



MULLEN
COUGHLIN_{LLC}
ATTORNEYS AT LAW

REGISTERED

OCT 18 2021

COMMUNICATIONS SECTION

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October 14, 2021

VIA U.S. 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 Elevated Title, LLC (“Elevated”), located at 1701 Barrett Lakes Blvd, Suite 260, Kennesaw, GA 30144. This notice will be supplemented with any new significant facts learned subsequent to its submission. By providing this notice Elevated 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

Elevated provides titling services to certain lenders regarding the purchase of commercial and residential real estate. Elevated became aware of unusual activity involving a single company email account. In response, Elevated began an investigation that ultimately determined that an unknown individual(s) accessed certain Elevated email accounts at various times from July 21, 2020 until December 19, 2020. Because the forensic investigation could not conclusively rule out unauthorized access to information in the account, Elevated immediately began a thorough review of the full contents of the email accounts to determine whether sensitive information was present at the time of the incident. Elevated completed this review on or about August 27, 2021, and determined that personal information for approximately three (3) New Hampshire residents was present in the account at the time of the incident.

The following types of information may have been impacted by this event: name, email address, phone number, mailing address, Social Security number, financial account information, payment card information, driver’s license and/or state identification number, passport number, military identification number, medical information, health insurance information, dates of birth, and/or digital signature. To date, Elevated has not identified any actual or attempted misuse of the information.

Notice to New Hampshire Residents

On or about October 14, 2021, Elevated began providing written notice of this incident to potentially affected individuals. Written notice is being provided in substantially the same form as the letter attached hereto as *Exhibit A*.

Other Steps Taken and To Be Taken


Upon discovering the event, Elevated moved quickly to investigate and respond to the incident, assess the security of Elevated's email system, and determine the scope of the incident. As part of Elevated's ongoing commitment to the security of information, Elevated is reviewing and enhancing existing policies and procedures and conducting additional workforce training to reduce the likelihood of a similar future event. Elevated is providing access to credit monitoring services for 1 year through IDX, to New Hampshire residents.

Additionally, Elevated is providing impacted individuals with guidance on how to better protect against identity theft and fraud, including 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) 930-2190.

Very truly yours,



Kevin M. Mekler of
MULLEN COUGHLIN LLC

KMK/jcl

EXHIBIT A



P.O. Box 989728
West Sacramento, CA 95798-9728

To Enroll, Please Call:
1-833-909-3931
Or Visit:
<https://response.idx.us/elevated-title>
Enrollment Code: <<Enrollment>>

<<FirstName>> <<MI>> <<LastName>>
<<Address1>>
<<Address2>>
<<City>>, <<State>> <<Zip>>

October 14, 2021

NOTICE OF SECURITY INCIDENT

Dear <<FirstName>> <<MI>> <<LastName>>:

Elevated Title, LLC (“Elevated”) provides titling services to certain lenders regarding the purchase of commercial and residential real estate. Elevated is writing to notify you of an incident that may affect the privacy of some of your information. This letter provides details of the incident, our response, and resources available to you to help protect your information from possible misuse, should you feel it is appropriate to do so.

What Happened? On or around November 18, 2020, Elevated became aware of unusual activity relating to a company email account. In response, we began an investigation and the investigation determined that an unknown individual(s) accessed certain Elevated email accounts at various times from July 21, 2020 until December 19, 2020. An additional review was undertaken to identify the types of information that were present in the email accounts. On or around August 27, 2021, we completed this review and determined that information related to individuals associated with some of our business partners was present the accounts. Unfortunately, Elevated was unable to associate certain individuals, including you, to our business partners. As such, out of an abundance of caution, Elevated worked quickly to provide you notice of this event.

What Information Was Involved? Our investigation determined that the following types of information related to you were present in at least one email account at the time of the incident: your name, email address, phone number, mailing address, Social Security number, financial account information, payment card information, driver’s license and/or state identification number, passport number, military identification number, medical information, health insurance information, dates of birth, and/or digital signature. To date, we are unaware of any actual or attempted misuse of your personal information as a result of this incident.

What Are We Doing? Upon learning of this incident, we moved quickly to investigate and respond to this incident. We assessed the security of our email tenant and continue to review and enhance existing policies and procedures to reduce the likelihood of a future similar event. As an added precaution, we are offering you complimentary access to credit monitoring and identity restoration services through IDX for <<Variable Data 2>> months.

What You Can 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 for the next twelve (12) to twenty-four (24) months. You may also review the information in the attached *Steps You Can Take to Help Protect Your Information*, which also includes information regarding the enrollment in the complimentary credit monitoring we are offering. While the credit monitoring is complimentary, you will need to enroll in this service yourself.

For More Information. We recognize that you may have additional questions not addressed in this letter. To ensure your questions are answered in a timely manner, we established a dedicated assistance line at 1-833-909-3931 which can be reached Monday through Friday from 9:00 a.m. to 9:00 p.m. Eastern Time. You may also write to us at Elevated Title, LLC, 1701 Barrett Lakes Blvd, Suite 260, Kennesaw, GA 30144.

Sincerely,

Elevated Title, LLC

STEPS YOU CAN TAKE TO PROTECT PERSONAL INFORMATION

Enroll in IDX Protection Services

1. **Website and Enrollment.** Go to <https://response.idx.us/elevated-title> and follow the instructions for enrollment using your Enrollment Code provided at the top of the letter. Please note the enrollment deadline is January 14, 2022.

2. **Activate the credit monitoring** provided as part of your IDX identity protection membership. The monitoring included in the membership must be activated to be effective. Note: You must have established credit and access to a computer and the internet to use this service. If you need assistance, IDX will be able to assist you.

3. **Telephone.** Contact IDX at 1-833-909-3931 to gain additional information about this event and speak with knowledgeable representatives about the appropriate steps to take to protect your credit identity.

Monitor Your Accounts

Under U.S. law, a consumer is entitled to one free credit report annually from each of the three major credit reporting bureaus, Equifax, Experian, and TransUnion. To order your free credit report, visit www.annualcreditreport.com or call, toll-free, 1-877-322-8228. You may also directly contact the three major credit reporting bureaus listed below to request a free copy of your credit report.

Consumers have the right to place an initial or extended “fraud alert” on a credit file at no cost. An initial fraud alert is a 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 three major credit reporting bureaus listed below.

As an alternative to a fraud alert, consumers 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 the consumer’s 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 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 credit freeze on your credit report. To request a security freeze, you will need to provide the following information:

1. Full name (including middle initial as well as Jr., Sr., II, III, etc.);
2. Social Security number;
3. Date of birth;
4. Addresses for the prior two to 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, etc.); 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 credit freeze, please contact the three major credit reporting bureaus listed below:

Equifax	Experian	TransUnion
https://www.equifax.com/personal/credit-report-services/	https://www.experian.com/help/	https://www.transunion.com/credit-help
888-298-0045	1-888-397-3742	833-395-6938
Equifax Fraud Alert, P.O. Box 105069 Atlanta, GA 30348-5069	Experian Fraud Alert, P.O. Box 9554, Allen, TX 75013	TransUnion Fraud Alert, P.O. Box 2000, Chester, PA 19016
Equifax Credit Freeze, P.O. Box 105788 Atlanta, GA 30348-5788	Experian Credit Freeze, P.O. Box 9554, Allen, TX 75013	TransUnion Credit Freeze, P.O. Box 160, Woodlyn, PA 19094

Additional Information

You may further educate yourself regarding identity theft, fraud alerts, credit freezes, and the steps you can take to protect your personal information by contacting the consumer reporting bureaus, the Federal Trade Commission, or your state Attorney General. The Federal Trade Commission may be reached at: 600 Pennsylvania Avenue NW, Washington, DC 20580; www.identitytheft.gov; 1-877-ID-THEFT (1-877-438-4338); and 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 may be contacted at: 400 6th Street, NW, Washington, DC 20001; 202-727-3400; and oag@dc.gov.

For Maryland residents, the Maryland Attorney General may be contacted at: 200 St. Paul Place, 16th Floor, Baltimore, MD 21202; 1-410-528-8662 or 1-888-743-0023; and www.oag.state.md.us.

For New Mexico residents, you have rights pursuant to the Fair Credit Reporting Act, such as the right to be told if information in your credit file has been used against you, the right to know what is in your credit file, the right to ask for your credit score, and the right to dispute incomplete or inaccurate information. Further, pursuant to the Fair Credit Reporting Act, the consumer reporting bureaus 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 credit reports to be provided to employers; you may limit "prescreened" offers of credit and insurance you get based on information in your credit report; and you may seek damages from violator. You may have additional rights under the Fair Credit Reporting Act not summarized here. Identity theft victims and active duty military personnel have specific additional rights pursuant to the Fair Credit Reporting Act. We encourage you to review your rights pursuant to the Fair Credit Reporting Act by visiting www.consumerfinance.gov/f/201504_cfpb_summary_your-rights-under-fcra.pdf, or by writing Consumer Response Center, Room 130-A, Federal Trade Commission, 600 Pennsylvania Ave. N.W., Washington, D.C. 20580.

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.

For Rhode Island residents, the Rhode Island Attorney General can be reached at: 150 South Main Street, Providence Rhode Island 02903, www.riag.ri.gov, 1-401-274-4400. Under Rhode Island law, you have the right to obtain any police report filed in regard to this incident. There are 3 Rhode Island residents impacted by this incident.

Vermont Residents: If you do not have internet access but would like to learn more about how to place a security freeze on your credit report, contact the Vermont Attorney General's Office at 802-656-3183 (800-649-2424 toll free in Vermont only).