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March 11, 2020

**VIA EMAIL**

Consumer Protection Bureau  
Office of the Attorney General  
33 Capitol Street  
Concord, NH 03301  
DOJ-CPB@doj.nh.gov

Re: Notification Pursuant to New Hampshire's Breach Notification Statute

To Whom It May Concern:

We represent Northeast Radiology ("NERAD") and are writing on their behalf to notify you of an incident.

As background, Alliance HealthCare Services ("Alliance") provides healthcare management services to NERAD, and on January 11, 2020, Alliance told NERAD that it had discovered that unauthorized individuals accessed data from NERAD's picture archiving and communication system ("PACS"), which is used to store radiology images.

Upon learning of the incident, Alliance promptly launched an internal investigation to understand the incident and to review the security controls related to the PACS application. Alliance also retained a leading forensic security firm to assist in its investigation and to evaluate systems and processes to further strengthen protections for the PACS. The investigation showed that unauthorized individuals had accessed PACS data between April 14, 2019 and January 7, 2020.

The investigation determined that the information of 29 patients was accessed by the unauthorized individuals. We are notifying each of those patients and providing them with details regarding the incident beginning March 11, 2020.

Other patients' information was available on the system, but for those other patients, NERAD and Alliance do not have evidence about whose particular information may have been accessed, if at all. Out of an abundance of caution, however, we are also notifying those patients, beginning March 11, 2020. The information potentially involved for each individual varied, but could have included name, gender, age, date of birth, exam description, date of service, image, image description, and medical record number which, in some instances, may have corresponded to the

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patient's Social Security Number. The number of individuals potentially impacted in New Hampshire is 191.

While NERAD and Alliance are not aware of any instances of fraud or identity theft as a result of this incident, we have arranged for identity protection and credit monitoring services for one year for the individuals in New Hampshire whom we are notifying whose Social Security numbers may have been impacted.

If you have any questions or need further information, please feel free to contact me at 1-317-569-4837 or [doriann.cain@faegredrinker.com](mailto:doriann.cain@faegredrinker.com). A copy of the Data Breach Notification Letter is enclosed for your consideration.

Very truly yours,

Doriann H. Cain



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

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

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

Northeast Radiology (“NERAD”) values and respects the privacy of your information, which is why we are writing to advise you of a recent incident that may have involved some of your personal information. Although we have no evidence that anyone viewed or acquired your specific personal information, and no reason to believe that any of your personal information has been misused for the purpose of committing fraud or identity theft, we are writing out of an abundance of caution to advise you about the steps that we have taken to address this incident and provide you with guidance on what you can do to help protect yourself.

**What Happened?** Alliance HealthCare Services (“Alliance”) provides information technology services to NERAD, and on January 11, 2020, Alliance told us it had discovered that unauthorized individuals accessed NERAD’s picture archiving and communication system (“PACS”), which is used to store radiology images. The personal information stored in the PACS includes information about your radiology services at NERAD or other radiology providers you visited. Upon further investigation, Alliance found that unauthorized individuals had accessed PACS data between April 14, 2019 and January 7, 2020.

**What Information Was Involved?** The information potentially involved for each individual varied, but may have included your name, gender, age, date of birth, exam description and identifier, date of service and medical record number, which may have corresponded to your Social Security number.

**What We Are Doing.** Upon learning of the incident, Alliance promptly launched an internal investigation to understand the incident and to review the security controls related to the PACS application. Alliance also retained a leading forensic security firm to assist in its investigation and to evaluate systems and processes to further strengthen protections for the PACS.

**What You Can Do.** Again, NERAD and Alliance have no evidence that anyone viewed or acquired your specific personal information, and no reason to believe that any of your personal information has been misused for the purpose of committing fraud or identity theft. However, we are offering a complimentary one-year membership of Experian IdentityWorks<sup>SM</sup> Credit 3B. This product helps detect possible misuse of your personal information and provides you with identity protection services focused on immediate identification and resolution of identity theft. IdentityWorks Credit 3B is completely free to you and enrolling in this program will not hurt your credit score. **For more information on identity theft prevention and IdentityWorks Credit 3B, including instructions on how to activate your complimentary one-year membership, please see the additional information provided in this letter.**

**For More Information.** We value the trust you place in us, and we apologize for any inconvenience or concern that this incident may cause you. For further information and assistance, please call 1-???-???-???? between 9:00 a.m. and 6:30 p.m., Eastern Time, Monday through Friday.

Sincerely,

Howard M. Lee, MD  
Northeast Radiology

## Activating Your Complimentary Credit Monitoring

To help protect your identity, we are offering a **complimentary** one-year membership of Experian IdentityWorks<sup>SM</sup> Credit 3B. 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.

### Activate IdentityWorks Credit 3B Now in Three Easy Steps

1. ENROLL by: <<b2b\_text\_1 (Date)>> (Your code will not work after this date.)
2. VISIT the **Experian IdentityWorks website** to enroll: <https://www.experianidworks.com/3bcredit>
3. PROVIDE the **Activation Code**: <<Member ID>>

If you have questions about the product, need assistance with identity restoration or would like an alternative to enrolling in Experian IdentityWorks online, please contact Experian's customer care team at 877-288-8057. Be prepared to provide engagement number <<b2b\_text\_2 (Engagement #)>> as proof of eligibility for the identity restoration services by Experian.

### ADDITIONAL DETAILS REGARDING YOUR 12-MONTH EXPERIAN IDENTITYWORKS CREDIT 3B MEMBERSHIP:

A credit card is **not** required for enrollment in Experian IdentityWorks Credit 3B.

You can contact Experian **immediately without needing to enroll in the product** regarding any fraud issues. Identity Restoration specialists are available to help you address credit and non-credit related fraud.

Once you enroll in Experian IdentityWorks, you will have access to the following additional features:

- **Experian credit report at signup:** See what information is associated with your credit file. Daily credit reports are available for online members only.\*
- **Credit Monitoring:** Actively monitors Experian, Equifax and Transunion files for indicators of fraud.
- **Experian IdentityWorks ExtendCARE<sup>TM</sup>:** You receive the same high-level of Identity Restoration support even after your Experian IdentityWorks membership has expired.
- **\$1 Million Identity Theft Insurance<sup>\*\*</sup>:** Provides coverage for certain costs and unauthorized electronic fund transfers.

**Activate your membership today at <https://www.experianidworks.com/3bcredit> or call 877-288-8057 to register with the activation code above.**

**What you can do to protect your information:** There are additional actions you can consider taking to reduce the chances of identity theft or fraud on your account(s). Please refer to [www.ExperianIDWorks.com/restoration](http://www.ExperianIDWorks.com/restoration) for this information. If you have any questions about IdentityWorks, 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.

\* Offline members will be eligible to call for additional reports quarterly after enrolling.

\*\* Identity theft insurance is underwritten by insurance company subsidiaries or affiliates of American International Group, Inc. (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.

## Additional Important Information

As a precautionary measure, we recommend that you remain vigilant to protect against potential fraud and/or identity theft by, among other things, reviewing your account statements and monitoring 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. You should also promptly report any fraudulent activity or any suspected incidents of identity theft to proper law enforcement authorities, including the police and your state's attorney general, as well as the Federal Trade Commission ("FTC").

You may wish to review the tips provided by the FTC on fraud alerts, security/credit freezes and steps to you can take to avoid identity theft. For more information and to contact the FTC, please visit [www.ftc.gov/idtheft](http://www.ftc.gov/idtheft) or call 1-877-ID-THEFT (1-877-438-4338). You may also contact the FTC at: Federal Trade Commission, 600 Pennsylvania Avenue, NW, Washington, DC 20580.

**Credit Reports:** You may obtain a free copy of your credit report once every 12 months from each of the three national credit reporting agencies by visiting <http://www.annualcreditreport.com>, by calling toll free 1-877-322-8228, or by completing an Annual Credit Report Request Form and mailing it to Annual Credit Report Request Service, P.O. Box 105281, Atlanta, GA 30348. You can print a copy of the request form at <https://www.annualcreditreport.com/cra/requestformfinal.pdf>.

Alternatively, you may elect to purchase a copy of your credit report by contacting one of the three national credit reporting agencies. Contact information for the three national credit reporting agencies for the purpose of requesting a copy of your credit report or for general inquiries, including obtaining information about fraud alerts and placing a security freeze on your credit files, is as follows:

### **Equifax**

1-800-349-9960  
[www.equifax.com](http://www.equifax.com)  
P.O. Box 105788  
Atlanta, GA 30348

### **Experian**

1-888-397-3742  
[www.experian.com](http://www.experian.com)  
P.O. Box 9554  
Allen, TX 75013

### **TransUnion**

1-888-909-8872  
[www.transunion.com](http://www.transunion.com)  
P.O. Box 2000  
Chester, PA 19022

**Fraud Alerts:** You may want to consider placing a fraud alert on your credit report. An initial fraud alert is free and will stay on your credit file for at least one year. The alert informs creditors of possible fraudulent activity within your report and requests that the creditor contact you prior to establishing any new accounts in your name. To place a fraud alert on your credit report, contact any of the three national credit reporting agencies using the contact information listed above. Additional information is available at <http://www.annualcreditreport.com>.

**Credit and Security Freezes:** You may have the right to place a credit freeze, also known as a security freeze, on your credit file, 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 the freeze. A credit freeze is designed to prevent potential credit grantors from accessing your credit report without your consent. If you place a credit 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 credit freeze may delay your ability to obtain credit. Unlike a fraud alert, you must separately place a credit freeze on your credit file at each credit reporting company. Since the instructions for how to establish a credit freeze may differ from state to state, please contact the three major credit reporting companies using the contact information above.

Individuals interacting with credit reporting agencies have rights under the Fair Credit Reporting Act. We encourage you to review your rights under the Fair Credit Reporting Act by visiting [https://files.consumerfinance.gov/f/201504\\_cfpb\\_summary\\_your-rights-under-fcra.pdf](https://files.consumerfinance.gov/f/201504_cfpb_summary_your-rights-under-fcra.pdf), or by requesting information in writing from the Consumer Response Center, Room 130-A, Federal Trade Commission, 600 Pennsylvania Ave. NW, Washington, DC 20580.

## Other Important State Information

You may also file a report with your local police or the police in the community where the identity theft took place. Further, you are entitled to request a copy of the police report filed in this matter.

### **For Rhode Island residents:**

You may obtain information about preventing and avoiding identity theft from Rhode Island's Attorney General Office: Rhode Island Office of the Attorney General, 150 South Main Street, Providence, RI 02903, Phone: (401) 274-4400 <http://www.riag.ri.gov>.

**For Maryland Residents:**

You may obtain information about avoiding identity theft at: Office of the State of Maryland Attorney General 200 St. Paul Place Baltimore, MD 21202 1-888-743-0023 [www.marylandattorneygeneral.gov](http://www.marylandattorneygeneral.gov).

**For North Carolina Residents:**

You may obtain information about avoiding identity theft at: North Carolina Attorney General's Office 9001 Mail Service Center Raleigh, NC 27699-9001 919-716-6400 [www.ncdoj.gov](http://www.ncdoj.gov).

**For New Mexico Residents:**

The Fair Credit Reporting Act provides certain rights in addition to the right to receive a copy of your credit report (including a free copy once every 12 months), including the right to ask for a credit score, dispute incomplete or inaccurate information, limit "prescreened" offers of credit and insurance, and seek damages from violators. If you are the victim of identity theft, you also have the right to file a police report and obtain a copy of it.

**For California Residents:**

You can visit the California Office of Privacy Protection ([www.oag.ca.gov/privacy](http://www.oag.ca.gov/privacy)) for additional information on protection against identity theft.

**For Iowa Residents:**

You are advised to report any suspected identity theft to law enforcement or to the Iowa Attorney General.

**For Colorado, Georgia, Maine, Maryland, Massachusetts, New Jersey, Puerto Rico and Vermont Residents:**

You may obtain one or more (depending on the state) additional copies of your credit report, free of charge. You must contact each of the credit bureaus directly to obtain such additional report(s).