

RE
JAN 24 2022
CONSUMER PROTECTION



MULLEN
COUGHLIN_{LLC}
ATTORNEYS AT LAW

RECEIVED
JAN 24 2022
DEVON PA

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426 W. Lancaster Avenue, Suite 200
Devon, PA 19333

January 20, 2022

VIA U.S. MAIL

Consumer Protection Bureau
Office of the New Hampshire Attorney General
33 Capitol Street
Concord, NH 03301

Re: Notice of Data Event

Dear Sir or Madam:

We represent WyndRidge Health and Rehabilitation Center (“WyndRidge”), located at 456 Wayne Avenue, Crossville, Tennessee 38555, and are writing to notify your Office of an incident that may affect the security of information relating to one (1) New Hampshire resident. The investigation into this matter is ongoing, and this notice will be supplemented with any new significant facts learned subsequent to its submission. By providing this notice, WyndRidge does not waive any rights or defenses regarding the applicability of New Hampshire law, the applicability of the New Hampshire data event notification statute, or personal jurisdiction.

Nature of the Data Event

On September 29, 2021, WyndRidge learned that it was the target of a cybercriminal attack. WyndRidge immediately worked to secure its environment and engaged third-party computer specialists to launch an investigation into the nature and scope of the incident. On October 12, 2021, the investigation determined that certain files on WyndRidge’s systems may have been accessed or acquired by an unknown, unauthorized third party. Therefore, WyndRidge began a thorough review of potentially impacted files and of the involved internal systems to identify the information present at the time of the incident and to whom the information relates. Through this review, on or about December 3, 2021, WyndRidge determined that certain resident information may have been impacted by this event, including name and Social Security number.

Notice to New Hampshire Resident

On or about January 13, 2022, WyndRidge provided written notice of this incident to potentially affected individuals, including one (1) New Hampshire resident. Written notice is being provided in substantially the same form as the letter attached here as *Exhibit A*.

Other Steps Taken and To Be Taken

Upon discovering the event, WyndRidge moved quickly to investigate and respond to the incident, assess the security of WyndRidge's systems, and notify potentially affected individuals. WyndRidge is also working to implement additional safeguards and training to its employees. While WyndRidge is not aware of any actual or attempted misuse of information related to this event, WyndRidge is providing access to complimentary credit monitoring services for twelve (12) months, through TransUnion, to individuals whose information was potentially affected by this incident out of an abundance of caution.

Additionally, WyndRidge is providing 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 Explanation of Benefits, and encouragement to contact the Federal Trade Commission, their state Attorney General, and law enforcement to report attempted or actual identity theft and fraud.

Contact Information

Should you have any questions regarding this notification or other aspects of the data security event, please contact us at (267) 930-4637.

Very truly yours,



Gregory Lederman of
MULLEN COUGHLIN LLC

GCL:rrg
Enclosure

Exhibit A



Return Mail Processing Center
P.O. Box 6336
Portland, OR 97228-6336

<<Mail ID>>
<<Name 1>>
<<Name 2>>
<<Address 1>>
<<Address 2>>
<<Address 3>>
<<Address 4>>
<<Address 5>>
<<City>><<State>><<Zip>>
<<Country>>

<<Date>>

Notice of Data <<Variable 1>>

Dear <<Name 1>>:

WyndRidge Health and Rehabilitation Center (“WyndRidge”) is writing to make you aware of an incident that may affect the privacy of some of your information. You are receiving this letter because you are a current or former WyndRidge resident and the investigation determined your information was potentially affected as a result of this incident. This letter provides details of the incident, our response, and resources available to you to help protect your information, should you feel it is appropriate to do so.

What Happened? On September 29, 2021, WyndRidge discovered suspicious activity on certain systems in our computer network. As a result, we immediately worked to secure our environment and, with the assistance of third-party computer specialists, launched an investigation to determine the nature and scope of the activity. On October 12, 2021, the investigation determined that certain files on our systems may have been accessed by an unknown, unauthorized third party. We therefore began a review of potentially impacted files and our internal systems to identify the information present at the time of the incident and to whom it relates.

What Information was Involved? Our review recently determined that files containing your information may have been impacted during the event. Our investigation determined that the following types of information related to you may have been impacted: <<Breached Elements>>. While there is no indication that your information was or will be misused, we are notifying potentially impacted residents out of an abundance of caution.

What we are Doing. We take this incident and the security of information in our care very seriously. Upon discovering this incident, we immediately took steps to review and reinforce the security of our systems. We are reviewing our existing security policies and have implemented additional measures to further protect against similar incidents moving forward. We are notifying potentially impacted individuals, including you, so that you may take steps to protect your information.

As a safeguard, we have arranged for you to enroll, at no cost to you, in an online credit monitoring service for <<12-24>> months provided by TransUnion Interactive, a subsidiary of TransUnion®, one of the three nationwide credit reporting companies. Individuals who wish to receive these services must enroll by following the enrollment instructions in the enclosed “Steps You Can Take to Help Protect Your Information.”

What You Can Do. We encourage you to remain vigilant against incidents of identity theft and fraud by reviewing your account statements and monitoring your Explanation of Benefits and free credit reports for suspicious activity and to detect errors. Please also review the information contained in the enclosed “Steps You Can Take to Help Protect Your Information.”

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 us at 855-604-1727, or write to us at 456 Wayne Avenue, Crossville, TN 38555.

We take this incident very seriously and sincerely regret any inconvenience or concern this incident may cause you.

Sincerely,

Barbara Neely
Licensed Nursing Home Administrator
WyndRidge Health and Rehabilitation Center

STEPS YOU CAN TAKE TO HELP PROTECT YOUR INFORMATION

Enroll in Credit and Identity Monitoring

To enroll in this service, go directly to the *myTrueIdentity* website at www.mytrueidentity.com and in the space referenced as "Enter Activation Code", enter the following unique 12-letter Activation Code <<Insert Unique 12-letter Activation Code>> and follow the three steps to receive your credit monitoring service online within minutes.

If you do not have access to the Internet and wish to enroll in a similar offline, paper based, credit monitoring service, via U.S. Mail delivery, please call the TransUnion Fraud Response Services toll-free hotline at **1-855-288-5422**. When prompted, enter the following 6-digit telephone pass code << Insert static 6-digit Telephone Pass Code >> and follow the steps to enroll in the offline credit monitoring service, add an initial fraud alert to your credit file, or to speak to a TransUnion representative if you believe you may be a victim of identity theft.

Once you are enrolled, you will be able to obtain <<12/24>> months of unlimited access to your TransUnion credit report and VantageScore[®] credit score by TransUnion. The daily credit monitoring service will notify you if there are any critical changes to your credit file at TransUnion[®], including fraud alerts, new inquiries, new accounts, new public records, late payments, change of address and more. The service also includes the ability to lock and unlock your TransUnion credit report online, access to identity restoration services that provide assistance in the event your identity is compromised to help you restore your identity, and up to \$1,000,000 in identity theft insurance with no deductible. (Policy limitations and exclusions may apply.)

You can sign up for the *myTrueIdentity* online Credit Monitoring service anytime between now and <<Insert Date>>. Due to privacy laws, we cannot register you directly. Please note that credit monitoring services might not be available for individuals who do not have credit file at TransUnion[®], or an address in the United States (or its territories) and a valid Social Security number, or are under the age of 18. Enrolling in this service will not affect your credit score.

If you have questions about your *myTrueIdentity* online credit monitoring benefits, need help with your online enrollment, or need help accessing your credit report, or passing identity verification, please contact the *myTrueIdentity* Customer Service Team toll-free at: 1-844-787-4607, Monday-Friday: 8am- 9pm, Saturday-Sunday: 8am-5pm Eastern time.

Monitor Your Accounts

Under U.S. law, a consumer is entitled to one free credit report annually from each of the three major credit reporting bureaus, Equifax, Experian, and TransUnion. To order your free credit report, visit www.annualcreditreport.com or call, toll-free, 1-877-322-8228. You may also directly contact the three major credit reporting bureaus listed below to request a free copy of your credit report.

Consumers have the right to place an initial or extended "fraud alert" on a credit file at no cost. An initial fraud alert is a 1-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 three major credit reporting bureaus listed below.

As an alternative to a fraud alert, consumers have the right to place a "credit freeze" on a credit report, which will prohibit a credit bureau from releasing information in the credit report without the consumer's express authorization. The credit 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 credit 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 credit freeze on your credit report. To request a security freeze, you will need to provide the following information:

1. Full name (including middle initial as well as Jr., Sr., II, III, etc.);
2. Social Security number;
3. Date of birth;
4. Addresses for the prior two to 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.); and
7. A copy of either the police report, investigative report, or complaint to a law enforcement agency concerning identity theft if you are a victim of identity theft.

Should you wish to place a fraud alert or credit freeze, please contact the three major credit reporting bureaus listed below:

Equifax	Experian	TransUnion
https://www.equifax.com/personal/credit-report-services/	https://www.experian.com/help/	https://www.transunion.com/credit-help
888-298-0045	888-397-3742	833-395-6938
Equifax Fraud Alert, P.O. Box 105069, Atlanta, GA 30348-5069	Experian Fraud Alert, P.O. Box 9554, Allen, TX 75013	TransUnion Fraud Alert, P.O. Box 2000, Chester, PA 19016
Equifax Credit Freeze, P.O. Box 105788, Atlanta, GA 30348-5788	Experian Credit Freeze, P.O. Box 9554, Allen, TX 75013	TransUnion Credit Freeze, P.O. Box 160, Woodlyn, PA 19094

You may further educate yourself regarding identity theft, fraud alerts, credit freezes, and the steps you can take to protect your personal information by contacting the consumer reporting bureaus, the Federal Trade Commission, or your state Attorney General. The Federal Trade Commission may be reached at: 600 Pennsylvania Avenue NW, Washington, DC 20580; www.identitytheft.gov; 1-877-ID-THEFT (1-877-438-4338); and 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 further 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 North Carolina Attorney General may be contacted at: 9001 Mail Service Center, Raleigh, NC 27699-9001; 1-877-566-7226 or 1-919-716-6000; and www.ncdoj.gov.