

August 18, 2023

Via E-Mail: Idtheft@oag.state.md.us

Attorney General Brian E. Frosh
Office of the Attorney General
Identity Theft Unit
200 St. Paul Place
Baltimore, MD 21202

Re: Notice of Data Security Incident Involving Maryland Residents

Dear Attorney General Frosh:

The undersigned is legal counsel for Discovery at Home, LLC (“DAH”), located at 3461 Bonita Bay Blvd #100, Bonita Springs, FL 34134. DAH is a licensed home health agency which provides home health services to adult patients in Florida and Texas. We are writing to provide your office with the required notice of a recent data security incident.

Rest assured, DAH takes the security and privacy of its patients’ personal and health information seriously and is taking steps to prevent a similar incident from occurring in the future.

1. Description of the Incident.

On or about June 1, 2023, DAH became aware that an employee had fallen victim to a phishing email scheme which resulted in the inadvertent transmittal of personal health information via unencrypted e-mail to an unauthorized third-party sender. This resulted in personal health information of a Maryland resident being acquired by an unknown third party. Since becoming aware of the unauthorized disclosure, DAH has worked diligently to determine the facts and circumstances that led to the incident.

As of this writing, DAH has not received any reports of fraud or identity theft related to this disclosure. The elements of personal information that may have been compromised include: name, address, date of birth, medical information, including dates of service, certain treatment-related information, health insurance information, insurance beneficiary number, claim number and policy number. Please note that patient social security numbers were not disclosed in the incident.

2. Number of Maryland Residents Affected.

Upon further examination, DAH determined that the incident may have resulted in the exposure of information pertaining to approximately 1 Maryland resident. DAH mailed a notification letter to this individual on July 31, 2023, via First Class Mail. A sample copy of the letter sent to this resident is attached for your review as **Exhibit A**.

3. Steps Taken.

Upon understanding the scope of the incident, DAH took steps to secure the email accounts in question and to prevent further unauthorized disclosures of the information. Additionally, DAH has offered the impacted Maryland resident complimentary identity theft and credit monitoring services for twelve (12) months through Experian.

DAH is committed to ensuring the security of all information in its control and is taking steps to prevent a similar event from occurring in the future. As counsel, we are actively involved in assisting DAH in this process.

4. Contact Information.

If you have any questions or need additional information, please do not hesitate to contact us using the contact information provided above.

Very truly yours,

/s/ Maryam M. Meseha

Maryam Meseha, Esq., Partner

/s/ Radha V. Bachman

Radha V. Bachman, Esq., Partner

FISHERBROYLES, LLP

EXHIBITS

EXHIBIT A



Return Mail Processing
PO Box 999
Suwanee, GA 30024

111 *****AUTO**MIXED AADC 300

SAMPLE A. SAMPLE - L01

APT ABC



123 ANY ST

ANYTOWN, US 12345-6789



July 31, 2023

Notice of Data Security Incident

Dear Sample A. Sample:

We are writing to inform you that Discovery at Home, LLC (“DAH”) recently experienced a data security incident which may have affected your personal information. We take the protection and proper use of your information seriously and want to provide you with information and resources you can use to protect your information.

At present, there is no evidence that any of your personal information has been misused; however, out of an abundance of caution, we are notifying you of this incident and offering you the resources discussed below so that you can take precautionary steps to protect yourself, should you wish to do so.

What Happened

On or about June 1, 2023, DAH became aware that a team member had fallen victim to a phishing email scheme which resulted in the inadvertent transmittal of personal health information via unencrypted e-mail to an unauthorized third-party sender. This may have resulted in some of your information being acquired by an unknown third party. Since becoming aware of the unauthorized disclosure, we have worked diligently to determine what happened and what information was potentially involved as a result of this incident.

What Information Was Involved

At present, there is no evidence that any of your personal information has been misused; however, elements of your personal information that may have been compromised included your: name, address, date of birth, medical information, including your dates of service, certain treatment-related information, and health insurance information, your insurance beneficiary number, claim number and policy number. **Please note that your social security number was not affected by this incident.**

What We Are Doing

We take the security of information that our patients entrust in us very seriously. Upon discovery, we immediately secured the email accounts in question and took steps to prevent further unauthorized disclosure. In addition to providing this notice to you, we are providing notice to privacy regulators and other parties as required.

We want to make sure you have the information you need so that you can take steps to help protect yourself from identity theft. We encourage you to remain vigilant and to regularly review and monitor relevant account statements and credit reports and report suspected incidents of identity theft to local law enforcement, your state's Attorney General, or the Federal Trade Commission (the "FTC"). We have included more information on these steps in this letter.

What You Can Do

Complimentary Identity Protection and Credit Monitoring Services

To help protect your identity, we are offering a complimentary 12 month membership of Experian's® IdentityWorksSM. This product provides you with superior identity detection and resolution of identity theft. To activate your membership and start monitoring your personal information please follow the steps below:

- Ensure that you **enroll by: October 31, 2023** (Your code will not work after this date.)
- **Visit** the Experian IdentityWorks website to enroll: <https://www.experianidworks.com/credit>
- Provide your **activation code: ABCDEFGHI**

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 844-955-2743 by **October 31, 2023**. Be prepared to provide engagement number **B100122** 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 file for indicators of fraud.
- **Identity Restoration:** Identity Restoration agents are immediately available to help you address credit and non-credit related fraud.
- **Experian IdentityWorks ExtendCARETM:** You receive the same high-level of Identity Restoration support even after your Experian IdentityWorks membership has expired.
- **Up to \$1 Million Identity Theft Insurance^{**}:** Provides coverage for certain costs and unauthorized electronic fund transfers.

* Offline members will be eligible to call for additional reports quarterly after enrolling.

** The Identity Theft Insurance is underwritten and administered by American Bankers Insurance Company of Florida, an Assurant company. Please refer to the actual policies for terms, conditions, and exclusions of coverage. Coverage may not be available in all jurisdictions.

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 at 844-955-2743. 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).

Please note that this Identity Restoration support is available to you for 12 months from the date of this letter and does not require any action on your part at this time. The Terms and Conditions for this offer are located at www.ExperianIDWorks.com/restoration. You will also find self-help tips and information about identity protection at this site.

Additional Steps

In addition to enrolling in the complimentary identity theft protection services being offered, we encourage you to review the enclosed *Steps You Can Take to Protect Your Information* for additional information on how to protect against identify theft and fraud.

For More Information

On behalf of DAH, please accept my sincere apology for this isolated incident and any inconvenience it may cause you. DAH values its relationship with its patients and others who provide us with information.

I can assure you that we are taking steps intended to prevent an incident like this from reoccurring and protect you and your information, now and in the future.

Representatives are available till October 31, 2023, to assist you with questions regarding this incident, Monday through Friday 8 am – 10 pm CST, Saturday and Sunday 10 am – 7 pm CST (excluding major U.S. holidays).

Please call the help line at 844-955-2743 and supply the fraud specialist with your unique code listed above.

Sincerely,

<<Executive Name>>

<<Title>>

Discovery at Home, LLC

Additional Important Information

For residents of Hawaii, Michigan, Missouri, North Carolina, Vermont, Virginia, and Wyoming: 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 Vermont: If you do not have internet access but would like to learn more about how to place a security freeze on your credit report, contact the Vermont Attorney General's Office at 802-656-3183 (800-649-2424 toll free in Vermont only).

For residents of New Mexico: Individuals interacting with credit reporting agencies have rights under the Fair Credit Reporting Act. We encourage you to review your rights under the Fair Credit Reporting Act by visiting https://files.consumerfinance.gov/f/documents/bcfp_consumer-rights-summary_2018-09.pdf, or by requesting information in writing from the Consumer Financial Protection Bureau, 1700 G Street N.W., Washington, DC 20552.

For Residents of Washington, D.C.: You can obtain information about steps to take to avoid identity theft from the Office of the Attorney General for the District of Columbia at: 441 4th Street, NW, Washington, DC 20001; 202-727-3400; www.oag.dc.gov.

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 Consumer Protection Division, 200 St. Paul Place, Baltimore, MD 21202 1-888-743-0023
www.oag.state.md.us

Rhode Island Office of the Attorney General Consumer Protection, 150 South Main Street, Providence, RI 02903 1-401-274-4400 www.riag.ri.gov

North Carolina Office of the Attorney General Consumer Protection Division, 9001 Mail Service Center, Raleigh, NC 27699-9001 1-877-566-7226 www.ncdoj.com

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

New York Office of Attorney General Consumer Frauds & Protection, The Capitol, Albany, NY 12224 1-800-771-7755

<https://ag.ny.gov/consumer-frauds/identity-theft>

For residents of Massachusetts and Rhode Island: 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](https://assets.equifax.com/assets/personal/Fraud%20Alert%20Request%20Form.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.

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
equifax.com/personal/credit-report-services/
1-800-349-9960

Experian Security Freeze

P.O. Box 9554
Allen, TX 75013
experian.com/freeze/center.html
1-888-397-3742

TransUnion Security Freeze

P.O. Box 160
Woodlyn, PA 19094
transunion.com/credit-freeze
1-888-909-8872

More information can also be obtained by contacting the Federal Trade Commission listed above.