



Robert L. Slaughter III  
633 W. 5th Street, Suite 4000  
Los Angeles, CA 90071  
Robert.Slaughter@lewisbrisbois.com  
Direct: 213.680.5028

October 27, 2019

**VIA E-MAIL**

Gordon MacDonald, Attorney General  
Consumer Protection and Antitrust Bureau  
Office of the Attorney General  
33 Capitol Street  
Concord, NH 03301  
E-Mail: DOJ-CPB@doj.nh.gov

Re: Notice of Data Security Incident

Dear Attorney General MacDonald:

We represent Sweetser, a nonprofit community mental health provider located in Saco, Maine. This letter is being sent because 327 New Hampshire residents may have been affected by a recent data security incident. Of those, 36 residents are being notified pursuant to N.H. Rev. Stat. §§ 359-C:19-21 because their personal information may have been impacted, which may have involved unauthorized access to names and Social Security numbers.

On June 24, 2019, Sweetser detected unusual activity in an employee's email account. Sweetser immediately took measures to secure its email system and launched an investigation with the assistance of a digital forensics firm to help determine what occurred and whether personal information was accessed without authorization. Based on the digital forensic firm's findings, it was determined that a very limited number of Sweetser employee email accounts were subject to unauthorized access. The unauthorized access was limited to information transmitted via email and did not affect any other information systems. In response, Sweetser launched a data review project to identify whether personal information within those accounts may have been accessed without authorization. Sweetser also reported the incident to law enforcement.

On September 10, 2019, the investigation revealed that data containing individuals' personal information within one or more email accounts may have been affected. On September 13, 2019, Sweetser provided notification of the incident to the U.S. Department of Health and Human Services' Office for Civil Rights ("OCR"), pursuant to the HIPAA Breach Notification Rule. Sweetser then worked diligently to identify up-to-date address information required to notify potentially impacted individuals. On October 17, 2019, Sweetser determined that the personal information of the above-referenced New Hampshire residents may have accessed without authorization.

Sweetser notified affected New Hampshire residents via the attached sample letter on October 25, 2019. Sweetser is offering twelve (12) months of complimentary credit monitoring and identity

protection services through Experian to residents whose Social Security numbers were potentially impacted.

Please contact me should you have any questions.

Sincerely,

***/s/ Robert L. Slaughter III***

Robert Slaughter of  
LEWIS BRISBOIS BISGAARD & SMITH LLP

Enclosure: Consumer Notification Letter

CC: Kevin Yoegel of  
LEWIS BRISBOIS BISGAARD & SMITH LLP



October 25, 2019

**Re: Notification of Data Security Incident**

Dear [REDACTED]

We are writing to inform you of a data security incident experienced by Sweetser that may have affected your personal information. Sweetser takes the privacy and security of your information very seriously and regrets any concern that this incident may cause. We are writing to notify you of this incident, inform you about steps that can be taken to help protect your personal information, and offer services to assist you.

**What Happened?** On June 24, 2019, we discovered unusual activity in an employee's email account. We immediately took steps to secure the account and launched an investigation to determine whether additional email accounts were involved and whether any personal information had been accessed without authorization. We also engaged an independent digital forensics firm to assist with this investigation. On September 10, 2019, our investigation determined that email accounts accessed without authorization included your personal information. Please note that this incident was limited to information transmitted via email and did not affect any other information systems.

**What Information Was Involved?** The information may have included your name, address, date of birth, telephone number, Social Security number, health insurance information and identification number, driver's license number, Medicare or Medicaid information, payment or claims information, diagnostic codes, and information regarding medical conditions and treatment.

**What We Are Doing.** As soon as we discovered this incident, we took the measures referenced above. We also implemented enhanced security measures applicable to our email system in order to better safeguard all personal information in our possession and to help prevent a similar incident from occurring in the future. In addition, we reported this matter to the Federal Bureau of Investigation and will provide whatever assistance is necessary to hold the perpetrators of this incident accountable. Additionally, out of an abundance of caution, we are providing you with information about steps you can take to help protect your information and offering complimentary credit monitoring and identity protection services through Experian.

**What You Can Do.** We recommend that you review the guidance included with this letter about how to protect your personal information. In addition, we recommend that you enroll in the complimentary credit monitoring and identity protection services being offered through Experian. Enrollment instructions and a description of the services being provided are included with this letter.

**For More Information.** If you have questions or need assistance, please contact 1-833-444-4458, Monday through Friday from 8 a.m. to 5 p.m. Eastern Standard Time. Our representatives are fully versed on this incident and can answer any questions you may have regarding the protection of your personal information.

Thank you for your patience through this incident. We take your trust in us and this matter very seriously. Please accept our sincere apologies and know that we deeply regret any worry or inconvenience that this may cause you.

Sincerely,

Debra Taylor  
President & CEO  
Sweetser

## 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:

<b>TransUnion</b> P.O. Box 1000 Chester, PA 19016 1-877-322-8228 www.transunion.com	<b>Experian</b> P.O. Box 9532 Allen, TX 75013 1-888-397-3742 www.experian.com	<b>Equifax</b> P.O. Box 105851 Atlanta, GA 30348 1-800-525-6285 www.equifax.com	<b>Free Annual Report</b> P.O. Box 105281 Atlanta, GA 30348 1-877-322-8228 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 at least 90 days. 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 is no charge to place, lift or remove the security freeze. 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, 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.

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

You also have certain rights under the Fair Credit Reporting Act (FCRA), including: to know what is in your file; to dispute incomplete or inaccurate information; to have consumer reporting agencies correct or delete inaccurate, incomplete, or unverifiable information, as well as others. 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](http://files.consumerfinance.gov/f/201504_cfpb_summary_your-rights-under-fcra.pdf).

## **Your Membership of Experian IdentityWorks<sup>SM</sup> Identity Protection**

To help protect your identity, we are offering a **complimentary** one-year membership of Experian IdentityWorks<sup>SM</sup> Credit 3B. This product helps detect possible misuse of your personal information and provides you with superior identity protection support focused on immediate identification and resolution of identity theft.

### **Activate IdentityWorks Credit 3B Now in Three Easy Steps**

1. ENROLL by: **1.16.20** (Your code will not work after this date.)
2. VISIT the **Experian IdentityWorks** website to enroll: **<https://www.experianidworks.com/3bcredit>**
3. PROVIDE the **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**. Be prepared to provide engagement number [REDACTED] as proof of eligibility for the identity restoration services by Experian.

### **ADDITIONAL DETAILS REGARDING YOUR EXPERIAN IDENTITYWORKS CREDIT 3B MEMBERSHIP:**

Once you enroll in Experian IdentityWorks, you will have access to the following additional features:

- **Tri-Bureau Credit Monitoring:** Makes you aware of changes to your credit report across the three major credit reporting bureaus: TransUnion, Experian, and Equifax. Checks your credit file daily and notifies you via email of any changes to your credit reports, including loan data, inquiries, new accounts, judgments, liens and more.
- **Daily Credit Reports:** Helps you stay aware of your credit history with easy access to your credit report that includes data from all three bureaus. Your Experian credit report includes your credit history and information, such as accounts in delinquency or new accounts opened.
- **Identity Restoration:** Experian provides full-service Identity Restoration in the event of identity theft. Even if you simply suspect a problem, a certified Identity Restoration specialist will work with you to identify and resolve the issue.
- **Identity Theft Insurance:** In the event that your identity is compromised, Identity Theft Insurance\* provided under policies issued to Experian IdentityWorks reimburses you for certain expenses with a \$1 million policy.

**Activate your membership today at <https://www.experianidworks.com/3bcredit> or call 877.288.8057 with the above Activation Code**

\* The Identity Theft Insurance is underwritten and administered by American Bankers Insurance Company of Florida, an Assurant company under group or blanket policy(ies). The description herein is a summary and intended for informational purposes only and does not include all terms, conditions and exclusions of the policies described. Please refer to the actual policies for terms, conditions, and exclusions of coverage. Coverage may not be available in all jurisdictions.