agency;
- (2) proper identification to verify your identity;
- (3) information regarding the third party or parties who are to receive the credit report or the period of time for which the credit report may be released to users of the credit report; and

A consumer reporting agency that receives a request from a consumer to lift temporarily a freeze on a credit report shall comply with the request no later than three business days after receiving the request. As of September 1, 2008, a consumer reporting agency shall comply with the request within fifteen minutes of receiving the request by a secure electronic method or by telephone.

A security freeze does not apply in all circumstances, such as where you have an existing account relationship and a copy of your credit report is requested by your existing creditor or its agents for certain types of account review, collection, fraud control or similar activities; for use in setting or adjusting an insurance rate or claim or insurance underwriting; for certain governmental purposes; and for purposes of prescreening as defined in the federal Fair Credit Reporting Act.

If you are actively seeking a new credit, loan, utility, telephone or insurance account, you should understand that the procedures involved in lifting a security freeze may slow your own applications for credit. You should plan ahead and lift a freeze, either completely if you are shopping around or specifically for a certain creditor, with enough advance notice before you apply for new credit for the lifting to take effect. You should contact a consumer reporting agency and request it to lift the freeze at least three business days before applying. As of September 1, 2008, if you contact a consumer reporting agency by a secure electronic method or by telephone, the consumer reporting agency should lift the freeze within fifteen minutes. You have a right to bring a civil action against a consumer reporting agency that violates your rights under the Fair Credit Reporting and Identity Security Act.

#### **For Residents of New York**

You may also obtain information about security breach response and identity theft prevention and protection from the New York Attorney General's Office:

Office of the Attorney General, The Capitol, Albany, NY 12224-0341, 1-800-771-7755, [www.ag.ny.gov](http://www.ag.ny.gov).

#### **For Residents of North Carolina**

You may also obtain information about preventing and avoiding identity theft from the North Carolina Attorney General's Office:

North Carolina Attorney General's Office, Consumer Protection Division  
9001 Mail Service Center, Raleigh, NC 27699-9001, 1-919-716-6000, [www.ncdoj.gov](http://www.ncdoj.gov).

#### **For Residents of Oregon**

State laws advise you to report any suspected identity theft to law enforcement, as well as the Federal Trade Commission. Contact information for the Oregon Department of Justice is as follows:

Oregon Department of Justice, 1162 Court Street NE, Salem, OR 97301, 1-877-877-9392, [www.doj.state.or.us](http://www.doj.state.or.us).

## **TAKE ADVANTAGE OF YOUR IDENTITY MONITORING SERVICES**

You have been provided with access to the following services from Kroll:

### **Single Bureau Credit Monitoring**

You will receive alerts when there are changes to your credit data—for instance, when a new line of credit is applied for in your name. If you do not recognize the activity, you will have the option to call a Kroll fraud specialist, who will be able to help you determine if it is an indicator of identity theft.

### **Fraud Consultation**

You have unlimited access to consultation with a Kroll fraud specialist. Support includes showing you the most effective ways to protect your identity, explaining your rights and protections under the law, assistance with fraud alerts, and interpreting how personal information is accessed and used, including investigating suspicious activity that could be tied to an identity theft event.

### **Identity Theft Restoration**

If you become a victim of identity theft, an experienced Kroll licensed investigator will work on your behalf to resolve related issues. You will have access to a dedicated investigator who understands your issues and can do most of the work for you. Your investigator will be able to dig deep to uncover the scope of the identity theft, and then work to resolve it.