



MULLEN  
COUGHLIN<sup>LLC</sup>  
ATTORNEYS AT LAW

RECEIVED

JAN 11 2021

CONSUMER PROTECTION

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December 30, 2020

**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 represent Orchestrate Healthcare Consulting, (“OHC”), located at 2054 Vista Parkway, Suite 400, West Palm Beach, FL 33411, and are writing to notify your office of an incident that may affect the security of some personal information relating to four (4) New Hampshire residents. This notice may be supplemented with any new significant facts learned subsequent to its submission. By providing this notice, OHC does not waive any rights or defenses regarding the applicability of New Hampshire law, the applicability of the New Hampshire data event notification statute, or personal jurisdiction.

**Nature of the Data Event**

On July 8, 2020, OHC discovered suspicious activity related to an employee email account and launched an investigation with the assistance of a third-party forensic investigator to determine the full nature and scope of what occurred. Through this investigation, OHC determined that an unknown actor gained access to two (2) OHC employee email accounts between July 3, 2020 and July 10, 2020. OHC then commenced a detailed review of the full contents of the accounts to determine what data was present, to whom that data related, and contact information for those individuals. The detailed review was completed on September 25, 2020. Thereafter OHC worked to confirm the scope of potentially impacted individuals and contact information to notify them. Because certain personal information was present in the email accounts, OHC is providing notice to potentially impacted individuals.

The information that could have been subject to unauthorized access includes name, address, Social Security number and driver's license or other government issued identification number.

### **Notice to New Hampshire Residents**

On or about December 30, 2020, OHC provided written notice of this incident to potentially affected individuals, which includes four (4) New Hampshire residents. 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**

Upon discovering the event, OHC moved quickly to investigate and respond to the incident, assess the security of OHC systems, and notify potentially affected individuals. OHC is also working to implement additional safeguards and training to its employees. OHC is providing access to credit monitoring services for twelve (12) months through Experian, to individuals whose personal information was potentially affected by this incident, at no cost to these individuals.

Additionally, OHC is providing impacted individuals with guidance on how to better protect against identity theft and fraud, including advising individuals to report any suspected incidents of identity theft or fraud to their credit card company and/or bank. OHC is providing individuals with 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) 930-1345.

Very truly yours,



Alexandria N. Murphy of  
MULLEN COUGHLIN LLC

# EXHIBIT A

  
**ORCHESTRATE**  
HEALTHCARE  
Return Mail Processing  
PO Box 589  
Claysburg, PA 16625-0589

December 30, 2020

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SAMPLE A SAMPLE - L01 GENERAL  
APT ABC  
123 ANY ST  
ANYTOWN, US 12345-6789  


**RE: Notice of Data Breach**

Dear Sample A Sample,

Orchestrate Healthcare Consulting, LLC (“OHC”) is writing to notify you of a recent incident that may affect the security of some of your personal information. This letter provides details of the incident, our response, and resources available to you to help protect your information, should you feel it is appropriate to do so.

**What Happened?** On July 8, 2020, OHC discovered suspicious activity related to an employee email account. We launched an investigation with the assistance of a third-party forensic investigator to determine the full nature and scope of what occurred. Through this investigation, OHC determined that an unknown actor gained access to two OHC employee email accounts between July 3, 2020 and July 10, 2020. OHC then commenced a detailed review of the full contents of the accounts to determine what data was present, to whom that data related, and contact information for those individuals. Because certain personal information was present in the email accounts, OHC is providing notice to potentially impacted individuals.

**What Information was Involved?** Through our investigation, we determined that the following types of your information may have been impacted by this incident: name, [Data Elements]. To date, OHC does not have any evidence of actual or attempted misuse of your personal information as a result of this incident.

**What We Are Doing.** The confidentiality, privacy, and security of information in our care is one of our highest priorities. Upon discovering this incident, OHC reset account passwords, started an investigation, and took steps to further secure our systems. We are also notifying the appropriate regulatory entities. We are notifying potentially impacted individuals, including you, so that you may take additional steps to better protect your personal information, should you feel it is appropriate to do so. Although we do not have any evidence of identity theft or fraud as a result of this incident, we are offering credit monitoring and identity theft protection services through Experian for 12 months at no cost to you as an added precaution.

**What You Can Do.** 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. Additional information and resources are included in the enclosed *Steps You May Take To Help Protect Personal Information*. You may also enroll in the complimentary credit monitoring services available to you.

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***For More Information.*** We understand you may have questions that are not answered in this letter. If you have questions, please contact our dedicated assistance line at (855) 726-7329, Monday through Friday, between 9:00 a.m. and 11:00 p.m. EST and Saturday and Sunday, between 11:00 a.m. and 8:00 p.m. EST. Protecting your information is important to us and OHC remains committed to safeguarding the information in our care.

Sincerely,

*Kara M. Gallagher*

Kara Gallagher  
Chief Operating Officer  
Orchestrate Healthcare Consulting, LLC

## STEPS YOU MAY TAKE TO HELP PROTECT PERSONAL INFORMATION

### Enroll in Credit Monitoring

To help protect your identity, we are offering a complimentary one-year membership of Experian's® IdentityWorks<sup>SM</sup>. This product provides you with superior identity detection and resolution of identity theft. To activate your membership and start monitoring your personal information please follow the steps below:

- Ensure that you **enroll by: February 28, 2021** (Your code will not work after this date.)
- **Visit** the Experian IdentityWorks website to enroll: <https://www.experianidworks.com/credit>
- Provide your **activation code: ABCDEFGHI**

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 (855) 726-7329 by **February 28, 2021**. Be prepared to provide engagement number **DB24156** as proof of eligibility for the identity restoration services by Experian.

### **ADDITIONAL DETAILS REGARDING YOUR 12-MONTH EXPERIAN IDENTITYWORKS MEMBERSHIP:**

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

You can contact Experian **immediately** regarding any fraud issues, and have access to the following features once you enroll in Experian IdentityWorks:

- **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 file for indicators of fraud.
- **Identity Restoration:** Identity Restoration agents are immediately available to help you address credit and non-credit related fraud.
- **Experian IdentityWorks ExtendCARE™:** You receive the same high-level of Identity Restoration support even after your Experian IdentityWorks membership has expired.
- **Up to \$1 Million Identity Theft Insurance\*\*:** Provides coverage for certain costs and unauthorized electronic fund transfers.

If you believe there was fraudulent use of your information and would like to discuss how you may be able to resolve those issues, please reach out to an Experian agent at (855) 726-7329. If, after discussing your situation with an agent, it is determined that Identity Restoration support is needed, then an Experian Identity Restoration agent is available to work with you to investigate and resolve each incident of fraud that occurred (including, as appropriate, helping you with contacting credit grantors to dispute charges and close accounts; assisting you in placing a freeze on your credit file with the three major credit bureaus; and assisting you with contacting government agencies to help restore your identity to its proper condition).

Please note that this Identity Restoration support is available to you for one year from the date of this letter and does not require any action on your part at this time. The Terms and Conditions for this offer are located at [www.ExperianIDWorks.com/restoration](http://www.ExperianIDWorks.com/restoration). You will also find self-help tips and information about identity protection at this site.

We sincerely apologize for this incident and regret any inconvenience it may cause you. Should you have questions or concerns regarding this matter, please do not hesitate to contact us at (855) 726-7329.

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## **Monitor Your Accounts**

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](http://www.annualcreditreport.com) or call, toll-free, 1-877-322-8228. You may also contact the three major credit bureaus listed below 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**

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)

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, 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, 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**

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)

## **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](http://www.identitytheft.gov), 1-877-ID-THEFT (1-877-438-4338); 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.

**California Residents:** 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.

**Kentucky Residents:** Office of the Attorney General of Kentucky, 700 Capitol Avenue, Suite 118 Frankfort, Kentucky 40601, [www.ag.ky.gov](http://www.ag.ky.gov), Telephone: 1-502-696-5300.

**Maryland Residents:** Office of the Attorney General of Maryland, Consumer Protection Division 200 St. Paul Place Baltimore, MD 21202, [www.oag.state.md.us/Consumer](http://www.oag.state.md.us/Consumer), Telephone: 1-888-743-0023.

**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 a 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. You can review your rights pursuant to the Fair Credit Reporting Act by visiting [www.consumerfinance.gov/f/201504\\_cfpb\\_summary\\_your-rights-under-fcra.pdf](http://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.

**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/>.

**North Carolina Residents:** Office of the Attorney General of North Carolina, Consumer Protection Division, 9001 Mail Service Center Raleigh, NC 27699-9001, [www.ncdoj.gov](http://www.ncdoj.gov), Telephone: 1-919-716-6400, 877-566-7226 (toll free within NC).

