



LEWIS BRISBOIS BISGAARD & SMITH LLP

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January 10, 2020

VIA EMAIL

Attorney General Gordon MacDonald
Office of the Attorney General
Consumer Protection Bureau
33 Capitol Street
Concord, NH 03301
Phone: (603) 271-3643
Fax: (603) 271-2110

Re: Notification of Data Security Incident

Dear Attorney General MacDonald:

Lewis Brisbois Bisgaard & Smith LLP (“Lewis Brisbois”) represents PIH Health, a healthcare provider headquartered in Whittier, California. This letter is being sent to provide notification of a data security incident potentially involving information belonging to New Hampshire residents. PIH Health is in the process of effectuating notification to potentially impacted individuals pursuant to the Health Insurance Portability and Accountability Act of 1996 (“HIPAA”) and N.H. Rev. Stat. §§ 359-C:19, C:20, C:21.

1. Nature of the security incident.

On June 18, 2019, PIH Health learned that certain PIH Health employee email accounts had potentially been accessed without authorization as a result of a targeted email phishing campaign. After learning this information, PIH Health reset the passwords required to access the employee email accounts and implemented additional email and network security measures. PIH Health also immediately began an investigation and, in so doing, engaged leading, independent cybersecurity experts to determine what happened and whether sensitive information, including personal information and protected health information, was accessed or acquired without authorization. As a result, PIH Health learned on October 2, 2019 that certain PIH Health employee email accounts were accessed without authorization between June 11, 2019 and June 19, 2019.

Upon receipt of confirmation of unauthorized access to certain PIH Health employee email accounts, PIH Health engaged the same leading, independent cybersecurity experts to determine whether the above-referenced employee email accounts contained personal information or protected health information that may have been subject to unauthorized access as a result. On November 12, 2019, as a result of that review, PIH Health learned that personal information belonging to New Hampshire residents – including individuals’ names, driver’s license numbers,

medical information, health insurance information, and online account credentials – was contained within the accessed email accounts in the form of messages and attachments.

2. Number of New Hampshire residents affected.

PIH Health is in the process of notifying 3 New Hampshire residents regarding this data security incident. Notification letters are being mailed via first class U.S. mail on January 9th and 10th, 2020. A sample copy of the notification letter is included with this letter.

3. Steps taken relating to the incident.

PIH Health takes the security of all information within its possession very seriously. PIH Health has taken steps to enhance the security of information to help prevent similar incidents from occurring in the future including, but not limited to: promptly deploying an incident response team and protocol based upon the NIST framework, promptly engaging independent cybersecurity experts to investigate, enabling new email security appliances, immediately changing passwords for affected individuals and high risk accounts, promptly notifying staff of the incident to guard against reoccurrence, reinforcing two-factor authentication where available, implementing additional training to guard against phishing attacks, and revising PIH's policies and procedures.

4. Contact information.

PIH Health is dedicated to protecting the sensitive information that is in its control. If you have any questions or need additional information, please do not hesitate to contact me at (720) 292-2052, or by e-mail at Alyssa.Watzman@lewisbrisbois.com.

Sincerely,



Alyssa Watzman of
LEWIS BRISBOIS BISGAARD & SMITH LLP

Enclosure



January 7, 2020



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Subject: Notice of Data Security Incident

Dear [REDACTED],

I am writing to inform you of a data security incident experienced by PIH Health that may have involved some of your healthcare and personal information, described below. At PIH Health, we take the privacy and security of all information very seriously. That is why I am writing to inform you of this incident, to offer information about steps that can be taken to help protect your information. I sincerely apologize for any concern that this incident may cause you.

What happened? On June 18, 2019, PIH Health learned that certain PIH Health employee email accounts had potentially been accessed without authorization as a result of a targeted email phishing campaign. After learning of this information, PIH Health reset the passwords required to access the affected employee email accounts and implemented additional email and network security measures. PIH Health also immediately began an investigation and, in so doing, engaged leading, independent cybersecurity experts for assistance. As a result of the independent investigation conducted thereby, PIH Health learned on October 2, 2019 that certain PIH Health employee email accounts were accessed without authorization between June 11, 2019 and June 18, 2019 as a result of the above-referenced phishing campaign.

Upon receipt of confirmation of unauthorized access to certain PIH Health employee email accounts, PIH Health engaged the same leading, independent cybersecurity experts to determine whether the accessed email accounts contained personal information and/or protected health information that may have been subject to unauthorized access as a result. On November 12, 2019, as a result of that review, PIH Health learned that your information was contained within the accessed email accounts. PIH Health then worked diligently to identify up-to-date address information for all potentially impacted individuals in order to provide notification.

What information was involved? Information contained within the impacted email accounts may have included your name in combination with your treatment/diagnosis, health insurance, claims, and billing information, doctor's name, medical record number, Medicare/Medicaid ID, patient account number, and/or driver's license number. As mentioned above, PIH Health is not aware of any evidence of your information being misused.

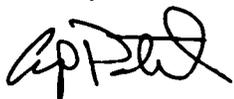
What are we doing? PIH Health takes the security of all information within its possession very seriously. As soon as PIH Health discovered this incident, PIH Health took the steps described above. In addition, PIH Health has taken steps to enhance the security of all information, including patient information, to help prevent similar incidents from occurring in the future.

What you can do: You can follow the steps recommended on the following page to further protect your personal information. If you are concerned that you have been a victim of identity theft, you should report your concern to the Federal Trade Commission and law enforcement.

For More Information: Further information and resources regarding how to safeguard your information appear on the following pages. If you have questions or need assistance, please contact Kroll at 1-833-963-0527, Monday through Friday from 6:00 a.m. to 3:30 p.m. Pacific Time. Kroll representatives are fully versed on this incident and can answer any questions that you may have regarding how to safeguard your personal information.

Our relationship with our patients is our most valued asset. I want to personally express my deepest regret for any worry or inconvenience that this incident may cause you.

Sincerely,

A handwritten signature in black ink, appearing to read 'Anup Patel', written in a cursive style.

Anup Patel
Vice President, Enterprise Risk Management
PIH Health

STEPS YOU CAN TAKE TO FURTHER PROTECT YOUR INFORMATION

Review Your Account Statements and Notify Law Enforcement of Suspicious Activity: 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. You also should promptly report any fraudulent activity or any suspected incidence of identity theft to proper law enforcement authorities, your state attorney general, and/or the Federal Trade Commission (FTC).

Copy of Credit Report: You may obtain a free copy of your credit report from each of the three major credit reporting agencies once every 12 months by visiting <http://www.annualcreditreport.com/>, calling toll-free 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 this form at <https://www.annualcreditreport.com/cra/requestformfinal.pdf>. You also can contact one of the following three national credit reporting agencies:

TransUnion	Experian	Equifax	Free Annual Report
P.O. Box 1000	P.O. Box 9532	P.O. Box 105851	P.O. Box 105281
Chester, PA 19016	Allen, TX 75013	Atlanta, GA 30348	Atlanta, GA 30348
1-877-322-8228	1-888-397-3742	1-800-525-6285	1-877-322-8228
www.transunion.com	www.experian.com	www.equifax.com	annualcreditreport.com

Fraud Alert: 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 one (1) year. The alert informs creditors of possible fraudulent activity within your report and requests that the creditor contact you prior to establishing any accounts in your name. To place a fraud alert on your credit report, contact any of the three credit reporting agencies identified above. Additional information is available at <http://www.annualcreditreport.com>.

Security Freeze: You have the right to put a security freeze on your credit file. This will prevent new credit from being opened in your name without the use of a PIN number that is issued to you when you initiate the freeze. A security freeze is designed to prevent potential creditors from accessing your credit report without your consent. As a result, using a security freeze may interfere with or delay your ability to obtain credit. You must separately place a security freeze on your credit file with each credit reporting agency. There should be no charge to place a security freeze on your credit file. In order to place a security freeze, you may be required to provide the consumer reporting agency with information that identifies you including your full name, Social Security number, date of birth, current and previous addresses, and a copy of your state-issued identification card, and a recent utility bill, bank statement or insurance statement.

Additional Free Resources: You can obtain information from the consumer reporting agencies, the FTC or from your respective state Attorney General about steps you can take toward preventing identity theft. You may report suspected identity theft to local law enforcement, including to the FTC or to the Attorney General in your state. Residents of Maryland, North Carolina, and Rhode Island can obtain more information from their Attorneys General using the contact information below.

Federal Trade Commission	Maryland Attorney General	North Carolina Attorney General	Rhode Island Attorney General
600 Pennsylvania Ave, NW	200 St. Paul Place	9001 Mail Service Center	150 South Main Street
Washington, DC 20580	Baltimore, MD 21202	Raleigh, NC 27699	Providence, RI 02903
consumer.ftc.gov , and	oag.state.md.us	ncdoj.gov	http://www.riag.ri.gov
www.ftc.gov/idtheft	1-888-743-0023	1-877-566-7226	401-274-4400
1-877-438-4338			

You also have certain rights under the Fair Credit Reporting Act (FCRA), including the right to know what is in your file, to dispute incomplete or inaccurate information, and to have consumer reporting agencies correct or delete inaccurate, incomplete, or unverifiable information. For more information about the FCRA, and your rights pursuant to the FCRA, please visit http://files.consumerfinance.gov/f/201504_cfpb_summary_your-rights-under-fcra.pdf.