



MULLEN
COUGHLIN^{LLC}
ATTORNEYS AT LAW

RECEIVED

AUG 15 2022

CONSUMER PROTECTION

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426 W. Lancaster Avenue, Suite 200
Devon, PA 19333

August 11, 2022

VIA U.S. MAIL

Consumer Protection Bureau
Office of the New Hampshire Attorney General
33 Capitol Street
Concord, NH 03301

Re: Notice of Data Event

Dear Sir or Madam:

We represent Infinity Title Solutions ("Infinity") located at 4511 Rockside Rd., Suite 220 Independence, OH 44131, and are writing to notify your office of an incident that may affect the security of certain personal information relating to one (1) New Hampshire resident. This notice may be supplemented with any new significant facts learned subsequent to its submission. By providing this notice, Infinity does not waive any rights or defenses regarding the applicability of New Hampshire law, the applicability of the New Hampshire data event notification statute, or personal jurisdiction.

Nature of the Data Event

On June 2, 2022, Infinity became aware of suspicious activity relating to an employee's email account. Infinity learned from its clients that an unauthorized actor contacted Infinity clients by sending fraudulent emails to clients in order to commit wire fraud. Upon learning of this activity, Infinity immediately took steps to secure the email account by changing account passwords and launched an investigation with the assistance of third-party forensic specialists into the nature and scope of the incident. Infinity learned that an unauthorized actor accessed an employee's email account between April 13, 2022, and June 8, 2022.

Because the investigation was unable to confirm which specific emails or attachments within the impacted email account may have been viewed or taken by the unauthorized actor, in an abundance of caution, Infinity undertook a comprehensive review of the potentially impacted emails and attachments to identify whether sensitive information was contained therein and to whom the

information relates. This review was recently completed, and Infinity determined that sensitive information related to certain individuals was present in the impacted account.

The information contained in the impacted email account includes name and Social Security number.

Notice to New Hampshire Resident

On August 11, 2022, Infinity began mailing written notice of this incident to one (1) New Hampshire resident. 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, Infinity moved quickly to investigate and respond to the incident, assess the security of Infinity systems, and identify potentially affected individuals. Further, Infinity notified the FBI regarding the event. Infinity is also working to implement additional safeguards and training to its employees. Infinity is providing access to credit monitoring services for 2 years through Experian, to individuals whose personal information was potentially affected by this incident, at no cost to these individuals. Infinity is providing contact information for a dedicated call center for potentially affected individuals to contact with questions or concerns regarding this incident.

Additionally, Infinity is providing impacted individuals with guidance on how to better protect against identity theft and fraud. Infinity is providing individuals with information on how to place a fraud alert and security freeze on one's credit file, 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.

Contact Information

Should you have any questions regarding this notification or other aspects of the data security event, please contact us at (267) 930-1129.

Very truly yours,

Brittany R. Bickel of
MULLEN COUGHLIN LLC

BRB/jpc
Enclosure

EXHIBIT A



August 11, 2022

Return Mail Processing
PO Box 589
Claysburg, PA 16625-0589



i1966-L01-0000001 T00001 P001 *****SCH 5-DIGIT 12345

SAMPLE A SAMPLE - L01 INDIVIDUAL

APT ABC

123 ANY STREET

ANYTOWN, ST 12345-6789



NOTICE OF [Extra2]

Dear Sample A. Sample:

Infinity Title Solutions ("Infinity") is writing to notify you of a recent incident that may involve some of your information. Although at this time there is no indication that your information has been fraudulently misused in relation to this event, we are providing you with information about the event, our response to it, and steps you may take to protect your information, should you feel it appropriate to do so.

What Happened? On June 2, 2022, we became aware of suspicious activity relating to one (1) employee's email account. Infinity immediately took steps to secure the email account and launched an investigation with the assistance of third-party forensic specialists to determine the nature and scope of the activity. Infinity determined that an unauthorized actor gained access to the employee's email account for various periods of time between April 13, 2022, and June 8, 2022.

Although the investigation was unable to confirm whether the unknown actor viewed any emails or attachments while in the account, we could not rule out the possibility that some information contained within the account may have been impacted. Therefore, out of an abundance of caution, we undertook a comprehensive review of all of the emails and attachments that could have been impacted to identify whether sensitive information was contained therein and to whom the information relates. This review was recently completed, and we determined that your information was present in the impacted email account. Although there is no evidence that an unauthorized actor has misused your information, we are providing you this notice out of an abundance of caution.

What Information Was Involved? Our investigation determined that at the time of the incident, your name and [Extra1] were stored within the impacted email account. To date, Infinity has not received any reports of fraudulent misuse of your information.

What We Are Doing. As soon as we detected suspicious activity, we worked diligently to investigate the incident and further secure our systems. The confidentiality, privacy, and security of your information are among our highest priorities, and Infinity is committed to protecting your information. As part of this commitment, we are reviewing and strengthening our existing policies, procedures, and systems related to cyber security. We reported this event to the Federal Bureau of Investigation, and notified certain state regulators, as necessary.

Although we have no evidence of any fraudulent misuse of your information as a result of this incident, as an additional precaution, we arranged to have Experian provide identity monitoring services to you for 2 years at no cost to you. Please review the enclosed *Steps You Can Take to Protect Personal Information* for instructions on how to enroll in these services.



What You Can Do. We encourage you to remain vigilant against incidents of identity theft and fraud by reviewing your account statements, enrolling in the complimentary identity monitoring services we are offering through Experian and monitoring your free credit reports for suspicious activity and to detect errors.

For More Information. We understand you may have questions about the incident that are not addressed in this letter. If you have additional questions, please call (833) 468-0641 from Monday through Friday 8 am-10 pm CST, Saturday and Sunday 10 am – 7 pm CST (excluding major U.S. holidays).

We apologize for any inconvenience or concern this incident may cause.

Sincerely,

David Freeburg
Chief Legal Counsel
Infinity Title Solutions

STEPS YOU CAN TAKE TO PROTECT PERSONAL INFORMATION

Enroll in Credit and Identity Monitoring Services

As an added precaution, we are offering a complimentary 2-year membership of Experian's® IdentityWorksSM. This product provides you with superior identity protection and resolution of identity theft. To activate your membership and start monitoring your personal information, please follow the steps below:

- Ensure that you **enroll by: November 30th, 2022** (Your code will not work after this date.)
- **Visit** the Experian IdentityWorks website to enroll: <https://www.experianidworks.com/credit>
- Provide your **activation code**:

If you have questions about the product, need assistance with identity restoration or would like an alternative to enrolling in Experian IdentityWorks online, please contact Experian's customer care team at **(833) 468-0641** by **November 30th, 2022**. Be prepared to provide engagement number as proof of eligibility for the identity restoration services by Experian.

A credit card is **not** required for enrollment in Experian IdentityWorks.

You can contact Experian **immediately** regarding any fraud issues and have access to the following features once you enroll in Experian IdentityWorks:

- **Experian credit report at signup:** See what information is associated with your credit file. Daily credit reports are available for online members only.*
- **Credit Monitoring:** Actively monitors Experian file for indicators of fraud.
- **Identity Restoration:** Identity Restoration agents are immediately available to help you address credit and non-credit related fraud.
- **Experian IdentityWorks ExtendCARETM:** You receive the same high-level of Identity Restoration support even after your Experian IdentityWorks membership has expired.
- **Up to \$1 Million Identity Theft Insurance^{**}:** Provides coverage for certain costs and unauthorized electronic fund transfers.

* Offline members will be eligible to call for additional reports quarterly after enrolling.

** The Identity Theft Insurance is underwritten and administered by American Bankers Insurance Company of Florida, an Assurant company. Please refer to the actual policies for terms, conditions, and exclusions of coverage. Coverage may not be available in all jurisdictions.

If you believe there was fraudulent use of your information and would like to discuss how you may be able to resolve those issues, please reach out to an Experian agent at (877) 770-3331. If, after discussing your situation with an agent, it is determined that Identity Restoration support is needed, then an Experian Identity Restoration agent is available to work with you to investigate and resolve each incident of fraud that occurred (including, as appropriate, helping you with contacting credit grantors to dispute charges and close accounts; assisting you in placing a freeze on your credit file with the three major credit bureaus; and assisting you with contacting government agencies to help restore your identity to its proper condition).

Please note that this Identity Restoration support is available to you for 2 years from the date of this letter and does not require any action on your part at this time. The Terms and Conditions for this offer are located at www.ExperianIDWorks.com/restoration. You will also find self-help tips and information about identity protection at this site.



Monitor Your Accounts

Under U.S. law, a consumer is entitled to one free credit report annually from each of the three major credit reporting bureaus, Equifax, Experian, and TransUnion. To order your free credit report, visit www.annualcreditreport.com or call, toll-free, 1-877-322-8228. You may also directly contact the three major credit reporting bureaus listed below to request a free copy of your credit report.

Consumers have the right to place an initial or extended "fraud alert" on a credit 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 three major credit reporting bureaus listed below.

As an alternative to a fraud alert, consumers have the right to place a "credit freeze" on a credit report, which will prohibit a credit bureau from releasing information in the credit report without the consumer's express authorization. The credit 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 credit 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 credit freeze on your credit report. To request a security freeze, you will need to provide the following information:

1. Full name (including middle initial as well as Jr., Sr., II, III, etc.);
2. Social Security number;
3. Date of birth;
4. Addresses for the prior two to 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, etc.); and
7. A copy of either the police report, investigative report, or complaint to a law enforcement agency concerning identity theft if you are a victim of identity theft.

Should you wish to place a credit freeze, please contact the three major credit reporting bureaus listed below:

Equifax	Experian	TransUnion
https://www.equifax.com/personal/credit-report-services/	https://www.experian.com/help/	https://www.transunion.com/credit-help
888-298-0045	1-888-397-3742	833-395-6938
Equifax Fraud Alert, P.O. Box 105069 Atlanta, GA 30348-5069	Experian Fraud Alert, P.O. Box 9554, Allen, TX 75013	TransUnion Fraud Alert, P.O. Box 2000, Chester, PA 19016
Equifax Credit Freeze, P.O. Box 105788 Atlanta, GA 30348-5788	Experian Credit Freeze, P.O. Box 9554, Allen, TX 75013	TransUnion Credit Freeze, P.O. Box 160, Woodlyn, PA 19094

Additional Information

You may further educate yourself regarding identity theft, fraud alerts, credit freezes, and the steps you can take to protect your personal information by contacting the consumer reporting bureaus, the Federal Trade Commission, or your state Attorney General. The Federal Trade Commission may be reached at: 600 Pennsylvania Avenue NW, Washington, DC 20580; www.identitytheft.gov; 1-877-ID-THEFT (1-877-438-4338); and 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 Maryland Attorney General may be contacted at: 200 St. Paul Place, 16th Floor, Baltimore, MD 21202; 1-410-528-8662 or 1-888-743-0023; and www.oag.state.md.us. Infinity is located at 4511 Rockside Rd., Suite 220, Independence, OH 44131.

For North Carolina residents, the North Carolina Attorney General may be contacted at: 9001 Mail Service Center, Raleigh, NC 27699-9001; 1-877-566-7226 or 1-919-716-6000; and www.ncdoj.gov.

For Rhode Island residents, the Rhode Island Attorney General may be reached at: 150 South Main Street, Providence, RI 02903; www.riag.ri.gov; and 1-401-274-4400. Under Rhode Island law, you have the right to obtain any police report filed in regard to this incident. There is 1 Rhode Island resident impacted by this incident.

STATE OF NH
DEPT OF JUSTICE

2022 AUG 15 PM 1:47

