

**Attachment A: Sample Individual Notification Letter**

April 4, 2019

[INDIVIDUAL NAME]  
[MAILING ADDRESS]  
[CITY], MA [ZIP CODE]

Dear [FIRST and LAST NAME],

Gulf Coast Pain Consultants, LLC (now doing business as Clearway Pain Solutions Institute) is writing to notify you of a breach of security of your personal information. Please read this entire letter carefully because it contains important information for you.

Clearway Pain Solutions Institute provides pain management services. On February 20, 2019, we became aware that our electronic medical record (“EMR”) system was accessed in an unauthorized manner by a third party. Immediately upon becoming aware of this issue, we terminated the third party’s access to our EMR system. Some of your information may have been impacted by this incident. The information in our EMR system includes your name, address, telephone number, email address, social security number, date of birth, chart numbers, and potentially your insurance or primary care information. Your credit card and banking information are **not** included and have **not** been impacted by this incident.

As soon as we discovered the issue, we notified law enforcement and have been cooperating in their investigation into the inappropriate access. We also generated and reviewed logs to determine what information in our EMR system may have been accessible by the third party.

We have taken a number of steps to protect against future incidents. In addition to investigating this matter thoroughly and terminating the unauthorized access to our EMR system, we have reviewed all user accounts and validated the access levels and activity for each account. We are also reviewing our policies and procedures and will provide re-training to employees as needed.

Under Massachusetts law, you have the right to obtain any police report filed in regard to this incident. If you are the victim of identity theft, you also have the right to file a police report and obtain a copy of it. Massachusetts law also allows consumers to place a security freeze on

their credit reports. A security freeze prohibits a credit reporting agency from releasing any information from your credit report without your written authorization. However, please be aware that placing a security freeze on your credit report may delay, interfere with, or prevent the timely approval of any requests you make for new loans, credit mortgages, employment, housing, or other services. If you have been a victim of identity theft, and you provide the credit reporting agency with a valid identity theft report, it cannot charge you to place, lift, or remove a security freeze. In all other cases, a credit reporting agency may charge you up to \$5.00 each to place, temporarily lift, or permanently remove a security freeze.

To place a security freeze on your credit report, you must contact each of the three major consumer reporting agencies below by regular, certified or overnight mail or by following directions regarding a "security freeze" posted on their websites:

**Equifax**

1-800-525-6285  
PO Box 105069  
Atlanta, GA 30348  
[www.equifax.com](http://www.equifax.com)

**Experian**

1-888-397-3742  
PO Box 9701  
Allen, TX 75013  
[www.experian.com](http://www.experian.com)

**TransUnion**

1-800-680-7289 (fraud alert)  
1-800-888-4213 (credit report)  
PO Box 2000  
Chester, PA 19022  
[www.transunion.com](http://www.transunion.com)

You may need to provide your name, address, date of birth, social security number, and other personal information in order to place the security freeze on your credit report. The credit reporting agencies have three (3) business days after receiving your request to place a security freeze on your credit report. The credit bureaus must also send written confirmation to you within five (5) business days and provide you with a unique personal identification number (PIN) or password, or both that can be used by you to authorize the removal or lifting of the security freeze. To lift the security freeze in order to allow a specific entity or individual access to your credit report, you must call or send a written request to the credit reporting agencies and include proper identification (name, address, and social security number) and the PIN number or password provided to you when you placed the security freeze as well as the identities of those entities or individuals you would like to receive your credit report or the specific period of time you want the credit report available. The credit reporting agencies have three (3) business days after receiving your request to lift the security freeze for those identified entities or for the specified period of time.

To remove the security freeze, you must send a request to each of the three credit bureaus and include proper identification (name, address, and social security number) and the PIN number or password provided to you when you placed the security freeze. The credit bureaus have three (3) business days after receiving your request to remove the security freeze.

In addition, to reduce the risk of fraud or identity theft, Clearway is offering you a free one-year membership in Experian's® IdentityWorks at no cost to you. 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. The key features of

the service and how to sign up are described in the Security Reference Guide attached to this letter.

The Security Reference Guide also outlines other steps you should consider to lessen the risk of identity theft and provides contact information for the three major credit reporting agencies and the toll-free number, website and address for the Federal Trade Commission (“FTC”).

Clearway takes information security and your privacy very seriously. We deeply regret this situation and any inconvenience this may cause you. If you have any questions, **please call (844) 439-7669**. Please be prepared to provide the engagement and activation codes set forth on the enclosed Security Reference Guide.

Very truly yours,

A handwritten signature in black ink that reads "Deborah L. Origer". The signature is written in a cursive style with a large, prominent "D" and "O".

Deborah Origer, President

Clearway Pain Solutions Institute

## Security Reference Guide

### How to Enroll in the Experian IdentityWorks<sup>SM</sup> Product

As stated in the attached letter, we are offering you a one-year membership in Experian IdentityWorks<sup>SM</sup> at no cost to you.

If you believe there was fraudulent use of your information and would like to discuss how you may be able to resolve those issues, please reach out to an Experian agent. If, after discussing your situation with an agent, it is determined that identity restoration support is needed then an Experian Identity Restoration agent is available to work with you to investigate and resolve each incident of fraud that occurred (including, as appropriate, helping you with contacting credit grantors to dispute charges and close accounts; assisting you in placing a freeze on your credit file with the three major credit bureaus; and assisting you with contacting government agencies to help restore your identity to its proper condition).

The Terms and Conditions for this offer are located at [www.ExperianIDWorks.com/restoration](http://www.ExperianIDWorks.com/restoration). You will also find self-help tips and information about identity protection at this site.

While Identity Restoration assistance is immediately available to you, we also encourage you to activate the fraud detection tools available through Experian IdentityWorks<sup>SM</sup> as a complimentary one-year membership. This product provides you with superior identity detection and resolution of identity theft. To start monitoring your personal information please follow the steps below:

- Ensure that you **enroll by June 30, 2019**. (Your code will not work after this date.)
- **Visit** the Experian IdentityWorks website:  
<https://www.experianidworks.com/3bcredit>
- Provide your **activation code**: [ENTER CODE]

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 **(844) 439-7669**. Be prepared to provide engagement number **DB11452** as proof of eligibility for the identity restoration services by Experian.

### **ADDITIONAL DETAILS REGARDING YOUR 12-MONTH EXPERIAN IDENTITYWORKS MEMBERSHIP:**

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

You can contact Experian **immediately** regarding any fraud issues, and have access to the following features once you enroll in Experian IdentityWorks:

- **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.
- **Internet Surveillance:** Technology searches the web, chat rooms & bulletin boards 24/7 to identify trading or selling of your personal information on the Dark Web.
- **Identity Restoration:** Identity Restoration specialists are immediately available to help you address credit and non-credit related 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.

Additional Steps You Can Take to Protect the Security of Your Information:

- Place a “fraud alert” on your credit file. An **initial 90 day alert** indicates to anyone requesting your credit file that you suspect you are a victim of fraud. When you or someone else attempts to open a credit account in your name, increase the credit limit on an existing account, or obtain a new card on an existing account, the lender should takes steps to verify that you have authorized the request. If the creditor cannot verify this, the request should not be satisfied. You may contact one of the credit reporting companies below for assistance.

**Equifax**

1-800-525-6285  
 PO Box 105069  
 Atlanta, GA 30348  
[www.equifax.com](http://www.equifax.com)

**Experian**

1-888-397-3742  
 PO Box 9701  
 Allen, TX 75013  
[www.experian.com](http://www.experian.com)

**TransUnion**

1-800-680-7289 (fraud alert)  
 1-800-888-4213 (credit report)  
 PO Box 2000  
 Chester, PA 19022  
[www.transunion.com](http://www.transunion.com)

- Review and monitor your credit report for any new developments. You can order a copy of your credit report on the internet at [www.annualcreditreport.com](http://www.annualcreditreport.com) or by calling the Annual Credit Report Request Service toll-free at 1-877-322-8228.
- If you find suspicious activity on your credit reports or account statements, or have reason to believe that your personal information is being misused, contact your local law enforcement authorities immediately and file a police report. You have the right to request a copy of the police report and should retain it for further use, as many creditors want the information it contains to absolve you of potential fraudulent debts.
- If you become aware of possible identity theft, report it to your state Attorney General and the Federal Trade Commission (“FTC”). You can contact the FTC to learn more about how to protect yourself from identity theft, how to place a fraud alert on your credit report and how to place a security freeze on your on your credit report:

Federal Trade Commission  
Consumer Response Center  
600 Pennsylvania Avenue, NW  
Washington, DC 20580  
1-877-IDTHEFT (438-4338)  
[www.ftc.gov/idtheft/](http://www.ftc.gov/idtheft/)

\* 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.