



Notice of Health Information Breach

All Smiles Dentistry recently learned that an employee had been arrested on charges of identity theft. All Smiles terminated the person's employment and access to its locations and patient information.

All Smiles is continuing to investigate the incident and cooperate with the local Port St. Lucie authorities but at this time has only identified a few potential victims of this identity theft crime.

Out of an abundance of caution and to protect its patients, All Smiles has notified all patients of the incident. In addition, because the former employee was authorized to access treatment and payment records as part of his job, All Smiles is providing one year of credit monitoring service through Experian to all patients and guarantors whose information was accessed by the former employee. The information that may have been accessed may vary between individuals, but may include: patient's name, address, telephone number, email address, home and work telephone numbers, cell phone number, Social Security number, dental record number, patient ID, dentist's name, dental plan/insurance number, guarantor(s), driver's license number, dental procedures, dental diagnosis, credit card number and charges and payments for services performed.

All Smiles encourages its patients to call the toll-free numbers of any of the three major credit bureaus to order a free credit report: **Experian:** 1-888-397-3742; P.O. Box 9532, Allen, TX 75013; **Equifax:** 1-800-525-6285; P.O. Box 740241, Atlanta, GA 30374-0241; **TransUnion:** 1-800-680-7289; P.O. Box 6790, Fullerton, CA 92834-6790.

All Smiles takes very seriously its duty to protect its patients' personal information and is working diligently to determine the full scope of the unauthorized use and take actions to confirm the security and privacy of personal information received by All Smiles. All Smiles deeply regrets that this has occurred and would like to express its sincerest apologies to its patients and assure them of All Smiles' commitment to maintaining the privacy and security of their personal and dental information. If you have any questions regarding this matter, please contact All Smiles at 772-252-0134.

FAQs for website:

1. *What happened?*

On April 9, 2019, All Smiles learned that an employee had been arrested on charges of identity theft.

2. *Did the incident affect all All Smiles records or was it limited to one clinic or location?*

All patient records are maintained on the same practice management system and accessible by All Smile employees who have authorized access. Our forensic examination of patient records showed the records accessed by the former employee, and we have notified those patients. At this time, the incident is limited to those records.

3. *What type of information was affected?*

The information that may have been accessed may vary between individuals, but may include: patient's name, address, telephone number, email address, home and work telephone numbers, cell phone number, Social Security number, dental record number, patient ID, dentist's name, dental plan/insurance number, guarantor(s), driver's license number, dental procedures, dental diagnosis, credit card number and charges and payments for services performed.

4. *What was the time period during which the records may have been accessed?*

The individual had access to patient records from August 29, 2018 through April 9, 2019.

5. *How many patients' records were affected?*

At this time, we have determined that approximately 1,500 patients' records were accessed by the individual, and those patients and guarantors have been notified of the possible risk.

6. *What action has All Smiles taken in response?*

The individual was terminated, and his access to our locations and records was terminated. We conducted audits to determine which patient accounts may have been accessed, and notified those patients of possible risk. We are cooperating with local law enforcement. We are also reviewing our processes for collecting and maintaining patient information.

7. *How can you let this happen? How do I know my records will be safe going forward?*

All Smiles takes the privacy of our patients and the confidentiality of our records very seriously. We're reviewing all of our policies and procedures and will take whatever steps are necessary to see that this doesn't happen again.

All Smiles deeply regrets that this has occurred and would like to take this opportunity to express its sincerest apologies to its patients and assure them of All Smiles' commitment to maintaining the privacy and security of their personal and dental information.

9. *What did you know about this person before he was hired?*

All Smiles does thorough background checks on all employees before they are hired. Nothing in this person's records at the time of being hired raised any concerns.

8. *Why did you wait so long to tell everyone about this?*

We contacted all patients whose records were accessed by the individual. We have been working diligently to understand what happened. We had to be absolutely sure we had all of our information clear before notifying all of our patients.

11. *Isn't this a HIPAA violation?*

This is a breach of patients' protected health information. All Smiles is taking every step required by the federal Health Insurance Portability and Accountability Act to deal with this incident.

9. *What if I didn't receive a letter?*

If you have not received a letter it means your account was not accessed and your last visit to one of our practices as a patient was prior to January 2017.

10. *Did the incident affect All Smiles's ability to provide patient care?*

No. This incident has in no way affected our ability to provide patient care.

11. *Will I still have access to my patient record if it is needed?*

Yes. Physical records were not taken, and your information has not been lost.

12. *Is my personal information still at risk?*

We are aware of approximately 1,500 patients whose records were accessed by the individual. Those patients have been notified of the possible risk. We are working diligently to determine the full scope of the unauthorized use and take actions to confirm the security and privacy of personal information received by All Smiles. If we find that your account was accessed then we will notify you of that fact.

13. *Who may I contact for additional information?*

If you have any questions regarding this matter, you may contact us at 772-252-0134.

14. *Does All Smiles know if anyone has suffered identity theft or that the information was used in a malicious manner?*

At this time, except for those persons who have already contacted the practice, All Smiles has not specifically identified the patients or guarantors whose information may have been used.

15. *What action has All Smiles taken to protect my personal information in the future?*

We're reviewing all of our policies and procedures and will take whatever steps are necessary to see that this doesn't happen again.

16. *If my personal health information was accessed, does that place me at risk for identity theft?*

We encourage you to obtain a copy of your credit report, free of charge, from each of the three nationwide credit reporting companies, monitor your personal accounts for any unauthorized activity, [*for persons whose information was accessed:* and recommend that you enroll in the free identity theft protection service offered by All Smiles.] You may also discuss with the credit reporting companies options such as a fraud alert or a security freeze.

17. *What can I do to protect my personal information?*

We encourage you to obtain a copy of your credit report, free of charge, from each of the three nationwide credit reporting companies, monitor your personal accounts for any unauthorized activity. You may also discuss with the credit reporting companies options such as a fraud alert or a security freeze. You may also go to the Federal Trade Commission or FTC website for identity theft protection advice.

<https://www.consumer.ftc.gov/features/feature-0014-identity-theft> The FTC provides consumers with information about how to protect your identity and protect yourself in the event of identity theft.

18. *Where can I get my free credit report?*

You may obtain a free credit report from the three nationwide credit reporting companies.

Equifax

www.Equifax.com

1-800-685-1111

Experian

www.Experian.com

1-888-397-3742

Transunion

www.Transunion.com

1-800-888-4213

19. *Why should I review my credit report?*

Your credit report will show any requests for your credit report, any credit applications in your name, or credit issued in your name. You should look for unusual or unauthorized activity in your account.

20. *What should I do if I discover unauthorized or fraudulent activity on my credit report or my personal accounts?*

You should immediately (1) contact the creditors involved, (2) contact the three credit reporting companies, and (3) report any crime to your local law enforcement.

Unauthorized account activity may include unauthorized charges, changes in your account, changes to an address which is not yours, or unauthorized credit applications in your name. If your credit report shows any unauthorized accounts opened with your identity, you should immediately contact those financial institutions to report the fraud and close the unauthorized accounts, and notify the credit monitoring services of the unauthorized accounts. For more information on steps you can take to if you suspect

identity theft and to avoid identity theft, you may contact the Federal Trade Commission at <http://www.consumer.ftc.gov/topics/identity-theft> or by phone at 1-877-438-4338.

21. *What is identity theft protection?*

Identity theft protection services protect your personal information and identity from theft. It provides services which may include: credit monitoring of all three bureaus, Social Security number monitoring, change of address alerts, court record monitoring, FICO score tracking, identity theft insurance, and fraud resolution specialists. If your information was accessed, and you have not already received a letter from us, please contact us immediately so that we can discuss the specific identity theft protection service which All Smiles will offer to you at no charge.

22. *What is credit monitoring?*

Credit monitoring services protect you against new account fraud by providing you with an alert when a change occurs in your credit file. Account fraud occurs when an unauthorized person uses your personal information to open a credit card, a utility account, or other financial account using your name, Social Security number, driver's license number, date of birth and other personal information to open a credit account. This may be difficult to discover otherwise because the criminals typically use a false address for delivery of bills.

23. *What is a fraud alert?*

You may consider initiating a free ninety (90) day fraud alert. The credit reporting companies will guide you through the process of placing a fraud alert on your credit report and discuss the potential impact to you. A fraud alert notifies creditors of possible fraudulent activity on your account and that they should contact you prior to establishing any credit in your name. This will not prevent you from using your currently established credit cards or credit accounts, but may slow your ability to apply for credit while the alert is active. If anyone, including you, applies for credit, the alert delivers a message to the creditor to verify the applicant identity prior to approval of a credit application.

24. *What is a security or credit freeze?*

A security freeze is another option which you may discuss with the credit reporting companies. This prevents a credit reporting company from releasing your credit report without your consent. You should discuss with the credit monitoring service all of the potential impacts to you of this action which may slow, restrict or prevent your ability to apply for credit, loans or other services, such as utilities and cellular service, which may require access to your credit report in the application process.

25. *What's going to happen to the employee who did this?*

Again, this person is no longer an employee. We terminated the employee after learning of the arrest. All Smiles continues to cooperate fully with the law enforcement investigation. We are not able to comment on the status of law enforcement activity.

26. Will All Smiles keep me updated on what's going on?

We will notify any patients who we learn may have had their identity stolen. We will also update our website notice as needed to keep our patients safe.