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September 12, 2019

CONFIDENTIAL

Office of the Attorney General
Consumer Protection Bureau
33 Capitol Street
Concord, NH 3301

RECEIVED
SEP 17 2019
CONSUMER PROTECTION

Re: Sarrell Dental Security Incident

Dear Attorney General MacDonald,

I represent Sarrell Dental of Alabama. Sarrell Dental is a not-for-profit healthcare organization serving oral and optical health needs in Alabama. Pursuant to N.H. Rev. Stat. § 359-C:19 et seq., I am writing to notify you of a data breach of Sarrell Dental data potentially affecting 4 New Hampshire residents.

In July 2019, Sarrell Dental detected suspicious activity on computers in the Sarrell Dental Center network. Sarrell Dental immediately instituted a temporary business shutdown and network deactivation and commenced an investigation into the activity. The investigation included working with outside counsel and third-party forensic investigators to review the nature and scope of the incident. The forensic investigation determined that the suspicious activity was the result of an intrusion that may have begun in January 2019, but that culminated in a ransomware attack in July 2019. Sarrell Dental's security professionals worked diligently with the forensic investigators to determine the scope of the incident and restore the integrity, security, and confidentiality of the data, without paying the demanded ransom. After a detailed review of the available data, the forensic investigators concluded in late August 2019, that while there is no evidence that personal data was extracted, they are also unable to rule out the possibility that the hackers accessed individuals' personal information.

Even though the investigation found no evidence that any files or personal information were copied, downloaded, or removed from the network as a result of the ransomware, or that information that may have been involved in this incident was misused, because my client was unable to obtain certainty on whether any data was exfiltrated from the system, Sarrell Dental is providing you with this notice and sending individual notifications to the potentially impacted patient population.

The personal information potentially impacted by this incident may have included patients' name, address, date of birth, and health insurance number. Of the total number of potentially impacted New Hampshire residents, approximately 2 individuals' Social Security number may have been impacted. Treatment information for approximately 2 residents, including dates of service, diagnosis codes, procedure codes, and treating provider, may also have been impacted.



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As described above, as soon as Sarrell Dental learned about the incident, they immediately deactivated their network, temporarily closed their clinics, and engaged an independent computer forensics firm to undertake an investigation. In addition, they restored their computer systems and updated security and virus protection for the entire Sarrell Dental network before reopening their practices. Sarrell Dental's network and systems are now monitored with upgraded capabilities to ensure that their system and the information they store will remain secure.

Sarrell Dental is notifying the potentially impacted population by written notification on September 12, 2019 and posting public notice on their website on that date as well, pursuant to the HIPAA Privacy Rule. Sarrell Dental will also be issuing the required media notices and informing all required regulatory agencies, federal and state, including the U.S. Department of Health and Human Services.

My client deeply regrets that this incident occurred and will be offering all potentially affected individuals complimentary identity protection services to help alleviate potential concerns and to help those individuals monitor and detect any misuse of their personal information.

Sarrell Dental Centers takes its obligation to safeguard patient information very seriously, and has taken extensive steps to fortify the protective measures in place throughout its network.

Please contact me at sberman@nutter.com or 617-439-2338 with any questions.

Very truly yours,

A handwritten signature in blue ink, appearing to read "S. Berman".

Seth Berman