

Notice of Privacy Incident
Northwood, Inc.

Northwood, Inc. is a manager and supplier of durable medical equipment for health-related business clients, including Blue Cross Complete of Michigan. On May 6, 2019, Northwood became aware of suspicious activity relating to a phishing scam which allowed an unauthorized user to gain access to an employee's email account. Northwood immediately launched an investigation and hired a forensics expert to investigate the issue. The forensic investigation determined that unauthorized individual(s) accessed the employee's email account between May 3 and May 6, 2019. Based on this investigation, Northwood found that personal or protected health information for certain individuals may have been accessed. The incident affected one Northwood email account and did not affect Blue Cross Complete systems. Less than two percent of Blue Cross Complete members are potentially affected by this incident.

On May 17, 2019, Northwood informed Blue Cross Complete that personal or protected health information of one or more of its Medicaid members was accessible via the Northwood email account that was affected by this incident. On June 26, 2019, it was confirmed that the Blue Cross Complete data accessible via the Northwood email account were patients' names, member ID numbers, addresses, dates of birth, and information concerning the procurement of durable medical equipment for certain members. The data also included social security numbers for three individuals who we are attempting to notify directly. Although the Northwood email account was accessed, it cannot be confirmed whether any data was actually viewed.

Upon learning of this incident, Northwood immediately took the impacted email account offline and changed the account password. Password resets were implemented for all employee email accounts and employees were notified to be on the lookout for suspicious emails. Northwood also implemented additional technical safeguards on its email system, including multi-factor authentication (more than one password to enter an account), advanced threat protection, email archiving, and provided further training and education for employees to prevent similar incidents.

Although Blue Cross Complete and Northwood are not aware of any actual or attempted misuse of information, Northwood has arranged for the following identity monitoring services to start on the date of this notice for use at any time during the next 24 months.

- **Kroll Consultation and Restoration:** Kroll has a team of licensed Fraud Investigators who can help restore an individual's identity and provide meaningful consultation on fraud issues. Kroll's restoration service provides a resource to identify the nature of the fraud, assist the individual in gathering and completing necessary documentation, and advise on resources, processes, and next steps for the individual's identity recovery work. The investigator can also advise on potential fraud issues, provide advice on safeguarding identity, and perform proactive investigations to identify unknown issues.
- **Kroll Credit Monitoring:** This service monitors your credit file and provides alerts to you when information on your credit file has changed, such as new accounts and credit lines opening, or address changes. Kroll's services are available both online and offline. To enroll in this service, you will need to provide your personal information to Kroll. Following enrollment, additional steps may also be required in order to activate your monitoring options.

Those with questions can call Northwood's dedicated assistance line provided by Kroll at 1-800-494-0297 (toll free), Monday through Friday, 8 a.m. to 5:30 p.m., Central Time.

Steps You Can Take to Protect Your Information

Enroll in Credit Monitoring

As an added precaution, Kroll will monitor your identity for 24 months at no cost to you. Identity monitoring services include Credit Monitoring, Fraud Consultation, and Identity Theft Restoration.

Visit **www.IDMonitoringService.com** to activate and take advantage of your identity monitoring services.

You have until October 10, 2019 to activate your identity monitoring services.

Membership Number: Be prepared with your Member ID number.

To receive credit services by mail instead of online, please call 1-800-494-0297.

Monitor Your Accounts.

To protect against the possibility of identity theft or other financial loss, we encourage you to remain vigilant, to review your account statements, and to monitor your credit reports for suspicious activity.

We recommend that you regularly review any Explanation of Benefits statements that you receive from your insurer. If you see any service that you believe you did not receive, please contact your insurer at the number on your statement. If you do not receive regular Explanation of Benefits statements, you can contact your insurer and request that they send such statements following the provision of services in your name or number.

Credit Reports. Under U.S. law, you are entitled to one free credit report annually from each of the three major credit reporting bureaus. To order your free credit report, visit **www.annualcreditreport.com** or call, toll-free, 1-877-322-8228. You may also contact the three major credit bureaus directly to request a free copy of your credit report.

Security Freeze. You have the right to place a “security freeze” on your credit report, which will prohibit a consumer reporting agency from releasing information in your credit report without your express authorization. The security 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 security 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 security freeze on your credit report. Should you wish to place a security freeze, please contact the major consumer reporting agencies listed:

Experian
PO Box 9554
Allen, TX 75013
1-888-397-3742

www.experian.com/freeze/center.html

TransUnion
P.O. Box 2000
Chester, PA 19016
1-888-909-8872

www.transunion.com/credit-freeze

Equifax
PO Box 105788
Atlanta, GA 30348
1-800-685-1111

www.equifax.com/personal/credit-report-services

To remove the security freeze, you must send a written request to each of the three credit bureaus by mail and include proper identification (name, address, and social security number) and the PIN number or password provided to you when you placed the security freeze. The credit bureaus have three (3) business days after receiving your request to remove the security freeze.

As an alternative to a security freeze, you have the right to place an initial or extended “fraud alert” on your 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 agencies listed below:

Experian
P.O. Box 2002
Allen, TX 75013
1-888-397-3742

www.experian.com/fraud/center.html

TransUnion
P.O. Box 2000
Chester, PA 19016
1-800-680-7289

www.transunion.com/fraud-victim-resource/place-fraud-alert

Equifax
P.O. Box 105069
Atlanta, GA 30348
1-888-766-0008

www.equifax.com/personal/credit-report-services

Additional Information. You can further educate yourself regarding identity theft, and the steps you can take to protect yourself, by contacting your state Attorney General or the Federal Trade Commission. The Federal Trade Commission also encourages those who discover that their information has been misused to file a complaint with them. The Federal Trade Commission can be reached at: 600 Pennsylvania Avenue, NW, Washington, DC 20580; www.ftc.gov/idtheft; 1-877-ID-THEFT (1-877-438-4338); and TTY: 1-866-653-4261. Instances of known or suspected identity theft should be reported to law enforcement, your Attorney General, and the FTC. You can also further educate yourself about placing a fraud alert or security freeze on your credit file by contacting the FTC or your state’s Attorney General.

Nondiscrimination Notice and Language Services

Discrimination is against the law

Blue Cross Complete of Michigan complies with applicable federal civil rights laws and does not discriminate on the basis of race, color, national origin, age, disability or sex. Blue Cross Complete of Michigan does not exclude people or treat them differently because of race, color, national origin, age, disability or sex.

Blue Cross Complete of Michigan:

- Provides free (no cost) aids and services to people with disabilities to communicate effectively with us, such as:
 - Qualified sign language interpreters
 - Information in other formats (large print, audio, accessible electronic formats)
- Provides free (no cost) language services to people whose primary language is not English, such as:
 - Qualified interpreters
 - Information written in other languages

If you need these services, contact Blue Cross Complete of Michigan Customer Service, 24 hours a day, 7 days a week at **1-800-228-8554 (TDD/TTY: 1-888-987-5832)**.

If you believe that Blue Cross Complete of Michigan has failed to provide these services or discriminated in another way on the basis of race, color, national origin, age, disability or sex, you can file a grievance with:

- **Blue Cross Complete of Michigan
Member Grievances**
P.O. Box 41789
North Charleston, SC 29423
1-800-228-8554
(TDD/TTY: 1-888-987-5832)
- If you need help filing a grievance, Blue Cross Complete of Michigan Customer Service is available to help you.

You can also file a civil rights complaint with the U.S. Department of Health and Human Services, Office for Civil Rights, through the Office for Civil Rights Complaint Portal available at **ocrportal.hhs.gov/ocr/portal/lobby.jsf**, by mail or phone at:

U.S. Department of Health and Human Services

200 Independence Avenue, SW
Room 509F, HHH Building
Washington, D.C. 20201

1-800-368-1019
(TDD/TTY: 1-800-537-7697)

Complaint forms are available at:
hhs.gov/ocr/office/file/index.html.

English: ATTENTION: If you speak English, language assistance services, at no cost, are available to you.
Call **1-800-228-8554**
(TTY: **1-888-987-5832**).

Arabic:
ملحوظة: إذا كنت تتحدث اللغة العربية، فإن خدمات المساعدة اللغوية تتوافر لك بالمجان. اتصل برقم 1-800-228-8554 (TTY: 1-888-987-5832).

Chinese Mandarin: 注意：如果您说中文普通话/国语，我们可为您提供免费语言援助服务。请致电：**1-800-228-8554**
(TTY: 1-888-987-5832)。

Chinese Cantonese: 注意：如果您使用粵語，
您可以免費獲得語言援助服務。請致電
1-800-228-8554 (TTY: 1-888-987-5832)。

Syriac:

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1-800-228-8554 ܬܠܦܢܐ
(TTY: 1-888-987-5832)

Vietnamese: CHÚ Ý: Nếu bạn nói Tiếng Việt, có các dịch vụ hỗ trợ ngôn ngữ miễn phí dành cho bạn. Gọi số **1-800-228-8554** (TTY: **1-888-987-5832**).

Albanian: VINI RE: Nëse flisni shqip, për
ju ka në dispozicion shërbime të asistencës
gjuhësore, pa pagesë. Telefononi në
1-800-228-8554 (TTY: 1-888-987-5832).

Korean: 주의: 한국어를 사용하시는 경우, 언어 지원 서비스를 무료로 이용하실 수 있습니다. **1-800-228-8554 (TTY: 1-888-987-5832)** 번으로 전화해 주십시오.

Bengali: লক্ষ্য করুন: যদি আপনি বাংলায় কথা বলেন, তাহলে নিঃখরচায় ভাষা সহায়তা পেতে পারেন। **1-800-228-8554**
(TTY: 1-888-987-5832) নম্বরে ফোন করুন।

Polish: UWAGA: Jeżeli mówisz po polsku, możesz skorzystać z bezpłatnej pomocy językowej. Zadzwoń pod numer **1-800-228-8554 (TTY: 1-888-987-5832).**

German: ACHTUNG: Wenn Sie Deutsch sprechen, stehen Ihnen kostenlos sprachliche Hilfsdienstleistungen zur Verfügung.
Rufnummer: **1-800-228-8554**
(TTY: **1-888-987-5832**).

Italian: ATTENZIONE: In caso la lingua parlata sia l'italiano, sono disponibili servizi di assistenza linguistica gratuiti. Chiamare il numero **1-800-228-8554** (TTY: **1-888-987-5832**).

Japanese: 注意事項：日本語を話される場合、
無料の通訳サービスをご利用いただけます。
1-800-228-8554 (TTY: 1-888-987-5832)
まで、お電話にてご連絡ください。

Russian: ВНИМАНИЕ: Если вы говорите на русском языке, то вам доступны бесплатные услуги перевода. Звоните **1-800-228-8554** (TTY: 1-888-987-5832).

Serbo-Croatian: PAŽNJA: Ako govorite srpsko-hrvatski, usluge jezičke pomoći dostupne su vam besplatno. Nazovite **1-800-228-8554 (TTY: 1-888-987-5832).**

Tagalog: PAUNAWA: Kung nagsasalita ka ng Tagalog, maaari kang gumamit ng mga serbisyo ng tulong sa wika nang walang bayad. Tumawag sa **1-800-228-8554** (TTY: **1-888-987-5832**).