# CLARK HILL

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February 25, 2021

# VIA PORTAL

Attorney General Frey Office of the Attorney General 6 State House Station Augusta, ME 04333

Dear Attorney General Aaron Frey:

We represent Cornerstone Care, Inc. ("Cornerstone") with respect to a security incident involving the potential exposure of certain personally identifiable information described in more detail below. Cornerstone, located in Greensboro, Pennsylvania, provides a variety of medical and dental services. Cornerstone is committed to answering any questions you may have about the security incident, its response, and steps taken to minimize the risk of a similar incident in the future.

# 1. Nature of security incident.

On June 1, 2020, Cornerstone became aware of suspicious activity associated with a corporate email account. Cornerstone began an internal investigation and hired independent computer forensic investigators to assist. The forensic investigators determined that an unauthorized user had gained access to one email account for a limited period of time. The forensic investigator conducted an in-depth review of the email account to determine what Protected Health Information ("PHI") may have been included, and to extract contact information of potentially affected individuals. On January 13, 2021, that review was completed, and the list of potentially impacted individuals was provided to Cornerstone. The review confirmed that the impacted account contained individual's names and addresses. For some individuals, their date of birth, Social Security number, medical history, condition, treatment, diagnosis, health insurance information, and other information related to medical care may have also been included.

# 2. Number of residents affected.

One (1) Maine resident may have been affected and was notified of the incident. A notification letter was sent to the potentially affected individuals on February 25, 2021 via regular mail (a copy of the template notification letter is attached).

# 3. Steps taken relating to the incident.

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Since the incident, Cornerstone has taken steps to minimize the risk of this happening in the future, including but not limited to resetting the password to the affected email account and enabling multi-factor authentication. Credit monitoring and identity protection services through IDX were offered at no cost to individuals whose Social Security numbers were impacted. Finally, Cornerstone provided notice of this incident to the Secretary of Health and Human Services on February 25, 2021.

# 4. Contact information.

Cornerstone takes the security of the information in its control seriously and is committed to ensuring it is appropriately protected. If you have any questions or need additional information, please do not hesitate to contact me at jschwent@clarkhill.com or (312) 985-5939.

Very truly yours,

CLARK HILL

Jason M. Schwent (Enclosure)





C/O IDX P.O. Box 1907 Suwanee, GA 30024 To Enroll, Please Call: 833-933-1095 Or Visit: <u>https://app.idx.us/accountcreation/protect</u> Enrollment Code: [XXXXXXX]

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

February 25, 2021

#### Notice of Data Security Incident

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

We are writing to inform you of a data security incident experienced by Cornerstone Care, Inc. ("Cornerstone") that may have impacted your protected health information ("PHI"), including your name, Social Security number, and other PHI described below. We take the privacy and security of your information seriously, and sincerely apologize for any concern or inconvenience this may cause you. This letter contains information about steps you can take to protect your information and resources we are making available to help you.

#### What happened:

On June 1, 2020, we became aware of suspicious activity associated with a corporate email account. We began an internal investigation and hired independent computer forensic investigators to assist. The forensic investigators determined that an unauthorized user had gained access to one email account for a limited period of time. The forensic investigator conducted an in-depth review of the email account to determine what PHI may have been included, and to extract contact information of potentially affected individuals. On January 13, 2021, the forensic investigator provided a list of impacted individuals, and determined that your PHI may have been impacted by this incident.

#### What information was involved:

From our investigation, the account may have contained your name, address, date of birth, and Social Security number. For some individuals, their medical history, condition, treatment, diagnosis, health insurance information, and other information related to medical care may have also been included.

#### What we are doing:

We want to assure you that we are taking steps to minimize the risk of this happening in the future. Since the incident, the password to the email account was changed, and multi-factor authentication was enabled on all email accounts within the organization.

In addition, while we are not aware of any misuse of your information, we have arranged for you to receive credit monitoring and identity protection services at no cost to you, as a precautionary measure.

# What you can do:

We are offering identity theft protection services through IDX, the data breach and recovery services expert. IDX identity protection services include: <<12/24>> months of credit and CyberScan monitoring, a \$1,000,000 insurance reimbursement policy, and fully managed ID theft recovery services. With this protection, IDX will help you resolve issues if your identity

is compromised. We encourage you to remain vigilant against incidents of identity theft by reviewing account statements and explanations of benefits for unusual activity. You should immediately report any suspicious activity to your insurance company, healthcare provider, or financial institution.

#### How to Enroll in IDX: You can sign up online or via telephone

We encourage you to contact IDX with any questions and to enroll in free services by calling 833-933-1095 or going to <u>https://app.idx.us/account-creation/protect</u> and using the Enrollment Code provided above. IDX is available Monday through Friday from 9 am - 9 pm Eastern Time. Please note the deadline to enroll is May 25, 2021.

Again, at this time, there is no evidence that your information has been misused. However, we encourage you to take full advantage of this service offering. IDX representatives have been fully informed of the incident and can answer questions or concerns you may have regarding protection of your personal information.

#### For more information:

You will find detailed instructions for enrollment on the enclosed Recommended Steps document. Also, you will need to reference the enrollment code at the top of this letter when calling or enrolling online, so please do not discard this letter.

Please call 833-933-1095 or go to <u>https://app.idx.us/account-creation/protect</u> for assistance or for any additional questions you may have.

Your trust is a top priority for us, and we deeply regret any inconvenience or concern that this matter may cause you.

Sincerely,

Richard T. Rinehart Chief Executive Officer Cornerstone Care, Inc.



#### **Recommended Steps to help Protect your Information**

1. Website and Enrollment. Go to <u>https://app.idx.us/account-creation/protect</u> and 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 IDX identity protection 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, IDX will be able to assist you.

**3. Telephone.** Contact IDX at 833-933-1095 to gain additional information about this event and speak with knowledgeable representatives about the appropriate steps to take to protect your credit identity.

**4. Review your credit reports**. We recommend that you remain vigilant by reviewing account statements and monitoring credit reports. Under federal law, you also are entitled every 12 months to one free copy of your credit report from each of the three major credit reporting companies. To obtain a free annual credit report, go to <u>www.annualcreditreport.com</u> or call 1-877-322-8228. You may wish to stagger your requests so that you receive a free report by one of the three credit bureaus every four months.

If you discover any suspicious items and have enrolled in IDX identity protection, notify them immediately by calling or by logging into the IDX website and filing a request for help.

If you file a request for help or report suspicious activity, you will be contacted by a member of our ID Care team who will help you determine the cause of the suspicious items. In the unlikely event that you fall victim to identify theft as a consequence of this incident, you will be assigned an ID Care Specialist who will work on your behalf to identify, stop and reverse the damage quickly.

You should also know that you have the right to file a police report if you ever experience identity fraud. Please note that in order to file a crime report or incident report with law enforcement for identity theft, you will likely need to provide some kind of proof that you have been a victim. A police report is often required to dispute fraudulent items. You can report suspected incidents of identity theft to local law enforcement or to the Attorney General.

**5.** Place Fraud Alerts with the three credit bureaus. If you choose to place a fraud alert, we recommend you do this after activating your credit monitoring. You can place a fraud alert 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 bureaus is as follows:

# **Credit Bureaus**

| Equifax Fraud Reporting<br>1-866-349-5191 | Experian Fraud Reporting<br>1-888-397-3742 | TransUnion Fraud Reporting 1-800-680-7289 |
|---|--|---|
| P.O. Box 105069<br>Atlanta, GA 30348-5069 | P.O. Box 9554<br>Allen, TX 75013           | P.O. Box 2000<br>Chester, PA 19022-2000   |
| www.equifax.com                           | www.experian.com                           | www.transunion.com                        |

It is necessary to contact only ONE of these bureaus and use only ONE of these methods. As soon as one of the three bureaus confirms your fraud alert, the others are notified to place alerts on their records as well. You will receive confirmation letters in the mail and will then be able to order all three credit reports, free of charge, for your review. An initial fraud alert will last for one year.

Please Note: No one is allowed to place a fraud alert on your credit report except you.

**6. Security Freeze.** By placing a security freeze, someone who fraudulently acquires your personal identifying information will not be able to use that information to open new accounts or borrow money in your name. You will need to contact the three national credit reporting bureaus listed above to place the freeze. Keep in mind that when you place the freeze, you will not be able to borrow money, obtain instant credit, or get a new credit card until you temporarily lift or permanently remove the freeze. There is no cost to freeze or unfreeze your credit files.

**7. You can obtain additional information** about the steps you can take to avoid identity theft from the following agencies. The Federal Trade Commission also encourages those who discover that their information has been misused to file a complaint with them.

**California Residents:** Visit the California Office of Privacy Protection (<u>www.oag.ca.gov/privacy</u>) for additional information on protection against identity theft.

Kentucky Residents: Office of the Attorney General of Kentucky, 700 Capitol Avenue, Suite 118 Frankfort, Kentucky 40601, <u>www.ag.ky.gov</u>, Telephone: 1-502-696-5300.

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

**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. Further, 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 a 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. You can review your rights pursuant to the Fair Credit Reporting Act by visiting <u>www.consumerfinance.gov/f/201504\_cfpb\_summary\_your-rights-under-fcra.pdf</u>, or by writing Consumer Response Center, Room 130-A, Federal Trade Commission, 600 Pennsylvania Ave. N.W., Washington, D.C. 20580.

**New York Residents:** the Attorney General may be contacted at: Office of the Attorney General, The Capitol, Albany, NY 12224-0341; 1-800-771-7755; <u>https://ag.ny.gov/</u>.

North Carolina Residents: Office of the Attorney General of North Carolina, 9001 Mail Service Center Raleigh, NC 27699-9001, <u>www.ncdoj.gov</u>, Telephone: 1-919-716-6400.

**Oregon Residents:** Oregon Department of Justice, 1162 Court Street NE, Salem, OR 97301-4096, <u>www.doj.state.or.us/</u>, Telephone: 877-877-9392

Rhode Island Residents: Office of the Attorney General, 150 South Main Street, Providence, Rhode Island 02903, <u>www.riag.ri.gov</u>, Telephone: 401-274-4400

All US Residents: Identity Theft Clearinghouse, Federal Trade Commission, 600 Pennsylvania Avenue, NW Washington, DC 20580, <u>www.consumer.gov/idtheft</u>, 1-877-IDTHEFT (438-4338), TTY: 1-866-653-4261.