

## APPENDIX

Lifeline is a covered entity as defined by the Health Insurance Portability & Accountability Act (“HIPAA”). On August 6, 2022, Lifeline identified unusual network activity. Lifeline immediately initiated its incident response protocols, which included isolating potentially impacted systems and network functions. Lifeline also began an investigation with the assistance of a computer forensic firm. The investigation determined that an unauthorized person gained access to the network between July 27, 2022 and August 6, 2022 and, during that time, accessed some of the documents on Lifeline’s system. Lifeline initiated a review of the documents involved to determine what information may have been accessible to the unauthorized person. On August 18, 2022, Lifeline determined the documents included information for subscribers, employees, and individuals eligible to receive Lifeline services. The review of the documents only recently concluded at which point Lifeline determined Maine residents were impacted. The documents in question contained information related to six Maine residents<sup>1</sup> which, depending on the individual, may have included their name, Social Security number and/or driver's license or state identification number.

On September 7, 2023, Lifeline began mailing notification letters to the six Maine residents in accordance Me. Rev. Stat. Tit. 10, §1348,<sup>2</sup> in substantially the same form as the enclosed letter. Lifeline has offered complimentary credit monitoring and identity theft protection services for individuals whose Social Security number or driver’s license number was identified in the documents. Lifeline has also established a dedicated, toll-free call center where all individuals may obtain more information regarding the incident.

Lifeline regrets any concern or inconvenience this incident may cause, and remains committed to protecting the confidentiality and security of information in Lifeline’s care. To help prevent something like this from happening again, Lifeline has enhanced its existing network monitoring capabilities, and will continue to regularly audit its systems for any unauthorized activity.

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<sup>1</sup> In addition to the individuals referenced in this notice, 288 Maine residents were notified in accordance with HIPAA. OCR was also notified of this incident.

<sup>2</sup> This notice does not waive Lifeline’s objection that Maine lacks personal jurisdiction over it regarding any claims related to this incident.

# Lifeline

<<Date>> (Format: Month Day, Year)

<<first\_name>> <<middle\_name>> <<last\_name>> <<suffix>>  
<<address\_1>>  
<<address\_2>>  
<<city>>, <<state\_province>> <<postal\_code>>  
<<country>>

## <<b2b\_text\_3(Notice of Data Breach)>>

Dear <<first\_name>> <<middle\_name>> <<last\_name>> <<suffix>>,

Lifeline Systems Company (“Lifeline”) is committed to protecting the confidentiality and security of the information in our care. Regrettably, we experienced a security incident that involved some of your information. This letter provides information about the incident, what we have done in response, and what you can do.

### **What Happened**

On August 6, 2022, we identified unusual network activity. We immediately initiated our incident response protocols, which included isolating potentially impacted systems and network functions. We also began an investigation with the assistance of a computer forensics firm. The investigation determined that an unauthorized person gained access to our network between July 27, 2022 and August 6, 2022 and, during that time, accessed and/or acquired some of the documents on our system. We initiated a review of the documents involved to determine what information they contained. That review was very time intensive, and only recently concluded.

### **What Information Was Involved**

The impacted documents contained your <<b2b\_text\_1(data elements)>>. Please note, our records do not indicate you are or were a Lifeline subscriber. We may have your information if you are a current or former employee, a family member of a current or former employee, or were identified as a point of contact for one of our subscribers.

### **What We Are Doing**

We regret any concern or inconvenience this incident may cause, and remain committed to protecting the confidentiality and security of the information in our care. To help prevent something like this from happening again, we have enhanced our existing network monitoring capabilities, and will continue to regularly audit our systems for any unauthorized activity.

### **What You Can Do**

We have no indication that your information was viewed or misused as a result of this incident. However, we wanted to let you know that this incident occurred and assure you that we take it very seriously. As a precaution, we are offering you a one-year complimentary membership to Experian® IdentityWorks<sup>SM</sup> Credit 3B. This product helps detect possible misuse of your personal information and provides you with identity protection support focused on immediate identification and resolution of identity theft. IdentityWorks Credit 3B is completely free to you and enrolling in this program will not hurt your credit score. For more information on identity theft protection, including instructions on how to activate your complimentary membership, please see the additional information provided with this letter.

**More Information**

We have established a toll-free number to help answer individuals' questions regarding this incident. If you have questions, please call [TFN](#), available Monday through Friday from 9:00 a.m. to 6:30 p.m. Eastern Time, excluding major U.S. holidays.

Sincerely,

Lifeline Systems Company

## Activate IdentityWorks Credit 3B Now in Three Easy Steps

1. ENROLL by: <<b2b\_text\_6(enrollment deadline)>> (Your code will not work after this date.)
2. VISIT the Experian IdentityWorks website to enroll: [www.experianidworks.com/3bcredit](http://www.experianidworks.com/3bcredit)
3. PROVIDE the Activation Code: <<activation code s\_n>>

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 877.288.8057 by <<b2b\_text\_6(enrollment deadline)>>. Be prepared to provide engagement number <<b2b\_text\_2(engagement number)>> as proof of eligibility for the identity restoration services by Experian.

### ADDITIONAL DETAILS REGARDING YOUR 12-MONTH EXPERIAN IDENTITYWORKS CREDIT 3B MEMBERSHIP:

A credit card is **not** required for enrollment in Experian IdentityWorks Credit 3B. 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, Equifax and Transunion files for indicators of fraud.
- **Identity Restoration:** Identity Restoration specialists are immediately available to help you address credit and non-credit related fraud.
- **Experian IdentityWorks ExtendCARE™:** 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.

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 877.288.8057. 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 one year 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](http://www.ExperianIDWorks.com/restoration). You will also find self-help tips and information about identity protection at this site.

\* 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.

### ADDITIONAL STEPS YOU CAN TAKE

We remind you it is always advisable to be vigilant for incidents of fraud or identity theft by reviewing your account statements and free credit reports for any unauthorized activity. You may obtain a copy of your credit report, free of charge, once every 12 months from each of the three nationwide credit reporting companies. To order your annual free credit report, please visit [www.annualcreditreport.com](http://www.annualcreditreport.com) or call toll free at 1-877-322-8228. Contact information for the three nationwide credit reporting companies is as follows:

- *Equifax*, PO Box 740241, Atlanta, GA 30374, [www.equifax.com](http://www.equifax.com), 1-888-378-4329
- *Experian*, PO Box 2002, Allen, TX 75013, [www.experian.com](http://www.experian.com), 1-888-397-3742
- *TransUnion*, PO Box 2000, Chester, PA 19016, [www.transunion.com](http://www.transunion.com), 1-800-916-8800

If you believe you are the victim of identity theft or have reason to believe your personal information has been misused, you should immediately contact the Federal Trade Commission and/or the Attorney General's office in your state. You can obtain information from these sources about steps an individual can take to avoid identity theft as well as information about fraud alerts and security freezes. You should also contact your local law enforcement authorities and file a police report. Obtain a copy of the police report in case you are asked to provide copies to creditors to correct your records. Contact information for the Federal Trade Commission is as follows:

- *Federal Trade Commission*, Consumer Response Center, 600 Pennsylvania Avenue NW, Washington, DC 20580, 1-877-IDTHEFT (438-4338), [www.identitytheft.gov](http://www.identitytheft.gov)

### **Fraud Alerts and Credit or Security Freezes:**

***Fraud Alerts:*** There are two types of general 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. You may ask that an initial fraud alert be placed on your credit report if you suspect you have been, or are about to be, a victim of identity theft. An initial fraud alert stays on your credit report for one year. 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.

To place a fraud alert on your credit reports, contact one of the nationwide credit bureaus. A fraud alert is free. The credit bureau you contact must tell the other two, and all three will place an alert on their versions of your report.

For those in the military who want to protect their credit while deployed, an Active Duty Military Fraud Alert lasts for one year and can be renewed for the length of your deployment. The credit bureaus will also take you off their marketing lists for pre-screened credit card offers for two years, unless you ask them not to.

***Credit or Security Freezes:*** You have the right to put a credit freeze, also known as a security freeze, on your credit file, free of charge, which makes it more difficult for identity thieves to open new accounts in your name. That's because most creditors need to see your credit report before they approve a new account. If they can't see your report, they may not extend the credit.

*How do I place a freeze on my credit reports?* There is no fee to place or lift a security freeze. Unlike a fraud alert, you must separately place a security freeze on your credit file at each credit reporting company. For information and instructions to place a security freeze, contact each of the credit reporting agencies at the addresses below:

- **Experian Security Freeze**, PO Box 9554, Allen, TX 75013, [www.experian.com](http://www.experian.com)
- **TransUnion Security Freeze**, PO Box 160, Woodlyn, PA 19094, [www.transunion.com](http://www.transunion.com)
- **Equifax Security Freeze**, PO Box 105788, Atlanta, GA 30348, [www.equifax.com](http://www.equifax.com)

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 bureau will provide you with 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.

*How do I lift a freeze?* A freeze remains in place until you ask the credit bureau to temporarily lift it or remove it altogether. If the request is made online or by phone, a credit bureau must lift a freeze within one hour. If the request is made by mail, then the bureau must lift the freeze no later than three business days after getting your request.

If you opt for a temporary lift because you are applying for credit or a job, and you can find out which credit bureau the business will contact for your file, you can save some time by lifting the freeze only at that particular credit bureau. Otherwise, you need to make the request with all three credit bureaus.

Lifeline's contact information is: 200 Donald Lynch Blvd. #300 Marlborough, MA 01752; 800-635-6156

### **Additional information for residents of the following states:**

Maryland: You may contact and obtain information from your state attorney general at: *Maryland Attorney General's Office*, 200 St. Paul Place, Baltimore, MD 21202, 1-888-743-0023 / 1-410-576-6300, [www.oag.state.md.us](http://www.oag.state.md.us)

New York: You may contact and obtain information from these state agencies: *New York Department of State Division of Consumer Protection*, One Commerce Plaza, 99 Washington Ave., Albany, NY 12231-0001, 518-474-8583 / 1-800-697-1220, <http://www.dos.ny.gov/consumerprotection>; and *New York State Office of the Attorney General*, The Capitol, Albany, NY 12224-0341, 1-800-771-7755, <https://ag.ny.gov>

North Carolina: You may contact and obtain information from your state attorney general at: *North Carolina Attorney General's Office*, 9001 Mail Service Centre, Raleigh, NC 27699, 1-919-716-6000 / 1-877-566-7226, [www.ncdoj.gov](http://www.ncdoj.gov)

Rhode Island: <<b2b\_text\_4(variable sentence)>> Under Rhode Island law, you have the right to file and obtain a copy of a police report. You also have the right to request a security freeze, as described above. You may contact and obtain information from your state attorney general at: Rhode Island Attorney General's Office, 150 South Main Street, Providence, RI 02903, 1-401-274-4400, [www.riag.ri.gov](http://www.riag.ri.gov)

West Virginia: You have the right to ask that nationwide consumer reporting agencies place “fraud alerts” in your file to let potential creditors and others know that you may be a victim of identity theft, as described above. You also have a right to place a security freeze on your credit report, as described above.

**A Summary of Your Rights Under the Fair Credit Reporting Act:** The federal Fair Credit Reporting Act (FCRA) promotes the accuracy, fairness, and privacy of information in the files of consumer reporting agencies. There are many types of consumer reporting agencies, including credit bureaus and specialty agencies (such as agencies that sell information about check writing histories, medical records, and rental history records). Your major rights under the FCRA are summarized below. For more information, including information about additional rights, go to [www.consumerfinance.gov/learnmore](http://www.consumerfinance.gov/learnmore) or write to: Consumer Financial Protection Bureau, 1700 G Street NW, Washington, DC 20552.

- You must be told if information in your file has been used against you.
- You have the right to know what is in your file.
- You have the right to ask for a credit score.
- You have the right to dispute incomplete or inaccurate information.
- 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 reports to be provided to employers.
- You may limit “prescreened” offers of credit and insurance you get based on information in your credit report.
- You have a right to place a “security freeze” on your credit report, which will prohibit a consumer reporting agency from releasing information in your credit report without your express authorization.
- You may seek damages from violators.
- Identity theft victims and active duty military personnel have additional rights.