

## NOTICE OF DATA INCIDENT

### ABOUT THE DATA INCIDENT

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

Covenant Care is the licensee of Wagner Heights Nursing and Rehabilitation Center, a skilled nursing facility located in Stockton, California. Covenant Care recently became aware of an incident in which an unauthorized individual(s) gained access to an employee's email account which contained certain personal information about patients and other individuals. To date, Covenant Care is not aware of actual or attempted misuse of information present in the account. This notice is intended to inform potentially affected individuals of the data incident and to provide information and resources that they may use to better protect against potential misuse of personal information, should they feel it is appropriate to do so.

### FREQUENTLY ASKED QUESTIONS

#### ***Q. What Happened?***

On February 24, 2022, Covenant Care learned of suspicious activity related to an email account for an employee of Wagner Heights Nursing and Rehabilitation Center. Covenant Care immediately secured the account and commenced an investigation. Working with third-party forensic investigators and other vendors, Covenant Care determined that an unauthorized actor(s) gained access to the email account on February 24, 2022. Covenant Care then undertook a diligent review and analysis of the email account to determine what information was present at the time of unauthorized access. While the investigation to confirm the full nature and scope of the incident is still ongoing, through this review, on April 18, 2022, Covenant Care determined that certain patient records and other personal information of individuals were present in the account at the time of the unauthorized access. Covenant Care began mailing notice letters on May 5, 2022 to potentially affected individuals.

#### ***Q. What Information Was Involved?***

While the information present at the time of the unauthorized access varies by individual, it may include: full name; date of birth; driver's license/state identification number; Social Security number; health insurance/subscriber number, Medicare/Medicaid number, medical record number, patient account number and/or other health insurance information, such as medical benefits and entitlements; treatment information; prescription/medication information; provider(s) names; and diagnosis or symptom information.

#### ***Q. What is Covenant Care Doing?***

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.

In response to this incident, Covenant Care promptly commenced an investigation to determine the full nature and scope of the issue and focused on identifying potentially affected individuals and their contact information in order to quickly notify them of the incident. While these efforts remain ongoing, Covenant Care is providing notice to potentially affected individuals that 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 individuals access to twelve (12) months of credit

monitoring and identity theft restoration services at no cost. In addition to notifying affected individuals, Covenant Care is also notifying federal and state regulatory agencies and law enforcement.

While we have strict security measures in place to protect information in our possession, we are currently reviewing Wagner Heights Nursing and Rehabilitation Center’s technical, administrative, and physical safeguards to identify and implement any potential enhancements to its security measures, including installation of additional technical safeguards to our email systems. Further, our general privacy and security policies and procedures are being reviewed for potential enhancements, as well as our policies and procedures specific to employee training on email security. Finally, additional employee retraining is being conducted regarding email safety and security awareness.

***Q. What Can I Do?***

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. Please also review the “Additional Resources” section below.

***Q. More Information?***

Covenant Care has established a dedicated assistance line for individuals seeking additional information regarding this incident. Individuals may call **1-855-788-2390** (toll free), Monday through Friday, 8:00 a.m. to 5:30 p.m. Central Time, excluding major U.S. holidays, with questions or if they would like additional information.

***Additional Resources***

**Monitor Your Accounts**

Under U.S. law, a consumer is entitled to one free credit report annually from each of the three major credit reporting bureaus, Equifax, Experian, and TransUnion. To order your free credit report, visit [www.annualcreditreport.com](http://www.annualcreditreport.com) or call, toll-free, 1-877-322-8228. You may also directly contact the three major credit reporting bureaus listed below to request a free copy of your credit report.

Consumers have the right to place an initial or extended “fraud alert” on a credit 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 you are a victim of identity theft, you are 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 three major credit reporting bureaus listed below.

As an alternative to a fraud alert, consumers have the right to place a “credit freeze” on a credit report, which will prohibit a credit bureau from releasing information in the credit report without the consumer’s express authorization. The credit freeze is designed to prevent credit, loans, and services from being approved in your name without your consent. However, you should be aware that using a credit freeze to take control over who gets access to the personal and financial information in your credit report may delay, interfere with, or prohibit the timely approval of any subsequent request or application you make regarding a new loan, credit, mortgage, or any other account involving the extension of credit. Pursuant to federal law, you cannot be charged to place or lift a credit freeze on your credit report. To request a security freeze, you will need to provide the following information:

1. Full name (including middle initial as well as Jr., Sr., II, III, etc.);

2. Social Security number;
3. Date of birth;
4. Addresses for the prior two to five years;
5. Proof of current address, such as a current utility bill or telephone bill;
6. A legible photocopy of a government-issued identification card (state driver’s license or ID card, etc.); and
7. A copy of either the police report, investigative report, or complaint to a law enforcement agency concerning identity theft if you are a victim of identity theft.

Should you wish to place a credit freeze or fraud alert, please contact the three major credit reporting bureaus listed below:

<b>Equifax</b>	<b>Experian</b>	<b>TransUnion</b>
<a href="https://www.equifax.com/personal/credit-report-services/">https://www.equifax.com/personal/credit-report-services/</a>	<a href="https://www.experian.com/help/">https://www.experian.com/help/</a>	<a href="https://www.transunion.com/credit-help">https://www.transunion.com/credit-help</a>
888-298-0045	1-888-397-3742	833-395-6938
Equifax Fraud Alert, P.O. Box 105069 Atlanta, GA 30348-5069	Experian Fraud Alert, P.O. Box 9554, Allen, TX 75013	TransUnion Fraud Alert, P.O. Box 2000, Chester, PA 19016
Equifax Credit Freeze, P.O. Box 105788 Atlanta, GA 30348-5788	Experian Credit Freeze, P.O. Box 9554, Allen, TX 75013	TransUnion Credit Freeze, P.O. Box 160, Woodlyn, PA 19094

**Additional Information**

You may further educate yourself regarding identity theft, fraud alerts, credit freezes, and the steps you can take to protect your personal information by contacting the consumer reporting bureaus, the Federal Trade Commission, or your state Attorney General. The Federal Trade Commission may be reached at: 600 Pennsylvania Avenue NW, Washington, DC 20580; [www.identitytheft.gov](http://www.identitytheft.gov); 1-877-ID-THEFT (1-877-438-4338); and 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 and your state Attorney General. This notice has not been delayed by law enforcement.

*For District of Columbia residents*, the District of Columbia Attorney General may be contacted at: 400 6th Street, NW, Washington, DC 20001; 202-727-3400; and [oag@dc.gov](mailto:oag@dc.gov).

*For Maryland residents*, the Maryland Attorney General may be contacted at: 200 St. Paul Place, 16th Floor, Baltimore, MD 21202; 1-410-528-8662 or 1-888-743-0023; and [www.oag.state.md.us](http://www.oag.state.md.us). Wagner Heights Nursing and Rehabilitation Center is located at 9289 Branstetter Pl, Stockton, CA 95209.

*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 bureaus 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](http://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.

*For New York residents*, the New York Attorney General may be contacted at: Office of the Attorney General, The Capitol, Albany, NY 12224-0341; 1-800-771-7755; or <https://ag.ny.gov/>.

*For North Carolina residents*, the North Carolina Attorney General may be contacted at: 9001 Mail Service Center, Raleigh, NC 27699-9001; 1-877-566-7226 or 1-919-716-6000; and [www.ncdoj.gov](http://www.ncdoj.gov).

*For Rhode Island residents*, the Rhode Island Attorney General may be reached at: 150 South Main Street, Providence, RI 02903; [www.riag.ri.gov](http://www.riag.ri.gov); and 1-401-274-4400. Under Rhode Island law, you have the right to obtain any police report filed in regard to this incident. The number of Rhode Island residents potentially impacted by this incident is not yet confirmed.