

BakerHostetler

Baker & Hostetler LLP

Key Tower
127 Public Square, Suite 2000
Cleveland, OH 44114-1214

T 216.621.0200
F 216.696.0740
www.bakerlaw.com

William H. Berglund
direct dial: 216.861.7416
wberglund@bakerlaw.com

January 28, 2021

VIA OVERNIGHT MAIL

Attorney General Gordon MacDonald
Office of the Attorney General
33 Capitol Street
Concord, NH 03301

Re: Supplemental Incident Notification

Dear Attorney General MacDonald:

We are submitting this supplemental notice on behalf of our client, Peabody & Arnold LLP (“Peabody & Arnold”), and one of its clients, regarding a security incident involving New Hampshire residents that we notified you about on December 21, 2020.¹ Peabody & Arnold is a law firm headquartered in Boston, Massachusetts with two other offices in New York and Rhode Island. In our previous notice, we explained that Peabody & Arnold identified ninety-seven New Hampshire residents whose personal information was potentially involved in a data security incident, and that those individuals were notified on December 21, 2020.

As part of its investigation, Peabody & Arnold notified one of its clients that personal information it shared with Peabody & Arnold was involved in the incident. The client requested that Peabody & Arnold provide notice to the individuals whose information was involved and any required regulators. Peabody & Arnold is now providing notice to these individuals and submitting this supplemental notice. Thirty-one individuals related to Peabody & Arnold’s client have been identified as New Hampshire residents. These individuals’ information includes their names and one or more of the following: Social Security numbers, driver’s license numbers, and financial account numbers.

Beginning today, January 28, 2021, Peabody & Arnold will mail written notification via First-Class U.S. mail to the additional thirty-one New Hampshire residents. A sample copy of the

¹ This notice does not waive Peabody & Arnold’s objection that New Hampshire lacks personal jurisdiction over it regarding any claims related to this incident.

STATE OF NH
DEPT OF JUSTICE
2021 JAN 29 PM 5:58

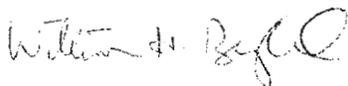
Attorney General Gordon MacDonald
January 28, 2021
Page 2

notification letter is enclosed. Peabody & Arnold has offered the New Hampshire residents with Social Security numbers and/or driver's license numbers involved a complimentary, one-year membership in credit monitoring and identity protection services through Experian. Peabody & Arnold has established a dedicated phone number that individuals may call with related questions. Peabody & Arnold's investigation into the incident has concluded and all individuals have been notified. In total, Peabody & Arnold has notified one hundred and twenty-eight New Hampshire residents, which includes ninety-seven who were initially notified and thirty-one who were notified on behalf of Peabody & Arnold's client.

To further protect personal information, Peabody & Arnold has taken steps to enhance its existing security protocols and re-educating staff for awareness on these types of incidents. Peabody & Arnold has enabled two-factor authentication on an enterprise-wide level, reset passwords for all users in its email environment, and configured its email tenant to disable legacy email protocols.

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

Sincerely,



William H. Berglund
Counsel

Enclosure

Peabody & Arnold LLP
Mail Handling Services
777 E Park Dr
Harrisburg, PA 17111

PEABODY
& ARNOLD

I-31

January 26, 2021

Dear [REDACTED],

We are writing to inform you of a security incident involving the email account of an employee of Peabody & Arnold LLP, which may have resulted in access to some of your information. Peabody & Arnold LLP is a law firm that provides legal services to Genesis Healthcare, Inc. ("Genesis") and its affiliates/subsidiaries.

Our investigation of this incident found that an unauthorized person accessed the subject email account between May 21, 2020 and May 27, 2020. The investigation, which was done with the assistance of a cybersecurity firm, did not determine whether emails or attachments relating to any individual were actually viewed or accessed, but in an abundance of caution we are notifying you of this event and assure you that we take it very seriously. On November 12, 2020 we determined that the subject email account contained your name, date of birth, Social Security number, and diagnosis / clinical information, which was provided to Peabody & Arnold LLP in connection with legal services performed on behalf of Genesis.

While we have no indication that your information was actually viewed by the unauthorized person or that it has been misused, we wanted to notify you of this incident and assure you that we take it very seriously. As an added precaution, we are also offering you a complimentary one-year membership with Experian's® IdentityWorksSM. This product helps detect possible misuse of your personal information and provides you with identity protection support. **For more information on IdentityWorksSM, including instructions on how to activate your complimentary one-year membership, as well as some additional steps you can take, please see the additional information provided in this letter.** For more information on safeguarding your identity, and your complimentary one-year membership, please see the additional information provided in this letter.

To further protect personal information, we are taking steps to enhance our existing security protocols and re-educating our staff for awareness on these types of incidents. We sincerely regret any inconvenience or concern this incident may cause. Should you have any questions, please call 1-800-295-9470, Monday through Friday, between 8:00 a.m. and 5:00 p.m. Eastern Time.

Sincerely,

Peabody & Arnold LLP

Activate IdentityWorks Credit 3B Now in Three Easy Steps

To activate your membership and start monitoring your personal information please follow the steps below:

1. ENROLL by: **April 14, 2021** (Your code will not work after this date.)
2. VISIT the **Experian IdentityWorks website** to enroll: [REDACTED]
3. PROVIDE the **Activation Code**: [REDACTED]

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** by **April 14, 2021**. Be prepared to provide engagement number [REDACTED] 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 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.
- **Identity Restoration:** Identity Restoration specialists 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.
- **\$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 877.288.8057. 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. You will also find self-help tips and information about identity protection at this site.

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

** The Identity Theft Insurance is underwritten and administered by American Bankers Insurance Company of Florida, an Assurant company. Please refer to the actual policies for terms, conditions, and exclusions of coverage. Coverage may not be available in all jurisdictions.

ADDITIONAL STEPS YOU CAN TAKE

We remind you it is always advisable to be vigilant for incidents of fraud or identity theft by reviewing your account statements and free credit reports for any unauthorized activity. You may obtain a copy of your credit report, free of charge, once every 12 months from each of the three nationwide credit reporting companies. To order your annual free credit report, please visit www.annualcreditreport.com or call toll free at 1-877-322-8228. Contact information for the three nationwide credit reporting companies is as follows:

- *Equifax*, PO Box 740241, Atlanta, GA 30374, www.equifax.com, 1-800-685-1111
- *Experian*, PO Box 2002, Allen, TX 75013, www.experian.com, 1-888-397-3742
- *TransUnion*, PO Box 2000, Chester, PA 19016, www.transunion.com, 1-800-916-8800

If you believe you are the victim of identity theft or have reason to believe your personal information has been misused, you should immediately contact the Federal Trade Commission and/or the Attorney General's office in your state. 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. Contact information for the Federal Trade Commission is as follows:

- *Federal Trade Commission*, Consumer Response Center, 600 Pennsylvania Avenue NW, Washington, DC 20580, 1-877-IDTHEFT (438-4338), www.ftc.gov/idtheft

If your health insurance or medical information was involved, it is also advisable to review the billing statements you receive from your health insurer or healthcare provider. If you see charges for services you did not receive, please contact the insurer or provider immediately.

Fraud Alerts and Credit or Security Freezes:

Fraud Alerts: There are two types of general fraud alerts you can place on your credit report to put your creditors on notice that you may be a victim of fraud—an initial alert and an extended alert. You may ask that an initial fraud alert be placed on your credit report if you suspect you have been, or are about to be, a victim of identity theft. An initial fraud alert stays on your credit report for one year. You may have an extended alert placed on your credit report if you have already been a victim of identity theft with the appropriate documentary proof. An extended fraud alert stays on your credit report for seven years.

To place a fraud alert on your credit reports, contact one of the nationwide credit bureaus. A fraud alert is free. The credit bureau you contact must tell the other two, and all three will place an alert on their versions of your report.

For those in the military who want to protect their credit while deployed, an Active Duty Military Fraud Alert lasts for one year and can be renewed for the length of your deployment. The credit bureaus will also take you off their marketing lists for pre-screened credit card offers for two years, unless you ask them not to.

Credit or Security Freezes: You have the right to put a credit freeze, also known as a security freeze, on your credit file, free of charge, which makes it more difficult for identity thieves to open new accounts in your name. That's because most creditors need to see your credit report before they approve a new account. If they can't see your report, they may not extend the credit.

How do I place a freeze on my credit reports? There is no fee to place or lift a security freeze. Unlike a fraud alert, you must separately place a security freeze on your credit file at each credit reporting company. For information and instructions to place a security freeze, contact each of the credit reporting agencies at the addresses below:

- **Experian Security Freeze**, PO Box 9554, Allen, TX 75013, www.experian.com
- **TransUnion Security Freeze**, PO Box 2000, Chester, PA 19016, www.transunion.com
- **Equifax Security Freeze**, PO Box 105788, Atlanta, GA 30348, www.equifax.com

You'll need to supply your name, address, date of birth, Social Security number and other personal information.

After receiving your freeze request, each credit bureau will provide you with a unique PIN (personal identification number) or password. Keep the PIN or password in a safe place. You will need it if you choose to lift the freeze.

How do I lift a freeze? A freeze remains in place until you ask the credit bureau to temporarily lift it or remove it altogether. If the request is made online or by phone, a credit bureau must lift a freeze within one hour. If the request is made by mail, then the bureau must lift the freeze no later than three business days after getting your request.

If you opt for a temporary lift because you are applying for credit or a job, and you can find out which credit bureau the business will contact for your file, you can save some time by lifting the freeze only at that particular credit bureau. Otherwise, you need to make the request with all three credit bureaus.

Additional information for residents of the following states:

Rhode Island: This incident involves 5 individuals in Rhode Island. Under Rhode Island law, you have the right to file and obtain a copy of a police report. You also have the right to request a security freeze, as described above. You may contact and obtain information from your state attorney general at: *Rhode Island Attorney General's Office*, 150 South Main Street, Providence, RI 02903, 1-401-274-4400, www.riag.ri.gov