

EXHIBIT 1

We represent Mid-Delaware Imaging (“MDI”) located at 710 S. Queen Street Dover, Delaware 19904, and are writing to notify your office of an incident that may affect the security of some personal information relating to 8,784 Delaware residents. The investigation into this matter is ongoing, and this notice will be supplemented with any new significant facts learned subsequent to its submission. By providing this notice, MDI does not waive any rights or defenses regarding the applicability of Delaware law, the applicability of the Delaware data event notification statute, or personal jurisdiction.

Nature of the Data Event

On January 30, 2020, MDI became aware of unusual activity on its network. MDI conducted an immediate investigation and determined that the network was impacted by ransomware. Third-party forensic specialists were engaged to assist in the investigation to determine the nature and scope of the incident and identify what personal information or protected health information may have been impacted by this incident.

MDI, with the assistance of its third-party forensic specialists, conducted a thorough and time-consuming review of its system to identify every individual whose sensitive information may have been accessible during this incident. The review concluded on May 11, 2020 and the investigators then prepared a list of potentially impacted individuals whose information may have been accessible to unauthorized individual(s) during this incident.

Although the types of personal information at risk may vary by individual, the following types of personal information was potentially impacted for Delaware residents: name, date of birth, date of service, provider name, medical record number, patient number, medical information, diagnostic treatment information, medications, health insurance information, and taxpayer identification number.

Notice to Delaware Residents

On July 14, 2020, MDI began providing written notice of this incident to potentially affected individuals, which includes 8,784 Delaware residents. Written notice is being provided in substantially the same form as the letter attached here as *Exhibit A*.

Other Steps Taken and To Be Taken

Upon discovering the event, MDI moved quickly to investigate and respond to the incident, assess the security of MDI systems, and notify potentially affected individuals. MDI is also working to implement additional safeguards and training to its employees. MDI is providing access to credit monitoring services for 12 months, through TransUnion, to individuals whose personal information was potentially affected by this incident, at no cost to these individuals.

Additionally, MDI is providing impacted individuals with guidance on how to better protect against identity theft and fraud, including advising individuals to report any suspected incidents of identity theft or fraud to their credit card company and/or bank. MDI is providing individuals with

information on how to place a fraud alert and security freeze on one's credit file, information on protecting against tax fraud, 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.

EXHIBIT A



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

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

Dear <<Name 1>>:

Mid-Delaware Imaging (“MDI”) is writing to advise you of a recent event that may impact the security of certain personal information related to you. We write to provide you with information about the event, steps taken since discovering the event, and what you can do to better protect against potential misuse of your information, should you feel it is appropriate to do so.

What Happened? On January 30, 2020, MDI became aware of unusual activity on its network. We conducted an immediate investigation and determined that the network was impacted by ransomware. Third-party forensic specialists were engaged to assist in the investigation to determine the nature and scope of the event and identify what personal information or protected health information may have been impacted by this incident.

MDI conducted a thorough and time-consuming review of its system to identify every individual whose sensitive information may have been accessible during this event. Through our ongoing investigation, MDI determined that information relating to you may have been accessible to unauthorized individual(s) during this event.

What Information Was Involved? While there is no evidence that information relating to you was actually viewed by an unauthorized individual, the following information about you was potentially accessible during this event: your name, <<data elements>>.

What We Are Doing. MDI is committed to, and takes very seriously, its responsibility to protect all data and health information entrusted to us. As part of our ongoing commitment to the privacy of personal information in our care, we reviewed our existing policies and procedures, and are working to implement additional safeguards to further secure the information contained within our network. MDI notified the Federal Bureau of Investigation (“FBI”) and are notifying regulatory authorities, as required by law.

As an added precaution, we are also offering twelve (12) months of complimentary access to credit monitoring, fraud consultation, and identity theft restoration services through TransUnion. Individuals who wish to receive these services must enroll by following the attached enrollment instructions.

What You Can Do. You can review the enclosed *Steps You Can Take to Protect Your Personal Information*. You can also enroll to receive the complimentary services being offered to you.

For More Information. We understand that you may have questions or concerns that are not addressed in this letter. Please call the dedicated assistance line that we have established regarding this incident by dialing 855-917-3549 Monday through Friday from 9 am to 9 pm, excluding U.S. holidays.

MDI sincerely regrets any inconvenience or concern this incident may have caused you.

Sincerely,

Mid-Delaware Imaging

Steps You Can Take to Protect Your Personal Information

Enroll in Complimentary Credit Monitoring

As a safeguard, we have arranged for you to enroll, at no cost to you, in an online credit monitoring service (*myTrueIdentity*) for one year provided by TransUnion Interactive, a subsidiary of TransUnion,[®] one of the three nationwide credit reporting companies.

How to Enroll: You can sign up **online** or via **U.S. mail delivery**

- To enroll in this service, go to the *myTrueIdentity* website at www.MyTrueIdentity.com and, in the space referenced as “Enter Activation Code,” enter the 12-letter Activation Code <<Insert Unique 12-letter Activation Code>> and follow the three steps to receive your credit monitoring service online within minutes.
- If you do not have access to the Internet and wish to enroll in a similar offline, paper-based credit monitoring service, via U.S. mail delivery, please call the TransUnion Fraud Response Services toll-free hotline at **1-855-288-5422**. When prompted, enter the six-digit telephone passcode <<Insert static 6-digit Telephone Pass Code>> and follow the steps to enroll in the offline credit monitoring service, add an initial fraud alert to your credit file, or to speak to a TransUnion representative if you believe you may be a victim of identity theft.

You can sign up for the online or offline credit monitoring service anytime between now and <<Enrollment Deadline>>. Due to privacy laws, we cannot register you directly. Please note that credit monitoring services might not be available for individuals who do not have a credit file with TransUnion or an address in the United States (or its territories) and a valid Social Security number. Enrolling in this service will not affect your credit score.

ADDITIONAL DETAILS REGARDING YOUR 12-MONTH COMPLIMENTARY CREDIT MONITORING SERVICE:

- Once you are enrolled, you will be able to obtain one year of unlimited access to your TransUnion credit report and credit score.
- The daily credit monitoring service will notify you if there are any critical changes to your credit file at TransUnion, including fraud alerts, new inquiries, new accounts, new public records, late payments, changes of address, and more.
- The service also includes access to an identity restoration program that provides assistance in the event that your identity is compromised and up to \$1,000,000 in identity theft insurance with no deductible. (Policy limitations and exclusions may apply.)

Monitor Your Accounts

We encourage you to remain vigilant against incidents of identity theft and fraud, to review your account statements, and to monitor your credit reports for suspicious activity. 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.

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 below:

Experian PO Box 9554 Allen, TX 75013 1-888-397-3742 www.experian.com/freeze/center.html	TransUnion P.O. Box 160 Woodlyn, PA 19094 1-888-909-8872 www.transunion.com/credit-freeze	Equifax PO Box 105788 Atlanta, GA 30348-5788 1-800-685-1111 www.equifax.com/personal/credit-report-services
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To request a security freeze, you will need to provide the following information:

1. Your full name (including middle initial as well as Jr., Sr., II, III, etc.);
2. Social Security number;
3. Date of birth;
4. If you have moved in the past five (5) years, provide the addresses where you have lived over the prior 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.);
7. If you are a victim of identity theft, include a copy of either the police report, investigative report, or complaint to a law enforcement agency concerning identity theft.

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 9554 Allen, TX 75013 1-888-397-3742 www.experian.com/fraud/center.htm	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
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Additional Information

You can further educate yourself regarding identity theft, fraud alerts, security freezes, and the steps you can take to protect yourself, by contacting the consumer reporting agencies, the Federal Trade Commission, or your state Attorney General. The Federal Trade Commission can be reached at: 600 Pennsylvania Avenue NW, Washington, DC 20580, www.identitytheft.gov, 1-877-ID-THEFT (1-877-438-4338); 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 Maryland residents, the Attorney General can be contacted at 200 St. Paul Place, 16th Floor, Baltimore, MD 21202, (410) 528-8662, www.oag.state.md.us. **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 agencies 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 Attorney General may be contacted at: Office of the Attorney General, The Capitol, Albany, NY 12224-0341; 1-800-771-7755; <https://ag.ny.gov/>. **For North Carolina residents**, the Attorney General can be contacted at 9001 Mail Service Center, Raleigh, NC 27699-9001, 1-877-566-7226 or 1-919-716-6000, www.ncdoj.gov. You can obtain information from the Attorney General or the Federal Trade Commission about preventing identity theft. **For Rhode Island Residents**, the Rhode Island Attorney General can be reached at: 150 South Main Street, Providence, Rhode Island 02903; www.riag.ri.gov. (401) 274-4400. Under Rhode Island law, you have the right to obtain any police report filed in regard to this incident. There are zero Rhode Island residents impacted by this incident.