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March 27, 2020

VIA U.S. MAIL

Attorney General Gordon MacDonald
Office of the Attorney General
33 Capitol Street
Concord, NH 03301

Re: Virginia Commonwealth University Health System – Incident Notification

Dear Attorney General MacDonald:

McDonald Hopkins PLC represents Virginia Commonwealth University Health System ("VCUHS"). I am writing to provide notification of an incident at VCUHS that may affect the security of personal information of approximately one (1) New Hampshire resident. VCUHS' investigation is ongoing, and this notification will be supplemented with any new or significant facts or findings subsequent to this submission, if any. By providing this notice, VCUHS does not waive any rights or defenses regarding the applicability of New Hampshire law or personal jurisdiction.

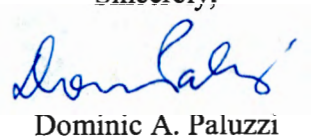
On February 29, 2020, VCUHS discovered a programmatic error within the Healthcare Provider Database available on the VCUHS intranet. Specifically, the Resident Primer License field in the Provider Database was populated with a Social Security number. The field was not labeled as listing a Social Security number and the nine-digit string of number did not contain dashes; again, it was labeled as a Resident Primer License. This programmatic error made this information viewable internally from 2008 until March 2, 2020. However, the affected individual's specific information was only viewable during his/her time as a resident or medical staff member at VCUHS and was not viewable outside of VCUHS.

To date, VCUHS has no evidence that any information has been acquired or misused as a direct result of this incident. Nevertheless, out of an abundance of caution, VCUHS wanted to inform you (and the affected resident) of the incident and to explain the steps that it is taking to help safeguard the affected resident against identity fraud. VCUHS will provide the affected resident with written notification of this incident commencing on or about March 27, 2020 in substantially the same form as the letter attached hereto. VCUHS will offer the affected resident a complimentary one-year membership with a credit monitoring service. VCUHS will advise the affected resident about the process for placing fraud alerts and/or security freezes on his/her credit files and obtaining free credit reports. The affected resident will also be provided with the contact information for the consumer reporting agencies and the Federal Trade Commission.

At VCUHS, protecting the privacy of personal information is a top priority. VCUHS has the policies and procedures in place to protect personal information. However, VCUHS continually evaluates and modifies its practices to enhance the security and privacy of information.

Should you have any questions regarding this notification, please contact me at (248) 220-1356 or dpaluzzi@mcdonaldhopkins.com. Thank you for your cooperation.

Sincerely,



Dominic A. Paluzzi

Encl.

VCU Health

VCU Health System

Return mail will be processed by: IBC
PO Box 847 • Holbrook, NY 11741

[redacted]

IMPORTANT INFORMATION
PLEASE REVIEW CAREFULLY

[redacted]

Dear [redacted]:

The privacy of your personal information is of utmost importance to VCU Health System (VCUHS). We are writing with important information about a recent incident involving the security of some of our employees' personal information. We wanted to provide you with information regarding the incident and explain the services we are making available to help safeguard you against identity fraud. We also are providing additional steps you can take to help protect your information.

What Happened?

On February 29, 2020, we discovered a programmatic error within the Healthcare Provider Database available on the VCUHS intranet. Specifically, the Resident Primer License field in your respective profile in the Provider Database was populated with your Social Security number. It was not labeled as a Social Security number and the nine-digit string of numbers did not contain dashes; again, it was labeled as your Resident Primer License. This programmatic error made this information viewable internally from 2008 until March 2, 2020. However, your specific information was only viewable during your time at VCUHS as a resident or medical staff member and was not viewable outside of VCUHS.

What Information Was Involved?

We have confirmed that the information viewable, as a result of this programmatic error, included your full name and Social Security number.

What We Are Doing.

Upon learning of the issue, our incident response team promptly launched an investigation, immediately corrected the programmatic error, and removed all Social Security numbers from the Provider Database. As part of our investigation, we have been working very closely with external cybersecurity professionals who regularly investigate and analyze these types of incidents. To date, we have no evidence that your information has been acquired or misused as a direct result of this incident. Out of an abundance of caution, we wanted to make you aware of the incident, explain the services we are making available to help safeguard you against identity fraud, and suggest steps you should take.

What You Can Do.

To protect you from potential misuse of your information, we are offering a complimentary one-year membership of Experian IdentityWorks℠ Credit 3B. This product helps detect possible misuse of your personal information and provides you with identity protection services focused on immediate identification and resolution of identity theft. IdentityWorks Credit 3B is completely free to you and enrolling in this program will not hurt your credit score. For more information on identity theft prevention and IdentityWorks Credit 3B, including instructions on how to activate your complimentary one-year membership, please see the additional information provided in this letter.

Also provided in "Other Important Information" are other precautionary measures you can take to protect your personal information, including placing a Fraud Alert and/or Security Freeze on your credit files, and/or obtaining a free credit report. Additionally, you should always remain vigilant in reviewing your financial account statements and credit reports for fraudulent or irregular activity on a regular basis.

For More Information.

If you have any further questions regarding this incident, please call our dedicated and confidential toll-free response line that we have set up to respond to questions at [redacted]. This response line is staffed with professionals familiar with this incident and knowledgeable on what you can do to protect against misuse of your information. The response line is available Monday through Friday, [redacted].

On behalf of VCUHS, please accept our sincere apologies that this incident occurred. Rest assured we have the policies and procedures in place to protect your personal information. However, we continually evaluate and modify our practices to enhance the security and privacy of your information. Please know that we are devoting considerable resources so that our employees are fully informed and are provided with some protection as a result of this unfortunate incident.

Sincerely,

VCU Health System

VCU-STD

— OTHER IMPORTANT INFORMATION —

1. Enrolling in Complimentary 12-Month Credit Monitoring.

Activate IdentityWorks Credit 3B Now in Three Easy Steps

1. ENROLL by: [redacted] (Your code will not work after this date.)
2. VISIT the **Experian IdentityWorks website** to enroll: [redacted]
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 [redacted] 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 CREDIT 3B MEMBERSHIP:

A credit card is **not** required for enrollment in Experian IdentityWorks Credit 3B.

You can contact Experian **immediately without needing to enroll in the product** regarding any fraud issues. Identity Restoration specialists are available to help you address credit and non-credit related fraud.

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

- **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.
- **Experian IdentityWorks ExtendCARE™**: You receive the same high-level of Identity Restoration support even after your Experian IdentityWorks membership has expired.
- **$1 Million Identity Theft Insurance****: Provides coverage for certain costs and unauthorized electronic fund transfers.

Activate your membership today at [redacted]
or call [redacted] to register with the activation code above.

What you can do to protect your information: There are additional actions you can consider taking to reduce the chances of identity theft or fraud on your account(s). Please refer to [redacted] for this information. If you have any questions about IdentityWorks, need help understanding something on your credit report or suspect that an item on your credit report may be fraudulent, please contact Experian's customer care team at [redacted]

* Offline members will be eligible to call for additional reports quarterly after enrolling.

** Identity theft insurance is underwritten by insurance company subsidiaries or affiliates of American International Group, Inc. (AIG). 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.

2. Placing a Fraud Alert on Your Credit File.

Whether or not you choose to use the complimentary 12 month credit monitoring services, we recommend that you place an initial one-year "Fraud Alert" on your credit files, at no charge. A fraud alert tells creditors to contact you personally before they open any new accounts. To place a fraud alert, call any one of the three major credit bureaus at the numbers listed below. As soon as one credit bureau confirms your fraud alert, they will notify the others.

Equifax
P.O. Box 105069
Atlanta, GA 30348
www.equifax.com
1-800-525-6285

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

TransUnion LLC
P.O. Box 2000
Chester, PA 19016
www.transunion.com
1-800-680-7289

3. Consider Placing a Security Freeze on Your Credit File.

If you are very concerned about becoming a victim of fraud or identity theft, you may request a "Security Freeze" be placed on your credit file, at no charge. A security freeze prohibits, with certain specific exceptions, the consumer reporting agencies from releasing your credit report or any information from it without your express authorization. You may place a security freeze on your credit report by contacting all three nationwide credit reporting companies at the numbers below and following the stated directions or by sending a request in writing, by mail, to all three credit reporting companies:

Equifax Security Freeze
P.O. Box 105788
Atlanta, GA 30348
https://www.freeze.equifax.com
1-800-349-9960

Experian Security Freeze
P.O. Box 9554
Allen, TX 75013
http://experian.com/freeze
1-888-397-3742

TransUnion Security Freeze
P.O. Box 2000
Chester, PA 19016
http://www.transunion.com/securityfreeze
1-888-909-8872

In order to place the security freeze, you'll need to supply your name, address, date of birth, Social Security number and other personal information. After receiving your freeze request, each credit reporting company will send you a confirmation letter containing a unique PIN (personal identification number) or password. Keep the PIN or password in a safe place. You will need it if you choose to lift the freeze.

If your personal information has been used to file a false tax return, to open an account or to attempt to open an account in your name or to commit fraud or other crimes against you, you may file a police report in the City in which you currently reside.

If you do place a security freeze *prior* to enrolling in the credit monitoring service as described above, you will need to remove the freeze in order to sign up for the credit monitoring service. After you sign up for the credit monitoring service, you may refreeze your credit file.

4. Obtaining a Free Credit Report.

Under federal law, you are entitled to one free credit report every 12 months from each of the above three major nationwide credit reporting companies. Call **1-877-322-8228** or request your free credit reports online at **www.annualcreditreport.com**. Once you receive your credit reports, review them for discrepancies. Identify any accounts you did not open or inquiries from creditors that you did not authorize. Verify all information is correct. If you have questions or notice incorrect information, contact the credit reporting company.

5. Additional Helpful Resources.

Even if you do not find any suspicious activity on your initial credit reports, the Federal Trade Commission (FTC) recommends that you check your credit reports periodically. Checking your credit report periodically can help you spot problems and address them quickly.

If you find suspicious activity on your credit reports or have reason to believe your information is being misused, call your local law enforcement agency and file a police report. Be sure to obtain a copy of the police report, as many creditors will want the information it contains to absolve you of the fraudulent debts. You may also file a complaint with the FTC by contacting them on the web at www.ftc.gov/idtheft, by phone at 1-877-IDTHEFT (1-877-438-4338), or by mail at Federal Trade Commission, Consumer Response Center, 600 Pennsylvania Avenue, NW, Washington, DC 20580. Your complaint will be added to the FTC's Identity Theft Data Clearinghouse, where it will be accessible to law enforcement for their investigations. In addition, you may obtain information from the FTC about fraud alerts and security freezes.