

January 3, 2022

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Via electronic-mail: *DOJ-CPB@doj.nh.gov*; *AttorneyGeneral@doj.nh.gov*

Attorney General Gordon McDonald

Consumer Protection Bureau
Office of the Attorney General
33 Capitol Street
Concord, NH 03302

Re: Our Client : Ravkoo
Matter : Data Security Incident on September 27, 2021
Wilson Elser File # : 16516.01653

Dear Attorney General:

We represent Ravkoo, located in Auburndale, Florida, with respect to a potential data security incident described in more detail below. Ravkoo takes the security and privacy of the information in its control seriously, and has taken steps to prevent a similar incident from occurring in the future.

This letter will serve to inform you of the nature of the security breach, the number of New Hampshire residents being notified, what information has been compromised, and the steps that Ravkoo is taking to restore the integrity of the system. We have also enclosed hereto a sample of the notification made to the potentially impact individuals, which includes an offer of free credit monitoring.

1. Nature of the Security Incident

It appears that on or around September 27, 2021, Ravkoo was the target of a cybersecurity incident. An unauthorized third party attempted to infiltrate Ravkoo's AWS hosted cloud prescription portal. This incident may have resulted in the exposure of limited prescription and health information that is located on the AWS portal.

Of note, there is no evidence that any individual's Social Security Number was accessed or compromised as Ravkoo does not maintain this information within the impacted portal. Additionally, Ravkoo is not aware of any evidence that information has been misused. Ravkoo has not received any reports of related identity theft since the date of the incident (September 27, 2021 to present).

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2. Number of New Hampshire Residents Affected

A total of 600 residents of New Hampshire were potentially affected by this security incident. Notification letters to these individuals will be mailed on January 3, 2022, by first class mail. A sample copy of the notification letter is included with this letter.

3. Steps Taken

Upon learning of this incident, Ravkoo moved quickly to institute a response plan, which included conducting an investigation with the assistance of third-party forensic specialists and engaging in steps to confirm the security of any relevant systems. Ravkoo has reviewed, altered and enhanced its policies and procedures relating to the security of its AWS hosted prescription portal, as well as its information life cycle management.

4. Contact Information

Ravkoo remains dedicated to protecting the sensitive information in its control. If you have any questions or need additional information, please do not hesitate to contact me at Ross.Molina@WilsonElser.com or 504.702.1726.

Very truly yours,

Wilson Elser Moskowitz Edelman & Dicker LLP


Ross M. Molina

Copy: Robert Walker, Esq. (Wilson Elser LLP)

Enclosure: *Sample Notification Letter*



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

TO ACTIVATE, PLEASE VISIT:
<https://enroll.krollmonitoring.com>

ACTIVATION NUMBER:
<<Membership Number s_n>>

<<first_name>> <<middle_name>> <<last_name>> <<suffix>>
<<address_1>>
<<address_2>>
<<city>>, <<state_province>> <<postal_code>>
<<country>>

Via First-Class Mail

Dear <<first_name>> <<middle_name>> <<last_name>> <<suffix>>:

Notice of Data Breach

Ravkoo is a digital SaaS platform for prescription fulfillment providing prescription delivery to patients' doorsteps. We recently discovered that a data security incident on Ravkoo's AWS portal may have resulted in the unintentional exposure of your personal information. This letter contains additional information about the incident, our response to this incident, and steps you can take to protect yourself. Please be assured that Ravkoo takes the protection and proper use of personal information very seriously, and we sincerely apologize for any inconvenience this may cause.

What Happened

Ravkoo utilizes AWS cloud services for online hosting of its prescription portal. On September 27, 2021, Ravkoo detected that this portal was the target of a cybersecurity attack. An unauthorized third party attempted to infiltrate the portal. On October 27, 2021, Ravkoo's responsive forensic investigation revealed that certain prescription and health information could have been compromised. **Notably, we have found no evidence that your Social Security Number was accessed or compromised as Ravkoo does not maintain this information within the impacted portal.**

Although we have found no evidence that your information has been specifically accessed for misuse, it is possible that your full name, mail address, phone number, and prescription/limited medical information could have been exposed.

At this time, Ravkoo does not have any evidence to indicate that any of your personal information has been or will be misused as a result of this incident. Nevertheless, Ravkoo decided to notify you of this incident out of an abundance of caution.

What We Are Doing

In light of this incident, Ravkoo is actively assessing ways we can further improve our cybersecurity posture. As a safeguard, we have arranged for you to receive a complementary, online identity monitoring service for one year provided by Kroll Information Assurance, LLC ("Kroll"). With this service, Kroll will help you resolve issues if your identity is compromised.

What You Can Do:

We recommend you take advantage of the following resources:

- **Contact Kroll for questions and support** - We encourage you to contact Kroll with any questions and to **activate your free Kroll services** by going to <https://enroll.krollmonitoring.com> and using the Enrollment Code provided above. Kroll is available Monday through Friday 9:00 am to 6:30 pm Eastern Time, excluding some U.S. holidays. Please note the deadline to activate is <<b2b_text_6 (Enrollment Date)>>. For more information about Kroll and your identity monitoring services, you can visit info.krollmonitoring.com.
- **Credit Report** - Obtain a copy of your credit report, free of charge, whether or not you suspect any unauthorized activity on your account.

- **Security Freezes** - You have the right to place a security freeze on your credit report. A security freeze is intended to prevent credit, loans, and services from being approved in your name without your consent.
- **Fraud Alerts** - Fraud alerts tell creditors to follow certain procedures, including contacting you, before they open any new accounts or change your existing accounts.
- **Monitoring** - Remain vigilant and monitor your accounts for suspicious or unusual activity.

Again, at this time, there is no evidence that your information has been misused. However, we encourage you to take full advantage of this service offering. Kroll representatives have been fully versed on the incident and can answer questions or concerns you may have regarding protection of your personal information.

For More Information

Please know that the protection of your personal information is a top priority, and we sincerely regret any concern or inconvenience that this matter may cause you. If you have any questions, please do not hesitate to call Kroll for questions and support at 1-855-545-2509, Monday – Friday, 9:00am to 6:30pm Eastern Standard Time, excluding some U.S. holidays. Please have your membership number ready.

Sincerely,

Alpesh Patel

Alpesh Patel
CEO

Additional Information



TAKE ADVANTAGE OF YOUR IDENTITY MONITORING SERVICES

You have been provided with access to the following services from Kroll:

Single Bureau Credit Monitoring

You will receive alerts when there are changes to your credit data—for instance, when a new line of credit is applied for in your name. If you do not recognize the activity, you'll have the option to call a Kroll fraud specialist, who will be able to help you determine if it is an indicator of identity theft.

\$1 Million Identity Fraud Loss Reimbursement

Reimburses you for out-of-pocket expenses totaling up to \$1 million in covered legal costs and expenses for any one stolen identity event. All coverage is subject to the conditions and exclusions in the policy.

Fraud Consultation

You have unlimited access to consultation with a Kroll fraud specialist. Support includes showing you the most effective ways to protect your identity, explaining your rights and protections under the law, assistance with fraud alerts, and interpreting how personal information is accessed and used, including investigating suspicious activity that could be tied to an identity theft event.

Identity Theft Restoration

If you become a victim of identity theft, an experienced Kroll licensed investigator will work on your behalf to resolve related issues. You will have access to a dedicated investigator who understands your issues and can do most of the work for you. Your investigator will be able to dig deep to uncover the scope of the identity theft, and then work to resolve it.

Kroll's activation website is only compatible with the current version or one version earlier of Chrome, Firefox, Safari and Edge.

To receive credit services, you must be over the age of 18 and have established credit in the U.S., have a Social Security number in your name, and have a U.S. residential address associated with your credit file.

Credit Reports: 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 from each of the three nationwide credit reporting agencies. To order your free credit report, please visit www.annualcreditreport.com, or call toll-free at 1-877-322-8228. You can also order your annual free credit report by mailing a completed Annual Credit Report Request Form (available at <https://www.consumer.ftc.gov/articles/0155-free-credit-reports>) to: Annual Credit Report Request Service, P.O. Box 105281, Atlanta, GA, 30348-5281.

Security Freeze: You also have the right to place a security freeze on your credit report. A security freeze is intended to prevent credit, loans, and services from being approved in your name without your consent. To place a security freeze on your credit report, you need to make a request to each consumer reporting agency. You may make that request by certified mail, overnight mail, regular stamped mail, or by following the instructions found at the websites listed below. The following information must be included when requesting a security freeze (note that if you are requesting a credit report for your spouse or a minor under the age of 16, this information must be provided for him/her as well): (1) full name, with middle initial and any suffixes; (2) Social Security number; (3) date of birth; (4) current address and any previous addresses for the past five years; and (5) any applicable incident report or complaint with a law enforcement agency or the Registry of Motor Vehicles. The request must also include a copy of a government-issued identification card and a copy of a recent utility bill or bank or insurance statement. It is essential that each copy be legible, display your name and current mailing address, and the date of issue. As of September 21, 2018, it is free to place, lift, or remove a security freeze. You may also place a security freeze for children under the age of 16. You may obtain a free security freeze by contacting any one or more of the following national consumer reporting agencies:

Equifax Security Freeze

P.O. Box 105788
Atlanta, GA 30348
1-800-349-9960

<https://www.equifax.com/personal/credit-report-services/credit-freeze/>

Experian Security Freeze

P.O. Box 9554
Allen, TX 75013
1-888-397-3742

www.experian.com/freeze/center.html

TransUnion Security Freeze

P.O. Box 160
Woodlyn, PA 19094
1-800-909-8872

www.transunion.com/credit-freeze

Fraud Alerts: You can place fraud alerts with the three credit bureaus by phone and online with:

- Equifax (https://assets.equifax.com/assets/personal/Fraud_Alert_Request_Form.pdf);
- TransUnion (<https://www.transunion.com/fraud-alerts>); or
- Experian (<https://www.experian.com/fraud/center.html>).

A fraud alert tells creditors to follow certain procedures, including contacting you, before they open any new accounts or change your existing accounts. For that reason, placing a fraud alert can protect you, but also may delay you when you seek to obtain credit. As of September 21, 2018, initial fraud alerts last for one year. Victims of identity theft can also get an extended fraud alert for seven years. The phone numbers for all three credit bureaus are at the bottom of this page.

Monitoring: You should always remain vigilant and monitor your accounts for suspicious or unusual activity.

File Police Report: You have the right to file or obtain a police report if you experience identity fraud. Please note that in order to file a crime report or incident report with law enforcement for identity theft, you will likely need to provide proof that you have been a victim. A police report is often required to dispute fraudulent items. You can generally report suspected incidents of identity theft to local law enforcement or to the Attorney General.

FTC and Attorneys General: 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, 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. This notice has not been delayed by law enforcement.

For Maryland residents, the Attorney General can be contacted at 200 St. Paul Place, 16th Floor, Baltimore, MD 21202, 1-888-743- 0023, and www.oag.state.md.us.

For 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 violators. 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. We encourage you to review your rights pursuant to the Fair Credit Reporting Act at 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.

For North Carolina residents, the Attorney General can be contacted at 9001 Mail Service Center, Raleigh, NC 27699-9001, 1-877- 566-7226 or 1-919-716-6400, and www.ncdoj.gov.

For 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, and <https://ag.ny.gov/>.

For Rhode Island residents, the Rhode Island Attorney General can be reached at 150 South Main Street, Providence, Rhode Island 02903, www.riag.ri.gov, and 1-401-274-4400. Under Rhode Island law, you have the right to obtain any police report filed in regard to this incident.