

**BakerHostetler**

STATE OF NH  
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November 30, 2020

**VIA OVERNIGHT MAIL**

Attorney General Gordon MacDonald  
Office of the Attorney General  
33 Capitol Street  
Concord, NH 03301

*Re: Incident Notification*

Dear Attorney General MacDonald:

We are writing on behalf of our client, Arc Home LLC (“Arc”), to notify you of a security incident involving seventeen New Hampshire residents. Arc is a full-service, nationwide residential lender and servicer.

On August 27, 2020, Arc Home LLC (“Arc”) learned that an unauthorized person gained access to a single Arc Home employee email account between August 26 and 27, 2020; during which time, the employee was working remotely due to the COVID-19 pandemic. The forensic investigation confirmed that the unauthorized access was limited to the single employee’s email account. Arc immediately secured the account, began an investigation, and a cybersecurity forensic firm was hired to assist. Arc Home completed a careful review of the email account, however the investigation was unable to determine whether the unauthorized person actually viewed any of the emails or attachments in the account. Out of an abundance of caution, we reviewed the emails and attachments in the account to identify individuals whose information may have been accessible to the unauthorized person. On October 21, 2020, we determined that an email or attachment in the account contained certain information pertaining to New Hampshire residents, including their Social Security numbers, driver’s license numbers, financial account numbers, and/or payment card numbers.

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On November 25, 2020, Arc provided written notice to the New Hampshire residents by mailing letters via United States Postal Service First-Class mail.<sup>1</sup> A sample copy of the notification letter is enclosed. Arc is offering the New Hampshire residents a complimentary, one-year membership to credit monitoring and identity theft prevention services through Kroll. Arc is recommending that the affected individuals remain vigilant to the possibility of fraud by reviewing their account statements for unauthorized activity. Arc has also established a dedicated phone number where the individuals may obtain more information regarding the incident.

Arc is taking steps to enhance its existing security protocols and re-educating our staff for awareness on these types of incidents

Please do not hesitate to contact me if you have any questions regarding this incident.

Sincerely,



Daniel A. Pepper  
Partner

Enclosure

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<sup>1</sup> This report does not waive Arc's objection that New Hampshire lacks personal jurisdiction over it related to any claims that may arise from this incident.



<<Date>> (Format: Month Day, Year)

<<first\_name>> <<middle\_name>> <<last\_name>> <<suffix>>  
<<address\_1>>  
<<address\_2>>  
<<city>>, <<state\_province>> <<postal\_code>>  
<<country >>

Dear <<first\_name>> <<middle\_name>> <<last\_name>> <<suffix>>,

Arc Home LLC, formerly WEI Mortgage LLC, ("Arc Home") recognizes the importance of protecting the information we maintain. We are writing to inform you of an incident that may have involved some of your information. This letter explains the incident, measures we have taken, and steps you can take in response.

#### **What Happened?**

On August 27, 2020, we learned that an unauthorized person gained access to a single Arc Home employee email account between August 26 and 27, 2020. We immediately secured the account, began an investigation, and a cybersecurity forensic firm was hired to assist.

#### **What Information Was Involved?**

Arc Home completed a careful review of the email account, however the investigation was unable to determine whether the unauthorized person actually viewed any of the emails or attachments in the account. In an abundance of caution, we reviewed the emails and attachments in the account to identify individuals whose information may have been accessible to the unauthorized person. On October 21, 2020, we determined that an email or attachment in the account contained your <<b2b\_text\_1(DataElements)>><<b2b\_text\_2(DataElements)>>.

#### **What You Can Do.**

While we have no indication that your information was actually viewed by the unauthorized person, or that it has been misused, we wanted to notify you of this incident and remind you that it is always advisable to remain vigilant for signs of unauthorized activity by reviewing your financial account statements. If you see charges or activity you did not authorize, we suggest that you contact your financial institution immediately. In an abundance of caution, we have secured the services of Kroll to provide you with one year of complimentary identity monitoring services. Your identity monitoring services include Credit Monitoring, Fraud Consultation, and Identity Theft Restoration.

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

You have until **March 1, 2021** to activate your identity monitoring services.

Membership Number: <<Member ID>>

For more information on identity theft prevention, including instructions on how to activate your complimentary one-year membership, as well as information on additional steps you can take in response to this incident, please see the additional information provided in this letter.

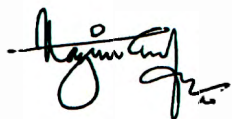
**What We Are Doing.**

We regret any inconvenience or concern this incident may cause you. To help prevent something like this from happening in the future, we are taking steps to enhance our existing security protocols and re-educating our staff for awareness on these types of incidents.

**For More Information.**

If you have any questions, please call 1-833-960-3575, Monday through Friday, from 8 a.m. to 5:30 p.m. Central Time.

Sincerely,

A handwritten signature in black ink, appearing to read 'Nazim Ahmed', with a stylized flourish at the end.

Nazim Ahmed  
Executive Vice President and  
Chief Information Officer  
Arc Home, LLC

## **TAKE ADVANTAGE OF YOUR IDENTITY MONITORING SERVICES**

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

### **Triple Bureau Credit Monitoring**

You will receive alerts when there are changes to your credit data at any of the three national credit bureaus—for instance, when a new line of credit is applied for in your name. If you do not recognize the activity, you will 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.

## ADDITIONAL STEPS YOU CAN TAKE

We remind you it is always advisable to be vigilant for incidents of fraud or identity theft by reviewing your account statements and free credit reports for any unauthorized activity. You may obtain a copy of your credit report, free of charge, once every 12 months from each of the three nationwide credit reporting companies. To order your annual free credit report, please visit [www.annualcreditreport.com](http://www.annualcreditreport.com) or call toll free at 1-877-322-8228. Contact information for the three nationwide credit reporting companies is as follows:

- *Equifax*, PO Box 740241, Atlanta, GA 30374, [www.equifax.com](http://www.equifax.com), 1-800-685-1111
- *Experian*, PO Box 2002, Allen, TX 75013, [www.experian.com](http://www.experian.com), 1-888-397-3742
- *TransUnion*, PO Box 2000, Chester, PA 19016, [www.transunion.com](http://www.transunion.com), 1-800-916-8800

If you believe you are the victim of identity theft or have reason to believe your personal information has been misused, you should immediately contact the Federal Trade Commission and/or the Attorney General's office in your state. You can obtain information from these sources about steps an individual can take to avoid identity theft as well as information about fraud alerts and security freezes. You should also contact your local law enforcement authorities and file a police report. Obtain a copy of the police report in case you are asked to provide copies to creditors to correct your records. Contact information for the Federal Trade Commission is as follows:

- *Federal Trade Commission*, Consumer Response Center, 600 Pennsylvania Avenue NW, Washington, DC 20580, 1-877-IDTHEFT (438-4338), [www.ftc.gov/idtheft](http://www.ftc.gov/idtheft)

### ***Fraud Alerts and Credit or Security Freezes:***

**Fraud Alerts:** There are two types of general fraud alerts you can place on your credit report to put your creditors on notice that you may be a victim of fraud—an initial alert and an extended alert. You may ask that an initial fraud alert be placed on your credit report if you suspect you have been, or are about to be, a victim of identity theft. An initial fraud alert stays on your credit report for one year. You may have an extended alert placed on your credit report if you have already been a victim of identity theft with the appropriate documentary proof. An extended fraud alert stays on your credit report for seven years.

To place a fraud alert on your credit reports, contact one of the nationwide credit bureaus. A fraud alert is free. The credit bureau you contact must tell the other two, and all three will place an alert on their versions of your report.

For those in the military who want to protect their credit while deployed, an Active Duty Military Fraud Alert lasts for one year and can be renewed for the length of your deployment. The credit bureaus will also take you off their marketing lists for pre-screened credit card offers for two years, unless you ask them not to.

**Credit or Security Freezes:** You have the right to put a credit freeze, also known as a security freeze, on your credit file, free of charge, which makes it more difficult for identity thieves to open new accounts in your name. That's because most creditors need to see your credit report before they approve a new account. If they can't see your report, they may not extend the credit.

*How do I place a freeze on my credit reports?* There is no fee to place or lift a security freeze. Unlike a fraud alert, you must separately place a security freeze on your credit file at each credit reporting company. For information and instructions to place a security freeze, contact each of the credit reporting agencies at the addresses below:

- **Experian Security Freeze**, PO Box 9554, Allen, TX 75013, [www.experian.com](http://www.experian.com)
- **TransUnion Security Freeze**, PO Box 2000, Chester, PA 19016, [www.transunion.com](http://www.transunion.com)
- **Equifax Security Freeze**, PO Box 105788, Atlanta, GA 30348, [www.equifax.com](http://www.equifax.com)

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 bureau will provide you with 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.

*How do I lift a freeze?* A freeze remains in place until you ask the credit bureau to temporarily lift it or remove it altogether. If the request is made online or by phone, a credit bureau must lift a freeze within one hour. If the request is made by mail, then the bureau must lift the freeze no later than three business days after getting your request.

If you opt for a temporary lift because you are applying for credit or a job, and you can find out which credit bureau the business will contact for your file, you can save some time by lifting the freeze only at that particular credit bureau. Otherwise, you need to make the request with all three credit bureaus.

**Additional information for residents of the following states:**

**New York:** You may contact and obtain information from these state agencies: *New York Department of State Division of Consumer Protection*, One Commerce Plaza, 99 Washington Ave., Albany, NY 12231-0001, 518-474-8583 / 1-800-697-1220, <http://www.dos.ny.gov/consumerprotection>; and *New York State Office of the Attorney General*, The Capitol, Albany, NY 12224-0341, 1-800-771-7755, <https://ag.ny.gov>

**North Carolina:** You may contact and obtain information from your state attorney general at: *North Carolina Attorney General's Office*, 9001 Mail Service Centre, Raleigh, NC 27699, 1-919-716-6000 / 1-877-566-7226, [www.ncdoj.gov](http://www.ncdoj.gov)

**A Summary of Your Rights Under the Fair Credit Reporting Act:** The federal Fair Credit Reporting Act (FCRA) promotes the accuracy, fairness, and privacy of information in the files of consumer reporting agencies. There are many types of consumer reporting agencies, including credit bureaus and specialty agencies (such as agencies that sell information about check writing histories, medical records, and rental history records). Your major rights under the FCRA are summarized below. For more information, including information about additional rights, go to [www.consumerfinance.gov/learnmore](http://www.consumerfinance.gov/learnmore) or write to: Consumer Financial Protection Bureau, 1700 G Street NW, Washington, DC 20552.

- You must be told if information in your file has been used against you.
- You have the right to know what is in your file.
- You have the right to ask for a credit score.
- You have the right to dispute incomplete or inaccurate information.
- Consumer reporting agencies must correct or delete inaccurate, incomplete, or unverifiable information.
- Consumer reporting agencies may not report outdated negative information.
- Access to your file is limited.
- You must give your consent for reports to be provided to employers.
- You may limit "prescreened" offers of credit and insurance you get based on information in your credit report.
- You have a right to place a "security freeze" on your credit report, which will prohibit a consumer reporting agency from releasing information in your credit report without your express authorization.
- You may seek damages from violators.
- Identity theft victims and active duty military personnel have additional rights.