

BakerHostetler

Baker & Hostetler LLP

45 Rockefeller Plaza
New York, NY 10111

T 212.589.4200
F 212.589.4201
www.bakerlaw.com

Theodore J. Kobus III
direct dial: 212.271.1504
tkobus@bakerlaw.com

March 4, 2016

VIA E-MAIL (CONSUMER@IOWA.GOV) AND OVERNIGHT MAIL

Office of the Attorney General of Iowa
Consumer Protection Division
Hoover State Office Building
1305 E. Walnut Street
Des Moines IA 50319

RECEIVED
16 MAR - 7 AM 11:11
CONSUMER PROTECTION DIV.

Re: Incident Notification

Dear Sir or Madam:

21st Century Oncology (“21st Century”) is committed to maintaining the privacy and security of its patients’ information. On November 13, 2015, the Federal Bureau of Investigation advised 21st Century that patient information was illegally obtained by an unauthorized third party who may have gained access to a 21st Century database. 21st Century immediately hired a leading forensics firm to support the investigation, assess 21st Century’s systems and bolster security. The forensics firm determined that, on October 3, 2015, the intruder may have accessed the database, which contained information that included patients’ names, Social Security numbers, physicians’ names, diagnosis and treatment information, and insurance information.

The FBI asked 21st Century to delay notification or public announcement of the incident until now so as not to interfere with its investigation. 21st Century has no indication that patient information has been misused in any way. Out of an abundance of caution, however, today, 21st Century began mailing letters to 639 Iowa residents pursuant to the requirements of the Health Insurance Portability and Accountability Act (“HIPAA”), in substantially the same form as the letter attached hereto.¹

¹ As 21st Century Oncology does not conduct business in Iowa, this letter is not, and does not constitute, a waiver of personal jurisdiction.

Office of the Attorney General of Iowa
Consumer Protection Division
March 4, 2016
Page 2

21st Century continues to work closely with the FBI on its investigation. In addition to security measures already in place, 21st Century has also taken steps to enhance internal security protocols to help prevent a similar incident in the future.

Please do not hesitate to contact me if you have any questions regarding this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Theodore J. Kobus III". The signature is written in a cursive style with a large, looped initial 'T'.

Theodore J. Kobus III

Enclosure



Return Mail Processing Center
 PO Box 6336
 Portland, OR 97228-6336

<<mail id>>
 <<First Name>><<Last Name>>
 <<Address1>>
 <<City>><<State>><<Zip>>

<<Date>>

Dear <<First Name>> <<Last Name>>:

21st Century Oncology is committed to maintaining the privacy and security of our patients' personal information. Regrettably, we are writing to inform you of an incident involving some of that information.

On November 13, 2015, the Federal Bureau of Investigation (FBI) advised us that patient information was illegally obtained by an unauthorized third party who may have gained access to a 21st Century database. We immediately hired a leading forensics firm to support our investigation, assess our systems and bolster security. The forensics firm determined that, on October 3, 2015, the intruder may have accessed the database, which contained information that may have included your name, Social Security number, physician's name, diagnosis and treatment information, and insurance information. We have no evidence that your medical record was accessed.

The FBI asked that we delay notification or public announcement of the incident until now so as not to interfere with its investigation. Now that law enforcement's request for delay has ended, we are notifying patients as quickly as possible. We continue to work closely with the FBI on its investigation of the intrusion into our system. In addition to security measures already in place, we have also taken steps to enhance internal security protocols to help prevent a similar incident in the future.

We have no indication that your information has been misused in any way; however, out of an abundance of caution, we are offering you a free one-year membership of Experian's[®] ProtectMyID[®] Alert. This product helps detect possible misuse of your personal information and provides you with identity protection services focused on immediate identification and resolution of identity theft. ProtectMyID Alert is completely free to you, and enrolling in this program will not hurt your credit score. For more information on identity theft prevention and ProtectMyID Alert, including instructions on how to activate your complimentary one-year membership, please see the additional information provided in this letter. We also recommend that you regularly review the explanation of benefits that you receive from your health insurer. If you see services that you did not receive, please contact your insurer immediately.

We deeply regret any concern this may cause you, and we want to emphasize that your care will not be affected by this incident. Should you have any questions, please call 1-866-446-1405, from 9 a.m. to 9 p.m. Eastern Time, Monday through Friday.

Sincerely,

Daniel Dosoretz, M.D.
 President and CEO

Attachment

Activate ProtectMyID Now in Three Easy Steps

1. ENSURE That You Enroll By: July 7, 2016 (Your code will not work after this date.)
2. VISIT the ProtectMyID Website to enroll: www.protectmyid.com/redeem
3. PROVIDE Your Activation Code: <<code>>

If you have questions or need an alternative to enrolling online, please call (866) 271-3084 and provide engagement #: PC98965

ADDITIONAL DETAILS REGARDING YOUR 12-MONTH PROTECTMYID MEMBERSHIP:

A credit card is not required for enrollment.

Once your ProtectMyID membership is activated, you will receive the following features:

- **Free copy of your Experian credit report**
- **Surveillance Alerts for:**
 - Daily Bureau Credit Monitoring: Alerts of key changes and suspicious activity found on your Experian, Equifax®, and TransUnion® credit reports.
- **Identity Theft Resolution and ProtectMyID ExtendCARE:** Toll-free access to U.S.-based customer care and a dedicated Identify Theft Resolution agent who will walk you through the process of fraud resolution from start to finish for seamless service. They will investigate each incident; help with contacting credit grantors to dispute charges and close accounts, including credit, debit, and medical insurance cards; assist with freezing credit files; and contact government agencies.
 - It is recognized that identity theft can happen months and even years after a data breach. To offer added protection, you will receive ExtendCARE™, which provides you with the same high level of Fraud Resolution support even after your ProtectMyID membership has expired.
- **\$1 Million Identity Theft Insurance*:** Immediately covers certain costs, including lost wages, private investigator fees, and unauthorized electronic fund transfers.

Activate your membership today at www.protectmyid.com/redeem or call (866) 271-3084 to register with the activation code above.

Once your enrollment in ProtectMyID is complete, you should carefully review your credit report for inaccurate or suspicious items. If you have any questions about ProtectMyID, need help understanding something on your credit report, or suspect that an item on your credit report may be fraudulent, please contact Experian's customer care team at (866) 271-3084.

Even if you choose not to take advantage of this free credit monitoring service, we recommend that you remain vigilant to the possibility of fraud and identity theft by reviewing your credit card, bank, and other financial statements for any unauthorized activity. You may also obtain a copy of your credit report, free of charge, directly from each of the three nationwide credit reporting agencies. To order your credit report, free of charge, once every twelve months, please visit www.annualcreditreport.com or call toll-free at 1-877-322-8228. Contact information for the three nationwide credit reporting agencies is as follows:

Equifax
PO Box 740241
Atlanta, GA 30374
www.equifax.com
1-800-685-1111

Experian
PO Box 2002
Allen, TX 75013
www.experian.com
1-888-397-3742

TransUnion
PO Box 1000
Chester, PA 19022
www.transunion.com
1-800-916-8800

If you believe you are the victim of identity theft or have reason to believe your personal information has been misused, you should immediately contact the Federal Trade Commission and/or the Office of the Attorney General in your home state. Contact information for the Federal Trade Commission is as follows:

Federal Trade Commission
600 Pennsylvania Avenue, NW
Washington, D.C. 20580
www.ftc.gov/idtheft
1-877-438-4338

You can obtain information from these sources about steps an individual can take to avoid identity theft as well as information about fraud alerts and security freezes. You should also contact your local law enforcement authorities and file a police report. Obtain a copy of the police report in case you are asked to provide copies to creditors to correct your records.

* Identity theft insurance is underwritten by insurance company subsidiaries or affiliates of AIG. The description herein is a summary, intended for informational purposes only, and does not include all terms, conditions, and exclusions of the policies described. Please refer to the actual policies for terms, conditions, and exclusions of coverage. Coverage may not be available in all jurisdictions.