WILSON ELSER
WILSON ELSER MOSKOWITZ EDELMAN & DICKER LLP

January 19, 2018

Anjali C Das
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Anjali.Das@wilsonelser.com

STATE OF NH
DEPT OF JUSTICE
2018 JAN 23 AM 11:27

Attorney General Joseph A. Foster
Office of the Attorney General
33 Capitol Street
Concord, NH 03302

Re: Data Security Incident

Dear Attorney General Foster:

We represent Westminster Ingleside King Farm Presbyterian Retirement Communities, Inc. ("Ingleside"), located in Rockville, Maryland, with respect to a potential data security incident described in more detail below. Ingleside takes the security and privacy of the information in its control very seriously, and has taken steps to prevent a similar incident from occurring in the future.

1. Nature of the security incident.

On November 21, 2017, Ingleside discovered that it had been the target of a malware attack. Ingleside immediately took action, launching a software program to assist in finding and removing the malware from its system. Ingleside also engaged independent computer forensics experts to determine how the incident occurred and if information had been accessed by an unauthorized third party. Although the investigation did not identify any evidence of access to information, Ingleside could not rule out the possibility that personal information, including names, addresses, dates of birth, social security numbers, financial account information, and protected health information may have been at risk.

2. Number of New Hampshire residents affected.

A total number of ten (10) New Hampshire residents may have been potentially affected by this incident. Notification letters to these individuals were mailed on January 19, 2018, by first class mail. A sample copy of the notification letter is included with this letter.

3. Steps taken.

Ingleside has taken steps to prevent a similar event from occurring in the future, and to protect the privacy and security of potentially impacted individuals' information. This includes upgrading its firewall, antivirus and malware security, requiring all new user credentials/passwords, adopting dual-factor authentication, and providing additional staff training on identifying unauthorized access. Ingleside has also provided potentially impacted individuals with identity theft restoration and credit

monitoring services for 12 months at no cost to the individual, through Kroll. Notice is also being provided to the credit reporting agencies.

4. Contact information.

Ingleside 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 Anjali.Das@wilsonelser.com or (312) 821-6164.

Very truly yours,

Wilson Elser Moskowitz Edelman & Dicker LLP

Anjali C Das

Enclosure.

INGLESIDE

ENGAGED LIVING

January 17, 2018

<<MemberFirstName>> <<MemberMiddleName>> <<MemberLastName>> <NameSuffix>
<<Address1>>
<<Address2>>
<<City>>, <<State>> <<ZipCode>>

Dear <<MemberFirstName>> <<MemberLastName>>,

We are writing to inform you of a data security incident at Ingleside that may have resulted in the disclosure of your personal information, including your name and Social Security number. We take the security of all employee information very seriously, and sincerely apologize for any inconvenience this incident may cause. This letter contains information about steps you can take to protect your information, and resources we are making available to you.

While data security breaches are becoming more commonplace around the world, Ingleside has been successful over the years in implementing multiple security mechanisms to safeguard our systems. Despite our focused efforts, on November 21, 2017, we discovered that we had been the target of a criminal malware attack. We immediately took action, launching a software program to assist in finding and removing the malware from our system. We also engaged independent computer forensics experts to determine how the incident occurred and if information had been accessed by an unauthorized third party. Although the investigation did not identify any evidence of access to your information, we unfortunately could not completely rule out the possibility that your personal information, including your name, address, date of birth, Social Security number, and financial account information may have been compromised because of this criminal activity.

While we have no evidence of misuse of your information, out of an abundance of caution we are providing you with resources to help protect your identity. We have secured the services of Kroll to provide identity monitoring at no cost to you for one year. Kroll is a global leader in risk mitigation and response, and their team has extensive experience helping people who have sustained an unintentional exposure of confidential data. Your identity monitoring services include Credit Monitoring, Web Watcher, Public Persona, Quick Cash Scan, $1 Million Identity Fraud Loss Reimbursement, Fraud Consultation, and Identity Theft Restoration.

Visit **my.idmonitoringservice.com** to activate and take advantage of your identity monitoring services.

You have until April 19, 2018 to activate your identity monitoring services.

Membership Number: <<Member ID>>

To receive credit services by mail instead of online, please call 1-833-214-8743. Additional information describing your services is included with this letter.

We take the security of all employee information very seriously, and want to assure you that we have taken steps to prevent a similar event from occurring in the future. This includes upgrading our firewall, antivirus and malware security, requiring all new user credentials/passwords, adopting dual-factor authentication, and providing additional staff training on identifying unauthorized access.

We sincerely regret any concern or inconvenience that this matter may cause you, and remain dedicated to protecting your information. If you have any questions, please do not hesitate to call 1-833-214-8743, Monday through Friday, 8:00 a.m. to 8:00 p.m. Eastern Time.

Sincerely,

Lynn O'Connor, MSA, LNHA, CASP
President and CEO

9301TR-0118

Kroll.

TAKE ADVANTAGE OF YOUR IDENTITY MONITORING SERVICES

You've been provided with access to the following services[1] 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 can help you determine if it's an indicator of identity theft.

Web Watcher

Web Watcher monitors internet sites where criminals may buy, sell, and trade personal identity information. An alert will be generated if evidence of your personal identity information is found.

Public Persona

Public Persona monitors and notifies when names, aliases, and addresses become associated with your Social Security number. If information is found, you'll receive an alert.

Quick Cash Scan

Quick Cash Scan monitors short-term and cash-advance loan sources. You'll receive an alert when a loan is reported, and you can call a Kroll fraud specialist for more information.

$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 can dig deep to uncover the scope of the identity theft, and then work to resolve it.

[1] Kroll's activation website is only compatible with the current version or one version earlier of Internet Explorer, Chrome, Firefox, and Safari. 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.

Additional Important Information

For residents of Hawaii, Michigan, Missouri, Virginia, Vermont, and North Carolina:

It is recommended by state law that you remain vigilant for incidents of fraud and identity theft by reviewing credit card account statements and monitoring your credit report for unauthorized activity.

For residents of Illinois, Iowa, Maryland, Missouri, North Carolina, Oregon, and West Virginia:

It is required by state laws to inform you that 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 nationwide three 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.

For residents of Iowa:

State law advises you to report any suspected identity theft to law enforcement or to the Attorney General.

For residents of Oregon:

State laws advise you to report any suspected identity theft to law enforcement, including the Attorney General, and the Federal Trade Commission.

For residents of Maryland, Rhode Island, Illinois, and North Carolina:

You can obtain information from the Maryland and North Carolina Offices of the Attorneys General and the Federal Trade Commission about fraud alerts, security freezes, and steps you can take toward preventing identity theft.

Maryland Office of the Attorney General
Consumer Protection Division
200 St. Paul Place
Baltimore, MD 21202
1-888-743-0023
www.oag.state.md.us

Rhode Island Office of the Attorney General
150 South Main Street
Providence RI 02903
1-401-274-4400
www.riag.ri.gov

North Carolina Office of the Attorney General
Consumer Protection Division
9001 Mail Service Center
Raleigh, NC 27699-9001
1-877-566-7226
www.ncdoj.com

Federal Trade Commission
Consumer Response Center
600 Pennsylvania Ave, NW
Washington, DC 20580
1-877-IDTHEFT (438-4338)
www.ftc.gov

For residents of Massachusetts:

It is required by state law that you are informed of your right to obtain a police report if you are a victim of identity theft

For residents of all states:

Fraud Alerts: You can place fraud alerts with the three credit bureaus at one of the three major credit bureaus by phone and also via Experian's or Equifax's website. 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. The contact information for all three credit bureaus is below.

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

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, or 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, 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. The consumer reporting agency may charge a small fee to place, lifte, or remove a freeze, but is free if you are a victim of identity theft or the spouse of a victim of identity theft, and you have submitted a valid police report relating to the identity theft incident to the consumer reporting agency. You may obtain a security freeze by contacting any one or more of the following national consumer reporting agencies:

Equifax Security Freeze	**Experian Security Freeze**	**TransUnion (FVAD)**
P.O. Box 105788	P.O. Box 9554	P.O. Box 2000
Atlanta, GA 30348	Allen, TX 75013	Chester, PA 19022
www.freeze.equifax.com	www.experian.com/freeze	freeze.transunion.com
800-525-6285	888-397-3742	888-680-7289

More information can also be obtained by contacting the Federal Trade Commission listed above.

INGLESIDE

ENGAGED LIVING

January 17, 2018

<<MemberFirstName>> <<MemberMiddleName>> <<MemberLastName>> <NameSuffix>
<<Address1>>
<<Address2>>
<<City>>, <<State>> <<ZipCode>>

Dear <<MemberFirstName>> <<MemberLastName>>,

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While data security breaches are becoming more commonplace around the world, Ingleside has been successful over the years in implementing multiple security mechanisms to safeguard our systems. Despite our focused efforts, on November 21, 2017, we discovered that we had been the target of a criminal malware attack. We immediately took action, launching a software program to assist in finding and removing the malware from our system. We also engaged independent computer forensics experts to determine how the incident occurred and if information had been accessed by an unauthorized third party. Although the investigation did not identify any evidence of access to your information, we unfortunately could not completely rule out the possibility that your personal information, including your name, address, date of birth, Social Security number, and protected health information may have been compromised because of this criminal activity. Your financial transactions including payment information were not involved in this incident.

While we have no evidence of misuse of your information, out of an abundance of caution we are providing you with resources to help protect your identity. We have secured the services of Kroll to provide identity monitoring at no cost to you for one year. Kroll is a global leader in risk mitigation and response, and their team has extensive experience helping people who have sustained an unintentional exposure of confidential data. Your identity monitoring services include Credit Monitoring, Web Watcher, Public Persona, Quick Cash Scan, $1 Million Identity Fraud Loss Reimbursement, Fraud Consultation, and Identity Theft Restoration.

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Sincerely,

Lynn O'Connor, MSA, LNHA, CASP
President and CEO

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[1] Kroll's activation website is only compatible with the current version or one version earlier of Internet Explorer, Chrome, Firefox, and Safari. 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.

Additional Important Information

For residents of Hawaii, Michigan, Missouri, Virginia, Vermont, and North Carolina:

It is recommended by state law that you remain vigilant for incidents of fraud and identity theft by reviewing credit card account statements and monitoring your credit report for unauthorized activity.

For residents of Illinois, Iowa, Maryland, Missouri, North Carolina, Oregon, and West Virginia:

It is required by state laws to inform you that 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 nationwide three 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.

For residents of Iowa:

State law advises you to report any suspected identity theft to law enforcement or to the Attorney General.

For residents of Oregon:

State laws advise you to report any suspected identity theft to law enforcement, including the Attorney General, and the Federal Trade Commission.

For residents of Maryland, Rhode Island, Illinois, and North Carolina:

You can obtain information from the Maryland and North Carolina Offices of the Attorneys General and the Federal Trade Commission about fraud alerts, security freezes, and steps you can take toward preventing identity theft.

Maryland Office of the Attorney General
Consumer Protection Division
200 St. Paul Place
Baltimore, MD 21202
1-888-743-0023
www.oag.state.md.us

Rhode Island Office of the Attorney General
150 South Main Street
Providence RI 02903
1-401-274-4400
www.riag.ri.gov

North Carolina Office of the Attorney General
Consumer Protection Division
9001 Mail Service Center
Raleigh, NC 27699-9001
1-877-566-7226
www.ncdoj.com

Federal Trade Commission
Consumer Response Center
600 Pennsylvania Ave, NW
Washington, DC 20580
1-877-IDTHEFT (438-4338)
www.ftc.gov

For residents of Massachusetts:

It is required by state law that you are informed of your right to obtain a police report if you are a victim of identity theft

For residents of all states:

Fraud Alerts: You can place fraud alerts with the three credit bureaus at one of the three major credit bureaus by phone and also via Experian's or Equifax's website. 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. The contact information for all three credit bureaus is below.

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The following information must be included when requesting a security freeze (note that if you are requesting a credit report for your spouse, 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. The consumer reporting agency may charge a small fee to place, life, or remove a freeze, but is free if you are a victim of identity theft or the spouse of a victim of identity theft, and you have submitted a valid police report relating to the identity theft incident to the consumer reporting agency. You may obtain a security freeze by contacting any one or more of the following national consumer reporting agencies:

Equifax Security Freeze	**Experian Security Freeze**	**TransUnion (FVAD)**
P.O. Box 105788	P.O. Box 9554	P.O. Box 2000
Atlanta, GA 30348	Allen, TX 75013	Chester, PA 19022
www.freeze.equifax.com	www.experian.com/freeze	freeze.transunion.com
800-525-6285	888-397-3742	888-680-7289

More information can also be obtained by contacting the Federal Trade Commission listed above.