

October 5, 2018

Kevin M Scott 312.821.6131 (direct) Kevin.Scott@wilsonelser.com

Attorney General Robert W. Ferguson Office of the Attorney General 1125 Washington Street SE PO Box 40100 Olympia, WA 98504-0100 Email: securitybreach@atg.wa.gov

Re: Data Security Incident

Dear Attorney General Ferguson:

We represent Northwest Surgical Specialists, P.C. d/b/a Rebound Orthopedics & Neurosurgery ("Rebound"), located in Vancouver, Washington, with respect to a potential data security incident described in more detail below. Rebound takes the security and privacy of the information in its control very seriously, and has taken steps to prevent a similar incident from occurring in the future.

1. Nature of the security incident.

On May 22, 2018, an unknown individual gained access to an employee's email account. Rebound quickly took action and notified its IT department of the incident, who prevented any further unauthorized access. Rebound also retained a computer forensic company and conducted a detailed forensic investigation to determine what information may have been accessed. As a result of its investigation, on August 8, 2018, Rebound discovered that patient and employee personal information, including name, date of birth, Social Security number, driver's license number, financial account information, and limited health information may have been disclosed.

2. Number of Washington residents affected.

A total number of one thousand, six hundred and seven (1,607) Washington residents may have been affected by this incident. Notification letters to these individuals were mailed on October 5, 2018, by first class mail. A sample copy of the notification letter is included with this letter.

3. Steps taken.

Rebound has taken steps to prevent a similar event from occurring in the future, and to protect the privacy and security of potentially impacted individuals' information. This includes, providing additional employee training and testing regarding the need to safeguard sensitive information, enabling dual-factor authentication and implementing a forced email password change policy. Rebound has also provided 55 West Monroe Street, Suite 3800 • Chicago, IL 60603 • p 312.704.0550 • f 312.704.1522

Albany • Atlanta • Austin • Baltimore • Beaumont • Boston • Chicago • Dallas • Denver • Edwardsville • Garden City • Hartford • Houston • Indiana • Kentucky Las Vegas • London • Los Angeles • Miami • Michigan • Milwaukee • New Jersey • New Orleans • New York • Orlando • Philadelphia • Phoenix • San Diego San Francisco • Sarasota • Stamford • Virginia • Washington, DC • West Palm Beach • White Plains



potentially impacted individuals with identity theft restoration and credit monitoring services for 12 months at no cost to the individual, through Kroll. Notice is also being provided to the credit reporting agencies.

4. Contact information.

Rebound remains dedicated to protecting the sensitive information in its control. If you have any questions or need additional information, please do not hesitate to contact me at <u>Kevin.Scott@wilsonelser.com</u> or (312) 821-6131.

Very truly yours,

Wilson Elser Moskowitz Edelman & Dicker LLP

1 Cerra Miche Db 0

Kevin M Scott

Enclosure.



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

<<MemberFirstName>> <<MemberMiddleName>> <<MemberLastName>> <<Suffix>> <<Address1>> <<Address2>> <<City>>, <<State>> <<ZipCode>>

Dear <</MemberFirstName>> <</MemberLastName>>,

We are writing to inform you of a data security incident at Rebound Orthopedics & Neurosurgery that may have resulted in the disclosure of your personal information, including your name and Social Security number. We take the security of your personal information very seriously, and sincerely apologize for any inconvenience this incident may cause. This letter contains information about steps you can take to protect yourself, and resources we are making available to you.

On May 22, 2018, an unknown individual gained access to an employee's email account. We quickly took action and notified our IT department of the incident, who prevented any further unauthorized access. We also retained a computer forensic company and conducted a detailed forensic investigation to determine what information may have been accessed. As a result of our investigation, on August 3, 2018, we discovered that your personal information, including your name, date of birth, Social Security number, driver's license number, and financial account information may have been disclosed.

Although we are unaware of any misuse of your or anyone's information, to help relieve concerns and restore confidence following this incident, we have secured the services of Kroll to provide identity monitoring at no cost to you for one year. Kroll is a global leader in risk mitigation and response, and their team has extensive experience helping people who have sustained an unintentional exposure of confidential data. Your identity monitoring services include Credit Monitoring, Fraud Consultation, and Identity Theft Restoration.

Visit my.idmonitoringservice.com to activate and take advantage of your identity monitoring services.

You have until January 3, 2019 to activate your identity monitoring services.

Membership Number: <<Member ID>>

To receive credit services by mail instead of online, please call 1-833-228-5716. Additional information describing your services is included with this letter.

We take the security of all information in our control very seriously, and are taking steps to prevent a similar event from occurring in the future. This includes, providing additional employee training and testing regarding the need to safeguard sensitive information, enabling dual-factor authentication and implementing a forced email password change policy.

Please know that the protection and security of your personal information is of our utmost priority, and we sincerely regret any concern or inconvenience that this matter may cause you. If you have any questions, please do not hesitate to call 1-833-228-5716, Monday through Friday, 6:00 a.m. to 3:30 p.m. Pacific Time.

Sincerely,

7u-

John R. Bauman Executive Director

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 laws 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 from each of the nationwide three credit reporting agencies. To order your free credit report, please visit www.annualcreditreport.com, or call toll-free at 1-877-322-8228. You can also order your annual free credit report by mailing a completed Annual Credit Report Request Form (available at https://www.consumer.ftc.gov/articles/0155-free-credit-reports) to: Annual Credit Report Request Service, P.O. Box 105281, Atlanta, GA, 30348-5281.

For residents of lowa:

State law advises you to report any suspected identity theft to law enforcement or to 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 Attorneys General and the Federal Trade Commission about fraud alerts, security freezes, and steps you can take toward preventing identity theft.

Maryland Office of the	Rhode Island Office of the	North Carolina Office of the	Federal Trade Commission
Attorney General	Attorney General	Attorney General	Consumer Response Center
Consumer Protection Division 200 St. Paul Place Baltimore, MD 21202 1-888-743-0023 www.oag.state.md.us	Consumer Protection 150 South Main Street Providence RI 02903 1-401-274-4400 www.riag.ri.gov	Consumer Protection Division 9001 Mail Service Center Raleigh, NC 27699-9001 1-877-566-7226 www.ncdoj.com	600 Pennsylvania Ave, NW Washington, DC 20580 1-877-IDTHEFT (438-4338) www.ftc.gov

For residents of Massachusetts:

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 all states:

Fraud Alerts: You can place fraud alerts with the three credit bureaus at one of the three major credit bureaus by phone and also via Experian's or Equifax's website. A fraud alert tells creditors to follow certain procedures, including contacting you, before they open any new accounts or change your existing accounts. For that reason, placing a fraud alert can protect you, but also may delay you when you seek to obtain credit. Fraud alerts last for a full year and can be extended for a total of 7 years. The contact information for all three credit bureaus is below:

Monitoring: You should always remain vigilant and monitor your accounts for suspicious or unusual activity.

Security Freeze: You also have the right to place a security freeze on your credit report. A security freeze is intended to prevent credit, loans and services from being approved in your name without your consent. To place a security freeze on your credit report, you need to make a request to each consumer reporting agency. You may make that request by certified mail, overnight mail, or regular stamped mail, or by following the instructions found at the websites listed below. The following information must be included when requesting a security freeze (note that if you are requesting a credit report for your spouse, this information must be provided for him/her as well): (1) full name, with middle initial and any suffixes; (2) Social Security number; (3) date of birth; (4) current address and any previous addresses for the past five years; and (5) any applicable incident report or complaint with a law enforcement agency or the Registry of Motor Vehicles. The request must also include a copy of a government-issued identification card and a copy of a recent utility bill or bank or insurance statement. It is essential that each copy be legible, display your name and current mailing address, and the date of issue. Security freeze are free to place, lift, or remove. You may also place a security freeze for children under the age of 16. You may obtain a security freeze by contacting any one or more of the following national consumer reporting agencies:

Equifax Security Freeze	Experian Security Freeze	TransUnion (FVAD)
P.O. Box 105788	P.O. Box 9554	P.O. Box 2000
Atlanta, GA 30348	Allen, TX 75013	Chester, PA 19022
www.freeze.equifax.com	www.experian.com/freeze	freeze.transunion.com
800-525-6285	888-397-3742	800-680-7289

More information can also be obtained by contacting the Federal Trade Commission listed above.



TAKE ADVANTAGE OF YOUR IDENTITY MONITORING SERVICES

You've been provided with access to the following services¹ from Kroll:

Single Bureau Credit Monitoring

You will receive alerts when there are changes to your credit data—for instance, when a new line of credit is applied for in your name. If you do not recognize the activity, you'll have the option to call a Kroll fraud specialist, who can help you determine if it's an indicator of identity theft.

Fraud Consultation

You have unlimited access to consultation with a Kroll fraud specialist. Support includes showing you the most effective ways to protect your identity, explaining your rights and protections under the law, assistance with fraud alerts, and interpreting how personal information is accessed and used, including investigating suspicious activity that could be tied to an identity theft event.

Identity Theft Restoration

If you become a victim of identity theft, an experienced Kroll licensed investigator will work on your behalf to resolve related issues. You will have access to a dedicated investigator who understands your issues and can do most of the work for you. Your investigator can dig deep to uncover the scope of the identity theft, and then work to resolve it.

Kroll's activation website is only compatible with the current version or one version earlier of Internet Explorer, Chrome, Firefox, and Safari. To receive credit services, you must be over the age of 18 and have established credit in the U.S., have a Social Security number in your name, and have a U.S. residential address associated with your credit file.