

EXHIBIT 1

We write to supplement our notices to your office on May 18, 2021 and June 7, 2021. This notice will be supplemented with any new significant facts learned subsequent to its submission. CaptureRx is providing this notice on behalf of the entities identified in *Exhibit A1*, collectively referred to as the “notifying entities” in this notification.

As previously noted, CaptureRx has been working continuously with healthcare providers, including the notifying entities, to notify the impacted individuals of the incident. As you know, on or about May 5, 2021, CaptureRx began providing written notice of this incident to all affected individuals on behalf of the notifying entities. Notice was provided on an ongoing basis as potentially affected individuals were identified by covered entities. Written notice is being provided in substantially the same form as the letter attached here as *Exhibit B1*.

Additionally, CaptureRx is providing impacted individuals with guidance on how to protect against identity theft and fraud. CaptureRx is also providing affected 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. In addition to notifying individuals and your Office, CaptureRx will be notifying the United States Department of Health and Human Services.

EXHIBIT A1

Notifying entities

- St. Croix Regional Family Health Center
- East Grand Health Center

EXHIBIT B1



Return Mail Processing Center
P.O. Box 6336
Portland, OR 97228-6336

<<Mail ID>>
<<Name 1>>
<<Name 2>>
<<Address 1>>
<<Address 2>>
<<Address 3>>
<<Address 4>> <<Date>>
<<Address 5>>
<<City>><<State>><<Zip>>
<<Country>>

Re: Notice of Security Incident

REF 3# <<CRX ID NUMBER>>

Dear <<Name 1>>:

CaptureRx is a vendor that provides services to certain healthcare providers, including <<Entity Name Long>>. CaptureRx is writing, on behalf of <<Entity Name Short>> to notify you of a recent event at CaptureRx that may affect the privacy of some of your personal information. We are providing you with information about the event, our response to it, and resources available to you to help protect your information, should you feel it appropriate to do so.

What Happened? CaptureRx recently became aware of unusual activity involving certain of its electronic files. Following this, CaptureRx immediately began an investigation into this activity and worked quickly to assess the security of its systems. On February 19, 2021, the investigation determined that certain files were accessed and acquired on February 6, 2021 without authorization.

CaptureRx immediately began a thorough review of the full contents of the files to determine whether sensitive information was present at the time of the incident. On or around March 19, 2021, CaptureRx confirmed that some of your information was present in the relevant files. CaptureRx began the process of notifying <<Entity Notification>> of this incident.

What Information Was Involved? The investigation determined that, at the time of the incident, the relevant files contained your first name, last name, date of birth, and prescription information. We are providing you this notice to ensure you are aware of this incident.

What Is CaptureRx Doing? Data privacy and security are among CaptureRx’s highest priorities, and there are extensive measures in place to protect information in CaptureRx’s care. Upon learning of this incident, CaptureRx moved quickly to investigate and respond. This investigation and response included confirming the security of CaptureRx’s systems, reviewing the contents of the relevant files for sensitive information, and notifying business partners associated with that sensitive information. As part of CaptureRx’s ongoing commitment to the security of information, all policies and procedures are being reviewed and enhanced and additional workforce training is being conducted to reduce the likelihood of a similar future event.

What You Can Do. We encourage you to remain vigilant against incidents of identity theft and fraud, to review your account statements and explanation of benefits forms, and to monitor your free credit reports for suspicious activity and to detect errors. Please also review the information contained in the attached “Steps You Can Take to Protect Personal Information.”

For More Information. We recognize that you may have questions not addressed in this letter. If you have additional questions, please call our dedicated assistance line at (855) 654-0919 (toll free), Monday – Friday, 9:00 a.m. to 9:00 p.m., Eastern Time.

Sincerely,
CaptureRx

STEPS YOU CAN TAKE TO PROTECT PERSONAL INFORMATION

Monitor Your Accounts

We encourage you to remain vigilant against incidents of identity theft and fraud by reviewing your account and monitoring your free credit reports for suspicious activity and to detect errors. 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 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
1-888-298-0045	1-888-397-3742	1-833-395-6938
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; 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.