Computerized Data Hacked, Stolen, Lost, or Otherwise Compromised

Is personal information resident on the device or computer?

- NO: External notification not required
- YES: Is data encrypted?

Does the device or computer sit behind a firewall with a perimeter intrusion detection system?

- NO: External notification not required
- YES: Does the device or computer sit behind a firewall with a perimeter intrusion detection system?

Logs confirm that personal information did or did not leave the network?

- YES: Notification Type B required
- NO: Are there indications of unauthorized possession or control of information?

- YES: Notification Type B required
- NO: External notification not required

Notification Type A required

External notification not required

Notification Type B required
Were data of more than 1,000 persons involved?

**Type A Notification:**
Affirmative written notice by mail using Notification Letter “Type A” unless individual has given prior written informed consent to electronic notice.

Substitute notice by email notice AND conspicuous posting on VUMC website pages AND notification to statewide media if:
- No contact information available
- Number of individuals exceeds 500,000
- Cost to notify exceeds $250,000

Are there indications that the information was used by an unauthorized person (e.g., identity theft)?

**Type B Notification:**
Precautionary written notice using Notification Letter “Type B” if the population impacted is discretely defined. Notice via email AND posting on VUMC website pages if:
- Population not discretely defined
- Contact information not available

**Type C Notification:**
Affirmative written notice of potential identity theft using Notification Letter “Type C” with additional mitigation steps including:
- Hotline telephone number to call
- Quarterly consumer credit reports
- Referral to identity theft recovery resources

Substitute notice by email notice AND conspicuous posting or VUMC website pages AND notification to statewide media if:
- No contact information available
- Number of individuals exceeds 500,000
- Cost to notify exceeds $250,000

Were data of more than 1,000 persons involved?

Notify all consumer reporting agencies and credit bureaus

STOP