

## Appendix

On June 24, 2021, Forefront Management, LLC and Forefront Dermatology, S.C. and its affiliated practices (collectively “Forefront”) concluded its investigation of an intrusion into its IT network by unauthorized parties and determined that the incident resulted in unauthorized access to certain files on its IT systems that contain Forefront physician, physician assistant, and nurse practitioner (collectively “provider”) and employee information. Forefront first identified the intrusion on June 4, 2021 and immediately took its entire network offline to protect the information it maintains and to secure its systems. Forefront then launched an investigation and notified law enforcement.

Through its investigation, Forefront determined that the intrusion resulted in unauthorized parties gaining access to its IT network between the dates of May 28, 2021 and June 4, 2021. While in Forefront’s IT network, the unauthorized parties accessed certain files that contain information pertaining to a small number of Forefront providers, employees, including their names and Social Security numbers. However, Forefront’s investigation could not rule out the possibility that files containing names and Social Security numbers pertaining to all of its providers and employees may have also been subject to unauthorized access.

Beginning on July 8, 2021, Forefront will mail notification letters via United States Postal Service First-Class mail to all of its providers and employees, although the investigation did not find evidence that their information was specifically involved, including to one Maine resident<sup>1</sup>, in accordance with Me. Rev. Stat. Tit. 10, §1348. A copy of the notification letter is enclosed. Forefront is offering individuals whose Social Security numbers were involved in the incident complimentary one-year memberships to credit monitoring services through TransUnion®. Forefront has also established a dedicated, toll-free call center to answer questions that letter recipients may have.

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<sup>1</sup> Forefront Dermatology is also providing notification of this incident to an additional 154 Maine residents whose names, addresses, dates of birth, patient account numbers, health insurance plan member ID numbers, medical record numbers, dates of service, provider names, and/or medical and clinical treatment information may have been accessed as a result of this incident, in accordance with 45 C.F.R. § 164.404.



<<Name 1>> <<Name 2>>

<<Address 1>>

<<Address 2>>

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

<<Date>>

Dear <<Name 1>> <<Name 2>>,

Forefront Dermatology, S.C. and its affiliated practices are committed to protecting the confidentiality and security of our current and former physicians, physician assistants, and nurse practitioners. We are writing to inform you that we recently identified and addressed a data security incident that may have involved some of your information. This notice explains the incident, measures that have been taken, and some steps you can take in response.

On June 24, 2021, Forefront concluded our investigation of an intrusion into our IT network by cyber criminals and determined that the incident resulted in unauthorized access to certain files on our IT systems that contain physician, physician assistant, and nurse practitioner information. We first identified the intrusion on June 4, 2021 and immediately took our entire network offline to protect the information we maintain and to secure our systems. We also launched an investigation and notified law enforcement.

Through our investigation, we determined that the intrusion resulted in an unauthorized party gaining access to our IT network between the dates of May 28, 2021 and June 4, 2021. While in our IT network, the unauthorized party accessed certain files that contain information pertaining to a small number of Forefront physicians, physician assistants, and nurse practitioners. **While our investigation did not find evidence that your information was specifically involved**, we could not rule out the possibility that, files containing some of your information, including your name, Social Security number, DEA registration number, Controlled Substance Registration Number, Medicare PTAN number, Railroad Medicare provider number, and Medicaid Provider Number may have been subject to unauthorized access as a result of this incident.

Additionally, our investigation determined that the unauthorized party also accessed certain files that contain a small number of Forefront Dermatology patients' information. If you are a current or former Forefront Dermatology patient, we cannot rule out the possibility that some of your patient information could have been involved, **although our investigation did not find evidence that patient information relating to our physicians, physician assistants, or nurse practitioners was specifically involved**, we could not rule out this possibility. This information may have included your name, address, date of birth, patient account number, health insurance plan member ID number, medical record number, dates of service, provider names, and/or medical and clinical treatment information.

We recommend that you remain vigilant by reviewing your financial account statements for any unauthorized activity. If you see charges or activity you did not authorize, you should contact your financial institution immediately. Additionally, if you are also a current or former patient of Forefront Dermatology, we recommend that you review the statements you receive from your healthcare providers and health insurance plan. If you see any services that were not received, please contact the provider or health plan immediately. We have provided notice of the incident to the DEA on behalf of those physicians, physician assistants, and nurse practitioners whose DEA registration numbers were contained in the files that were potentially involved in this incident.

Out of an abundance of caution, and because we take this incident seriously, we are offering you a complimentary 12-month membership to TransUnion's *myTrueIdentity* Credit Monitoring Service. This service helps detect possible misuse of your information and provides you with identity protection support focused on immediate identification and resolution of identity theft. *myTrueIdentity* is free and enrolling in this program will not affect your credit score. **For more information on *myTrueIdentity*, including instructions on how to activate your complimentary 12-month membership and steps you can take to protect your information, please see the pages that follow this letter.**

We deeply regret any inconvenience or concern this incident may cause. We take this matter very seriously and are continuing to enhance our security protocols to help prevent a similar incident from occurring in the future. If you have any questions about this incident, please call 855-899-4166, Monday through Friday, between 8:00am and 8:00pm, Central Time.

Sincerely,

*Betsy J. Wernli*

Betsy J. Wernli, M.D., FAAD  
President

As a safeguard, we have arranged for you to enroll, at **no cost to you**, in an online credit monitoring service (*myTrueIdentity*) for **12 months** provided by TransUnion Interactive, a subsidiary of TransUnion,<sup>®</sup> one of the three nationwide credit reporting companies. This service helps detect possible misuse of your personal information and provides you with superior identity protection support focused on immediate identification and resolution of identity theft.

### Activate *myTrueIdentity* Now in Three Easy Steps

1. ENROLL by: **<<Enrollment Deadline>>** (Your code will not work after this date.)
2. VISIT the **TransUnion *myTrueIdentity* website** to enroll: [www.MyTrueIdentity.com](http://www.MyTrueIdentity.com)
3. 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 12-MONTH COMPLIMENTARY CREDIT MONITORING SERVICE:

- Once you are enrolled, you will be able to obtain 12 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.) \* Offline members will be eligible to call for additional reports quarterly after enrolling.

## 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), 1-800-685-1111
- *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.ftc.gov/idtheft](http://www.ftc.gov/idtheft)

***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 2000, Chester, PA 19016, [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.

Forefront Management, LLC's address is 801 York St, Manitowoc, WI 54220 and its phone number is 855-535-7175.

### **Additional Information for Residents of the Following States:**

**Maryland Residents:** 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 Residents:** 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 Residents:** 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 Residents:** This incident involves X Rhode Island residents. 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 Residents:** 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 N.W., 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.



<<Name 1>> <<Name 2>>

<<Address 1>>

<<Address 2>>

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

<<Date>>

Dear <<Name 1>> <<Name 2>>,

Forefront Management, LLC is committed to protecting the confidentiality and security of our current and former employees' information. We are writing to inform you that we recently identified and addressed a data security incident that may have involved some of your information. This notice explains the incident, measures that have been taken, and some steps you can take in response.

On June 24, 2021, Forefront concluded our investigation of an intrusion into our IT network by cyber criminals and determined that the incident resulted in unauthorized access to certain files on our IT systems that contain employee information. We first identified the intrusion on June 4, 2021 and immediately took our entire network offline to protect the information we maintain and to secure our systems. We also launched an investigation and notified law enforcement.

Through our investigation, we determined that the intrusion resulted in an unauthorized party gaining access to our IT network between the dates of May 28, 2021 and June 4, 2021. While in our IT network, the unauthorized party accessed certain files that contain information pertaining to a small number of Forefront employees. **While our investigation did not find evidence that your information was specifically involved**, we could not rule out the possibility that, files containing some of your information, including your name and Social Security number, may have been subject to unauthorized access as a result of this incident.

Additionally, our investigation determined that the unauthorized party also accessed certain files that contain a small number of Forefront Dermatology patients' information. If you are a current or former Forefront Dermatology patient, we cannot rule out the possibility that some of your patient information could have been involved, **although investigation did not find evidence that patient information relating to our employees was specifically involved**. This information may have included your name, address, date of birth, patient account number, health insurance plan member ID number, medical record number, dates of service, provider names, and/or medical and clinical treatment information.

We recommend that you remain vigilant by reviewing your financial account statements for any unauthorized activity. If you see charges or activity you did not authorize, you should contact your financial institution immediately. Additionally, if you are also a current or former patient of Forefront Dermatology, we recommend that you review the statements you receive from your healthcare providers and health insurance plan. If you see any services that were not received, please contact the provider or health plan immediately.

Out of an abundance of caution, and because we take this incident seriously, we are offering you a complimentary 12-month membership to TransUnion's *myTrueIdentity* Credit Monitoring Service. This service helps detect possible misuse of your information and provides you with identity protection support focused on immediate identification and resolution of identity theft. *myTrueIdentity* is free and enrolling in this program will not affect your credit score. **For more information on *myTrueIdentity*, including instructions on how to activate your**



**complimentary 12-month membership and steps you can take to protect your information, please see the pages that follow this letter.**

We deeply regret any inconvenience or concern this incident may cause. We take this matter very seriously and are continuing to enhance our security protocols to help prevent a similar incident from occurring in the future. If you have any questions about this incident, please call 855-899-4166, Monday through Friday, between 8:00am and 8:00pm, Central Time.

Sincerely,

*Scott Bremen*

Scott Bremen  
Chief Executive Officer

As a safeguard, we have arranged for you to enroll, at **no cost to you**, in an online credit monitoring service (*myTrueIdentity*) for **12 months** provided by TransUnion Interactive, a subsidiary of TransUnion,® one of the three nationwide credit reporting companies. This service helps detect possible misuse of your personal information and provides you with superior identity protection support focused on immediate identification and resolution of identity theft.

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## 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:

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- *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.ftc.gov/idtheft](http://www.ftc.gov/idtheft)

***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:

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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.

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**New York Residents:** 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 Residents:** 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)

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- 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.