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426 W. Lancaster Avenue, Suite 200
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December 29, 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 Navvis & Company, LLC (“Navvis”) located at 555 Maryville University Drive Suite 240, St. Louis MO, 63141, and are writing to notify your office of an incident that may affect the security of certain personal information relating to seven hundred sixty-four (764) Iowa residents. The investigation into this matter is ongoing, and this notice will be supplemented with any new significant facts learned subsequent to its submission. By providing this notice, Navvis 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 25, 2023, Navvis became aware of suspicious activity on its computer network. Navvis immediately launched an investigation to determine the nature and scope of the incident. Through its investigation, Navvis determined that, between July 12, 2023 – July 25, 2023, it was a victim of a cyber-attack, and a threat actor had access to certain systems that stored personal and protected health information. Navvis conducted a thorough review of the systems and files to confirm what information was stored therein, and to whom the information related. On or about July 25, 2023, this extensive review identified certain individuals’ information was present within the accessed records. Although Navvis has no evidence of any identity theft or fraud in connection with this incident, Navvis is notifying those individuals whose information was impacted.

The information that could have been subject to unauthorized access includes name, Social Security number, date of birth, diagnosis/clinical information, and medical treatment/procedure information.

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Notice to Iowa Residents

On September 22, 2023, Navvis began providing notice to impacted individuals. The review of the impacted files continued. On December 7, 2023, additional individuals were identified as potentially impacted. On December 29, 2023, Navvis began providing written notice of this incident to the additional individuals determined to be potentially impacted, including seven hundred sixty-four (764) Iowa residents. Written notice is being provided in substantially the same form as the letter attached here as **Exhibit A**.

Other Steps Taken and To Be Taken

Upon discovering the event, Navvis moved quickly to investigate and respond to the incident, assess the security of Navvis systems, and identify affected individuals. Further, Navvis notified federal law enforcement regarding the event. Navvis is also working to implement additional safeguards and training to its employees. Navvis is providing access to credit monitoring services for twelve (12) months, through IDX, to individuals whose personal information was affected by this incident, at no cost to these individuals.

Additionally, Navvis is providing impacted individuals with guidance on how to better protect against identity theft and fraud, including advising individuals to report any suspected incidents of identity theft or fraud to their credit card company and/or bank. Navvis 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.

Navvis provided written notice of this incident to relevant state regulators, as necessary. Navvis also notified the U.S. Department of Health and Human Services pursuant to the Health Insurance Portability and Accountability Act (HIPAA) and prominent media.

Contact Information

Should you have any questions regarding this notification or other aspects of the data security event, please contact us at (267) 930-4888.

Very truly yours,



Richard Aponte-Boyd of
MULLEN COUGHLIN LLC

RAB/mf1
Enclosure

EXHIBIT A

NAVVIS

P.O. Box 989728
West Sacramento, CA 95798-9728

<<FIRST NAME>> <<LAST NAME>>
<<ADDRESS1>>
<<ADDRESS2>>
<<CITY>>, <<STATE>> <<ZIP>>
<<Country>>

Enrollment Code: <<ENROLLMENT>>

To Enroll, Scan the QR Code Below:



Or Visit:

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

December 29, 2023

RE: NOTICE OF <<SECURITY INCIDENT/DATA BREACH>>

Dear <<FIRST NAME>> <<LAST NAME>>:

Navvis & Company, LLC (“Navvis”) writes to inform you of a recent incident that may impact the privacy of some of your information. We are providing this notice in an abundance of caution, to inform you of the incident, our response, and steps you may take to help protect your information, should you feel it is necessary to do so. Navvis is in possession of your information because we are a provider of health management services to health care organizations, including SSM Health.

What happened? On July 25, 2023, Navvis identified suspicious activity within our computer network environment. We immediately took steps to secure our network and launched an investigation to determine the nature and scope of the activity. Through the investigation, we determined that between July 12, 2023, and July 25, 2023, an unauthorized actor may have had access to certain systems. As a result, certain files and information within these systems may have been accessed, or acquired, by the unauthorized actor. Based on the investigation, we conducted a detailed review of the data involved to determine the type of information present and to whom it related. The review was exhaustive and time-consuming, but we are notifying you now because the investigation recently concluded that information related to you was contained within the files.

What information was involved? We determined that the following information related to you may have been subject to unauthorized access during this incident: your name, and <<ExposedDataElements>>.

What are we doing? The confidentiality, privacy, and security of information within our care is Navvis’ highest priority. Upon learning of the incident, we took immediate steps to secure our network environment, and launched an investigation to understand its nature and scope. We are unaware of any actual misuse of your information at this time. As part of our ongoing commitment to the security of information, we are reviewing and enhancing our already robust policies and procedures related to data privacy, to reduce the likelihood of a similar future event. We have notified applicable regulatory authorities, as required by law. As an added precaution, we are also offering to you <<12/24>> months of complimentary access to credit monitoring services through IDX. Individuals who wish to receive these services must enroll by following the enclosed instructions under *Steps You Can Take to Help Protect Your Information*, as we are unable to enroll you.

What can you do? We encourage you to remain vigilant against incidents of identity theft and fraud, and to review your account statements and credit reports for suspicious activity and errors. The enclosed *Steps You Can Take to Help Protect Your Information* offers helpful tips and actions you can take to protect against possible information misuse, should you feel it appropriate to do so. You may also enroll in the complimentary credit monitoring services we are offering to you by calling 1-888-996-4022, or visiting <https://app.idx.us/account-creation/protect>.

For more information: We understand that you may have questions about this incident that are not addressed in this letter. If you do, or otherwise need assistance, please call our dedicated toll-free help line at 1-888-996-4022, Monday through Friday from 8:00 am to 9:00 pm Central time (excluding major U.S. holidays). You may also write to Navvis at 555 Maryville University Drive, Suite 240, St. Louis, MO, 63141.

Sincerely,
Navvis

STEPS YOU CAN TAKE TO HELP PROTECT YOUR INFORMATION

Enroll in Credit Monitoring

1. Website and Enrollment. Scan the QR image or 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 in services is March 29, 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 1-888-996-4022 to gain additional information about this event and speak with knowledgeable representatives about the appropriate steps to take to protect your credit identity.

4. Review your credit reports. We recommend that you remain vigilant by reviewing account statements and monitoring credit reports. Under federal law, you also are entitled every 12 months to one free copy of your credit report from each of the three major credit reporting companies. To obtain a free annual credit report, go to www.annualcreditreport.com or call 1-877-322-8228. You may wish to stagger your requests so that you receive a free report by one of the three credit bureaus every four months.

If you discover any suspicious items and have enrolled in IDX identity protection, notify them immediately by calling or by logging into the IDX website and filing a request for help.

If you file a request for help or report suspicious activity, you will be contacted by a member of our ID Care team who will help you determine the cause of the suspicious items. In the unlikely event that you fall victim to identity theft as a consequence of this incident, you will be assigned an ID Care Specialist who will work on your behalf to identify, stop and reverse the damage quickly.

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 one-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 credit 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, 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
888-298-0045	888-397-3742	888-909-8872
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 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.

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/>. Navvis is located at 555 Maryville University Drive Suite 240, St. Louis MO, 63141.

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 https://files.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, you have the right to obtain any police report filed in regard to this incident. There are 33 Rhode Island residents impacted.