



A business advisory and advocacy law firm®

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March 24, 2024

VIA EMAIL (Idtheft@oag.state.md.us)

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

Re: Pembina County Memorial Hospital - Incident Notification

Dear Mr. Brown:

We are writing on behalf of our client, Pembina County Memorial Hospital (“Pembina”) (located at 301 Mountain Street East, Cavalier, ND 58220) to notify you of a data security incident involving eleven (11) Maryland residents. By providing this notice, Pembina does not waive any rights or defenses regarding the applicability of Maryland law or personal jurisdiction.

On April 13, 2023, Pembina detected suspicious activity on its network involving a potential ransomware incident. Upon identifying the activity, Pembina acted quickly to contain the threat, investigate, and ensure the security of its systems with the assistance of third-party forensic specialists. The investigation revealed that an unauthorized actor gained access to Pembina’s systems on March 7, 2023, and as a result likely obtained some information. On March 4, 2024, after an extensive forensic investigation and review, Pembina discovered that certain personal information was included within the files that were subject to unauthorized access or acquisition as a result of the incident. Further, on March 20, 2024, Pembina located the most recent contact information for these individuals and identified eleven (11) Maryland residents whose information was involved.

The personal information contained within the impacted data included first and last name, address, phone number, email address, date of birth, Social Security number, medical record number, patient ID account number, medical information, and/or health information. The types of impacted information varied by individual. Pembina has no evidence of financial fraud or identity theft related to this data. Nevertheless, out of an abundance of caution, Pembina wanted to inform you (and the affected residents) of the incident and to explain the steps that it is taking to help

safeguard the affected residents against identity fraud. Pembina is providing the affected residents with notification of this incident, commencing on or about March 25, 2024. The notice will be in substantially the same form as the letter attached hereto. Pembina is also offering the affected residents whose Social Security number was potentially impacted by the incident with complimentary one-year membership with a credit monitoring service. Pembina is advising the affected residents to always remain vigilant in reviewing financial account statements, explanation of benefits statements, and credit reports for fraudulent or irregular activity on a regular basis. Pembina is also advising the affected residents about the process for placing a fraud alert and/or security freeze on their credit files and obtaining free credit reports. Additionally, the affected residents are being provided with the contact information for the consumer reporting agencies and the Federal Trade Commission.

At Pembina, protecting the privacy of personal information is a top priority. Pembina is committed to maintaining the privacy of personal information in its possession and has taken many precautions to safeguard it. Pembina continually evaluates and modifies its practices and internal controls to enhance the security and privacy of personal information.

If you have any questions or wish to discuss this event further, please do not hesitate to call me on my direct dial (410) 456-2741 or email me at spollock@mcdonaldhopkins.com.

Sincerely Yours,

A handwritten signature in blue ink, appearing to read 'Spencer S. Pollock', with a stylized, flowing script.

Spencer S. Pollock, Esq., CIPP/US, CIPM

EXHIBIT A



March 25, 2024

IMPORTANT INFORMATION PLEASE REVIEW CAREFULLY

Dear [REDACTED],

The privacy and security of the personal information we maintain is of the utmost importance to Pembina County Memorial Hospital ("Pembina"). We are writing with important information regarding a recent data security incident that may have involved some of your personal information. We want to provide you with information about the incident, explain the services we are making available to you, and let you know that we continue to take significant measures to protect your personal information.

What Happened?

On April 13, 2023, we became aware of suspicious activity on our network.

What We Are Doing

Upon learning of this issue, we immediately took steps to contain the threat and secure our systems. We promptly launched an investigation in consultation with outside cybersecurity professionals who regularly investigate and analyze these types of situations to determine whether any sensitive data had been compromised as a result of the incident. On March 4, 2024, we completed our extensive forensic investigation and manual document review which determined that an unauthorized actor accessed our systems beginning on March 7, 2023 and, as a result, subsequently obtained certain files containing some of your personal information.

What Information Was Involved

The impacted files contained your full name and [REDACTED]
[REDACTED]

What You Can Do

In response to the incident, we are providing you with access to **Single Bureau Credit Monitoring/Single Bureau Credit Report/Single Bureau Credit Score** services at no charge. These services provide you with alerts for twelve (12) months from the date of enrollment when changes occur to your credit file. This notification is sent to you the same day that the change or update takes place with the bureau. Finally, we are providing you with proactive fraud assistance to help with any questions that you might have or in the event that you become a victim of fraud. These services will be provided by Cyberscout, a TransUnion company specializing in fraud assistance and remediation services.

To enroll in Credit Monitoring services at no charge, please log on to [REDACTED] and follow the instructions provided. When prompted, please provide the following unique code to receive services:
[REDACTED]

[REDACTED]

In order for you to receive the monitoring services described above, you must enroll within 90 days from the date of this letter. The enrollment requires an internet connection and e-mail account and may not be available to minors under the age of 18 years of age. Please note that when signing up for monitoring services, you may be asked to verify personal information for your own protection to confirm your identity.

This letter also provides other precautionary measures you can take to protect your personal information, including placing a Fraud Alert and Security Freeze on your credit files, and obtaining a free credit report. Additionally, you should always remain vigilant in reviewing your financial account statements, explanation of benefits statements, and credit reports for fraudulent or irregular activity on a regular basis.

For More Information

Please accept our apologies that this incident occurred. We are committed to maintaining the privacy of personal information in our possession and have taken many precautions to safeguard it. We continually evaluate and modify our practices and internal controls to enhance the security and privacy of your personal information.

If you have any further questions regarding this incident, please call the dedicated, confidential toll-free response line we have set up to respond to questions at [REDACTED]. The response line is staffed with professionals familiar with this incident and knowledgeable about what you can do to protect against misuse of your information. The response line is available between the hours of 8:00 a.m. to 8:00 p.m. Eastern time, Monday through Friday, excluding holidays.

Sincerely,

Pembina County Memorial Hospital
301 Mountain Street East
Cavalier, ND 58220
701-265-6319

- OTHER IMPORTANT INFORMATION -

1. **Placing a Fraud Alert on Your Credit File.**

Whether or not you choose to use the complimentary credit monitoring services, we recommend that you place an initial one (1) year “Fraud Alert” on your credit files, at no charge. A fraud alert tells creditors to contact you personally before they open any new accounts. To place a fraud alert, call any one of the three major credit bureaus at the numbers listed below. As soon as one credit bureau confirms your fraud alert, they will notify the others.

Equifax

P.O. Box 105069
Atlanta, GA 30348-5069
<https://www.equifax.com/personal/credit-report-services/credit-fraud-alerts/>
(800) 525-6285

Experian

P.O. Box 9554
Allen, TX 75013
<https://www.experian.com/fraud-center.html>
(888) 397-3742

TransUnion

Fraud Victim Assistance Department
P.O. Box 2000
Chester, PA 19016-2000
<https://www.transunion.com/fraud-alerts>
(800) 680-7289



2. **Consider Placing a Security Freeze on Your Credit File.**

If you are very concerned about becoming a victim of fraud or identity theft, you may request a “Security Freeze” be placed on your credit file, at no charge. A security freeze prohibits, with certain specific exceptions, the consumer reporting agencies from releasing your credit report or any information from it without your express authorization. You may place a security freeze on your credit report by contacting all three nationwide credit reporting companies at the numbers below and following the stated directions or by sending a request in writing, by mail, to all three credit reporting companies:

Equifax Security Freeze

P.O. Box 105788
Atlanta, GA 30348-5788
<https://www.equifax.com/personal/credit-report-services/credit-freeze/>
(888) 298-0045

Experian Security Freeze

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

TransUnion Security Freeze

P.O. Box 160
Woodlyn, PA 19094
<https://www.transunion.com/credit-freeze>
(888) 909-8872

In order to place the security freeze, you’ll need to supply your name, address, date of birth, Social Security number and other personal information. After receiving your freeze request, each credit reporting company will send you a confirmation letter containing a unique PIN (personal identification number) or password. Keep the PIN or password in a safe place. You will need it if you choose to lift the freeze.

If your personal information has been used to file a false tax return, to open an account or to attempt to open an account in your name or to commit fraud or other crimes against you, you may file a police report in the City in which you currently reside.

If you do place a security freeze prior to enrolling in the credit monitoring service as described above, you will need to remove the freeze in order to sign up for the credit monitoring service. After you sign up for the credit monitoring service, you may refreeze your credit file.

3. **Obtaining a Free Credit Report.**

Under federal law, you are entitled to one free credit report every 12 months from each of the above three major nationwide credit reporting companies. Call **1-877-322-8228** or request your free credit reports online at **www.annualcreditreport.com**. Once you receive your credit reports, review them for discrepancies. Identify any accounts you did not open or inquiries from creditors that you did not authorize. Verify all information is correct. If you have questions or notice incorrect information, contact the credit reporting company.

4. **Additional Helpful Resources.**

Even if you do not find any suspicious activity on your initial credit reports, the Federal Trade Commission (FTC) recommends that you check your credit reports periodically. Checking your credit report periodically can help you spot problems and address them quickly.

If you find suspicious activity on your credit reports or have reason to believe your information is being misused, call your local law enforcement agency and file a police report. Be sure to obtain a copy of the police report, as many creditors will want the information it contains to absolve you of the fraudulent debts.

You may also file a complaint with the FTC by contacting them on the web at www.ftc.gov/idtheft, by phone at 1-877-IDTHEFT (1-877-438-4338), or by mail at Federal Trade Commission, Consumer Response Center, 600 Pennsylvania Avenue, NW, Washington, DC 20580. Your complaint will be added to the FTC's Identity Theft Data Clearinghouse, where it will be accessible to law enforcement for their investigations. In addition, you may obtain information from the FTC about fraud alerts and security freezes.

If this notice letter states that your financial account information and/or credit or debit card information was impacted, we recommend that you contact your financial institution to inquire about steps to take to protect your account, including whether you should close your account or obtain a new account number.

Protecting Your Medical Information.

The following practices can help to protect you from medical identity theft.

- Only share your health insurance cards with your health care providers and other family members who are covered under your insurance plan or who help you with your medical care.
- Review your "explanation of benefits statement" which you receive from your health insurance company. Follow up with your insurance company or care provider for any items you do not recognize. If necessary, contact the care provider on the explanation of benefits statement and ask for copies of medical records from the date of the potential access (noted above) to current date.
- Ask your insurance company for a current year-to-date report of all services paid for you as a beneficiary. Follow up with your insurance company or the care provider for any items you do not recognize.

Iowa Residents: You may contact law enforcement or the Iowa Attorney General's Office to report suspected incidents of identity Theft: Office of the Attorney General of Iowa, Consumer Protection Division, Hoover State Office Building, 1305 East Walnut Street, Des Moines, IA 50319, www.iowaattorneygeneral.gov, Telephone: 515-281-5164. **Maryland Residents:** You may obtain information about avoiding identity theft from the Maryland Attorney General's Office: Office of the Attorney General of Maryland, Consumer Protection Division, 200 St. Paul Place, Baltimore, MD 21202, www.marylandattorneygeneral.gov, Telephone: 888-743-0023. **Massachusetts Residents:** Under Massachusetts law, you have the right to obtain a police report 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. **New York Residents:** You may obtain information about preventing identity theft from the New York Attorney General's Office: Office of the Attorney General, The Capitol, Albany, NY 12224-0341; <https://ag.ny.gov/consumer-frauds-bureau/identity-theft>; Telephone: 800-771-7755. **North Carolina Residents:** You may obtain information about preventing identity theft from the North Carolina Attorney General's Office: Office of the Attorney General of North Carolina, Consumer Protection Division, 9001 Mail Service Center, Raleigh, NC 27699-9001, www.ncdoj.gov/, Telephone: 877-566-7226. **Oregon Residents:** You may obtain information about preventing identity theft from the Oregon Attorney General's Office: Oregon Department of Justice, 1162 Court Street NE, Salem, OR 97301-4096, www.doj.state.or.us/, Telephone: 877-877-9392. **Washington D.C. Residents:** You may obtain information about preventing identity theft from the Office of the Attorney General for the District of Columbia, 400 6th Street NW, Washington D.C. 20001, <https://oag.dc.gov/consumer-protection>, Telephone: 202-442-9828. **New Mexico Residents:** You have rights under the federal Fair Credit Reporting Act (FCRA). These include, among others, the right to know what is in your file; to dispute incomplete or inaccurate information; and to have consumer reporting agencies correct or delete inaccurate, incomplete, or unverifiable information. For more information about the FCRA, please visit www.consumer.ftc.gov/articles/pdf-0096-fair-credit-reporting-act.pdf or www.ftc.gov. Further, pursuant to the Fair Credit Reporting Act, the consumer reporting bureaus must correct or delete inaccurate, incomplete, or unverifiable information; consumer reporting agencies may not report outdated negative information; access to consumers' files is limited; consumers must give consent for credit reports to be provided to employers; consumers may limit "prescreened" offers of credit and insurance based on information in their credit report; and consumers may seek damages from violators. Consumers 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 consumers to review their 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. *In Addition, New Mexico Consumers Have the Right to Obtain a Security Freeze or Submit a Declaration of Removal* As noted above, you may obtain a security freeze on your credit report to protect your privacy and ensure that credit is not granted in your name without your knowledge. You may submit a declaration of removal to remove information placed in your credit report as a result of being a victim of identity theft. You have a right to place a security freeze on your credit report or submit a declaration of removal pursuant to the Fair Credit Reporting and Identity Security Act. **Rhode Island Residents:** Under Rhode Island law, individuals have the right to obtain any policy report filed in regard to this event. You may contact law enforcement, such as the Rhode Island Attorney General's Office, to report incidents of identity theft or to learn about steps you can take to protect yourself from identity theft. You can contact the Rhode Island Attorney General at: Rhode Island Office of the Attorney General, 150 South Main Street, Providence, RI 02903, www.riag.ri.gov, (401) 274-4400. There was approximately 1 Rhode Island resident that may be impacted by this incident.



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