

HUSCH BLACKWELL

Shelby E. Dolen

1801 Wewatta St., Suite 1000
Denver, CO 80202
Direct: 303.749.7214

April 12, 2021
Via Mail

Office of the Attorney General
Attn: Security Breach Notification
33 Capitol Street
Concord, New Hampshire 03302

RECEIVED
APR 13 2021
CONSUMER PROTECTION

Re: Notification of Security Incident

To Whom it May Concern:

On behalf of Fairway Independent Mortgage Corporation (“Fairway”), 4750 South Biltmore Lane, Madison, WI 53718, I am writing to provide notice of a security incident in accordance with N.H. Rev. Stat. Ann. 359-C:19, C:20, C:21..

I. BACKGROUND OF THE INCIDENT

Fairway experienced a phishing campaign that began in early August, 2020 and concluded in the middle of January, 2021. The intent of the campaign was to fraudulently obtain sensitive information by way of accessing corporate email accounts. Within the first three days of this campaign, Fairway’s Information Security Team (the “Team”) developed attacker profiles including a number of unique characteristics that shed light as to which Fairway employees had responded to the phishing emails. At this stage, Fairway decided to engage two outside security firms to assist with the source and scope of the breach, with the hopes of mitigating any further damage. Unfortunately, the volume of the attacks increased two-fold for the next few months, with additional attacks targeting various Fairway employees until the middle of January. The attacks ultimately ceased as a result of the combined effort of outside security firms and our internal teams. Despite the length of the attack, the investigation determined that, in total, only four Fairway email accounts were compromised. Fairway’s information security controls, incident response procedures, and remediation efforts prevented any further compromises. Fairway notified affected customers and offered each impacted customer five years of free credit monitoring and identity theft restoration services through Experian.

II. NEW HAMPSHIRE RESIDENTS

Fairway determined that twenty-six (26) New Hampshire residents may have been impacted by this incident. Fairway began sending written notice by U.S. mail to consumers on April 1, 2021.

III. STEPS TAKEN TO RESTORE SYSTEM

HUSCH BLACKWELL

Office of the Attorney General

Page 2

In assessing the security breach, Fairway has increased its employee education, via additional training courses required for all Fairway teammates. After discovering the cause of the breach, Fairway adjusted internal security protocols to ensure that a similar data breach does not occur again. Fairway continues to communicate to our internal employees regarding the importance of knowing the identity of the sender of all received emails, and to “think before you click.”

Fairway identified areas for improvement within its email system and endpoint protection controls. Fairway also identified strategic new controls to shore up defenses to future phishing attempts. The controls recently deployed will be instrumental in blunting future attacks.

Please contact me if you have any questions or if I can provide you with any additional information concerning this matter.

Sincerely,
HUSCH BLACKWELL LLP
Shelby E. Dolen