



MULLEN
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February 14, 2025

VIA E-MAIL

Office of the Attorney General
Attn: Security Breach Notification
200 St. Paul Place
Baltimore, MD 21202
E-mail: idtheft@oag.state.md.us

Re: Notice of Data Event

To Whom It May Concern:

We represent American Renal Management LLC d/b/a Innovative Renal Care (“IRC”), located at 1550 W McEwen Drive, Suite 600, Franklin, TN 37067, and are writing to notify your Office of an incident that may affect the security of information relating to certain Maryland residents. This notice will be supplemented with any new significant facts learned subsequent to its submission. By providing this notice, IRC does not waive any rights or defenses regarding the applicability of Maryland law, the applicability of the Maryland data event notification statute, or personal jurisdiction.

Nature of the Data Event

On February 29, 2024, IRC learned of suspicious activity within certain computer systems. Upon learning of the activity, IRC quickly took steps to secure its information technology environment and began an investigation to determine the nature and scope of the activity. The investigation determined an unauthorized actor accessed certain computer systems between February 21, 2024 and March 1, 2024. During this time, files from certain internal systems were copied. As a result, IRC undertook an extensive review of the involved files and folders to determine whether they contained sensitive information, to whom the information relates, and to which facilities affected individuals received treatment from. On or about February 5, 2025, IRC completed the review and confirmed the potentially affected information, which varies by individual, includes name, Social Security number, medical information, and health insurance information.

Notice to Maryland Residents

On or about February 14, 2025, IRC provided written notice of this incident to individuals, including approximately four hundred sixty-four (464) Maryland residents. Written notice is being provided in substantially the same form as the letter attached here as **Exhibit A**. Notification to affected individuals is ongoing, and IRC may supplement this notification if it is determined that a significant amount of additional Maryland residents will receive notice.

Other Steps Taken and To Be Taken

Upon discovering the incident, IRC moved quickly to investigate and respond to the incident, assess the security of IRC systems, and identify potentially affected individuals. Further, IRC notified federal law enforcement regarding the incident and is also reviewing existing security policies and have implemented additional measures to further protect against similar incidents moving forward. IRC is providing access to complimentary credit monitoring services to individuals for twelve (12) months, through IDX, to individuals whose Social Security number or similar identifier was potentially affected by this incident.

Additionally, IRC is providing impacted individuals with guidance on how to better protect against identity theft and fraud, including information on how to place a fraud alert and security freeze on one's credit file, the contact details for the national consumer reporting agencies, information on how to obtain a free credit report, a reminder to remain vigilant for incidents of fraud and identity theft by reviewing account statements and monitoring free credit reports and explanations of benefits, and encouragement to contact the Federal Trade Commission, their state Attorney General, and law enforcement to report attempted or actual identity theft and fraud. IRC is providing written notice of this incident to relevant state and federal regulators, as necessary.

Contact Information

Should you have any questions regarding this notification or other aspects of the incident, please contact us at (267) 930-4637.

Very truly yours,



Gregory Lederman of
MULLEN COUGHLIN LLC

GCL/laf
Enclosure

Exhibit A



Innovative Renal Care

P.O. Box 989728

West Sacramento, CA 95798-9728

<<First Name>> <<Last Name>>

<<Address1>>

<<Address2>>

<<City>>, <<State>> <<Zip>>

<<Country>>

Enrollment Code: <<ENROLLMENT>>

To Enroll, Scan the QR Code Below:



Or Visit:

<https://app.idx.us/account-creation/protect>

February 14, 2025

Dear <<First Name>> <<Last Name>>:

American Renal Management LLC d/b/a Innovative Renal Care is writing to inform you of an incident that may impact the privacy of some of your information. As you are aware, we manage a network of dialysis centers and providers across the United States. You are receiving this letter because you previously received services from an IRC associated facility. Although we are not aware of any identity theft or fraud as a result of this incident, we are providing you with information about the incident, our response, and steps you can take, should you feel it appropriate to do so.

What Happened? On February 29, 2024, we learned of suspicious activity within certain computer systems. Upon learning of the activity, we immediately took steps to secure our environment and began an investigation to determine the nature and scope of the activity. The investigation determined an unauthorized actor accessed certain computer systems between February 21, 2024 and March 1, 2024. During this time, files from certain internal systems were copied. As a result, we undertook an extensive review of the involved files and folders to determine whether they contained sensitive information, to whom the information relates, and to which facilities affected individuals received treatment from.

What Information Was Involved? This review was recently completed, and we determined that your information was present in the involved files and we are notifying you out of an abundance of caution. This information includes your name, <<Variable 3: Data Elements>>.

What We Are Doing. We treat the responsibility to safeguard information in our possession as an utmost priority. Upon learning of this incident, we promptly took steps to secure our systems, began a comprehensive investigation, and worked diligently to provide affected individuals with notice. As part of our commitment to the privacy and security of information in our care, we continue to review and enhance existing policies and procedures relating to data protection and security. We also implemented additional security measures to mitigate risk associated with this event and to help prevent similar future incidents. We also notified law enforcement and are providing notice of this incident to relevant regulators.

Out of an abundance of caution, we are also offering you complimentary access to <<twelve (12)/twenty-four (24)>> months of credit monitoring and identity restoration services through IDX. While we are covering the cost of these services, due to privacy restrictions, you will need to complete the activation process yourself. Enrollment instructions are included in this letter below.

What You Can Do. Although there is no evidence of any actual or attempted identity theft or fraud of your information, as a general best practice, we encourage you to remain vigilant against incidents of identity theft and fraud by reviewing your account statements and monitoring your free credit reports and explanation of benefits for suspicious

activity and to detect errors. You can also find out more about how to safeguard your information in the enclosed *Steps You Can Take to Help Protect Your Information*.

For More Information. We understand you may have questions about this incident that are not addressed in this letter. To ensure your questions are answered in a timely manner, please call the dedicated assistance line at: 1-877-927-4394, from 9 am – 9 pm Eastern Time Monday through Friday, except holidays. You may also write to us directly at: 1550 W McEwen Drive, Suite 600, Franklin, TN 37067.

Sincerely,

American Renal Management LLC d/b/a Innovative Renal Care

STEPS YOU CAN TAKE TO HELP PROTECT YOUR INFORMATION

Enroll in Monitoring Services

1. Website and Enrollment. Scan the QR image or go to <https://app.idx.us/account-creation/protect> and follow the instructions for enrollment using your Enrollment Code provided at the top of the letter. Please note the deadline to enroll is May 14, 2025.

2. Activate the credit monitoring provided as part of your IDX identity protection membership. The monitoring included in the membership must be activated to be effective. Note: You must have established credit and access to a computer and the internet to use this service. If you need assistance, IDX will be able to assist you.

3. Telephone. Contact IDX at 1-877-927-4394 to gain additional information about this event and speak with knowledgeable representatives about the appropriate steps to take to protect your credit identity.

Monitor Your Accounts

Under U.S. law, a consumer is entitled to one free credit report annually from each of the three major credit reporting bureaus, Equifax, Experian, and TransUnion. To order a free credit report, visit www.annualcreditreport.com or call, toll-free, 1-877-322-8228. Consumers may also directly contact the three major credit reporting bureaus listed below to request a free copy of their credit report.

Consumers have the right to place an initial or extended “fraud alert” on a credit file at no cost. An initial fraud alert is a 1-year alert that is placed on a consumer’s credit file. Upon seeing a fraud alert display on a consumer’s credit file, a business is required to take steps to verify the consumer’s identity before extending new credit. If consumers are the victim of identity theft, they are entitled to an extended fraud alert, which is a fraud alert lasting seven years. Should consumers wish to place a fraud alert, please contact any of the three major credit reporting bureaus listed below.

As an alternative to a fraud alert, consumers have the right to place a “credit freeze” on a credit report, which will prohibit a credit bureau from releasing information in the credit report without the consumer’s express authorization. The credit freeze is designed to prevent credit, loans, and services from being approved in a consumer’s name without consent. However, consumers should be aware that using a credit freeze to take control over who gets access to the personal and financial information in their credit report may delay, interfere with, or prohibit the timely approval of any subsequent request or application they make regarding a new loan, credit, mortgage, or any other account involving the extension of credit. Pursuant to federal law, consumers cannot be charged to place or lift a credit freeze on their credit report. To request a credit freeze, individuals may need to provide some or all of the following information:

1. Full name (including middle initial as well as Jr., Sr., II, III, etc.);
2. Social Security number;
3. Date of birth;
4. Addresses for the prior two to five 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, etc.); and
7. A copy of either the police report, investigative report, or complaint to a law enforcement agency concerning identity theft if they are a victim of identity theft.

Should consumers wish to place a credit freeze or fraud alert, please contact the three major credit reporting bureaus listed below:

Equifax	Experian	TransUnion
https://www.equifax.com/personal/credit-report-services/	https://www.experian.com/help/	https://www.transunion.com/credit-help
1-888-298-0045	1-888-397-3742	1-833-799-5355
Equifax Fraud Alert, P.O. Box 105069 Atlanta, GA 30348-5069	Experian Fraud Alert, P.O. Box 9554, Allen, TX 75013	TransUnion Fraud Alert, P.O. Box 2000, Chester, PA 19016
Equifax Credit Freeze, P.O. Box 105788 Atlanta, GA 30348-5788	Experian Credit Freeze, P.O. Box 9554, Allen, TX 75013	TransUnion Credit Freeze, P.O. Box 160, Woodlyn, PA 19094

Additional Information

Consumers may further educate themselves regarding identity theft, fraud alerts, credit freezes, and the steps they can take to protect your personal information by contacting the consumer reporting bureaus, the Federal Trade Commission, or their state Attorney General. The Federal Trade Commission may be reached at: 600 Pennsylvania Avenue NW, Washington, D.C. 20580; www.identitytheft.gov; 1-877-ID-THEFT (1-877-438-4338); and 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. Consumers can obtain further information on how to file such a complaint by way of the contact information listed above. Consumers have the right to file a police report if they ever experience identity theft or fraud. Please note that in order to file a report with law enforcement for identity theft, consumers will likely need to provide some proof that they have been a victim. Instances of known or suspected identity theft should also be reported to law enforcement and the relevant state Attorney General. This notice has not been delayed by law enforcement.

For District of Columbia residents, the District of Columbia Attorney General may be contacted at: 400 6th Street, NW, Washington, D.C. 20001; (202) 442-9828; and oag.dc.gov. American Renal Management LLC d/b/a Innovative Renal Care is located at 1550 W McEwen Drive, Suite 600, Franklin, TN 37067.

For Maryland residents, the Maryland Attorney General may be contacted at: 200 St. Paul Place, 16th Floor, Baltimore, MD 21202; 1-410-576-6300 or 1-888-743-0023; and <https://www.marylandattorneygeneral.gov/>. American Renal Management LLC d/b/a Innovative Renal Care is located at 1550 W McEwen Drive, Suite 600, Franklin, TN 37067.

For New Mexico residents, consumers have rights pursuant to the Fair Credit Reporting Act, such as the right to be told if information in their credit file has been used against them, the right to know what is in their credit file, the right to ask for their credit score, and the right to dispute incomplete or inaccurate information. 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.

For New York residents, the New York Attorney General may be contacted at: Office of the Attorney General, The Capitol, Albany, NY 12224-0341; 1-800-771-7755; or <https://ag.ny.gov>.

For North Carolina residents, the North Carolina Attorney General may be contacted at: 9001 Mail Service Center, Raleigh, NC 27699-9001; 1-877-566-7226 or 1-919-716-6000; and www.ncdoj.gov.

For Rhode Island residents, the Rhode Island Attorney General may be reached at: 150 South Main Street, Providence, RI 02903; www.riag.ri.gov; and 1-401-274-4400. Under Rhode Island law, individuals have the right to obtain any police report filed in regard to this event. There are approximately 1,505 Rhode Island residents that may be impacted by this event.