

CIPRIANI & WERNER

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RECEIVED

FEB 07 2022

CONSUMER PROTECTION

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February 4, 2022

Via Mail

Office of Attorney General
33 Capitol Street
Concord, New Hampshire 03302

RE: Security Incident Notification

To Whom It May Concern:

We serve as counsel for Bay Title Company ("Bay Title"), located at 125 West Street, Fourth Floor, Annapolis, Maryland 21401 and provide this notification to you of a recent data security incident. By providing this notice, Bay Title does not waive any rights or defenses under New Hampshire law, including the data breach notification statute.

On September 21, 2021, Bay Title Company discovered suspicious activity related to one employee email account. Upon discovery, Bay Title took swift action to secure its email system and network. Bay Title also launched an internal investigation and engaged leading, independent cybersecurity specialists. Based on this investigation, Bay Title confirmed that one employee email account was subject to unauthorized access between September 13, 2021 and September 21, 2021. Bay Title then began a thorough and time intensive review of the contents of the email account to determine the type of information contained within the account, to whom that information related, and obtain sufficient address information to provide individuals with notice. This intensive review was completed on January 5, 2022 and it was discovered that two (2) residents of New Hampshire were impacted as a result of this incident. The information at risk includes the individuals' name and driver's license number.

On January 31, 2022, Bay Title provided written notice of this incident to the New Hampshire residents pursuant to New Hampshire law. The notice letter includes an offer of complimentary credit monitoring and identity protection services offered through Kroll for 12 months. A copy of the notice letter is attached hereto.

Please contact me should you have any questions.

Very truly yours,

CIPRIANI & WERNER, P.C.

By:



Jason Goodwin, Esq.



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

<<first_name>> <<middle_name>> <<last_name>> <<suffix>>
<<address_1>>
<<address_2>>
<<city>>, <<state_province>> <<postal_code>>
<<country>>

<<b2b_text_2(SubjectLine)>>

Dear <<first_name>>:

We are writing to inform you of a data security incident experienced by our company that may have involved your information as described below. We take the privacy and security of all information very seriously, and while we have no evidence to suggest that any information was subject to actual or attempted misuse as a result of this incident, this letter includes information about the incident and steps you can take to help protect your information.

What Happened: We recently discovered suspicious activity related to one employee email account. Upon discovery, we took swift action to secure our email system and network. We also launched an internal investigation and engaged leading, independent cybersecurity specialists. Based on this investigation, we confirmed that one employee email account was subject to unauthorized access between September 13, 2021 and September 21, 2021. We then began a thorough and time intensive review of the contents of the email account to determine the type of information contained within the account, to whom that information related, and obtain sufficient address information to provide you with this notice. This process was completed on January 5, 2022.

What Information Was Involved: The types of information contained within the affected email account included your first and last name, in combination with the following data element(s): <<b2b_text_3(Data Elements)>>.

What We Are Doing: We have taken steps necessary to address the incident and are committed to fully protecting all of the information that you have entrusted to us. Upon learning of this incident, we immediately took the steps described above, including performing password resets. We have also implemented additional technical safeguards to further enhance the security of information in our possession and prevent similar incidents from happening in the future. Additionally, we are offering you complimentary identity monitoring services.

What You Can Do: We recommend that you remain vigilant against incidents of identity theft and fraud by reviewing your credit reports/account statements for suspicious activity and to detect errors. If you discover any suspicious or unusual activity on your accounts, please promptly contact your financial institution. We have provided additional information below, which contains more information about steps you can take to help protect yourself against fraud and identity theft.

For More Information: We have established a dedicated assistance line to address any questions you may have which can be reached at 1-855-568-2173, Monday through Friday, 9:00 a.m. to 6:30 p.m. Eastern Time. The security of information is of the utmost importance to us. We stay committed to protecting your trust in us and continue to be thankful for your support.

Sincerely,

Stephen A. Oberg
President

STEPS YOU CAN TAKE TO HELP PROTECT INFORMATION

Activate Identity Monitoring Services

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

You have until <<b2b_text6(ActivationDeadline)>> to activate your identity monitoring services.

Membership Number: <<MembershipNumber (S_N)>>

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

If you prefer to activate these services offline and receive monitoring alerts via the US Postal Service, you may activate via our automated phone system by calling 1-888-653-0511, Monday through Friday, 8:00 a.m. to 5:30 p.m. Central Time, excluding major U.S. holidays. Please have your membership number located in your letter ready when calling. Please note that to activate monitoring services, you will be required to provide your name, date of birth, and Social Security number through our automated phone system.

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 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.

You can sign up for the online or offline credit monitoring service anytime between now and <<b2b_text_6(ActivationDeadline)>>. Due to privacy laws, we cannot register you directly. Enrolling in this service will not affect your credit score.

Monitor Your Accounts

We encourage you to remain vigilant against incidents of identity theft and fraud by reviewing your credit reports/account statements and explanation of benefits forms for suspicious activity and to detect errors. Under U.S. law, you are entitled to one free credit report annually from each of the three major credit reporting bureaus, TransUnion, Experian, and Equifax. To order your free credit report, visit www.annualcreditreport.com or call 1-877-322-8228. Once you receive your credit report, review it for discrepancies and identify any accounts you did not open or inquiries from creditors that you did not authorize. If you have questions or notice incorrect information, contact the credit reporting bureau.

You have the right to place an initial or extended "fraud alert" on a credit file at no cost. An initial fraud alert is a one-year alert that is placed on a consumer's credit file. Upon seeing a fraud alert, 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 lasting seven years. Should you wish to place a fraud alert, please contact any of the three credit reporting bureaus listed below.

As an alternative to a fraud alert, you 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 your 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 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 credit freeze, you will need to provide the following information:

1. Full name (including middle initial as well as Jr., Sr., III, etc.);
2. Social Security number;
3. Date of birth;
4. Address for the prior two to five years;
5. Proof of current address, such as a current utility or telephone bill;
6. A legible photocopy of a government-issued identification card (e.g., state driver's license or identification card); 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 fraud alert or credit freeze, please contact the three major credit reporting bureaus listed below:

<p>TransUnion 1-800-680-7289 www.transunion.com TransUnion Fraud Alert P.O. Box 2000 Chester, PA 19016-2000 TransUnion Credit Freeze P.O. Box 160 Woodlyn, PA 19094</p>	<p>Experian 1-888-397-3742 www.experian.com Experian Fraud Alert P.O. Box 9554 Allen, TX 75013 Experian Credit Freeze P.O. Box 9554 Allen, TX 75013</p>	<p>Equifax 1-888-298-0045 www.equifax.com Equifax Fraud Alert P.O. Box 105069 Atlanta, GA 30348-5069 Equifax Credit Freeze P.O. Box 105788 Atlanta, GA 30348-5788</p>
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Additional Information

You can further educate yourself regarding identity theft, fraud alerts, credit freezes, and the steps you can take to protect your personal information by contacting the credit reporting bureaus, the Federal Trade Commission (FTC), or your state Attorney General. The FTC also encourages those who discover that their information has been misused to file a complaint with them. The FTC may be reached at 600 Pennsylvania Ave. NW, Washington, D.C. 20580; www.identitytheft.gov; 1-877-ID-THEFT (1-877-438-4338); and TTY: 1-866-653-4261.

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, your state Attorney General, and the FTC. 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; 1-888-743-0023; and www.oag.state.md.us. *Bay Title Company may be contacted at _____.*

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 Washington, D.C. residents, the District of Columbia Attorney General may be contacted at 441 4th Street NW #1100, Washington, D.C. 20001; 202-727-3400, and <https://oag.dc.gov/consumer-protection>. *Bay Title Company may be contacted at _____.*