

May 9, 2022

Tawana B. Johnson, Esq.
470.419.6653 (direct)
Tawana.Johnson@WilsonElser.com

Via electronic-mail: Idtheft@oag.state.md.us

Office of the Attorney General
Attn: Security Breach Notification
200 St. Paul Place
Baltimore, MD 21202

Re:	Our Client	:	Quantum Imaging and Therapeutic Associates, Inc.
	Matter	:	Data Security Incident on October 7, 2021
	Wilson Elser File #	:	16516.01660

Dear Attorney General Frosh:

We represent Quantum Imaging and Therapeutics Associates, Inc. (“QITA”) headquartered in Lewisberry, Pennsylvania, with respect to a potential data security incident described in more detail below. QITA takes the security and privacy of the information in its control seriously, and has taken steps to prevent a similar incident from occurring in the future.

This letter will serve to inform you of the nature of the security breach, the number of Maryland residents that were potentially affected, what information has been compromised, and the steps that QITA is taking to secure the integrity of its systems. We have also enclosed hereto samples of the notifications made to the potentially impacted individuals, which includes an offer of free credit monitoring.

1. Nature of the Security Incident

On October 7, 2021, QITA was the target of a ransomware attack that may have resulted in the exposure of personal information. Although we have found no evidence that any information has been specifically accessed for misuse, it is possible that the potentially impacted individuals’ names, mailing addresses, dates of birth, social security numbers, and/or health information (radiology procedure code and/or radiology procedure code description) could have been exposed as a result of this attack.

As of this writing, QITA has not received any reports of related identity theft since the date of the incident (October 7, 2021 to present).

3348 Peachtree Road N.E., Suite 1400 • Atlanta, Georgia 30326 • p 470.419.6650 • f 470.419.6651

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2. Maryland Residents Notified

A total of two thousand six hundred and seventy-eight (2,678) residents of Maryland were potentially affected by this security incident. Notification letters to these individuals will be mailed on May 9, 2022, by first class mail. Sample copies of the notification letters are included with this letter.

3. Steps Taken

Immediately upon learning of this incident, QITA contacted a reputable third party forensic team to assist with its investigation. Since then, QITA has been working with law enforcement to help respond to this incident, along with cybersecurity experts to review all policies and procedures relating to the security of QITA's systems.

Although QITA is not aware of any evidence of misuse of personal information, QITA extended to all potentially impacted individuals an offer for free credit monitoring and identity theft protection through IDX. This service will include 12 months of credit monitoring, along with a fully managed identity theft recovery service, should the need arise.

4. Contact Information

QITA 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 Tawana.Johnson@WilsonElser.com or 470.419.6653.

Very truly yours,

Wilson Elser Moskowitz Edelman & Dicker LLP



Tawana B. Johnson, Esq.

Copy: Robert Walker, Esq. (Wilson Elser LLP)

Enclosure: *Sample Notification Letters*



Quantum Imaging & Therapeutic Associates, Inc.
P.O. Box 1907
Suwanee, GA 30024

To Enroll, Please Call:
(833) 909-4434
Or Visit:
<https://response.idx.us/quantum>
Enrollment Code: [XXXXXXXXXX]

Via First-Class Mail

Parent or Guardian of <<FirstName>><<LastName>>
<<Address1>><<Address2>>
<<City>>, <<State>> <<Zip>>

May 6, 2022

Notice of Data Security Incident

Dear Parent or Guardian of <<First Name>> <<Last Name>>,

Quantum Imaging & Therapeutic Associates, Inc. ("QITA") provides specialized diagnostic radiology services to health care providers in Pennsylvania. We are writing to inform you of an incident that may have exposed your child's personal information. We take the security of your child's personal information seriously and want to provide you with information and resources you can use to protect your child's information.

What Happened and What Information was Involved:

On October 7, 2021, QITA detected and stopped a network data security incident. Upon detection, we immediately started looking into the incident to determine what happened and how it happened. We also started looking into what type of information might have been affected and whether or not your child's information was specifically affected.

We investigated the incident thoroughly, and although we did not find any evidence that your child's information was specifically accessed for misuse, it is possible that your child's personal information was exposed to an unauthorized party.

While we have not identified any instances of identity theft or financial fraud from this incident, the following personal information could have been exposed to unauthorized party: first and last name, <<data elements>>.

What We Are Doing:

When we detected this incident, we responded quickly by reviewing the security of our network environment while working with outside information technology ("IT") specialists. We also notified law enforcement. QITA is continuously improving the security of our network environment by monitoring the evolving cyber security landscape and taking appropriate actions.

We value the safety of your child's personal information and are offering free identity theft protection services through IDX, a company that provides protection against identity theft. IDX's services include: <<12/24>> months of CyberScan monitoring and help with identity theft recovery services. With this protection, IDX will help you resolve issues if your child experiences identity theft related to this incident.

What You Can Do:

We encourage you to contact IDX with any questions and to enroll in free IDX services by calling (833) 909-4434 or going to <https://response.idx.us/quantum>. IDX is available Monday through Friday, 6 am - 6 pm PST. Please note that the last day to enroll in these free services is **August 6, 2022**.

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

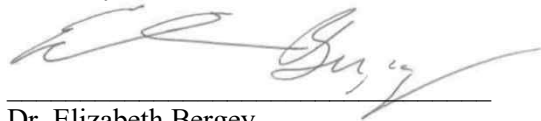
Enclosed you will find information regarding additional resources available to you, and the steps that you can take to further protect your child's personal information.

For More Information:

If you have any questions about the information in this letter, please call IDX services at (833) 909-4434, Monday through Friday, 6 am - 6 pm PST.

QITA values the security of the personal data that we protect.

Sincerely,

A handwritten signature in dark ink, appearing to read "Elizabeth Bergey", written over a horizontal line.

Dr. Elizabeth Bergey
President and CEO

Additional Information

Credit Reports: 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.

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, 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 any one or more of the following national consumer reporting agencies:

Equifax Security Freeze P.O. Box 105788 Atlanta, GA 30348 1-800-349-9960 https://www.equifax.com/personal/credit-report-services/credit-freeze/	Experian Security Freeze P.O. Box 9554 Allen, TX 75013 1-888-397-3742 www.experian.com/freeze/center.html	TransUnion Security Freeze P.O. Box 160 Woodlyn, PA 19094 1-800-909-8872 www.transunion.com/credit-freeze
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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);
- TransUnion (<https://www.transunion.com/fraud-alerts>); or
- Experian (<https://www.experian.com/fraud/center.html>).

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.

File Police Report: You have the right to file or obtain a police report if you 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 proof that you have been a victim. A police report is often required to dispute fraudulent items. You can generally report suspected incidents of identity theft to local law enforcement or to the Attorney General.

FTC and Attorneys General: You can further educate yourself regarding identity theft, fraud alerts, security freezes, and the steps you can take to protect yourself, by contacting the consumer reporting agencies, the Federal Trade Commission, or your state Attorney General.

The Federal Trade Commission can be reached at: 600 Pennsylvania Avenue NW, Washington, DC 20580, www.identitytheft.gov, 1-877-ID-THEFT (1-877-438-4338), 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. This notice has not been delayed by law enforcement.

For Maryland residents, the Attorney General can be contacted at 200 St. Paul Place, 16th Floor, Baltimore, MD 21202, 1-888-743-0023, and www.oag.state.md.us.

For 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 violators. 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. We encourage you to review your rights pursuant to the Fair Credit Reporting Act by visiting www.consumerfinance.gov/f/201504_cfpb_summary_your-rights-under-fcra.pdf or by writing Consumer Response Center, Room 130-A, Federal Trade Commission, 600 Pennsylvania Ave. N.W., Washington, D.C. 20580.

For North Carolina residents, the Attorney General can be contacted at 9001 Mail Service Center, Raleigh, NC 27699-9001, 1-877-566-7226 or 1-919-716-6400, and www.ncdoj.gov.

For 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, and <https://ag.ny.gov/>.

For Rhode Island residents, the Rhode Island Attorney General can be reached at 150 South Main Street, Providence, Rhode Island 02903, www.riag.ri.gov, and 1-401-274-4400. Under Rhode Island law, you have the right to obtain any police report filed in regard to this incident.



Quantum Imaging & Therapeutic Associates, Inc.
P.O. Box 1907
Suwanee, GA 30024

To Enroll, Please Call:
(833) 909-4434
Or Visit:
<https://response.idx.us/quantum>
Enrollment Code: [XXXXXXXXXX]

Via First-Class Mail

The Estate of <<FirstName>><<LastName>>
<<Address1>><<Address2>>
<<City>>, <<State>> <<Zip>>

May 6, 2022

Notice of Data Security Incident

To the Estate of <<First Name>> <<Last Name>>,

Quantum Imaging & Therapeutic Associates, Inc. ("QITA") provides specialized diagnostic radiology services to health care providers in Pennsylvania. We are writing to inform you of an incident that may have exposed the decedent's personal information. We take the security of patient information seriously and want to provide you with information and resources you can use to protect the decedent's information.

What Happened and What Information was Involved:

On October 7, 2021, QITA detected and stopped a network data security incident. Upon detection, we immediately started looking into the incident to determine what happened and how it happened. We also started looking into what type of information might have been affected and whether or not the decedent's information was specifically affected.

We investigated the incident thoroughly, and although we did not find any evidence that the decedent's information was specifically accessed for misuse, it is possible that the decedent's personal information was exposed to an unauthorized party.

While we have not identified any instances of identity theft or financial fraud from this incident, the following personal information could have been exposed to unauthorized party: first and last name, <<data elements>>.

What We Are Doing:

When we detected this incident, we responded quickly by reviewing the security of our network environment while working with outside information technology ("IT") specialists. We also notified law enforcement. QITA is continuously improving the security of our network environment by monitoring the evolving cyber security landscape and taking appropriate actions.

We value the safety of our patient's information and are offering free credit monitoring and identity theft protection services through IDX, a company that provides protection against identity theft. IDX's services include: <<12/24>> months of credit monitoring and help with identity theft recovery services. With this protection, IDX will help you resolve issues if the decedent experiences identity theft related to this incident.

What You Can Do:

We encourage you to contact IDX with any questions and to enroll in free IDX services by calling (833) 909-4434 or going to <https://response.idx.us/quantum>. IDX is available Monday through Friday, 6 am - 6 pm PST. Please note that the last day to enroll in these free services is **August 6, 2022**.

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

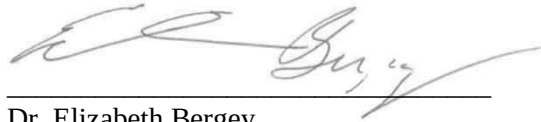
Enclosed you will find information regarding additional resources available to you, and the steps that you can take to further protect the decedent's personal information.

For More Information:

If you have any questions about the information in this letter, please call IDX services at (833) 909-4434, Monday through Friday, 6 am - 6 pm PST.

QITA values the security of the personal data that we protect.

Sincerely,

A handwritten signature in dark ink, appearing to read "Elizabeth Bergey", is written over a horizontal line.

Dr. Elizabeth Bergey
President and CEO

Additional Information

Credit Reports: 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.

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, 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 any one or more of the following national consumer reporting agencies:

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Fraud Alerts: You can place fraud alerts with the three credit bureaus by phone and online with:

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Monitoring: You should always remain vigilant and monitor your accounts for suspicious or unusual activity.

File Police Report: You have the right to file or obtain a police report if you 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 proof that you have been a victim. A police report is often required to dispute fraudulent items. You can generally report suspected incidents of identity theft to local law enforcement or to the Attorney General.

FTC and Attorneys General: You can further educate yourself regarding identity theft, fraud alerts, security freezes, and the steps you can take to protect yourself, by contacting the consumer reporting agencies, the Federal Trade Commission, or your state Attorney General.

The Federal Trade Commission can be reached at: 600 Pennsylvania Avenue NW, Washington, DC 20580, www.identitytheft.gov, 1-877-ID-THEFT (1-877-438-4338), 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. This notice has not been delayed by law enforcement.

For Maryland residents, the Attorney General can be contacted at 200 St. Paul Place, 16th Floor, Baltimore, MD 21202, 1-888-743-0023, and www.oag.state.md.us.

For 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 violators. 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. We encourage you to review your rights pursuant to the Fair Credit Reporting Act by visiting www.consumerfinance.gov/f/201504_cfpb_summary_your-rights-under-fcra.pdf or by writing Consumer Response Center, Room 130-A, Federal Trade Commission, 600 Pennsylvania Ave. N.W., Washington, D.C. 20580.

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For 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, and <https://ag.ny.gov/>.

For Rhode Island residents, the Rhode Island Attorney General can be reached at 150 South Main Street, Providence, Rhode Island 02903, www.riag.ri.gov, and 1-401-274-4400. Under Rhode Island law, you have the right to obtain any police report filed in regard to this incident.



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Enrollment Code: [XXXXXXXXXX]

Via First-Class Mail

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

May 6, 2022

Notice of Data Security Incident

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

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What Happened and What Information was Involved:

On October 7, 2021, QITA detected and stopped a network data security incident. Upon detection, we immediately started looking into the incident to determine what happened and how it happened. We also started looking into what type of information might have been affected and whether or not your information was specifically affected.

We investigated the incident thoroughly, and although we did not find any evidence that your information was specifically accessed for misuse, it is possible that your information was exposed to an unauthorized party.

While we have not identified any instances of identity theft or financial fraud from this incident, your following personal information could have been exposed to unauthorized party: first and last name, <<data elements>>.

What We Are Doing:

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What You Can Do:

We encourage you to contact IDX with any questions and to enroll in free IDX services by calling (833) 909-4434 or going to <https://response.idx.us/quantum>. IDX is available Monday through Friday, 6 am - 6 pm PST. Please note that the last day to enroll in these free services is **August 6, 2022**.

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

Enclosed you will find information regarding additional resources available to you, and the steps that you can take to further protect your personal information.

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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. This notice has not been delayed by law enforcement.

For Maryland residents, the Attorney General can be contacted at 200 St. Paul Place, 16th Floor, Baltimore, MD 21202, 1-888-743-0023, and www.oag.state.md.us.

For 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 violators. 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. We encourage you to review your rights pursuant to the Fair Credit Reporting Act by [visiting www.consumerfinance.gov/f/201504_cfpb_summary_your-rights-under-fcra.pdf](http://www.consumerfinance.gov/f/201504_cfpb_summary_your-rights-under-fcra.pdf) or by writing Consumer Response Center, Room 130-A, Federal Trade Commission, 600 Pennsylvania Ave. N.W., Washington, D.C. 20580.

For North Carolina residents, the Attorney General can be contacted at 9001 Mail Service Center, Raleigh, NC 27699-9001, 1-877-566-7226 or 1-919-716-6400, and www.ncdoj.gov.

For 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, and <https://ag.ny.gov/>.

For Rhode Island residents, the Rhode Island Attorney General can be reached at 150 South Main Street, Providence, Rhode Island 02903, www.riag.ri.gov, and 1-401-274-4400. Under Rhode Island law, you have the right to obtain any police report filed in regard to this incident.