



MULLEN
COUGHLIN_{LLC}
ATTORNEYS AT LAW

RECEIVED

JUL 17 2023

CONSUMER PROTECTION

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

July 11, 2023

VIA U.S. MAIL

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

Re: Selene Title LLC - Notice of Data Event

To Whom It May Concern:

We represent Selene Title LLC ("Selene Title") located at 8201 Cypress Plaza Drive, Suite 100, Jacksonville, FL 32256, and are writing to notify your office of an incident that may affect the security of certain personal information relating to two (2) New Hampshire residents. This notice will be supplemented with any new significant facts learned subsequent to its submission. By providing this notice, Selene Title 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

In September 2022, Selene Title learned of suspicious activity related to an employee email account. Upon learning of the activity, Selene Title quickly took steps to ensure security of the account and launched an internal investigation to determine the nature and scope of the activity. Although no unauthorized activity was detected within the email account at the time, on or about December 12, 2022, with the assistance of external cybersecurity specialists, Selene Title commenced a deeper review of its entire email tenant for any suspicious activity. This investigation determined that an unauthorized actor had access to two Selene Title email accounts between August 5, 2022, and October 7, 2022. Although the investigation was unable to determine if any particular email or attachment was accessed by the actor, in an abundance of caution, a thorough and time-intensive review of the contents of the email accounts was conducted by Selene Title to determine if any personal information may have been accessible within the email accounts and to whom that information relates. This review was completed on June 15, 2023.

Mullen.law

The information that could have been subject to unauthorized access includes

Notice to New Hampshire Residents

On or about July 11, 2023, Selene Title provided written notice of this incident to two (2) New Hampshire 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, Selene Title moved quickly to investigate and respond to the incident, assess the security of the identified email accounts, and identify potentially affected individuals. Selene Title is also working to implement additional safeguards and training to its employees. Selene Title is providing access to credit monitoring and identity restoration services for , through Experian, to individuals whose personal information was potentially affected by this incident, at no cost to these individuals.

Additionally, Selene Title 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. Selene Title 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

Very truly yours,

Kevin Dolan of
MULLEN COUGHLIN LLC

KED/kzm
Enclosure

EXHIBIT A



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

July 11, 2023

J6696-L01-0000001 T00001 P001 *****SCH 5-DIGIT 12345



SAMPLE A SAMPLE - L01 INDIVIDUAL

APT ABC

123 ANY STREET

ANYTOWN, ST 12345-6789



Re: Notice of [Variable Header]

Dear Sample A. Sample:

[Formatted Entity] ("Selene Title") is writing to inform you of an event that may involve some of your information. Although we are unaware of any actual misuse of your information, we are providing you with notice of the incident, steps we are taking in response, and resources available to help you better protect your information, should you feel it is appropriate to do so. You are receiving this letter because you were involved in a real estate transaction in which Selene Title provided title or settlement related services.

What Happened? In September 2022, Selene Title learned of suspicious activity related to an employee email account. Upon learning of the activity, Selene Title quickly took steps to ensure security of the account and launched an internal investigation to determine the nature and scope of the activity. Although no unauthorized activity was detected within the email account at the time, on or about December 12, 2022, with the assistance of external cybersecurity specialists, Selene Title commenced a deeper review of its entire email tenant for any suspicious activity. This investigation determined that an unauthorized actor had access to two Selene Title email accounts between August 5, 2022, and October 7, 2022. Although Selene Title was unable to determine if the unauthorized actor viewed any particular email or attachment as a result of this activity, in an abundance of caution, a thorough and time-intensive review of the contents of the email accounts was conducted by Selene Title to determine if any personal information may have been accessible within the email accounts and to whom that information relates. Selene Title's review was completed on June 15, 2023. You are receiving this letter because the review determined that your information was contained in the affected email accounts.

What Information Was Involved? Selene Title has no indication that information from the affected emails has been used to commit identity theft, fraud, or other financial harm to individuals. However, we are notifying you out of an abundance of caution because the information present in the accessed email accounts included your

What We Are Doing. Selene Title prioritizes its responsibility to safeguard the information it collects in providing services to clients, customers, and borrowers. As such, Selene Title responded promptly to this incident and has worked diligently to provide you with accurate and complete notice of the incident as soon as possible. As part of its ongoing commitment to the privacy and security of information in its care, Selene Title is reviewing its existing policies and training protocols relating to data protection. Selene Title also implemented enhanced security measures and additional monitoring tools to mitigate any risk associated with this incident and to better prevent similar incidents in the future.

As an added precaution, Selene Title is providing you complimentary access to _____ of credit monitoring and identity restoration services through Experian, as well as guidance on how to better protect your information. Although Selene Title is covering the cost of these services, due to privacy restrictions, you will need to complete the activation process yourself using the enrollment instructions enclosed.

What You Can Do. Selene Title encourages you to remain vigilant against incidents of identity theft and fraud by reviewing your account statements, explanation of benefits, and free credit reports for unexpected activity or errors over the next _____. Any questionable activity detected should be reported to the associated financial institution immediately. You can also find out more about how to safeguard your information in the enclosed *Steps You Can Take to Protect Information*. There, you will find additional information about the complimentary credit monitoring services and how to enroll.

For More Information. We understand you may have questions about this incident that are not addressed in this letter. To ensure your questions are answered in a timely manner, please call Selene Title's dedicated assistance line at: _____, Monday through Friday from 8 am – 10 pm Central, or Saturday and Sunday from 10 am – 7 pm Central (excluding major U.S. holidays). Be prepared to provide your engagement number B097892. You may also write to us at: Selene Title, Attn: Legal Department, 3501 Olympus Blvd., Suite 510, Dallas Texas 75019.

Selene Title apologizes for any inconvenience this incident may cause you and remains committed to protecting the privacy and security of information in its possession.

Sincerely,

Selene Title LLC

STEPS YOU CAN TAKE TO HELP PROTECT PERSONAL INFORMATION

Enroll in Complimentary Credit Monitoring Services

To help protect your identity, we are offering complimentary access to Experian IdentityWorksSM for

If you believe there was fraudulent use of your information as a result of this incident and would like to discuss how you may be able to resolve those issues, please reach out to an Experian agent. 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 from the date of the incident (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 Identity Restoration is available to you for _____ 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.

While identity restoration assistance is immediately available to you, we also encourage you to activate the fraud detection tools available through Experian IdentityWorks as a complimentary _____ membership. This product provides you with superior identity detection and resolution of identity theft. To start monitoring your personal information, please follow the steps below:

If you have questions about the product, need assistance with Identity Restoration that arose as a result of this incident, or would like an alternative to enrolling in Experian IdentityWorks online, please contact Experian's customer care team at _____. Be prepared to provide engagement number _____ as proof of eligibility for the Identity Restoration services by Experian.

ADDITIONAL DETAILS REGARDING YOUR MEMBERSHIP

EXPERIAN IDENTITYWORKS

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 specialists 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.
- **\$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.

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	1 (800) 916-8800
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 District of Columbia residents, the District of Columbia Attorney General may be contacted at: 400 6th Street, NW, Washington, DC 20001; 202-727-3400; and oag.dc.gov.

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 <https://www.marylandattorneygeneral.gov/>.

For New York residents, the New York Attorney General may be contacted at: Office of the Attorney General, The Capitol, Albany, NY 12224-0341; 1-800-771-7755; or <https://ag.ny.gov/>.

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.

