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CONSUMER PROTECTION

CONCEPT TITLE SERVICES, INC.
2950 SW 27TH AVENUE
SUITE 210
MIAMI, FLORIDA 33133

Tel 305-448-5252
305-476-8133
Fax 305-476-8199

Patricia O. Espinosa, Esq.
Jose L. Espinosa, Esq.

Attorney General Joseph Foster
Office of the Attorney General
33 Capitol Street
Concord, NH 03301

August 14, 2018

NOTICE OF INFORMATION SECURITY INCIDENT

Dear Attorney General Joseph Foster,

We are writing to notify you of an information security incident that potentially resulted in the unauthorized disclosure of personal information. We have investigated the incident with the assistance of an independent forensic firm and legal counsel, and provide you with the following information.

What Happened?	We are a business that handles real estate transaction closings on behalf of our clients. On August 7, 2018, one of our clients informed us that he was the victim of wire fraud. We investigated the complaint and discovered our email account had been used to commit a phishing attack on that client. We immediately retained an independent forensic analysis firm and legal counsel to assist us with incident response, analysis, containment, recovery and notification. On August 8, 2018, we completed forensic analysis on this incident and learned that the attack was directed by a malicious external entity. While the forensic firm is unable to confirm whether the malicious entity stole copies of consumers' personal information, we are nevertheless sending this notice and a notice to our clients as a precautionary measure to help our clients protect their personal information.
What Information was Involved?	If the malicious entity stole any personal information, it is possible the following information we have received from clients may have been compromised in the incident: contact information; financial information (i.e., account number); email communications; government identification; and, if applicable, corporate or organizational records containing personal information.
Number of Affected Residents	Approximately 2 residents are affected in your state.

Timing of Notices to Residents	We are notifying residents in your state starting August 15, 2018.
Content of Notices to Residents	The notices explain what happened, what information was involved, what we are doing to protect the consumers' personal information and prevent future incidents, what consumers can do to protect themselves, and how to contact us. In the notice, we encourage consumers to be vigilant by reviewing their account statements and obtaining free credit reports, and to contact local law enforcement or the attorney general's office if they suspect identity theft or detect suspicious activity on their account(s). We also explain how consumers can contact the Federal Trade Commission (FTC) and major consumer agencies and the resources provided by these entities, how to place a fraud alert on their credit report, and how to place a security freeze on their credit file.
Distribution of Notices to Residents	Because we primarily communicate with our clients through email and our clients have consented to such communications, we will send the notice of a security incident to our clients via email.
What We Are Doing	We have contained the incident and have taken certain technical and organizational measures to protect consumer's personal information from further compromise. We are also taking additional security measures to prevent future incidents of this nature, including data protection training for staff to identify phishing attacks and other security issues, further restriction of access controls, implementing a secure mechanism to transfer sensitive personal information, and more.
For More Information	If you have any questions about this incident, please feel free to contact us directly at: Concept Title Services, Inc. 2950 SW 27th Avenue Suite 210 Miami, Florida 33133 (305) 448-5252

Sincerely,



Patricia O. Espinosa

For and on behalf of Concept Title Services, Inc.