

December 21, 2023

**VIA U.S. MAIL**

Attorney General John Formella  
Office of the Attorney General  
33 Capitol Street  
Concord, NH 03301

**Re: Security 1st Title – Incident Notification**

To Whom It May Concern:

McDonald Hopkins PLC represents Security 1st Title. I am writing to provide notification of an incident at Security 1st Title that may affect the security of personal information of one (1) New Hampshire resident. Security 1st Title's investigation is ongoing, and this notification will be supplemented with any new or significant facts or findings subsequent to this submission, if any. By providing this notice, Security 1st Title does not waive any rights or defenses regarding the applicability of New Hampshire law or personal jurisdiction.

Security 1st Title recently discovered unauthorized access to its network occurred on or around September 19, 2022. Security 1st Title immediately launched an investigation in consultation with outside cybersecurity professionals who regularly investigate and analyze these types of situations to analyze the extent of any compromise of the information on its network. Based on its comprehensive investigation and document review, which concluded on December 14, 2023, Security 1st Title discovered that a limited amount of personal information may have been removed from its network in connection with this incident, including the affected resident's . Unfortunately, the investigation was unable to conclusively determine whether any personal information was actually removed.

To date, Security 1st Title is not aware of any reports of identity fraud or improper use of any information as a direct result of this incident. Nevertheless, out of an abundance of caution, Security 1st Title wanted to inform you (and the affected resident) of the incident and to explain the steps that it is taking to help safeguard the affected resident against identity fraud. Security 1st Title is providing the affected resident with written notification of this incident commencing on or about December 21, 2023 in substantially the same form as the letter attached hereto. Security 1st Title is advising the affected resident about the process for placing fraud alerts and/or security freezes on their credit files and obtaining free credit reports. The affected resident is also being

provided with the contact information for the consumer reporting agencies and the Federal Trade Commission.

At Security 1st Title, protecting the privacy of personal information is a top priority. Security 1st Title is committed to maintaining the privacy of personal information in its possession and has taken many precautions to safeguard it. Security 1st Title continually evaluates and modifies its practices and internal controls to enhance the security and privacy of personal information.

Should you have any questions regarding this notification, please contact me at  
. Thank you for your cooperation.

Very truly yours,

Spencer S. Pollock

Encl.



P.O. Box 989728  
West Sacramento, CA 95798-9728

December 21, 2023

Dear [REDACTED]

Thank you for choosing Security 1st Title. We are writing with important information regarding a cybersecurity incident that may have affected some of your information. The privacy and security of the personal information we maintain is of the utmost importance to Security 1st Title. Security 1st Title received your information in connection with its providing of title insurance, abstract products, and real estate closing services. We wanted to provide you with information about the incident and let you know that we continue to take significant measures to protect your information.

What Happened?

We discovered unauthorized access to our network occurred on or around September 19, 2022.

What We Are Doing.

We immediately launched an investigation in consultation with outside cybersecurity professionals who regularly investigate and analyze these types of situations to analyze the extent to which any of the information on our network was compromised.

What Information Was Involved?

Based on our comprehensive investigation and document review, which concluded on December 14, 2023 we discovered that your full name and one or more of the following may have been removed from our network in connection with this incident: [REDACTED]. Unfortunately, the investigation was unable to conclusively determine whether your personal information was actually removed.

What You Can Do.

To date, we are not aware of any reports of identity fraud or improper use of your information as a direct result of this incident. Nevertheless, out of an abundance of caution, we wanted to make you aware of the incident and suggest steps that you should take to protect yourself. This letter provides precautionary measures you can take to protect your personal information, including placing a Fraud Alert and/or Security Freeze on your credit files, and/or obtaining a free credit report. Additionally, you should always remain vigilant in reviewing your financial account statements and credit reports for fraudulent or irregular activity on a regular basis.

For More Information.

**If you have any further questions regarding this incident, please call our dedicated and confidential toll-free response line that we have set up to respond to questions at [REDACTED].** This response line is staffed with professionals familiar with this incident and knowledgeable on what you can do to protect against misuse of your information. The response line is available Monday through Friday, 9 am to 9 pm Eastern Time.

Please accept our apologies that this incident occurred. We understand these types of events are unfortunately becoming common among various industries, requiring vigilance on all our parts to protect against the potential of ID theft and fraud. We are committed to maintaining the privacy of personal information in our possession and have taken many precautions to safeguard it. We have a team of professionals that assess industry best practices and standards and have recently made some adjustments to our security environment to make sure we are one step ahead of these evolving threats, and we will continue to develop and implement additional cybersecurity measures to protect against incidents of this nature from occurring. Again, we thank you for choosing Security 1st Title, and we appreciate your patience during this time.

Sincerely,

Security 1<sup>st</sup> Title

**- OTHER IMPORTANT INFORMATION -**

**Placing a Fraud Alert on Your Credit File.**

We recommend that you place an initial one-year "Fraud Alert" on your credit files, at no charge. A fraud alert tells creditors to contact you personally before they open any new accounts. To place a fraud alert, call any one of the three major credit bureaus at the numbers listed below. As soon as one credit bureau confirms your fraud alert, they will notify the others.

***Equifax***

P.O. Box 105069

Atlanta, GA 30348-5069

<https://www.equifax.com/personal/credit-report-services/credit-fraud-alerts/>

(800) 525-6285

***Experian***

P.O. Box 9554

Allen, TX 75013

<https://www.experian.com/fraud/center.html>

(888) 397-3742

***TransUnion***

Fraud Victim Assistance Department

P.O. Box 2000

Chester, PA 19016-2000

<https://www.transunion.com/fraud-alerts>

(800) 680-7289

**Consider Placing a Security Freeze on Your Credit File.**

If you are very concerned about becoming a victim of fraud or identity theft, you may request a "Security Freeze" be placed on your credit file, at no charge. A security freeze prohibits, with certain specific exceptions, the consumer reporting agencies from releasing your credit report or any information from it without your express authorization. You may place a security freeze on your credit report by contacting all three nationwide credit reporting companies at the numbers below and following the stated directions or by sending a request in writing, by mail, to all three credit reporting companies:

***Equifax Security Freeze***

P.O. Box 105788

Atlanta, GA 30348-5788

<https://www.equifax.com/personal/credit-report-services/credit-freeze/>

(888)-298-0045

***Experian Security Freeze***

P.O. Box 9554

Allen, TX 75013

<http://experian.com/freeze>

(888) 397-3742

***TransUnion Security Freeze***

P.O. Box 160

Woodlyn, PA 19094

<https://www.transunion.com/credit-freeze>

(888) 909-8872

In order to place the security freeze, you'll need to supply your name, address, date of birth, Social Security number and other personal information. After receiving your freeze request, each credit reporting company will send you a confirmation letter containing a unique PIN (personal identification number) or password. Keep the PIN or password in a safe place. You will need it if you choose to lift the freeze.

If your personal information has been used to file a false tax return, to open an account or to attempt to open an account in your name or to commit fraud or other crimes against you, you may file a police report in the City in which you currently reside.

**Obtaining a Free Credit Report.**

Under federal law, you are entitled to one free credit report every 12 months from each of the above three major nationwide credit reporting companies. Call **1-877-322-8228** or request your free credit reports online at [www.annualcreditreport.com](http://www.annualcreditreport.com). Once you receive your credit reports, review them for discrepancies. Identify any accounts you did not open or inquiries from creditors that you did not authorize. Verify all information is correct. If you have questions or notice incorrect information, contact the credit reporting company.

**Additional Helpful Resources.**

Even if you do not find any suspicious activity on your initial credit reports, the Federal Trade Commission (FTC) recommends that you check your credit reports periodically. Checking your credit report periodically can help you spot problems and address them quickly.

If you find suspicious activity on your credit reports or have reason to believe your information is being misused, call your local law enforcement agency and file a police report. Be sure to obtain a copy of the police report, as many



creditors will want the information it contains to absolve you of the fraudulent debts. You may also file a complaint with the FTC by contacting them on the web at [www.ftc.gov/idtheft](http://www.ftc.gov/idtheft), by phone at 1-877-IDTHEFT (1-877-438-4338), or by mail at Federal Trade Commission, Consumer Response Center, 600 Pennsylvania Avenue, NW, Washington, DC 20580. Your complaint will be added to the FTC's Identity Theft Data Clearinghouse, where it will be accessible to law enforcement for their investigations. In addition, you may obtain information from the FTC about fraud alerts and security freezes.

**Iowa Residents:** You may contact law enforcement or the Iowa Attorney General's Office to report suspected incidents of identity Theft: Office of the Attorney General of Iowa, Consumer Protection Division, Hoover State Office Building, 1305 East Walnut Street, Des Moines, IA 50319, [www.iowaattorneygeneral.gov](http://www.iowaattorneygeneral.gov), Telephone: (515) 281-5164.

**Maryland Residents:** You may obtain information about avoiding identity theft from the Maryland Attorney General's Office: Office of the Attorney General of Maryland, Consumer Protection Division, 200 St. Paul Place, Baltimore, MD 21202, [www.marylandattorneygeneral.gov](http://www.marylandattorneygeneral.gov), Telephone: 1-888-743-0023.

**Massachusetts Residents:** Under Massachusetts law, you have the right to obtain a police report in regard to this incident. If you are the victim of identity theft, you also have the right to file a police report and obtain a copy of it.

**New Mexico Residents:** You have rights under the federal Fair Credit Reporting Act (FCRA). These include, among others, the right to know what is in your file; to dispute incomplete or inaccurate information; and to have consumer reporting agencies correct or delete inaccurate, incomplete, or unverifiable information. For more information about the FCRA, please visit [www.consumer.ftc.gov/sites/default/files/articles/pdf/pdf-0096-fair-credit-reporting-act.pdf](http://www.consumer.ftc.gov/sites/default/files/articles/pdf/pdf-0096-fair-credit-reporting-act.pdf) or [www.ftc.gov](http://www.ftc.gov).

***In Addition, New Mexico Consumers Have the Right to Obtain a Security Freeze or Submit a Declaration of Removal***

As noted above, you may obtain a security freeze on your credit report to protect your privacy and ensure that credit is not granted in your name without your knowledge. You may submit a declaration of removal to remove information placed in your credit report as a result of being a victim of identity theft. You have a right to place a security freeze on your credit report or submit a declaration of removal pursuant to the Fair Credit Reporting and Identity Security Act.

The security freeze is designed to prevent credit, loans, and services from being approved in your name without your consent. When you place a security freeze on your credit report, you will be provided with a personal identification number, password, or similar device to use if you choose to remove the freeze on your credit report or to temporarily authorize the release of your credit report to a specific party or parties or for a specific period of time after the freeze is in place. To remove the freeze or to provide authorization for the temporary release of your credit report, you must contact the consumer reporting agency and provide all of the following:

1. The unique personal identification number, password, or similar device provided by the consumer reporting agency;
2. Proper identification to verify your identity; and
3. Information regarding the third party or parties who are to receive the credit report or the period of time for which the credit report may be released to users of the credit report.

A consumer reporting agency that receives a request from a consumer to lift temporarily a freeze on a credit report shall comply with the request no later than three business days after receiving the request. As of September 1, 2008, a consumer reporting agency shall comply with the request within fifteen minutes of receiving the request by a secure electronic method or by telephone.

A security freeze does not apply in all circumstances, such as where you have an existing account relationship and a copy of your credit report is requested by your existing creditor or its agents for certain types of account review, collection, fraud control, or similar activities; for use in setting or adjusting an insurance rate or claim or insurance underwriting; for certain governmental purposes; and for purposes of prescreening as defined in the federal Fair Credit Reporting Act.

If you are actively seeking a new credit, loan, utility, telephone, or insurance account, you should understand that the procedures involved in lifting a security freeze may slow your own applications for credit. You should plan ahead and lift a freeze, either completely if you are shopping around or specifically for a certain creditor, with enough advance notice before you apply for new credit for the lifting to take effect. You should contact a consumer reporting agency and request it to lift the freeze at least three business days before applying. As of September 1, 2008, if you contact a consumer reporting agency by a secure electronic method or by telephone, the consumer reporting agency should lift the freeze within fifteen minutes. You have a right to bring a civil action against a consumer reporting agency that violates your rights under the Fair Credit Reporting and Identity Security Act.

To place a security freeze on your credit report, you must send a request to each of the three major consumer reporting agencies: Equifax, Experian, and TransUnion. You may contact these agencies using the contact information provided above.

**New York Residents:** You may obtain information about preventing identity theft from the New York Attorney General's Office: Office of the Attorney General, The Capitol, Albany, NY 12224-0341; <https://ag.ny.gov/consumer-frauds-bureau/identity-theft>; Telephone: 800-771-7755 (TDD/TYY Support: 800-788-9898); Medicare Fraud Control Unit Direct Line: 212-417-5397.

**North Carolina Residents:** You may obtain information about preventing identity theft from the North Carolina Attorney General's Office: Office of the Attorney General of North Carolina, Department of Justice, 9001 Mail Service Center, Raleigh, NC 27699-9001, [www.ncdoj.gov/](http://www.ncdoj.gov/), Telephone: 877-566-7226.

**Oregon Residents:** You may obtain information about preventing identity theft from the Oregon Attorney General's Office: Oregon Department of Justice, 1162 Court Street NE, Salem, OR 97301-4096, [www.doj.state.or.us/](http://www.doj.state.or.us/), Telephone: 877-877-9392.

**Rhode Island Residents:** You may contact law enforcement, such as the Rhode Island Attorney General's Office, to report incidents of identity theft or to learn about steps you can take to protect yourself from identity theft. You can contact the Rhode Island Attorney General at: Rhode Island Office of the Attorney General, 150 South Main Street, Providence, RI 02903, [www.riag.ri.gov](http://www.riag.ri.gov), (401) 274-4400.

As noted above, you may obtain a security freeze on your credit report to protect your privacy and ensure that credit is not granted in your name without your knowledge. You have a right to place a "security freeze" on your credit report pursuant to chapter 48 of title 6 of the Identity Theft Prevention Act of 2006.

The security freeze is designed to prevent credit, loans, and services from being approved in your name without your consent. When you place a security freeze on your credit report, within five (5) business days you will be provided a personal identification number or password to use if you choose to remove the freeze on your credit report or to temporarily authorize the release of your credit report for a specific period of time after the freeze is in place. To provide that authorization, you must contact the consumer reporting agency and provide all of the following:

1. The unique personal identification number or password provided by the consumer reporting agency.
2. Proper identification to verify your identity.
3. The proper information regarding the period of time for which the report shall be available to users of the credit report.

A consumer reporting agency that receives a request in writing from a consumer to temporarily lift a freeze on a credit report must comply with the request no later than three (3) business days after receiving the request. If the request is made online or by phone, the consumer reporting agency must comply with the request within one (1) hour.

A security freeze does not apply to circumstances where you have an existing account relationship and a copy of your report is requested by your existing creditor or its agents or affiliates for certain types of an account review, collection, fraud control, or similar activities.

If you are actively seeking a new credit, loan, utility, telephone, or insurance account, you should understand that the procedures involved in lifting a security freeze may slow your own applications for credit. You should plan ahead and

lift a freeze -- either completely, if you are shopping around, or specifically for a certain creditor -- with enough advance notice before you apply for new credit for the lifting to take effect.

You have a right to bring a civil action against someone who violates your rights under the credit reporting laws. The action can be brought against a consumer reporting agency or a user of your credit report.

To place a security freeze on your credit report, you must send a request to each of the three major consumer reporting agencies: Equifax, Experian, and TransUnion. These agencies can be contacted using the contact information provided above.

In order to request a security freeze, you may 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. Complete address;
5. Prior addresses;
6. Proof(s) of identification (state driver's license or ID card, military identification, birth certificate, etc.); and
7. If you are a victim of identity theft, a copy of either the police report, investigative report, or complaint to a law enforcement agency concerning identity theft.

Approximately ■ Rhode Island ■ was impacted by this incident.

**Washington, D.C. Residents:** You may obtain information about preventing identity theft from the Office of the Attorney General for the District of Columbia, 441 4th Street NW, Suite 110 South, Washington D.C. 2001, <https://oag.dc.gov/consumer-protection>, Telephone: 1-202-727-3400.