



MULLEN
COUGHLIN^{LLC}
ATTORNEYS AT LAW

STATE OF NH
DEPT OF JUSTICE
2020 NOV 16 PM 3:16

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

November 10, 2020

VIA FIRST-CLASS MAIL

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

Re: Notice of Data Event

Dear Sir or Madam:

We represent Century 21 Redwood Realty (“Century 21 Redwood”) located at 44095 Pipeline Plaza Drive, Suite 300, Ashburn, VA 20147, and are writing to notify your office of an incident that may affect the security of some personal information relating to one (1) New Hampshire resident. This notice may be supplemented if any new significant facts are learned subsequent to its submission. By providing this notice, Century 21 Redwood 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

On or around June 26, 2020, Century 21 Redwood became aware of unusual activity in an employee’s email account. At that time, Century 21 Redwood immediately launched an investigation, which included working with third-party forensic specialists to determine the full nature and scope of this incident. The investigation determined that an unknown individual accessed the Century 21 Redwood employee’s email account between June 17, 2020 and June 30, 2020. While Century 21 Redwood was unable to confirm if any personal information in the account had been subject to unauthorized acquisition, it was unable rule out the possibility of such activity. Therefore, in an abundance of caution, Century 21 Redwood conducted a comprehensive and lengthy review of the entire contents of the email account to determine what information was present in the account at the time of the incident and to whom the information related.

On October 12, 2020, Century 21 Redwood completed the email account review and began reviewing its files to determine address information for potentially impacted individuals so they could be notified of this incident. This review confirmed the email account contained personal information as defined by N.H. Rev. Stat. Ann. § 359-C:19 for one (1) New Hampshire resident, including name, address, and Social Security number.

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Notice to New Hampshire Resident

On November 10, 2020, Century 21 Redwood mailed written notice of this incident to one (1) New Hampshire resident. 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

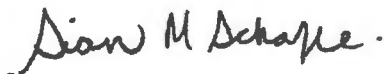
Upon discovering the event, Century 21 Redwood moved quickly to investigate and respond to the incident, assess the security of the involved Century 21 Redwood systems, and notify potentially affected individuals. Century 21 Redwood is also working to implement additional safeguards and training to its employees. Century 21 Redwood is providing access to credit monitoring services for 12 months, through TransUnion, to individuals whose personal information was potentially affected by this incident, at no cost to these individuals.

Additionally, Century 21 Redwood 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. Century 21 Redwood 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 (267) 930-4799.

Very truly yours,



Sian M. Schafle of
MULLEN COUGHLIN LLC

SMS/ken

Exhibit A

CENTURY 21.

Redwood Realty

Return Mail Processing Center
P.O. Box 6336
Portland, OR 97228-6336

<<Mail ID>>

<<Name 1>>

<<Name 2>>

<<Address 1>>

<<Address 2>>

<<Address 3>>

<<Address 4>>

<<Address 5>>

<<City>><<State>><<Zip>>

<<Country>>

<<Date>>

Notice of Data Breach

Dear <<Name 1>>:

Century 21 Redwood Realty (“Redwood”) writes to notify you of an incident that may affect the privacy of some of your personal information. Redwood takes the protection of your information very seriously. *Although we have no evidence of actual or attempted misuse of your information as a result of this incident*, this letter provides details of the incident, our response, and resources available to you to help protect your personal information from possible misuse, should you feel it is appropriate to do so.

What Happened? On or around June 26, 2020, Redwood became aware of unusual activity in an employee’s email account. We immediately launched an investigation, which included working with third-party forensic specialists to determine the full nature and scope of this incident. The investigation determined that an unknown individual accessed the Redwood employee’s email account between June 17, 2020 and June 30, 2020. Because the investigation could not rule out the possibility of access to information in the account, in an abundance of caution, we conducted a comprehensive and lengthy review of the entire contents of the email account to determine what information was present in the account at the time of the incident and to whom the information related.

On October 12, 2020, we confirmed what personal information was present in the email account and began reviewing our files to determine address information for potentially impacted individuals. Although we have no evidence of any actual or attempted misuse of information, we are providing you this notification out of an abundance of caution because your information was present in the email account at the time of the incident.

What Information Was Involved? The information present in the email account at the time of the incident may have included your first and last name and the following data elements: <<Data Elements>>.

What Are We Doing? Information privacy and security are among our highest priorities, and we have strict security measures in place to protect information in our care. Upon discovering this incident, we immediately took steps to confirm the security of our email tenant. Our response included resetting relevant passwords, working with third-party forensic specialists to investigate the incident, and ultimately reviewing the full content of the relevant email account to determine whether and what personal information was present. As part of our ongoing commitment to information security, we are also reviewing and enhancing existing policies and procedures related to data privacy and security. In an abundance of caution, we are notifying potentially impacted individuals, including you, so that you may take steps to best protect your information, should you feel it is appropriate to do so. Although we are unaware of any actual or attempted misuse of information as a result of this incident, we arranged to have TransUnion protect your identity for <<12/24>> months at no cost to you as an added precaution.

What Can You Do? We encourage you to remain vigilant against incidents of identity theft and fraud, to review your account statements, and to monitor your credit reports for suspicious activity. You may review the information contained in the attached *Steps You Can Take to Protect Your Information*. You may also enroll to receive the identity protection services we are making available to you. There is no charge to you for this service; however, you will need to enroll yourself in this service.

For More Information. We recognize that you may have questions not addressed in this letter. If you have additional questions, please call our dedicated assistance line at 855-914-4674 (toll free), Monday - Friday, 9:00 a.m. to 9:00 p.m., ET. You may also write to us at 44095 Pipeline Plaza Drive, Suite 300, Ashburn, VA 20147.

We sincerely regret any inconvenience this incident may cause you. Protecting your information is important to us, and Redwood remains committed to safeguarding the information in our care.

Sincerely,

CENTURY 21 REDWOOD

Steps You Can Take to Protect Your Information

Enroll in Credit Monitoring

As a safeguard, we have arranged for you to enroll, at no cost to you, in an online credit monitoring service (*myTrueIdentity*) for <<12/24>> months provided by TransUnion Interactive, a subsidiary of TransUnion,[®] one of the three nationwide credit reporting companies.

How to Enroll: You can sign up online or via U.S. mail delivery

- To enroll in this service, go to the *myTrueIdentity* website at **www.MyTrueIdentity.com** and, in the space referenced as “Enter Activation Code,” enter the 12-letter Activation Code << **Activation Code**>> and follow the three steps to receive your credit monitoring service online within minutes.
- If you do not have access to the Internet and wish to enroll in a similar offline, paper-based credit monitoring service, via U.S. mail delivery, please call the TransUnion Fraud Response Services toll-free hotline at 1-855-288-5422. When prompted, enter the six-digit telephone passcode <<**Engagement Number**>> and follow the steps to enroll in the offline credit monitoring service, add an initial fraud alert to your credit file, or to speak to a TransUnion representative if you believe you may be a victim of identity theft.

You can sign up for the online or offline credit monitoring service anytime between now and <<**Enrollment Deadline**>>. Due to privacy laws, we cannot register you directly. Please note that credit monitoring services might not be available for individuals who do not have a credit file with TransUnion or an address in the United States (or its territories) and a valid Social Security number. Enrolling in this service will not affect your credit score.

ADDITIONAL DETAILS REGARDING YOUR <<12/24>> MONTH COMPLIMENTARY CREDIT MONITORING SERVICE:

- Once you are enrolled, you will be able to obtain <<12/24>> months of unlimited access to your TransUnion credit report and credit score.
- The daily credit monitoring service will notify you if there are any critical changes to your credit file at TransUnion, including fraud alerts, new inquiries, new accounts, new public records, late payments, changes of address, and more.
- The service also includes access to an identity restoration program that provides assistance in the event that your identity is compromised and up to \$1,000,000 in identity theft insurance with no deductible. (Policy limitations and exclusions may apply.)

Monitor Accounts, Financial, and Billing Statements

We encourage you to remain vigilant against incidents of identity theft and fraud and to review your account statements and credit reports for suspicious charges. Under U.S. law you are entitled to one (1) free credit report annually from each of the three (3) major credit reporting bureaus. To order your free credit report, visit www.annualcreditreport.com or call, toll-free, 1-877-322-8228. You may also contact the three major credit bureaus directly to request a free copy of your credit report.

You have the 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. The security 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 security 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 security freeze on your credit report. Should you wish to place a security freeze, please contact the major consumer reporting agencies listed below:

Experian

P.O. Box 9554
Allen, TX 75013
1-888-397-3742
www.experian.com/freeze/center.html

TransUnion

P.O. Box 160
Woodlyn, PA 19094
1-888-909-8872
www.transunion.com/credit-freeze

Equifax

P.O. Box 105788
Atlanta, GA 30348-5788
1-800-685-1111
www.equifax.com/personal/credit-report-services

In order to request a security freeze, you will 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. If you have moved in the past five (5) years, provide the addresses where you have lived over the prior 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, military identification, etc.);
7. If you are a victim of identity theft, include a copy of either the police report, investigative report, or complaint to a law enforcement agency concerning identity theft.

As an alternative to a security freeze, you have the right to place an initial or extended "fraud alert" on your file at no cost. An initial fraud alert is a one (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 agencies listed below:

Experian

P.O. Box 9554
Allen, TX 75013
1-888-397-3742
www.experian.com/fraud/center.html

TransUnion

P.O. Box 2000
Chester, PA 19106
1-800-680-7289
www.transunion.com/fraud-alerts

Equifax

P.O. Box 105069
Atlanta, GA 30348
1-888-766-0008
www.equifax.com/personal/credit-report-services

Additional Information

You can further educate yourself regarding identity theft, fraud alerts, security freezes, and the steps you can take to protect yourself by contacting the consumer reporting agencies, the Federal Trade Commission, or your state Attorney General. The Federal Trade Commission can be reached at: 600 Pennsylvania Avenue NW, Washington, DC 20580; www.identitytheft.gov; 1-877-ID-THEFT (1-877-438-4338); 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 can be reached at: 441 4th St. NW #1100 Washington, D.C. 20001; (202) 727-3400; email at oag@dc.gov. You can obtain information from the Attorney General or the Federal Trade Commission about preventing identity theft.

For Maryland residents, the Attorney General can be contacted at: 200 St. Paul Place, 16th Floor, Baltimore, MD 21202; 1-410-528-8662; www.oag.state.md.us. You can obtain information from the Attorney General or the Federal Trade Commission about preventing identity theft.

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

For North Carolina residents, the Attorney General can be contacted at: 9001 Mail Service Center, Raleigh, NC 27699-9001; 1-877-566-7226 or 1-919-716-6000; www.ncdoj.gov. You can obtain information from the Attorney General or the Federal Trade Commission about preventing identity theft.

For Oregon residents, the Oregon Attorney General can be reached at: Oregon Department of Justice, 1162 Court St. NE, Salem, OR 97301-4096; (503) 378-4400; <https://www.doj.state.or.us/oregon-department-of-justice/office-of-the-attorney-general/attorney-general-ellen-f-rosenblum/>. You can obtain information from the Attorney General or the Federal Trade Commission about preventing identity theft.