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December 18, 2019

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Via Online Submission Only

Attorney General Maura Healey
Office of the Attorney General
One Ashburton Place
Boston, MA 02108-1518

Undersecretary John C. Chapman
Office of Consumer Affairs and Business Regulation
10 Park Plaza, Suite 5170
Boston, MA 02116

Re: Data Security Incident

Dear Attorney General Healey and Undersecretary Chapman:

We represent Tanglewood Manor, Inc. ("Tanglewood"), located in Jamestown, New York, with respect to a potential data security incident described in more detail below. Tanglewood 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.

Tanglewood offers independent living and assisted living options, including memory care, respite care and adult day services for seniors. On September 23, 2019, Tanglewood discovered that an unknown individual potentially gained access to one of its employee's email accounts. Tanglewood immediately prevented any further unauthorized access to the account by changing the employee's email credentials. Tanglewood then commenced an investigation with the assistance of an independent computer forensic company to determine the nature and extent of the unauthorized access. The investigation concluded on October 21, 2019. Tanglewood determined that the incident affected the email accounts of three (3) Tanglewood employees. Tanglewood then searched for personal information in the affected email accounts and discovered individuals' names in combination with their Social Security numbers. No financial account information or

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protected health information was involved in this incident. Tanglewood has no evidence of misuse of anyone's personal information.

2. Number of Massachusetts residents affected.

A total of one (1) Massachusetts resident may have been potentially affected by this incident. A notification letter to this individual was mailed on December 17, 2019, by first class mail. A sample copy of the notification letter is included with this letter.

3. Steps taken.

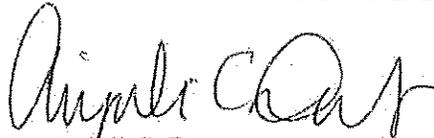
Tanglewood takes the security and privacy of the information in its control very seriously and has taken steps to prevent a similar event from occurring in the future, as well as to protect the privacy and security of potentially impacted individuals' information. This includes disabling external email access via legacy protocols, enabling additional auditing logs to notify of external access to email accounts, providing employees with awareness training on security policies, enabling encryption for all outgoing emails, implementing dual-factor authentication on all email accounts, and strengthening the security of our email systems. Tanglewood also offered potentially impacted individuals with identity theft restoration and credit monitoring services for twelve (12) months at no cost through Kroll.

4. Contact information.

Tanglewood 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.



<<Date>> (Format: Month Day, Year)

<<FirstName>> <<MiddleName>> <<LastName>> <<NameSuffix>>
<<Address1>>
<<Address2>>
<<City>>, <<State>> <<Zip>>

Dear <<FirstName>> <<MiddleName>> <<LastName>> <<NameSuffix>>,

We are writing to inform you of a data security incident involving Tanglewood Manor that may have resulted in unauthorized access to some of your personal information. We take the privacy and security of your personal information very seriously. Your trust is a top priority at Tanglewood Manor, and we deeply regret any inconvenience this may cause. This letter contains information about steps we have taken and resources we are making available to you to monitor your identity.

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, **free of charge**. A security freeze prohibits a credit reporting agency from releasing any information from a consumer's credit report without 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.

To place a security freeze on your credit report, you must make a direct request by telephone, secure electronic means (website), or written request to each of the three major consumer reporting agencies: Equifax; Experian; and TransUnion at the addresses and/or numbers below:

Equifax Security Freeze

P.O. Box 105788
Atlanta, GA 30348
my.equifax.com/consumer-
registration
(800) 349-9960

Experian Security Freeze

P.O. Box 9554
Allen, TX 75013
experian.com/freeze
(888) 397-3742

TransUnion Security Freeze

Fraud Victim Assistance Dept.
P.O. Box 2000
Chester, PA 19022-2000
transunion.com/credit-freeze
(888) 909-8872

In order to request a security freeze, you will need to provide the following information:

1. Your full name (including middle initial as well as Jr., Sr., II, III, etc.)
2. Social Security number;
3. Date of birth;
4. If you have moved in the past five (5) years, provide the addresses where you have lived over the prior five (5) 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.)
7. If you are a victim of identity theft, include a copy of either the police report, investigative report, or complaint to a law enforcement agency concerning identity theft.

The credit reporting agencies have one (1) business day after receiving a telephone or secure electronic request, or three (3) business days after receiving your written 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 permanently remove the security freeze, or to temporarily lift the security freeze for a specified period of time or to provide a specified entity access to your credit report, you must make a request either by phone, through secure electronic means (website), or send a written request to the credit reporting agencies by mail. Requests must include proper identification (name, address, and Social Security number) and the PIN or password provided to you when you placed the security freeze. To temporarily remove the security freeze, include the specific period of time you want the credit report available or the name of the entity you want to have access to your credit report.

In the case of a request by phone or secure electronic means, the security freeze will be lifted within one (1) hour after receiving the request for removal; or in the case of a request that is by mail, the credit reporting agencies have three (3) business days after receiving your request to permanently or temporarily remove the security freeze.

In an abundance of caution, we have secured the services of Kroll to provide identity monitoring, at no cost to you, for eighteen (18) months. 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, Fraud Consultation, and Identity Theft Restoration.

Visit krollbreach.idMonitoringService.com to activate and take advantage of your identity monitoring services.

*You have until **March 16, 2020** to activate your identity monitoring services.*

Membership Number: <<Member ID>>

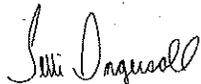
Additional information describing your services is included with this letter.

Please review the enclosed "Additional Important Information" section included with this letter. This section describes additional steps you can take to help protect yourself, including recommendations by the Federal Trade Commission regarding identity theft protection and details on how to place a fraud alert or a security freeze on your family member's credit file.

We take the security of all information in our systems very seriously and want to assure you that we are taking steps to prevent a similar event from occurring in the future. This includes disabling external email access via legacy protocols, enabling additional auditing logs to notify of external access to email accounts, providing employees with awareness training on security policies, enabling encryption for all outgoing emails, implementing dual-factor authentication on all email accounts, strengthening the security of our email systems, and reporting the incident to the appropriate government regulators.

We sincerely regret any inconvenience that this matter may cause you, and remain dedicated to protecting your information. Please see the addendum for additional steps you can take to protect your personal information. If you have any questions, please do not hesitate to call our support center at 1-866-775-4209, Monday through Friday, 9:00 a.m. to 6:30 p.m., Eastern Time.

Sincerely,



Terri Ingersoll
Chief Executive Officer
Tanglewood Manor, Inc.
560 Fairmount Avenue WE
Jamestown, NY 14701

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 three nationwide 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, New York, and North Carolina:

You can obtain information from the Maryland and North Carolina Offices of the Attorney 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	Rhode Island Office of the Attorney General	North Carolina Office of the Attorney General	Federal Trade Commission	New York Office of the Attorney General
Consumer Protection Division 200 St. Paul Place Baltimore, MD 21202 1-888-743-0023 www.oag.state.md.us	Consumer Protection 150 South Main Street Providence, RI 02903 1-401-274-4400 www.riag.ri.gov	Consumer Protection Division 9001 Mail Service Center Raleigh, NC 27699-9001 1-877-566-7226 www.ncdoj.com	Consumer Response Center 600 Pennsylvania Ave, NW Washington, DC 20580 1-877-IDTHEFT (438-4338) www.ftc.gov/idtheft	Bureau of Consumer Frauds & Protection The Capitol Albany, NY 12224-0341 1-800-771-7755 https://ag.ny.gov/consumer-frauds/identity-theft

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 by phone and online with Equifax (https://assets.equifax.com/assets/personal/Fraud_Alert_Request_Form.pdf), Experian (<https://www.experian.com/fraud/center.html>) or TransUnion (<https://www.transunion.com/fraud-alerts>). 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. As of September 21, 2018, initial fraud alerts last for one year. Victims of identity theft can also get an extended fraud alert for seven years. The phone numbers for all three credit bureaus are at the bottom of this page.

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, regular stamped mail, telephone 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 or a minor under the age of 16, 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. As of September 21, 2018, it is free to place, lift, or remove a security freeze. You may also place a security freeze for children under the age of 16. You may obtain a free security freeze by contacting each of the following national consumer reporting agencies:

Equifax Security Freeze P.O. Box 105788 Atlanta, GA 30348 www.freeze.equifax.com 800-525-6285	Experian Security Freeze P.O. Box 9554 Allen, TX 75013 www.experian.com/freeze 888-397-3742	TransUnion (FVAD) P.O. Box 2000 Chester, PA 19022 freeze.transunion.com 800-680-7289
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More information can also be obtained by contacting the Federal Trade Commission listed above.

TAKE ADVANTAGE OF YOUR IDENTITY MONITORING SERVICES

You've been provided with access to the following services¹ 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.

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 Chrome, Firefox, Safari and Edge. 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.