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ATTORNEYS AT LAW

RECEIVED

APR 01 2019

CONSUMER PROTECTION

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March 25, 2019

**VIA U.S. MAIL**

Attorney General Gordon J. MacDonald  
Office of the New Hampshire Attorney General  
Attn: Security Breach Notification  
33 Capitol Street  
Concord, NH 03301

**Re: Notice of Data Event**

Dear Attorney General MacDonald:

We represent Superior Dental Care (“SDC”) located at 6683 Centerville Business Parkway, Centerville, OH 45459, and are writing to notify your office of an incident that may affect the security of personal information relating to eight (8) New Hampshire residents. The investigation into this event is ongoing, and this notice will be supplemented if significant new facts are learned subsequent to its submission. By providing this notice, SDC does not waive any rights or defenses regarding the applicability of New Hampshire law or personal jurisdiction.

**Nature of the Data Event**

On February 11, 2019, Superior determined an employee’s email account was subject to unauthorized access by an unknown actor. SDC first identified suspicious activity within that employee’s email account on January 23, 2019, and immediately took steps to secure the email account and investigate, with the support of third-party forensic experts, the nature and scope of the incident, the information potentially accessible to the unauthorized actor, and the identities of the impacted individuals. We determined that an unknown individual accessed the email account of a SDC employee on December 21, 2018, until that access was discovered and terminated on January 23, 2019. On or around March 18, 2019, Superior confirmed the identities of the individuals who may have had information affected by this incident.

The personal information impacted by this event may include the following: name address, bank/financial account information, Social Security number, date of birth, driver’s license number, health payment information, taxpayer identification number and username and password. To date, SDC has not received any reports of the misuse of this information.

### **Notice to New Hampshire Residents**

On March 25, 2019, SDC began providing written notice of this incident to affected individuals, which includes eight (8) New Hampshire residents. Three (3) New Hampshire residents were notified pursuant to New Hampshire law. An additional five (5) New Hampshire residents were notified pursuant to the Health Insurance Portability and Accountability Act ("HIPAA"). Written notice was provided in substantially the same form as the letter attached here as *Exhibit A*.

### **Other Steps Taken and To Be Taken**

Upon discovering the potential unauthorized access to the email account, SDC moved quickly to identify those that may be affected, put in place resources to assist them, and provide them with notice of this incident. Superior is also working to implement additional safeguards to protect the security of information in its systems.

SDC is providing written notice to those individuals who may be affected by this incident. This notice includes an offer of complimentary access to one year of credit and identity monitoring services, including identity restoration services through ID Experts, and the contact information for a dedicated call center for potentially affected individuals to contact with questions or concerns regarding this incident. Additionally, SDC is providing potentially impacted individuals with guidance on how to better protect against identity theft and fraud, including information on how to place a fraud alert and security freeze on one's credit file, the contact details for the national consumer reporting agencies, information on how to obtain a free credit report, a reminder to remain vigilant for incidents of fraud and identity theft by reviewing account statements and monitoring free credit reports, and encouragement to contact the Federal Trade Commission, their state Attorney General, and law enforcement to report attempted or actual identity theft and fraud. SDC is also providing written notice of this incident to other state and federal regulators, as necessary.

### **Contact Information**

Should you have any questions regarding this notification or other aspects of the data security event, please contact us at (267) 930-4798.

Very truly yours,



James E. Prendergast of  
MULLEN COUGHLIN LLC

JEP:plm  
Enclosure

# **EXHIBIT A**



To Enroll, Please Call:  
(800) 810-5638  
Or Visit:  
<https://ide.myidcare.com/sdc>  
Enrollment Code: <<XXXXXXXXXX>>

<<First Name>> <<Last Name>>  
<<Address1>> <<Address2>>  
<<City>>, <<State>> <<Zip>>

March 25, 2019

Re: Notice of Data Breach

Dear <<First Name>> <<Last Name>>,

We at Superior Dental Care (SDC) are writing to inform you of a recent event that may impact the privacy of some of your personal information. While we are unaware of any attempted or actual misuse of your information, we are providing you with details about the event, our response, and steps you may take to better protect against the possibility of identity theft and fraud, should you feel it is necessary to do so.

#### What Happened?

SDC first identified suspicious activity within an employee's email account on Jan. 23, 2019. We took immediate steps to secure the email account. With the support of third-party forensic experts, we investigated the nature and scope of the incident. On Feb. 11, 2019, SDC determined an employee's email account was subject to unauthorized access by an unknown party. The unknown party had access from Dec. 21, 2018, through Jan. 23, 2019.

#### What Information Was Involved?

On March 18, 2019, we determined an email message containing the following types of information relating to you was accessible to the unknown party: <<Data Element>>.

#### What We Are Doing.

SDC takes this incident and the security of your personal information seriously. As part of our ongoing commitment to the privacy of personal information in our care, we are reviewing our existing policies and procedures and implementing additional safeguards to further secure the information in our systems. We also notified state regulators, as required.

Again, while we are unaware of any misuse of your information as a result of this incident, we want to make sure you are protected. Therefore, we are offering you access to complimentary 12 months of credit and CyberScan monitoring, a \$1,000,000 insurance reimbursement policy, and fully managed identity theft recovery services through ID Experts®.

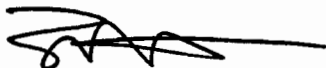
#### What You Can Do.

You can find out more about how to protect against potential identity theft and fraud in the enclosed *Steps You Can Take to Prevent Fraud and Identity Theft*. We encourage you to remain vigilant against incidents of identity theft by reviewing your account statements regularly and keeping a close eye on your credit card activity. Under U.S. law, you are entitled to one free credit report annually from each of the three major credit bureaus. To order a free credit report, visit [www.annualcreditreport.com](http://www.annualcreditreport.com) or call, toll-free, 1-877-322-8228. You may also contact the three major credit bureaus directly to request a free copy of their credit report.

**For More Information.**

We understand that you may have questions about this incident that are not addressed in this letter. If you have additional questions, please call our dedicated assistance line at (800) 810-5638, Monday through Friday, during the hours of 8 am - 8 pm Eastern Time. You may also write to Superior Dental Care at 6683 Centerville Business Parkway, Centerville, OH 45459. We sincerely regret any inconvenience or concern this incident has caused.

Sincerely,

A handwritten signature in black ink, appearing to read 'Traci Y. Harrell', with a long horizontal line extending to the right.

Traci Y. Harrell  
President  
Superior Dental Care

## STEPS YOU CAN TAKE TO BETTER PROTECT YOUR INFORMATION

### **Credit Monitoring Enrollment Instructions.**

- 1. Website and Enrollment.** Go to <https://ide.myidcare.com/sdc> follow the instructions for enrollment using your Enrollment Code provided at the top of the letter.
- 2. Activate the credit monitoring** provided as part of your MyIDCare membership. The monitoring included in the membership must be activated to be effective. Note: You must have established credit and access to a computer and the internet to use this service. If you need assistance, MyIDCare will be able to assist you.
- 3. Telephone.** Contact MyIDCare at (800) 810-5638 to gain additional information about this event and speak with knowledgeable representatives about the appropriate steps to take to protect your credit identity.

### **Additional Steps You Can Take to Protect Your Information.**

We encourage you to remain vigilant against incidents of identity theft and fraud. This includes reviewing your account statements and monitoring your credit reports for suspicious activity. Under U.S. law, you are entitled to one free credit report annually from each of the three major credit reporting bureaus. To order your free credit report, visit [www.annualcreditreport.com](http://www.annualcreditreport.com) or call, toll free 1-877-322-8228. You may also contact the three major credit bureaus directly to request a free copy of your credit report.

You have the right to place a security freeze on your credit report. This will prohibit a consumer reporting agency from releasing information in your credit report without your express authorization. The security freeze is designed to prevent credit, loans, and services from being approved in your name without your consent. However, you should be aware that using a security freeze to take control over who gets access to the personal and financial information in your credit report may delay, interfere with, or prohibit the timely approval of any subsequent request or application you make regarding a new loan, credit, mortgage, or any other account involving the extension of credit. Pursuant to federal law, you cannot be charged to place or lift a security freeze on your credit report. Should you wish to place a security freeze, please contact the major consumer reporting agencies listed below:

<b>Experian</b> PO Box 9554 Allen, TX 75013 1-888-397-3742 <a href="http://www.experian.com/freeze/center.html">www.experian.com/freeze/center.html</a>	<b>TransUnion</b> P.O. Box 2000 Chester, PA 19016 1-888-909-8872 <a href="http://www.transunion.com/credit-freeze">www.transunion.com/credit-freeze</a>	<b>Equifax</b> PO Box 105788 Atlanta, GA 30348-5788 1-800-685-1111 <a href="http://www.equifax.com/personal/credit-report-services">www.equifax.com/personal/credit-report-services</a>
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In order to request a security freeze, you will need to provide the following information:

1. Your full name (including middle initial as well as Jr., Sr., II, III, etc.)
2. Social Security number
3. Date of birth
4. If you have moved in the past five (5) years, provide the addresses where you have lived over the prior five years
5. Proof of current address, such as a current utility bill or telephone bill
6. A legible photocopy of a government-issued identification card (state driver's license or ID card, military identification, etc.)
7. If you are a victim of identity theft, include a copy of either the police report, investigative report, or complaint to a law enforcement agency concerning identity theft

As an alternative to a security freeze, you have the right to place an initial or extended fraud alert on your file at no cost. An initial fraud alert is a one-year alert that is placed on a consumer's credit file. Upon seeing a fraud alert display on a consumer's credit file, a business is required to take steps to verify the consumer's identity before extending new credit. If you are a victim of identity theft, you are entitled to an extended fraud alert, which is a fraud alert lasting seven years. Should you wish to place a fraud alert, please contact any one of the agencies listed below:

**Experian**

P.O. Box 2002  
Allen, TX 75013  
1-888-397-3742

[www.experian.com/fraud/center.html](http://www.experian.com/fraud/center.html)

**TransUnion**

P.O. Box 2000  
Chester, PA 19106  
1-800-680-7289

[www.transunion.com/fraud-victim-resource/place-fraud-alert](http://www.transunion.com/fraud-victim-resource/place-fraud-alert)

**Equifax**

P.O. Box 105069  
Atlanta, GA 30348  
1-888-766-0008

[www.equifax.com/personal/credit-report-services](http://www.equifax.com/personal/credit-report-services)

To monitor for actual or attempted misuse of Social Security benefits, you can create an account at <https://www.socialsecurity.gov/myaccount>. If you see an error or attempted misuse of Social Security benefits, you can go to your local Social Security office for assistance. Local offices can be found using the following office locator - <https://secure.ssa.gov/ICON/main.jsp>.

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](http://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 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 and your state Attorney General. This notice has not been delayed by law enforcement.

**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, [www.ncdoj.gov](http://www.ncdoj.gov).

**For Maryland residents**, the Attorney General can be contacted at 200 St. Paul Place, 16th Floor, Baltimore, MD 21202, 1-888-743-0023, [www.oag.state.md.us](http://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. Additionally, 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 violator. 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 by visiting [www.consumerfinance.gov/f/201504\\_cfpb\\_summary\\_your-rights-under-fcra.pdf](http://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 Rhode Island Residents:** The Rhode Island Attorney General can be reached at: 150 South Main Street, Providence, Rhode Island 02903, [www.riag.ri.gov](http://www.riag.ri.gov), 1-401-274-4400. Under Rhode Island law, you have the right to obtain any police report filed in regard to this incident. There are [#] Rhode Island residents impacted by this incident.