



MULLEN
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October 19, 2023

VIA E-MAIL

Office of the Attorney General of Iowa
Consumer Protection Division
Security Breach Notifications
1305 E. Walnut Street
Des Moines, IA 50319-0106
E-mail: consumer@ag.iowa.gov

Re: Notice of Data Event

To Whom It May Concern:

We represent Chartis Group and Greeley Company, LLC (“Chartis”) located at 220 West Kinzie Street, Third Floor, Chicago IL 60654, and write to notify your office of an incident that occurred at Chartis that may affect the security of certain personal information related to three (3) Iowa residents. Chartis is providing this notice on behalf of UnityPoint Health for which it provides healthcare related services. This notice may be supplemented with any new significant facts learned subsequent to its submission. By providing this notice, Chartis does not waive any rights or defenses regarding the applicability of Iowa law, the applicability of the Iowa data event notification statute, or personal jurisdiction.

Nature of the Data Event

On July 30, 2023, Chartis became aware of unusual activity on a network belonging to their Clinical Quality Solutions division (formerly known as Greeley). Chartis immediately took steps to secure the network and launched an investigation with the assistance of third-party computer forensics specialists to determine the full nature and scope of the incident. The investigation determined that the network was subject to unauthorized access between July 16, 2023 and July 30, 2023, and the unauthorized actor had the ability to view or acquire certain information stored on the network during the period of access. Therefore, Chartis undertook a comprehensive review of the data at risk to assess if any sensitive information could be affected and to whom it related. On September 8, 2023, Chartis provided notice of this event to all data owners whose data was impacted and offered to provide notification services on their behalf.

The information that could have been subject to unauthorized access varies by individual but could include name, address, Social Security number, driver’s license number, date of birth, medical record number (“MRN”), admission date, discharge date, length of stay, procedure date, procedure type, medical diagnosis, treatment information, lab results, medical imaging, and medications. Chartis has no indication that information has been misused in relation to this event.

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Notice to Iowa Residents

On October 19, 2023, Chartis began mailing written notice of this incident to three (3) Iowa residents. Written notice is being provided in substantially the same form as the letter attached here as *Exhibit A*. As Chartis does not own the data at issue, it provided notice to appropriate data owners who requested that Chartis provide notice to your office on their behalf. Chartis may supplement this notice to report additional residents have been notified on behalf of data owners.

Other Steps Taken and To Be Taken

Upon discovering the event, Chartis moved quickly to investigate and respond to the incident, assess the security of its systems, and identify potentially affected individuals. Further, Chartis notified federal law enforcement regarding the event and is providing individuals whose personal information was potentially affected by this incident with access to credit monitoring services for twenty-four (24) months through IDX at no cost to the individuals.

Chartis is providing impacted individuals with guidance on how to better protect against identity theft and fraud. Chartis is providing individuals with information on how to place a fraud alert and security freeze on one's credit file, the contact details for the national consumer reporting agencies, information on how to obtain a free credit report, a reminder to remain vigilant for incidents of fraud and identity theft by reviewing account statements and monitoring free credit reports, and encouragement to contact the Federal Trade Commission, their state Attorney General, and law enforcement to report attempted or actual identity theft and fraud. Chartis is providing written notice of this incident to relevant state and federal regulators.

Contact Information

Should you have any questions regarding this notification or other aspects of the data security event, please contact us at (267) 930-4259.

Very truly yours,



Colin Scanlon of
MULLEN COUGHLIN LLC

CDS/gpm
Enclosure

EXHIBIT A



CHARTIS

4145 SW Watson Avenue, Suite 400
Beaverton, OR 97005

<<First Name>> <<Last Name>>
<<Address1>> <<Address2>>
<<City>>, <<State>> <<Zip>>

Enrollment Code: <<XXXXXXXX>>

To Enroll, Scan the QR Code Below:



Or Visit:

<https://app.idx.us/account-creation/protect>

October 19, 2023

Notice of Data <<Event/Breach>>

Dear <<First Name>> <<Last Name>>,

The Chartis Group and Greeley Company, LLC (“Chartis”) is writing to notify you of an incident that may affect the privacy of some of your information. Chartis provides services to <<name of data owner>> which is how we came into possession of your information. We are providing details of the incident and the resources available to you to help protect your information should you feel it is appropriate to do so.

What Happened? On July 30, 2023, Chartis became aware of unusual activity on a network belonging to our Clinical Quality Solutions division (formerly known as Greeley). We immediately took steps to secure the network and launched an investigation with the assistance of third-party computer forensics specialists to determine the full nature and scope of the incident. The investigation determined that the network was subject to unauthorized access between July 16, 2023 and July 30, 2023, and the unauthorized actor had the ability to view or acquire certain information stored on the network during the period of access. Therefore, Chartis undertook a comprehensive review of the data at risk to assess if any sensitive information could be affected and to whom it related. We are notifying you because certain information related to you could be impacted.

What Information Was Involved? The types of information potentially affected by this incident may include your name, address, Social Security number, driver’s license number, date of birth, medical record number (“MRN”), admission date, discharge date, length of stay, procedure date, procedure type, medical diagnosis, treatment information, lab results, medical imaging, and medications. Chartis has no indication that your information has been misused in relation to this event.

What We Are Doing. Upon discovering this incident, we immediately took steps to conduct a diligent investigation to confirm the nature and scope of the incident. The investigation confirmed that the security of our core network and other segments were unaffected by this incident. As part of Chartis’ ongoing commitment to the security of information, our policies and procedures regarding information security are being reviewed and enhanced, and additional safeguards have been implemented.

As an added precaution, we are also offering you access to complimentary credit monitoring and identity restoration services for twenty-four (24) months through IDX. Please review the attached *Steps You Can Take to Help Protect Your Personal Information* for instructions regarding how to enroll and for additional information regarding these services. Credit monitoring is voluntary, you will need to enroll yourself in these services if you wish to do so, as we are not able to activate the services on your behalf.

What You Can Do. We encourage you to remain vigilant against incidents of identity theft and fraud, to monitor your account statements to detect errors, and to review your credit reports for suspicious activity. We also encourage you to enroll in the complimentary credit monitoring services we are offering you.

For More Information. We understand you may have questions about this incident that are not addressed in this letter. If you have questions, please call 1-800-939-4170 available Monday through Friday, 8 am to 8 pm Central Time, excluding major U.S. holidays. Additionally, you can write to us at The Chartis Group, 220 West Kinzie Street, Third Floor, Chicago IL 60654.

We continue to devote significant resources to protect and maintain the confidentiality of information entrusted to us and regret any inconvenience or concern this may cause you.

Sincerely,

A handwritten signature in black ink that reads "Greg Kopulos". The signature is written in a cursive style with a large initial "G" and a long, sweeping underline.

Greg Kopulos
President
Chartis Clinical Quality Solutions
gkopulos@chartis.com

STEPS YOU CAN TAKE TO HELP PROTECT YOUR PERSONAL INFORMATION

Enroll in Credit Monitoring

- 1. Website and Enrollment.** Go to <https://app.idx.us/account-creation/protect> and follow the instructions for enrollment using your Enrollment Code provided at the top of the letter. Please note the deadline to enroll is January 19, 2024.
- 2. Activate the credit monitoring** provided as part of your IDX identity protection membership. The monitoring included in the membership must be activated to be effective. Note: You must have established credit and access to a computer and the internet to use this service. If you need assistance, IDX will be able to assist you.
- 3. Telephone.** Contact IDX at 1-800-939-4170 to gain additional information about this event and speak with knowledgeable representatives about the appropriate steps to take to protect your credit identity.

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 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 may need to provide the following information, depending on whether you make the request online, by phone, or by mail:

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.);
7. Social Security Card, pay stub, or W2;
8. If you are a victim of identity theft, include a copy of either the police report, investigative report, or complaint to a law enforcement agency concerning identity theft.

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

Equifax	Experian	TransUnion
https://www.equifax.com/personal/credit-report-services/	https://www.experian.com/help/	https://www.transunion.com/credit-help
1-888-298-0045	1-888-397-3742	1-800-916-8800
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; 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 Massachusetts Residents, Under Massachusetts law, you have the right to obtain any police report filed in regard to this incident. If you are the victim of identity theft, you also have the right to file a police report and obtain a copy of it.

For District of Columbia residents, the District of Columbia Attorney General may be contacted at: 400 6th Street, NW, Washington, D.C. 20001; 202-727-3400; and 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 <https://www.marylandattorneygeneral.gov/>.

For New Mexico residents, consumers have rights pursuant to the Fair Credit Reporting Act, such as the right to be told if information in their credit file has been used against them, the right to know what is in their credit file, the right to ask for their 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 consumers' files is limited; consumers must give consent for credit reports to be provided to employers; consumers may limit "prescreened" offers of credit and insurance based on information in their credit report; and consumers may seek damages from violators. Consumers 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 consumers to review their 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.

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.

For Rhode Island residents, the Rhode Island Attorney General may be reached at: 150 South Main Street, Providence, RI 02903; www.riag.ri.gov; and 1-401-274-4400. Under Rhode Island law, individuals have the right to obtain any police report filed in regard to this event. There is/are approximately <<#>> Rhode Island residents that may be impacted by this event.