

AGENCY FOR COMMUNITY TREATMENT SERVICES, INC.
Return Mail Processing Center
P.O. Box 6336
Portland, OR 97228-6336

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NOTICE OF DATA BREACH

Dear <<Name 1>>:

This letter is to notify you of a data security incident at Agency for Community Treatment Services, Inc. (“ACTS”) that may have compromised personal information and/or protected health information. This notice provides information about what happened, what ACTS is doing in response, and steps you can take to further protect your information, including whom to call with concerns and the opportunity to sign up for free credit monitoring and identity theft protection services.

What Happened? On October 23, 2020, ACTS became aware of a data security incident, including ransomware, that impacted portions of its server and data infrastructure. ACTS immediately took its systems offline and undertook efforts to restore its servers with additional high-level security mechanisms and monitoring. ACTS thereafter retained a professional forensic investigation firm to determine the nature of the security compromise and identify any individuals whose personal information and/or protected health information may have been compromised.

What Information Was Involved? The forensic investigation was unable to identify any specific individuals whose personal information and/or protected health information may have been compromised due to the complexity of the event and efforts undertaken by the perpetrators to conceal their actions. The forensic investigation did determine that first access to ACTS’ systems occurred on approximately October 21, 2020, with the ransomware launched on October 23, 2020. The data security incident *may have* resulted in unauthorized access to or acquisition of personal information, including names, date of birth, and Social Security numbers, as well as protected health information, including medical records, treatment information, health insurance information in connection with the provision of treatment services at ACTS from 2000 through 2013. **Please note that it is entirely possible that your personal information and/or protected health information may not have been compromised as a result of the incident, particularly as ACTS believes that the information was extremely difficult to access given the security controls in place.** Nonetheless, we are providing you with this notification in an abundance of caution.

What We Are Doing As stated above, following the data security incident, ACTS immediately undertook efforts to restore its servers with additional high-level security mechanisms and monitoring. Backups and other information maintained by ACTS were used to enable near seamless restoration of security and services. ACTS has retained a forensic investigation firm to thoroughly investigate the incident and is providing this notification to you in an abundance of caution and in accordance with applicable state law and Health Insurance Portability and Accountability Act (HIPAA) requirements. Please be advised that ACTS is continuing to work closely with leading security experts to identify and implement measures to further strengthen the security of their systems to help prevent this from happening in the future.

Additionally, we are offering you a free <<CM Length>> month membership to TransUnion *myTrueIdentity* credit monitoring service. This product helps detect possible misuse of your personal information and provides you with identity protection services focused on immediate identification and resolution of identity theft. This product also includes various features such as up to \$1,000,000 in identity theft insurance with no deductible, subject to policy limitations and exclusions. TransUnion *myTrueIdentity* is completely free to you and enrolling in this program will not hurt your credit score. For more information on identity theft protection and TransUnion *myTrueIdentity*, including instructions on how to activate your complimentary <<CM Length>> month membership, please see the additional information attached to this letter. **To take advantage of this offer, you must enroll by <<Enrollment Deadline>>.**

What You Can Do We are aware of how important personal information and protected health information is to patients and their loved ones. We encourage you to protect yourself from potential harm associated with this incident by closely monitoring all mail, email, or other contact from individuals not known to you personally, and to avoid answering questions or providing additional information to such unknown individuals. We also remind you to remain vigilant for incidents of fraud or identity theft by reviewing account statements, explanation of benefits statements, and credit reports for unauthorized activity, and to report any such activity or any suspicious contact whatsoever to law enforcement if warranted.

For More Information For further information on steps you can take to prevent against possible fraud or identity theft, please see the attachments to this letter. ACTS understands the importance of protecting your personal information and protected health information, and deeply regrets any concern that this may have caused to you. **Should you have any questions or would like further information regarding the information contained in this letter, do not hesitate to contact 800-242-9418 between the hours of 9:00 a.m. to 9:00 p.m. EST, Monday through Friday.**

Sincerely,

A handwritten signature in black ink that reads "Asha Terminello". The signature is written in a cursive style with a long, sweeping tail on the letter "l".

Asha Terminello
Chief Executive Officer

Attachment 1: Protecting Yourself

Under the Health Insurance Portability and Accountability Act, we advise you that protected health information is defined as individually identifiable information transmitted or maintained in electronic media or any other form or medium, including demographic information collected from an individual, and relates to the past, present, or future physical or mental health conditions, provision of health care, or payment for health care to an individual.

We also remind you to remain vigilant for incidents of fraud or identity theft by reviewing account statements and credit reports for unauthorized activity. **Residents of the United States are entitled to one free credit report annually from each of the three major credit reporting agencies.** To order your free credit reports, visit www.annualcreditreport.com or call toll-free (877) 322-8228. 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 should also promptly report any fraudulent activity or any suspected incidents of identity theft to proper law enforcement authorities, your state attorney general, and/or the Federal Trade Commission.

You may want to consider placing a fraud alert on your credit report. There are two types of fraud alerts you can place on your credit report to put your creditors on notice that you may be a victim of fraud – an initial alert and an extended alert.

- **Initial Alert:** You may ask that an initial alert be placed on your credit report if you suspect you have been, or are about to be, a victim of identity theft. A fraud alert does not impact your ability to get a loan or credit, but rather alerts a business that your personal information may have been compromised and requires the business to verify your identity before issuing you credit. Although this may cause some delay if you are applying for credit, it may protect against someone else obtaining credit in your name. An initial fraud alert stays on your credit report for at least 90 days.
- **Extended Alert:** You may have an extended alert placed on your credit report if you have already been a victim of identity theft with the appropriate documentary proof. An extended fraud alert stays on your credit report for seven years. You can place a fraud alert on your credit report by contacting any of the three national credit reporting agencies. The agency that you contacted must notify the other two agencies.

Additionally, you have the right to put a **credit freeze**, also known as a security freeze, on your credit file, free of charge, so that no new credit can be opened in your name without the use of a PIN number that is issued to you when you initiate a freeze. A security freeze is designed to prevent potential credit grantors from accessing your credit report without your consent. If you place a security freeze, potential creditors and other third parties will not be able to access your credit report unless you temporarily lift the freeze. Therefore, using a security freeze may delay your ability to obtain credit. There is no fee to place or lift a security freeze. However, unlike a fraud alert, you must separately place a security freeze on your credit file at each of the three national credit reporting agencies. In order to request a security freeze, you may need to provide the following information:

1. Your full name (including middle initial as well as Jr., Sr., II, III, etc.);
2. Social Security Number;
3. Date of birth;
4. If you have moved in the past five (5) years, provide the addresses where you have lived over the prior 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, military identification, etc.); and
7. If you are a victim of identity theft, include a copy of either the police report, investigative report, or complaint to a law enforcement agency concerning identity theft.

Below are the toll-free numbers and addresses for the three largest credit reporting agencies:

Equifax
P.O. Box 74021
Atlanta, GA 30374
1-800-685-1111
www.equifax.com

Experian
P.O. Box 2002
Allen, TX 75013
1-888-397-3742
www.experian.com

TransUnion
P.O. Box 1000
Chester, PA 19016
1-800-916-8800
www.transunion.com

Below is the toll-free number, address and website address for the Federal Trade Commission, which you may contact to obtain further information on how to protect yourself from identity theft and how to repair identity theft:

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

For residents of Hawaii, Michigan, Missouri, Virginia, Vermont and North Carolina: 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 law 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 using the contact information listed above.

For residents of Iowa: State law advises you to report any suspected identity theft to law enforcement or 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 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

Office of the Illinois Attorney General
Identity Theft Hotline
100 W Randolph St, Fl. 12
Chicago, IL 60601
1-866-999-5630
www.illinoisattorneygeneral.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

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 Connecticut, Massachusetts, Rhode Island and West Virginia: You also have the right to place a security freeze on your credit report by contacting any of the credit bureaus listed above.

For residents of Texas: We believe that this incident may have affected **XX** Texas residents.

FAIR CREDIT REPORTING ACT. You also have rights under the federal Fair Credit Reporting Act, which promotes the accuracy, fairness, and privacy of information in the files of consumer reporting agencies. The FTC has published a list of the primary rights created by the FCRA (<https://www.consumer.ftc.gov/articles/pdf-0096-fair-credit-reporting-act.pdf>), and that article refers individuals seeking more information to visit www.ftc.gov/credit. The FTC's list includes the following FCRA rights: (1) To receive a copy of your credit report, which must contain all the information in your file at the time of your request; (2) To receive a free copy of your credit report, at your request, once every 12 months from each of the nationwide credit reporting companies – Equifax, Experian, and TransUnion; (3) To receive a free credit report if a company takes adverse action against you (e.g. denying your application for credit, insurance, or employment), and you ask for your report within 60 days of receiving notice of the action. The notice will give you the name, address, and phone number of the credit reporting company. You are also entitled to one free report a year if you're unemployed and plan to look for a job within 60 days; if you are on welfare; or if your report is inaccurate because of fraud, including identity theft; (4) To ask for a credit score; (5) To dispute incomplete or inaccurate information; (6) To obtain corrections to your report or delete inaccurate, incomplete, or unverifiable information; (7) Consumer reporting agencies may not report outdated negative information; (8) To restrict access to your file and to require consent from you for reports to be provided to employer; (9) To limit "prescreened" offers of credit and insurance you receive based on information in your credit report; and (10) To seek damages from violators. Note - Identity theft victims and active duty military personnel have additional rights.



Complimentary <<CM Length>> Month *myTrueIdentity* Credit Monitoring Service

As a safeguard, we have arranged for you to enroll, at no cost to you, in an online credit monitoring service (*myTrueIdentity*) for <<CM Length>> months provided by TransUnion Interactive, a subsidiary of TransUnion,[®] one of the three nationwide credit reporting companies.

How to Enroll: You can sign up [online](#) or via [U.S. mail delivery](#)

- To enroll in this service, go to the *myTrueIdentity* website at www.MyTrueIdentity.com and, in the space referenced as “Enter Activation Code,” enter the 12-letter Activation Code <<Insert Unique 12-letter Activation Code>> and follow the three steps to receive your credit monitoring service online within minutes.
- If you do not have access to the Internet and wish to enroll in a similar offline, paper-based credit monitoring service, via U.S. mail delivery, please call the TransUnion Fraud Response Services toll-free hotline at **1-855-288-5422**. When prompted, enter the six-digit telephone passcode <<Insert static 6-digit Telephone Pass Code>> and follow the steps to enroll in the offline credit monitoring service, add an initial fraud alert to your credit file, or to speak to a TransUnion representative if you believe you may be a victim of identity theft.

You can sign up for the online or offline credit monitoring service anytime between now and <<Enrollment Deadline>>. Due to privacy laws, we cannot register you directly. Please note that credit monitoring services might not be available for individuals who do not have a credit file with TransUnion or an address in the United States (or its territories) and a valid Social Security number. Enrolling in this service will not affect your credit score.

ADDITIONAL DETAILS REGARDING YOUR <<CM Length>> MONTH COMPLIMENTARY CREDIT MONITORING SERVICE:

- Once you are enrolled, you will be able to obtain <<CM Length>> months of unlimited access to your TransUnion credit report and credit score.
- The daily credit monitoring service will notify you if there are any critical changes to your credit file at TransUnion, including fraud alerts, new inquiries, new accounts, new public records, late payments, changes of address, and more.
- The service also includes access to an identity restoration program that provides assistance in the event that your identity is compromised and up to \$1,000,000 in identity theft insurance with no deductible. (Policy limitations and exclusions may apply.)