

April 26, 2016

Preliminary Notice

To All Employees:

We recently discovered that our company was the targeted victim of an email spoofing attack by an individual or individuals purporting to be our CEO. Through this attack, a request was made from what appeared to be a legitimate InnovAge email address for all 2015 employee W2 information, which included employees' names, Social Security numbers, and 2015 compensation information. Unfortunately this information was provided before we discovered that the request was made from a fraudulent email account, by an individual using an email account that initially appeared to be from our CEO. Since discovering this event late on Friday, April 22 we have been working tirelessly to investigate what happened, who may be affected and to put in place resources for those who may be affected by this incident.

The privacy of your information is a priority to us. To help you better protect against the potential misuse of the information involved, InnovAge has arranged to provide those employees who received a 2015 W2 access to 2 years of credit monitoring and identity restoration services from Experian® at no charge. This product helps detect possible misuse of your personal information and provides you with superior identity protection support focused on immediate identification and resolution of identity theft. If you are impacted by this incident, you will be receiving a letter via US Mail at your home address that will provide more details. If you would like to enroll in these service prior to receiving the letter, please follow the steps below:

1. **ENSURE That You Enroll By: 07/31/2016** (Your code will not work after this date.)
2. Visit the **ProtectMyID Web Site to enroll: <http://www.protectmyid.com/enroll>**
3. **PROVIDE Your Activation Code. To receive your unique activation code, please call 844-812-9530.**

If you have questions or need an alternative to enrolling online, please call 877-441-6943 and provide engagement #: PC101119.

We will be notifying the IRS about this incident. If you receive a notice from the IRS that leads you to believe that someone may have used your information, please notify the IRS's Identity Protection Specialized Unit (IPSU) immediately at: 800-908-4490 or www.irs.gov/Individuals/Identity-Protection. You will also find information at <https://www.irs.gov/uac/Taxpayer-Guide-to-Identity-Theft>. IPSU employees are available to answer questions about identity theft and resolve any tax account issues that resulted from identity theft.

If you have any questions, please contact our dedicated assistance line at 844-812-9530. This assistance line is available Monday through Friday from 9:00 a.m. – 9:00 p.m. ET.

In the coming days we will be sending out a letter to all affected individuals that will offer additional resources to assist those individuals impacted by this incident. We sincerely regret any

inconvenience or concern this incident may cause you and will continue to take appropriate actions to protect the privacy of your information.

Thank you,

Maureen Hewitt
President and Chief Executive Officer
InnovAge



Return Mail Processing Center
P.O. Box 6336
Portland, OR 97228-6336

<<mail id>>
<<Name>>
<<Address>>
<<City>>, <<State>> <<Zip>>

<<Date>>

Notice of Data Breach

Dear <<Name>>:

Our Company¹ (“InnovAge”) recently discovered an incident that may affect the security of your personal information. We are writing to provide you with information regarding the incident, steps we’ve taken since discovering the incident, and information on what you can do to better protect against identity theft and fraud should you feel it is appropriate to do so.

What Happened. On April 22, 2016, we discovered that our company was targeted in an email spoofing attack. Through this attack, what was then believed to be a legitimate request was made on April 8, 2016 for 2015 IRS Tax Form W-2 information. Unfortunately, the requested W-2 information was provided before it was discovered that the request was made from a fraudulent email account by an individual purporting to be me. Since discovering this event late on Friday, April 22 we have been working tirelessly to investigate what happened, who may be affected and to put in place resources for those who may be affected by this incident.

What Information Was Involved. While our investigation is ongoing, we have confirmed that a report may have been accessed which included your name, home address, Social Security number, and 2015 compensation data. We have confirmed date of birth and banking information were not included in this incident.

What We Are Doing. The privacy and security of your information is a priority to us. In addition to launching an investigation into this incident, we have hired an outside computer forensic investigator to supplement our internal investigation, and to confirm the security of our computer systems. We are providing notice of this incident to potentially impacted individuals. We are also providing you with information on how to better protect against identity theft and fraud and complimentary access to 2 free years of credit monitoring and restoration services with Experian’s[®] ProtectMyID[®] Elite product. The enclosed Privacy Safeguards Information contains information on protecting against identity theft and fraud and instructions on how to enroll and receive the complimentary credit monitoring and restoration services.

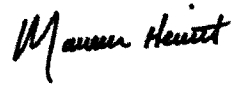
What You Can Do. While our investigation is ongoing, we felt it was important to notify you about this incident, and what we are doing to investigate and respond, as quickly as possible. We encourage you to file your tax return as soon as possible if you have not already done so, and provide you with the information below that you can use to better protect against identity theft and fraud. The IRS encourages you to file IRS Form 14039 with your 2015 tax return. You can contact the IRS at www.irs.gov/Individuals/Identity-Protection for helpful information and guidance on steps you can take to prevent a fraudulent tax return from being filed in your name and what to do if you become the victim of such fraud. You can also visit www.irs.gov/uac/Taxpayer-Guide-to-Identity-Theft for more information. We encourage you to enroll in and receive the complimentary membership to the credit monitoring and restoration services we are offering to you. We also encourage you to review the information in the enclosed Steps You Can Take to Protect Against Identity Theft and Fraud to learn more about what you can do.

¹ InnovAge refers to the parent company, Total Community Options, Inc., and includes its affiliated entities: InnovAge Greater Colorado PACE, and InnovAge Greater California PACE (Total Longterm Care, Inc.), InnovAge Greater New Mexico PACE (Total Community Care, LLC), InnovAge –Lowry (Total Longterm Care Solutions, LLC), InnovAge Home Care, InnovAge Home Health (Seniors! Inc.), InnovAge Care Management (Innovative Care Management, LLC), InnovAge Johnson Adult Day Program (Johnson Adult Day Program, Inc.), and InnovAge Foundation (Total Community Options Foundation).

For More Information. We recognize that you may have questions that are not answered in this letter. If you have questions regarding the incident, your affected information, and steps you may take to protect yourself against identity theft and fraud please contact our dedicated assistance line at 844-812-9530. This assistance line is available Monday through Friday from 9:00 a.m. to 9:00 p.m. ET.

This notice has not been delayed as a result of a law enforcement investigation. We sincerely regret any inconvenience or concern this incident may cause you and will continue to take appropriate actions to protect the privacy of your information.

Sincerely,

A handwritten signature in black ink that reads "Maureen Hewitt". The signature is written in a cursive style with a prominent initial "M".

Maureen Hewitt
President and Chief Executive Officer
InnovAge

STEPS YOU CAN TAKE TO PROTECT AGAINST IDENTITY THEFT AND FRAUD

To help protect your identity, we are offering a **complimentary** two-year membership of Experian's® ProtectMyID® Elite. This product helps detect possible misuse of your personal information and provides you with superior identity protection support focused on immediate identification and resolution of identity theft.

Activate ProtectMyID Now in Three Easy Steps

1. ENSURE That You Enroll By: 07/31/2016 (Your code will not work after this date.)
2. Visit the ProtectMyID Web Site to enroll: www.protectmyid.com/enroll
3. PROVIDE Your Activation Code: <<code>>

If you have questions or need an alternative to enrolling online, please call 877-441-6943 and provide engagement #: <<PC Engagement #>>.

Additional details regarding your 24-MONTH ProtectMyID Membership:

A credit card is not required for enrollment.

Once your ProtectMyID membership is activated, you will receive the following features:

- **Free copy of your Experian credit report**
- **Surveillance Alerts for:**
 - **Daily 3 Bureau Credit Monitoring:** Alerts of key changes & suspicious activity found on your Experian, Equifax®, and TransUnion® credit reports.
 - **Internet Scan:** Alerts if your personal information is located on sites where compromised data is found, traded or sold.
 - **Change of Address:** Alerts of any changes in your mailing address.
- **Identity Theft Resolution & ProtectMyID ExtendCARE:** Toll-free access to US-based customer care and a dedicated Identity Theft Resolution agent who will walk you through the process of fraud resolution from start to finish for seamless service. They will investigate each incident; help with contacting credit grantors to dispute charges and close accounts including credit, debit and medical insurance cards; assist with freezing credit files; contact government agencies.
 - It is recognized that identity theft can happen months and even years after a data breach. To offer added protection, you will receive ExtendCARE™, which provides you with the same high-level of Fraud Resolution support even after your ProtectMyID membership has expired.
- **\$1 Million Identity Theft Insurance¹:** Immediately covers certain costs including, lost wages, private investigator fees, and unauthorized electronic fund transfers.
- **Lost Wallet Protection:** If you misplace or have your wallet stolen, an agent will help you cancel your credit, debit, and medical insurance cards.

Once your enrollment in ProtectMyID is complete, you should carefully review your credit report for inaccurate or suspicious items. If you have any questions about ProtectMyID, need help understanding something on your credit report or suspect that an item on your credit report may be fraudulent, please contact Experian's customer care team at 877-441-6943.

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

If you receive a notice from the IRS that leads you to believe that someone may have used your information, please notify the IRS's Identity Protection Specialized Unit (IPSU) immediately at: 800-908-4490 or www.irs.gov/Individuals/Identity-Protection. You will also find information at www.irs.gov/uac/Taxpayer-Guide-to-Identity-Theft. IPSU employees are available to answer questions about identity theft and resolve any tax account issues that resulted from identity theft.

¹ Identity theft insurance is underwritten by insurance company subsidiaries or affiliates of American International Group, Inc. (AIG). The description herein is a summary and intended for informational purposes only and does not include all terms, conditions and exclusions of the policies described. Please refer to the actual policies for terms, conditions, and exclusions of coverage. Coverage may not be available in all jurisdictions.

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.

At no charge, you can also have these credit bureaus place a “fraud alert” on your file that alerts creditors to take additional steps to verify your identity prior to granting credit in your name. Note, however, that because it tells creditors to follow certain procedures to protect you, it may also delay your ability to obtain credit while the agency verifies your identity. As soon as one credit bureau confirms your fraud alert, the others are notified to place fraud alerts on your file. Should you wish to place a fraud alert, or should you have any questions regarding your credit report, please contact any one of the agencies listed below.

Equifax
P.O. Box 105069
Atlanta, GA 30348
800-525-6285
www.equifax.com

Experian
P.O. Box 2002
Allen, TX 75013
888-397-3742
www.experian.com

TransUnion
P.O. Box 2000
Chester, PA 19022-2000
800-680-7289
www.transunion.com

You may also place a security freeze on your credit reports. A security freeze prohibits a credit bureau from releasing any information from a consumer’s credit report without the consumer’s written authorization. However, please be advised that placing a security freeze on your credit report may delay, interfere with, or prevent the timely approval of any requests you make for new loans, credit mortgages, employment, housing or other services.

If you have been a victim of identity theft, and you provide the credit bureau with a valid police report, it cannot charge you to place, list or remove a security freeze. In all other cases, a credit bureau may charge you a fee to place, temporarily lift, or permanently remove a security freeze. You will need to place a security freeze separately with each of the three major credit bureaus listed above if you wish to place the freeze on all of your credit files.

To find out more on how to place a security freeze, you can use the following contact information:

Equifax Security Freeze
P.O. Box 105788
Atlanta, GA 30348
1-800-685-1111
(NY residents please call
1-800-349-9960)
[www.equifax.com/help/
credit-freeze/en_cp](http://www.equifax.com/help/credit-freeze/en_cp)

Experian Security Freeze
P.O. Box 9554
Allen, TX 75013
1-888-397-3742
[www.experian.com/
freeze/center.html](http://www.experian.com/freeze/center.html)

TransUnion Fraud Victim Assistance
P.O. Box 2000
Chester, PA 19022
Fraud Division
888-909-8872
[www.transunion.com/
securityfreeze](http://www.transunion.com/securityfreeze)

You can further educate yourself regarding identity theft, fraud alerts, security freezes, 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. **For Maryland residents**, the Attorney General can be contacted at 200 St. Paul Place, 16th Floor, Baltimore, MD 21202, 1-888-743-0023, www.oag.state.md.us. **For North Carolina residents**, the Attorney General can be contacted by mail at 9001 Mail Service Center, Raleigh, NC 27699-9001; toll-free at 1-877-566-7226; by phone at 1-919-716-6400; and online at www.ncdoj.gov. Instances of known or suspected identity theft should be reported to law enforcement, your Attorney General, and the FTC.