

Mail Handling Services
777 E Park Dr
Harrisburg, PA 17111



15954

October 25, 2019

Re: Notification of Data Security Incident

Dear [REDACTED]

We are writing to inform you of a data security incident experienced by Sweetser that may have affected your personal information. Sweetser takes the privacy and security of your information very seriously and regrets any concern that this incident may cause. We are writing to notify you of this incident, inform you about steps that can be taken to help protect your personal information, and offer services to assist you.

What Happened? On June 24, 2019, we discovered unusual activity in an employee's email account. We immediately took steps to secure the account and launched an investigation to determine whether additional email accounts were involved and whether any personal information had been accessed without authorization. We also engaged an independent digital forensics firm to assist with this investigation. On September 10, 2019, our investigation determined that email accounts accessed without authorization included your personal information. Please note that this incident was limited to information transmitted via email and did not affect any other information systems.

What Information Was Involved? The information may have included your name, address, date of birth, telephone number, Social Security number, health insurance information and identification number, driver's license number, Medicare or Medicaid information, payment or claims information, diagnostic codes, and information regarding medical conditions and treatment.

What We Are Doing. As soon as we discovered this incident, we took the measures referenced above. We also implemented enhanced security measures applicable to our email system in order to better safeguard all personal information in our possession and to help prevent a similar incident from occurring in the future. In addition, we reported this matter to the Federal Bureau of Investigation and will provide whatever assistance is necessary to hold the perpetrators of this incident accountable. Additionally, out of an abundance of caution, we are providing you with information about steps you can take to help protect your information and offering complimentary credit monitoring and identity protection services through Experian.

What You Can Do. We recommend that you review the guidance included with this letter about how to protect your personal information. In addition, we recommend that you enroll in the complimentary credit monitoring and identity protection services being offered through Experian. Enrollment instructions and a description of the services being provided are included with this letter.

For More Information. If you have questions or need assistance, please contact 1-833-444-4458, Monday through Friday from 8 a.m. to 5 p.m. Eastern Standard Time. Our representatives are fully versed on this incident and can answer any questions you may have regarding the protection of your personal information.

Thank you for your patience through this incident. We take your trust in us and this matter very seriously. Please accept our sincere apologies and know that we deeply regret any worry or inconvenience that this may cause you.

Sincerely,

Debra Taylor
President & CEO
Sweetser

Steps You Can Take to Further Protect Your Information

Review Your Account Statements and Notify Law Enforcement of Suspicious Activity

As a precautionary measure, we recommend that you remain vigilant by reviewing your account statements and credit reports closely. If you detect any suspicious activity on an account, you should promptly notify the financial institution or company with which the account is maintained. You also should promptly report any fraudulent activity or any suspected incidence of identity theft to proper law enforcement authorities, your state attorney general, and/or the Federal Trade Commission (FTC).

Copy of Credit Report: You may obtain a free copy of your credit report from each of the three major credit reporting agencies once every 12 months by visiting <http://www.annualcreditreport.com/>, calling toll-free 877-322-8228, or by completing an Annual Credit Report Request Form and mailing it to Annual Credit Report Request Service, P.O. Box 105281, Atlanta, GA 30348. You can print this form at <https://www.annualcreditreport.com/cra/requestformfinal.pdf>. You also can contact one of the following three national credit reporting agencies:

TransUnion	Experian	Equifax	Free Annual Report
P.O. Box 1000 Chester, PA 19016 1-877-322-8228 www.transunion.com	P.O. Box 9532 Allen, TX 75013 1-888-397-3742 www.experian.com	P.O. Box 105851 Atlanta, GA 30348 1-800-525-6285 www.equifax.com	P.O. Box 105281 Atlanta, GA 30348 1-877-322-8228 annualcreditreport.com

Fraud Alert: You may want to consider placing a fraud alert on your credit report. An initial fraud alert is free and will stay on your credit file for at least 90 days. The alert informs creditors of possible fraudulent activity within your report and requests that the creditor contact you prior to establishing any accounts in your name. To place a fraud alert on your credit report, contact any of the three credit reporting agencies identified above. Additional information is available at <http://www.annualcreditreport.com>.

Security Freeze: You have the right to put a security freeze on your credit file. This will prevent new credit from being opened in your name without the use of a PIN number that is issued to you when you initiate the freeze. A security freeze is designed to prevent potential creditors from accessing your credit report without your consent. As a result, using a security freeze may interfere with or delay your ability to obtain credit. You must separately place a security freeze on your credit file with each credit reporting agency. There is no charge to place, lift or remove the security freeze. In order to place a security freeze, you may be required to provide the consumer reporting agency with information that identifies you including your full name, Social Security number, date of birth, current and previous addresses, a copy of your state-issued identification card, and a recent utility bill, bank statement or insurance statement.

Additional Free Resources: You can obtain information from the consumer reporting agencies, the FTC or from your respective state Attorney General about steps you can take toward preventing identity theft. You may report suspected identity theft to local law enforcement, including to the FTC or to the Attorney General in your state. Residents of Maryland, North Carolina, and Rhode Island can obtain more information from their Attorneys General using the contact information below.

Federal Trade Commission	Maryland Attorney General	North Carolina Attorney General	Rhode Island Attorney General
600 Pennsylvania Ave, NW Washington, DC 20580 consumer.ftc.gov , and www.ftc.gov/idtheft 1-877-438-4338	200 St. Paul Place Baltimore, MD 21202 oag.state.md.us 1-888-743-0023	9001 Mail Service Center Raleigh, NC 27699 ncdoj.gov 1-877-566-7226	150 South Main Street Providence, RI 02903 http://www.riag.ri.gov 401-274-4400

You also have certain rights under the Fair Credit Reporting Act (FCRA), including: to know what is in your file; to dispute incomplete or inaccurate information; to have consumer reporting agencies correct or delete inaccurate, incomplete, or unverifiable information, as well as others. For more information about the FCRA, and your rights pursuant to the FCRA, please visit http://files.consumerfinance.gov/f/201504_cfpb_summary_your-rights-under-fcra.pdf.

Your Membership of Experian IdentityWorksSM Identity Protection

To help protect your identity, we are offering a **complimentary** two-year membership of Experian IdentityWorksSM Credit 3B. 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.

Activate IdentityWorks Credit 3B Now in Three Easy Steps

1. ENROLL by: **1.16.20** (Your code will not work after this date.)
2. VISIT the **Experian IdentityWorks** website to enroll: **<https://www.experianidworks.com/3bcredit>**
3. PROVIDE the **Activation Code:** [REDACTED]

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 **877.288.8057**. Be prepared to provide engagement number [REDACTED] as proof of eligibility for the identity restoration services by Experian.

ADDITIONAL DETAILS REGARDING YOUR EXPERIAN IDENTITYWORKS CREDIT 3B MEMBERSHIP:

Once you enroll in Experian IdentityWorks, you will have access to the following additional features:

- **Tri-Bureau Credit Monitoring:** Makes you aware of changes to your credit report across the three major credit reporting bureaus: TransUnion, Experian, and Equifax. Checks your credit file daily and notifies you via email of any changes to your credit reports, including loan data, inquiries, new accounts, judgments, liens and more.
- **Daily Credit Reports:** Helps you stay aware of your credit history with easy access to your credit report that includes data from all three bureaus. Your Experian credit report includes your credit history and information, such as accounts in delinquency or new accounts opened.
- **Identity Restoration:** Experian provides full-service Identity Restoration in the event of identity theft. Even if you simply suspect a problem, a certified Identity Restoration specialist will work with you to identify and resolve the issue.
- **Identity Theft Insurance:** In the event that your identity is compromised, Identity Theft Insurance* provided under policies issued to Experian IdentityWorks reimburses you for certain expenses with a \$1 million policy.

**Activate your membership today at <https://www.experianidworks.com/3bcredit>
or call 877.288.8057 with the above Activation Code**

* The Identity Theft Insurance is underwritten and administered by American Bankers Insurance Company of Florida, an Assurant company under group or blanket policy(ies). 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.

ADDITIONAL INFO 15954

Hotchkiss, Anne (SCA)

From: Slaughter, Robert <Robert.Slaughter@lewisbrisbois.com>
Sent: Wednesday, October 30, 2019 12:26 PM
To: Hotchkiss, Anne (SCA)
Cc: Yoegel, Kevin
Subject: RE: Data Breach - 15954

Follow Up Flag: Follow up
Flag Status: Flagged

Hi Anne,

Thanks for your email, and I apologize for any confusion.

To clarify, Sweetser notified 52 Massachusetts residents in total pursuant to the HIPAA Breach Notification Rule.

Of those 52:

- 35 residents were notified solely pursuant to the HIPAA Breach Notification Rule, because they had data sets potentially implicated that would not have otherwise triggered notification obligations pursuant to M.G.L. Ch. 93H (for instance, a name and medical insurance information only);
- 17 residents were notified pursuant to both the HIPAA Breach Notification Rule as well as M.G.L. Ch. 93H, because they had data sets potentially implicated that would independently be "personal information" as defined by M.G.L. ch. 93H §1(a) (here, a name and Social Security number).

Please let me know if this clears up the issue.

Best regards,

Robert



Robert L. Slaughter III
Partner
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From: Hotchkiss, Anne (SCA) [<mailto:anne.hotchkiss@state.ma.us>]
Sent: Wednesday, October 30, 2019 6:20 AM

To: Slaughter, Robert
Subject: [EXT] Data Breach - 15954

External Email

Hello Robert,

The Office of Consumer Affairs and Business Regulation (MA) has received a notification of a data breach dated October 28, 2019 in regards to Sweetser. We are in need of more information in order to fully process this notification.

-In the Number of Massachusetts Residents Affected section you indicate 52. In your letter to the Attorney General's office in paragraph one you indicate 52 Massachusetts residents may have been affected, of those, 17 residents are being notified pursuant to M.G.L. Ch. 93H because their personal information may have been impacted. In paragraph 4 of your letter you indicate 52 residents were notified. Please let me know how many Massachusetts residents were notified of this data breach and if only 17 were notified, why the additional 35 residents were not notified.

Please email your response with the missing information, a new letter is not needed.

If you have any questions, please let me know.

Thank you,
Anne

Anne Hotchkiss
Executive Assistant to the Undersecretary
Office of Consumer Affairs and Business Regulation
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Suite 5100
Boston, MA 02116

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