

Privacy Incident Notice

Privacy Incident at MedWatch – April 13, 2018

MedWatch, LLC (“MedWatch”), recently learned that one of our vendors unintentionally misconfigured our online portal during a routine update which allowed some internet search engines to potentially make certain information accessible on the internet during the time period from October 20, 2017 until December 15, 2017. Upon learning of the incident, we immediately secured the portal, requested the internet search engines remove all cached data related to this matter, and conducted an internal investigation to determine the root cause of the incident and to prevent the incident from reoccurring. An external security firm was also engaged to verify our findings, confirm the prevention steps we undertook were appropriate, and assist with identifying the full extent of the information that could have potentially been accessible as a result of this incident. On March 1, 2018, we determined that the following types of confidential information that may have been accessible as a result of the misconfiguration include: members’ full name, date(s) of service, employer group health plan name, date of birth, health insurance number, and providers’ full names. In addition, for some members, social security numbers may have been involved. *However, we are currently not aware of any misuse of members’ protected health and/or personal information.*

We take this matter very seriously and sincerely apologize that this situation has occurred. We have taken steps to enhance our security program, controls, and procedures as a result of this incident. We also have re-educated our staff and vendor on the proper handling of personal and protected health information. We have provided information below on the various steps members can take to protect their identity.

Once again, MedWatch has no evidence that the information involved has been misused. Out of an abundance of caution, we are informing individuals whose personal and health information may have been involved by mailing a letter to their last known address. Since it is possible we have outdated contact information for some individuals, we are also providing this notice on our website as required by HIPAA. To learn whether your information was involved and, if so, what types of information, or if you have other questions about the incident, please call (866) 858-2133, Monday through Friday, between 8:00 a.m. and 8:00 p.m. Eastern Time (Closed on U.S. observed holidays). This substitute notice and toll-free number will remain active for at least 90 days.

Best Practices

We encourage you to remain vigilant against incidents of identity theft and fraud, to review your account statements, explanation of benefits and to monitor your credit reports for suspicious activity. Under U.S. law you are entitled to one free credit report annually from each of the three major credit reporting bureaus. To order your free credit report, visit www.annualcreditreport.com or call, toll-free, 1-877-322-8228. You may also contact the three major credit bureaus directly to request a free copy of your credit report.

At no charge, you can also have these credit bureaus place a “fraud alert” on your file that alerts creditors to take additional steps to verify your identity prior to granting credit in your name. Note, however, that because it tells creditors to follow certain procedures to protect you, it may also delay your ability to obtain credit while the agency verifies your identity. As soon as one credit bureau confirms your fraud alert, the others are notified to place fraud alerts on your file. Should you wish to place a fraud alert, or should you have any questions regarding your credit report, please contact any one of the agencies listed below.

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| Equifax | Experian | TransUnion |
| P.O. Box 105069 | P.O. Box 2002 | P.O. Box 2000 |
| Atlanta, GA 30348 | Allen, TX 75013 | Chester, PA 19022-2000 |
| 800-525-6285 | 888-397-3742 | 800-680-7289 |
| www.equifax.com | www.experian.com | www.transunion.com |

You may also place a security freeze on your credit reports. A security freeze prohibits a credit bureau from releasing any information from a consumer’s credit report without the consumer’s written authorization. However, please be advised that placing a security freeze on your credit report may delay, interfere with, or prevent the timely approval of any requests you make for new loans, credit mortgages, employment, housing, or other services. If you have been a victim of identity theft, and you provide the credit bureau with a valid police report, it cannot charge you to place, list or remove a security freeze. In all other cases, a credit bureau may charge you a fee to place, temporarily lift, or permanently remove a security freeze. You will need to place a security freeze separately with each of the three major credit bureaus listed above if you wish to place a freeze on all of your credit files. To find out more on how to place a security freeze, you can use the following contact information:

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| Equifax Security Freeze | Experian Security Freeze | TransUnion |
| P.O. Box 105788 | P.O. Box 9554 | P.O. Box 2000 |
| Atlanta, GA 30348 | Allen, TX 75013 | Chester, PA 19022-2000 |
| 1-800-685-1111 | 1-888-397-3742 | 1-888-909-8872 |
| www.freeze.equifax.com | www.experian.com/freeze/center.html | freeze.transunion.com |

You can further educate yourself regarding identity theft, fraud alerts, and the steps you can take to protect yourself, by contacting the Federal Trade Commission or your state Attorney General. The Federal Trade Commission can be reached at: 600 Pennsylvania Avenue NW, Washington, DC 20580; www.identitytheft.gov; 1-877-ID-THEFT (1-877-438-4338); and TTY: 1-866-653-4261. You have the right to file a police report if you ever experience identity theft or fraud. Please note that in order to file a crime report or incident report with law enforcement for identity theft, you will

likely need to provide some kind of proof that they have been a victim. Instances of known or suspected identity theft should also be reported to law enforcement. This notice has not been delayed by law enforcement. **For Maryland residents**, the Attorney General can be reached at: 200 St. Paul Place, 16th Floor, Baltimore, MD 21202; 1-888-743-0023; and www.oag.state.md.us. **For North Carolina residents**, the Attorney General can be contacted by mail at 9001 Mail Service Center, Raleigh, NC 27699-9001; toll-free at 1-877-566-7226; by phone at 1-919-716-6400; and online at www.ncdoj.gov. **For Rhode Island residents**, the Attorney General can be contacted by mail at 150 South Main Street, Providence, RI 02903; by phone at (401) 274-4400; and online at www.riag.ri.gov. A total of 69 Rhode Island resident(s) may be impacted by this incident. **For New Mexico residents**, you have rights pursuant to the Fair Credit Reporting Act, such as the right to be told if information in your credit file has been used against you, the right to know what is in your credit file, the right to ask for your credit score, and the right to dispute incomplete or inaccurate information. Further, pursuant to the Fair Credit Reporting Act, the 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 credit reports to be provided to employers; you may limit "prescreened" offers of credit and insurance you get based on information in your credit report; and you may seek damages from violator. You 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 you to review your 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. The Federal Trade Commission also encourages those who discover that their information has been misused to file a complaint with them. You can obtain further information on how to file such a complaint by way of the contact information listed above.