

NOTICE OF DATA PRIVACY INCIDENT

ABOUT THE DATA PRIVACY INCIDENT

Covenant Care California, LLC (“Covenant Care”) is hereby providing notice of a recent data privacy incident.

Covenant Care provides support services, including administration and resources assistance, to certain affiliated licensed nursing facilities. Covenant Care recently became aware of a privacy incident in which unauthorized individual(s) gained access to an employee's email account which contained certain patient information. To date, Covenant Care has no evidence of actual or attempted misuse of information present in the account. This notice is intended to inform affected patients of the data privacy incident and to provide information and resources that they may use to better protect against potential financial fraud or other misuse of personal information.

FREQUENTLY ASKED QUESTIONS

Q. What Happened?

On January 29, 2019, Covenant Care learned of suspicious activity related to an employee email account. We immediately commenced an investigation to determine the nature and scope of the incident. Working with third-party forensic investigators, Covenant Care determined that an unauthorized actor(s) gained access to the employee's email account between January 22, 2019 and January 29, 2019. We then undertook a diligent review and analysis of the email account to determine what information was present in the account at the time of unauthorized access and to whom that information relates. Through this review, on February 13, 2019, Covenant Care determined that certain patient records were present in the account at the time of the unauthorized access and that the information varied for each individual. Covenant Care began reviewing each record to identify the potentially affected patient, the nature of the information in the patient's record, the patient's contact information, and the nursing facility where the patient received care. On March 6, 2019, Covenant Care began notifying affected patients, state and federal regulatory agencies, and the FBI.

Q. What Information Was Involved?

While the information present at the time of the unauthorized access varies by individual, the information present in the account may include: full name; Social Security number or health insurance claim number; date of birth and/or date of death; provider(s) name and treatment location(s); medical record number; diagnoses or diagnosis-related groups (DRGs); dollar amounts billed to Medicare; Medicare covered days; admission, re-admission, dates of service, and/or discharge dates; and/or information related to ancillary services, such as home health, hospice, outpatient services, or durable medical equipment.

Q. What is Covenant Care Doing to Respond?

Information privacy and security are among our highest priorities. Upon learning of this incident, we quickly took steps to secure the affected email account and initiated a thorough investigation. Our investigation is ongoing, and we are working with forensic investigators and other third-party vendors to assist with investigation, mitigation, and remediation activities.

Covenant Care immediately focused on identifying potentially affected patients and their contact information in order to quickly notify them of the incident. Notices to potentially affected patients include information and resources that they may use to better protect against potential misuse of personal information. As an added precaution, Covenant Care is also offering potentially affected patients access to

twelve (12) months of credit monitoring and identity theft restoration services at no cost. Information on these services and how to enroll is included in the notice being mailed to potentially affected patients. In addition to notifying affected patients, Covenant Care also notified federal and state regulatory agencies and the FBI.

While we have strict security measures in place to protect information in our possession, we are currently reviewing our security policies in response to this incident. We are also reviewing technical, administrative, and physical safeguards to identify and implement any further security enhancements as needed.

We are conducting additional employee training on email safety awareness, and reviewing training policies and existing procedures on security safeguards.

Q. What Can I Do to Protect My Information?

Credit Monitoring and Identity Theft Restoration Services. Covenant Care encourages potentially affected patients to access the twelve (12) months of credit monitoring and identity theft restoration services that is being offered at no cost. Information on these services and how to enroll is available in the notice being mailed to those patients who may be potentially impacted by this incident.

Monitor Your Accounts. We encourage potentially affected individuals to remain vigilant against incidents of identity theft and fraud, to review account statements and explanation of benefits, and to monitor credit reports for suspicious activity and to detect errors. Under U.S. law adult consumers are entitled to one free credit report annually from each of the three major credit reporting bureaus. To order a 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 a credit report.

You have the right to place a “security freeze” on a credit report, which will prohibit a consumer reporting agency from releasing information in a credit report without your express authorization. The security freeze is designed to prevent credit, loans, and services from being approved in the consumer’s name without your consent. However, you should be aware that using a security freeze to take control over who gets access to the personal and financial information in a credit report may delay, interfere with, or prohibit the timely approval of any subsequent request or application made regarding a new loan, credit, mortgage, or any other account involving the extension of credit. Pursuant to federal law, consumers cannot be charged to place or lift a security freeze on a credit report. Should you wish to place a security freeze, please contact the major consumer reporting agencies listed below:

Experian
P.O. Box 9554
Allen TX 75013
1-888-397-3742
www.experian.com/freeze/center.html

TransUnion
P.O. Box 2000
Chester, PA 19016
1-888-909-8872
[www.transunion.com/
credit-freeze](http://www.transunion.com/credit-freeze)

Equifax
PO Box 105788
Atlanta, GA 30348-5788
1-800-685-1111
[www.equifax.com/personal/
credit-report-services](http://www.equifax.com/personal/credit-report-services)

As an alternative to a security freeze, consumers have the right to place an initial or extended “fraud alert” on a file at no cost. An initial fraud alert is a 1-year alert that is placed on a consumer’s credit file. Upon seeing a fraud alert display on a consumer’s credit file, a business is required to take steps to verify the consumer’s identity before extending new credit. If a consumer is a victim of identity theft, he or she is entitled to an extended fraud alert, which is a fraud alert lasting seven years. Should you wish to place a fraud alert, please contact any one of the agencies listed below:

Experian

P.O. Box 2002
Allen, TX 75013
1-888-397-3742
www.experian.com/fraud/center.html

TransUnion

P.O. Box 2000
Chester, PA 19106
1-800-680-7289
www.transunion.com/fraud-victim-resource/place-fraud-alert

Equifax

P.O. Box 105069
Atlanta, GA 30348
1-888-766-0008
www.equifax.com/personal/credit-report-services

Additional Information. You can further educate yourself regarding identity theft, fraud alerts, security freezes, and the steps you can take to protect information, by contacting the consumer reporting agencies, 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); TTY: 1-866-653-4261. 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. 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 report with law enforcement for identity theft, you will likely need to provide some proof that you have been a victim. Instances of known or suspected identity theft should also be reported to law enforcement. Notice in this matter has not been delayed by law enforcement.

Q. Where Can I Go To Get More Information?

Covenant Care has established a dedicated assistance line for individuals seeking additional information regarding this incident. Individuals may call **1-866-298-8060** (toll free), Monday through Friday, 6:00 a.m. to 3:30 p.m. PT, with questions or if they would like additional information.