



| 6055 Nathan Lane North, Ste. 200, Plymouth, MN 55442 | 763.513.4300 | www.thriftywhite.com |

April 28, 2021

SENT VIA ELECTRONIC MAIL

Wayne Stenehjem
Office of Attorney General
600 East Boulevard Avenue
Department 125
Bismarck, ND 58505-0040

Dear Mr. Stenehjem,

Please consider this letter notice of a breach of a security system, pursuant to North Dakota Century Code 51-30-02. Thrifty Drug Stores, Inc.'s business associate, NEC Networks, LLC d/b/a CaptureRx ("CaptureRx") recently had a security incident that affected 250 or more North Dakota residents. Notices are being sent out to the individuals affected, as well as to the Bismarck Tribune. Thrifty Drug Stores, Inc. no longer does business with CaptureRx.

Very Truly Yours,

Kathryn Olson

Associate Legal Counsel

Exhibit A

Date

[Individual Name]
[Address]
[City, State Zip Code]

Re: Notice of Security Incident

Dear [Name]:

CaptureRx is a 340B third party administrator that provides services to certain healthcare providers, including [Organization]. CaptureRx is writing, on behalf of [Organization], to notify you of a recent event at CaptureRx that may affect the privacy of some of your personal information. While, to date, we have no evidence that your information has been misused, 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 files on its systems. 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 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. **To date, CaptureRx is unaware of any actual or attempted misuse of your information as a result of this incident.**

What Information Was Involved? The investigation determined that, at the time of the incident, the relevant files contained your [Data Elements]. Please note that while our investigation has not identified any actual or attempted misuse of your information, we are providing you this notice to ensure you are aware of this incident.

What Is CaptureRx Doing? Data privacy and security is 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 (XXX) XXX - XXXX (toll free), Monday – Friday, 9:00 a.m. to 5:00 p.m., Eastern Time.

Sincerely,

[signatory]
CaptureRx

STEPS YOU CAN TAKE TO PROTECT PERSONAL INFORMATION

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 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, military identification, 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.

For District of Columbia residents, the District of Columbia Attorney General may be contacted at: 441 4th St. NW #1100 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; and www.oag.state.md.us. Whitehall Specialties is located at 36120 Owen Street, Whitehall, WI 54773.

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 [#] Rhode Island residents impacted by this incident.

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, 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/>.