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CONSUMER PROTECTION

McDonald Hopkins PLC
39533 Woodward Avenue
Suite 318
Bloomfield Hills, MI 48304

P 1.248.646.5070
F 1.248.646.5075

April 12, 2023

VIA U.S. MAIL

John M. Formella
Office of the Attorney General
Consumer Protection Bureau
33 Capitol Street
Concord, NH 03301

Re: Sure Title Company, LLC – Incident Notification

Dear Mr. Formella:

McDonald Hopkins PLC represents Sure Title Company, LLC (“Sure Title”). I am writing to provide notification of an incident at Sure Title that may affect the security of personal information of approximately one (1) New Hampshire resident. Sure 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, Sure Title does not waive any rights or defenses regarding the applicability of New Hampshire law or personal jurisdiction.

On or around July 1, 2022, Sure Title detected unauthorized access into one employee email account. Upon learning of this issue, Sure Title immediately began efforts to remediate the issue and commenced a prompt and thorough investigation. As part of its investigation, Sure Title has been working very closely with external cybersecurity professionals experienced in handling these types of incidents. After an extensive forensic investigation and manual document review, Sure Title discovered on March 21, 2023 that two Sure Title email accounts which were accessed between May 4, 2022 – June 28, 2022, contained some personal information of New Hampshire resident including

Sure 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. Sure Title is providing the affected resident with written notification of this incident commencing on or about April 12, 2023 in substantially the same form as the letter attached hereto. Sure Title is offering resident complimentary one-year membership with a credit monitoring service. Sure Title will advise the affected resident to always remain vigilant in reviewing financial account statements for fraudulent or irregular activity on a regular basis. Sure Title will advise the affected resident about the process for placing a fraud alert and/or security freeze 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.

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

If you have any additional questions, please contact me at _____ or _____

Very truly yours,

James J. Giszczak

Encl.



[REDACTED]

[REDACTED]

Dear [REDACTED]

The privacy and security of the personal information we maintain is of the utmost importance to Sure Title Company, LLC ("Sure Title"). We are writing with important information regarding a recent data security incident that involved some of your information. We want to provide you with information about the incident, inform you about the services we are providing to you, and let you know that we continue to take significant measures to help protect your information.

What Happened?

On or around July 1, 2022, Sure Title detected unauthorized access into one employee email account.

What We Are Doing.

Upon learning of this issue, we immediately began efforts to remediate the issue and commenced a prompt and thorough investigation. As part of our investigation, we have been working very closely with external cybersecurity professionals experienced in handling these types of incidents. After an extensive forensic investigation and manual document review, we discovered on March 21, 2023 that two Sure Title email accounts which were accessed between May 4, 2022 – June 28, 2022, contained some of your personal information.

What Information Was Involved.

Based on our comprehensive investigation and manual document review, we determined that the compromised email accounts contained your [REDACTED]

What You Can Do.

We have no evidence that any of your information has been misused. To help relieve concerns and restore confidence following this incident, we have secured the services of Kroll to provide identity monitoring at no cost to you for one year. Kroll is a global leader in risk mitigation and response, and their team has extensive experience helping people who have sustained an unintentional exposure of confidential data. Your identity monitoring services include Credit Monitoring, Fraud Consultation, and Identity Theft Restoration.

Visit <https://enroll.krollmonitoring.com> to activate and take advantage of your identity monitoring services.

You have until [REDACTED] to activate your identity monitoring services.

Membership Number: [REDACTED]

For more information about Kroll and your Identity Monitoring services, you can visit info.krollmonitoring.com.

Additional information describing your services is included with this letter.

This letter also provides other precautionary measures that you can take to help 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.

Please accept our apologies that this incident occurred. We remain fully committed to maintaining the privacy of personal information in our possession and have taken many precautions to safeguard it. We continually evaluate and modify our practices to enhance the security and privacy of your personal 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 help protect against misuse of your information. The response line is available Monday through Friday, 8:00 a.m. to 5:30 p.m., Central Time, excluding major U.S. holidays.

Sincerely,

Sure Title Company, LLC

[REDACTED]

– OTHER IMPORTANT INFORMATION –

1. Placing a Fraud Alert on Your Credit File.

Whether or not you choose to use the complimentary 12-month credit monitoring services, we recommend that you place an initial one (1) 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

<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 LLC

P.O. Box 2000

Chester, PA 19016-2000

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

(800) 680-7289

2. 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

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

(800) 349-9960

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 you do place a security freeze *prior* to enrolling in the credit monitoring service as described above, you will need to remove the freeze in order to sign up for the credit monitoring service. After you sign up for the credit monitoring service, you may refreeze your credit file.

3. 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**. 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.

4. 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, 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.

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.

If this notice letter states that your financial account information and/or credit or debit card information was impacted, we recommend that you contact your financial institution to inquire about steps to take to protect your account, including whether you should close your account or obtain a new account number.

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.

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, Consumer Protection Division, 9001 Mail Service Center, Raleigh, NC 27699-9001, www.ncdoj.gov/, Telephone: 877-566-7226 (Toll-free within North Carolina), 919-716-6000.

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, 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 from a consumer to temporarily lift a freeze on a credit report shall comply with the request no later than three (3) business days after receiving the request.

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.);
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.

There were [REDACTED] Rhode Island residents impacted by this incident.



TAKE ADVANTAGE OF YOUR IDENTITY MONITORING SERVICES

You have been provided with access to the following services from Kroll:

Single Bureau Credit Monitoring

You will receive alerts when there are changes to your credit data—for instance, when a new line of credit is applied for in your name. If you do not recognize the activity, you'll have the option to call a Kroll fraud specialist, who will be able to help you determine if it is an indicator of identity theft.

Fraud Consultation

You have unlimited access to consultation with a Kroll fraud specialist. Support includes showing you the most effective ways to protect your identity, explaining your rights and protections under the law, assistance with fraud alerts, and interpreting how personal information is accessed and used, including investigating suspicious activity that could be tied to an identity theft event.

Identity Theft Restoration

If you become a victim of identity theft, an experienced Kroll licensed investigator will work on your behalf to resolve related issues. You will have access to a dedicated investigator who understands your issues and can do most of the work for you. Your investigator will be able to dig deep to uncover the scope of the identity theft, and then work to resolve it.

Kroll's activation website is only compatible with the current version or one version earlier of Chrome, Firefox, Safari and Edge.

To receive credit services, you must be over the age of 18 and have established credit in the U.S., have a Social Security number in your name, and have a U.S. residential address associated with your credit file.