

BAKER DONELSON

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July 23, 2020

Attorney General Gordon J. MacDonald
Office of New Hampshire Attorney General
Attn: Security Breach Notification
33 Capitol Street
Concord, NH 03301
DOJ-CPB@doj.nh.gov

Re: *Notice of Data Incident*

Dear Attorney General MacDonald:

PaperlessPay Corporation (“PaperlessPay”) is a third-party vendor that specializes in assisting employers with generating paystubs and tax forms, among other services. PaperlessPay notified my client, Prisma Health, of a vendor data incident involving Prisma Health employee data that PaperlessPay was obligated to protect. Prisma Health is a not-for-profit hospital system headquartered at 1501 Sumter Street, Columbia, South Carolina 29202. Prisma Health does not maintain any physical facilities in New Hampshire. Although Prisma Health is a HIPAA covered entity, this incident did not involve HIPAA data at all.

This incident also did not affect Prisma Health’s computer systems.¹ In an abundance of caution, notification letters are being sent by my client via U.S. Mail to 4 residents of your State on or about July 20, 2020. The notification letters include instructions for activating one (1) year of credit monitoring services at no cost to the residents. The personally identifiable information (“PII”) that was potentially at risk included first and last names, addresses, and Social Security numbers. A sample notification letter is enclosed for your reference and includes:

- A description of the security event;
- Steps taken to investigate;
- Steps taken to mitigate any potential harm to consumers;

¹ By providing this notice, Prisma Health does 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.

- Instructions for activation of 1 year of free identity theft protection services that include credit monitoring and a \$1 million insurance reimbursement policy to all consumers who received notification;
- Instructions on how to place a security freeze on the recipient's consumer credit report; and
- Instructions regarding how to obtain more information about this event, etc.

Protecting consumer privacy and the confidentiality of personal information remains the primary concern of my client. We will follow-up this correspondence with any forms or other documents that may need to be completed. Please contact me if you require any additional information regarding this incident.

Best regards,

BAKER, DONELSON, BEARMAN,
CALDWELL & BERKOWITZ, PC

A handwritten signature in blue ink that reads "Gina G. Greenwood". The signature is written in a cursive, flowing style.

Gina G. Greenwood

Enclosure: Sample Notification Letter sent to 4 residents

Prisma Health
Mail Handling Services
777 E Park Dr
Harrisburg, PA 17111



July 20, 2020

[REDACTED]
[REDACTED]
[REDACTED]

A-8675

Dear [REDACTED],

PaperlessPay Corporation (“PaperlessPay”) specializes in assisting businesses with generating paystubs and W-2 data, among other services. This letter is to inform you that PaperlessPay, a Prisma Health-Midlands vendor, experienced a data security incident which involved your employee information. This incident did not involve any computer systems owned by Prisma Health, but we are alerting you directly of this incident.

It is our understanding that an unauthorized person gained access to PaperlessPay’s servers where your employee data was stored. The unauthorized access began on or about February 18, 2020 and was discovered by PaperlessPay on or about February 19, 2020. The final mail list associated with this incident was provided by PaperlessPay on July 9, 2020, which allowed us to notify you of this incident.

PaperlessPay and federal law enforcement authorities have not been able to determine which specific data elements may have been accessed by the unauthorized person. PaperlessPay has indicated that the impacted servers may have contained data elements such as your name, address, and Social Security number. PaperlessPay cannot rule out the possibility of unauthorized access to your information.

In order to help protect you as a valued current or former team member, and give you peace of mind, Prisma Health is offering you one (1) year of free credit monitoring and \$1 million in identity theft insurance through Experian. You must activate the Experian product by the activation date in order for it to be effective. We have also included some additional steps that you may wish to take to protect yourself, as you deem appropriate.

PaperlessPay has given assurances that it has taken extensive steps to prevent additional incidents. This includes retaining a national cybersecurity firm to help with an internal investigation, changing all passwords for users and administrators, and bolstering the security of its systems. Nonetheless, Prisma Health recommends that you consider taking certain precautions which are noted in this letter.

For more information, you may call 1-803-296-2751, Monday through Friday (excluding holidays), between 9:00 a.m. and 5:00 p.m. Eastern time. We sincerely regret any concern this incident may have caused you.

Sincerely,

Shanna Perry
Midlands Privacy Officer
Prisma Health

STEPS YOU CAN TAKE TO PROTECT YOUR INFORMATION

Below are instructions on how to enroll in the complimentary credit monitoring services that we are offering:

To help protect your identity, we are offering a complimentary one-year membership of Experian's® IdentityWorksSM. 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: 10/23/2020** (Your code will not work after this date.)
- **Visit** the Experian IdentityWorks website to enroll: <https://www.experianidworks.com/3bcredit>
- Provide your **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 **10/23/2020**. 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.

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, 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.
- **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 **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 TO PROTECT YOURSELF

We also remind you to remain vigilant for incidents of fraud or identity theft by reviewing account statements and credit reports for unauthorized activity. **Residents of the United States are entitled to one free credit report annually from each of the three major credit reporting agencies.** To order your free credit reports, visit www.annualcreditreport.com or call toll-free (877) 322-8228. 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 incidence of identity theft to proper law enforcement authorities, your state attorney general, and/or the Federal Trade Commission.

You may want to consider placing a fraud alert on your credit report. There are two types of 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.

- **Initial Alert:** You may ask that an initial alert be placed on your credit report if you suspect you have been, or are about to be, a victim of identity theft. A fraud alert does not impact your ability to get a loan or credit, but rather alerts a business that your personal information may have been compromised and requires the business to verify your identity before issuing you credit. Although this may cause some delay if you are applying for credit, it may protect against someone else obtaining credit in your name. An initial fraud alert stays on your credit report for at least 90 days
- **Extended Alert:** 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. You can place a fraud alert on your credit report by contacting any of the three national credit reporting agencies. The agency that you contacted must notify the other two agencies.

Additionally, you have the right to put a **credit freeze**, also known as a security freeze, on your credit file, 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 access your credit report unless you temporarily lift the freeze. Therefore, using a security freeze may delay your ability to obtain credit. There is no fee to place or lift a security freeze. However, unlike a fraud alert, you must separately place a security freeze on your credit file at each of the three national credit reporting agencies.

Below are the toll-free numbers and addresses for the three largest credit reporting agencies:

Equifax
P.O. Box 74021
Atlanta, GA 30374
1-800-685-1111
www.equifax.com

Experian
P.O. Box 2002
Allen, TX 75013
1-888-397-3742
www.experian.com

TransUnion
P.O. Box 1000
Chester, PA 19016
1-800-916-8800
www.transunion.com

Below is the toll-free number, address and website address for the Federal Trade Commission, which you may contact to obtain further information on how to protect yourself from identity theft and how to repair identity theft:

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

For residents of Hawaii, Michigan, Missouri, Virginia, Vermont and North Carolina: It is recommended by state law that you remain vigilant for incidents of fraud and identity theft by reviewing credit card account statements and monitoring your credit report for unauthorized activity.

For residents of Illinois, Iowa, Maryland, Missouri, North Carolina, Oregon and West Virginia: It is required by state law to inform you that you may obtain a copy of your credit report, free of charge, whether or not you suspect any unauthorized activity on your account. You may obtain a free copy of your credit report using the contact information listed above.

For residents of Iowa: State law advises you to report any suspected identity theft to law enforcement or the Attorney General.

For residents of Oregon: State laws advise you to report any suspected identity theft to law enforcement, including the Attorney General, and the Federal Trade Commission.

For residents of Maryland, Rhode Island, Illinois and North Carolina: You can obtain information from the Maryland and North Carolina Offices of the Attorney General and the Federal Trade Commission about fraud alerts, security freezes, and steps you can take toward preventing identity theft.

Maryland Office of the Attorney General
Consumer Protection Division
200 St. Paul Place
Baltimore, MD 21202
1-888-743-0023
www.oag.state.md.us

Rhode Island Office of the Attorney General
Consumer Protection
150 South Main Street
Providence, RI 02903
1-401-274-4400
www.riag.ri.gov

Office of the Illinois Attorney General
Identity Theft Hotline
100 W Randolph St, Fl. 12
Chicago, IL 60601
1-866-999-5630
www.illinoisattorneygeneral.gov

North Carolina Office of the Attorney General
Consumer Protection Division
9001 Mail Service Center
Raleigh, NC 27699-9001
1-877-566-7226
www.ncdoj.com

For residents of Massachusetts and Rhode Island: It is required by state law that you are informed of your right to obtain a police report if you are a victim of identity theft.

For residents of Connecticut, Massachusetts, Rhode Island and West Virginia: You also have the right to place a security freeze on your credit report by contacting any of the credit bureaus listed above.