

HUSCH BLACKWELL

Shelby E. Dolen

STATE OF NH
DEPT OF JUSTICE

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

2021 SEP -7 PM 1:36

September 2, 2021

Via Mail

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

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 supplementary notice of a security incident Fairway previously notified your office of in accordance with N.H. Rev. Stat. Ann. 359-C:19, C:20, C:21.

I. BACKGROUND OF THE INCIDENT

Fairway originally notified your office of a security incident that occurred due to 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 personal information by way of accessing corporate email accounts. 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 engaged two outside security firms to assist with the source and scope of the breach, with the hopes of mitigating any further damage. The attacks ultimately ceased as a result of the combined effort of outside security firms and Fairway's internal teams.

Fairway's initial investigation determined that four (4) email accounts were compromised, and Fairway previously provided your office with notice of same. Fairway's Team continued to investigate the incident and determined that a similar attack occurred by the same bad actor(s) prior to and following the August attack, which affected six (6) additional email accounts.

II. NEW HAMPSHIRE RESIDENTS

Fairway originally notified twenty-six (26) New Hampshire residents of the security incident. Based on its further investigation, Fairway determined that fifteen (15) additional New Hampshire residents may have been impacted. Fairway has provided notification to the additional fifteen (15) New Hampshire residents and offered each impacted resident five (5) years of free credit monitoring and identity theft restoration services through Experian.

In an abundance of caution, we are providing your office with an update on Fairway's investigation and notification efforts.

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

Enclosure

Fairway Independent Mortgage Corporation
4750 South Biltmore Lane
Madison, WI., 53718



[Name]
[Address]

[Date]

Notice of Operational Incident

Dear [Name],

We are writing to inform you of a data security incident that involved some of your personal information. We take the privacy and security of your personal information very seriously. Although we are not aware of any actual misuse of your personal information as a result of this incident, due to the sensitive nature of the compromised personal information, we are writing to inform you of the incident, to advise you of steps to further protect your personal information, and to offer you 5 years of complimentary identity monitoring services.

What Happened?

We experienced a phishing campaign that began in early April 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. We developed attacker profiles including several unique characteristics that shed light as to which employees responded to the phishing emails. We engaged two outside security firms to assist with the source and scope of the incident, and ultimately to mitigate any further damage. Attacks continued to target other employees until the middle of the month of January. In and around the middle of January, the attacks ceased because of the combined effort of the outside security firms and our internal teams.

What Information Was Involved?

Based on our investigation, the personal information impacted may be some or all of the following: first name, last name, social security number, date of birth, current address, bank account information and credit card account numbers.

What We Are Doing:

To help protect your identity, we are offering a complimentary five year membership of Experian's® IdentityWorksSM. This offer through Experian IdentityWorksSM includes the following:

Phone: (800) 201-7544

Hours of operation: 8:30 am to 5 pm CDT, Monday – Friday.

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- Experian credit report at signup: See what information is associated with your credit file. Daily credit reports are available for online members only.*
- Credit Monitoring: Actively monitors Experian, Equifax and Transunion files for indicators of fraud.
- Identity Restoration: Identity Restoration specialists are immediately available to help you address credit and non-credit related fraud.
- Experian IdentityWorksSM ExtendCARETM: You receive the same high-level of Identity Restoration support even after your Experian IdentityWorksSM membership has expired.
- Up to \$1 Million Identity Theft Insurance^{**}: Provides coverage for certain costs and unauthorized electronic fund transfers.

This product provides you with superior identity detection and resolution of identity theft. To activate your membership and start monitoring your personal information please follow the steps below:

- Ensure that you enroll by: **[Date]** (Your code will not work after this date.)
- Visit the Experian IdentityWorksSM website to enroll:
 - <https://www.experianidworks.com/3bcredit>
 - Provide your activation code: **[Code]**

If you have questions about the product, need assistance with identity restoration or would like an alternative to enrolling in Experian IdentityWorks online, please contact Experian's Customer Care Team at (877) 890-9332 by **[Date]**. Be prepared to provide engagement number **[Number]** as proof of eligibility for the identity restoration services by Experian.

A credit card is not required for enrollment in Experian IdentityWorksSM.

We strongly suggest you take advantage of the services offered as a precautionary method of protecting your personal identity and credit.

What You Can Do To Protect Your Information:

We encourage you to remain vigilant against incidents of identity theft and fraud, promptly change any involved account passwords, and to review account statements, credit reports, and explanation of benefits forms for suspicious activity. Under U.S. law you are entitled to one free credit report annually from each of the three 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 may wish to stagger your requests so that you receive a free report by one of the three credit bureaus every four months.

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:

Equifax Security Freeze	Experian Security Freeze	TransUnion Credit Freeze
P.O. Box 105788	P.O. Box 9554	P.O. Box 2000
Atlanta, GA 30348	Allen, TX 75013	Chester, PA 19016
1-800-685-1111	1-888-397-3742	1-888-909-8872
www.freeze.equifax.com	www.experian.com/freeze	www.transunion.com/credit-freeze

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 years, provide the addresses where you 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.); and
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-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:

Equifax	Experian	TransUnion
PO Box 740241	PO Box 9554	PO Box 2000
Atlanta, GA 30374	Allen, TX 75013	Chester, PA 19016
www.equifax.com	www.experian.com	www.transunion.com
(888) 766-0008	(888) 397-3742	(800) 680-7289

Information for Residents of all States:

If you believe you are the victim of identity theft, you should contact the proper law enforcement authorities, including local law enforcement, and consider contacting your state attorney general and/or the Federal Trade Commission ("FTC"). You may obtain information from the FTC and the credit reporting agencies listed above about placing a fraud alert and/or credit freeze on your credit report. You may contact the FTC to obtain additional information about avoiding identity theft at the following:

Federal Trade Commission,
Consumer Response Center
600 Pennsylvania Avenue NW
Washington, DC 20580
(877) IDTHEFT (438-4338)
www.ftc.gov/idtheft

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 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.

Special Information for District of Columbia Residents:

The Attorney General can be contacted at: Office of the Attorney General for the District of Columbia, 441 4th Street NW, Suite 1100 South, Washington, D.C. 20001; 202.727.3400; <https://oag.dc.gov/>.

Special Information for Kentucky Residents:

Office of the Attorney General of Kentucky, 700 Capitol Avenue, Suite 118 Frankfort, Kentucky 40601, www.ag.ky.gov, 502-696-5300.

Special Information for Maryland Residents:

Office of the Attorney General of Maryland, Consumer Protection Division 200 St. Paul Place Baltimore, MD 21202, www.oag.state.md.us/Consumer, 888-743-0023.

Special Information for North Carolina Residents:

North Carolina residents may also wish to review information provided by the North Carolina Attorney General's office on how to avoid identity theft at: <http://www.ncdoj.gov/Protect-Yourself/2-4-3-Protect-Your-Identity/Protect-Yourself.aspx> or by calling (919) 716-6000.

Special Information for New York Residents:

The Attorney General can be contacted at: Office of the Attorney General, The Capitol, Albany, NY 12224-0341; 800-771-7755; <https://ag.ny.gov/>. The New York State Division of Consumer Protection can be contacted at: New York State Division of Consumer Protection, 123 William Street, New York, NY 10038-3804, or One Commerce Plaza, 99 Washington Ave., Albany, NY 12231-0001; 800-697-1220; <https://www.dos.ny.gov/consumerprotection/>.

Special Information 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 agencies 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 violators. 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.

Special Information 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, 401-274-4400. Under Rhode Island law, you have the right to obtain any police report filed in regard to this incident. There are 7 Rhode Island residents impacted by this incident.

State Attorneys General:

Information on how to contact your state attorney general may be found at www.naag.org/naag/attorneys-general/whos-my-ag.php.

For More Information:

At Fairway, protecting the security of the information in our possession is a responsibility we take very seriously. We apologize for any inconvenience this incident may cause and thank you for being a loyal customer of Fairway. If you have additional questions, please call our dedicated call center at (800) 201-7544, available from 8 a.m. to 5 p.m. Central Standard Time.

Sincerely,



Ted Layne
Chief Information Security Officer

* Offline members will be eligible to call for additional reports quarterly after enrolling.

** Identity theft insurance is underwritten by insurance company subsidiaries or affiliates of American International Group, Inc. (AIG). The description herein is a summary and intended for informational purposes only and does not include all terms, conditions and exclusions of the policies described. Please refer to the actual policies for terms, conditions, and exclusions of coverage. Coverage may not be available in all jurisdictions.