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August 30, 2022

VIA E-MAIL: DOJ-CPB@DOJ.NH.GOV

Attorney General John M. Formella
Office of the Attorney General
33 Capitol Street
Concord, NH 03301

Re: Incident Notification

Dear Attorney General Formella:

We are writing on behalf of our client, Fulton Bank, to notify your office of a cybersecurity incident that involved Overby-Seawell Company.

Overby-Seawell Company, or OSC, provides property insurance validation for banks and other lenders, including Fulton Bank. On July 5, 2022, OSC discovered suspicious activity on certain computer systems. They immediately launched an investigation with the assistance of third-party forensic specialists to determine the nature and scope of the activity. OSC's investigation determined that there was unauthorized access to specific OSC servers beginning on May 26, 2022. On July 11, 2022, OSC learned that certain information was stolen from OSC's network, and they undertook a review of the impacted files and later determined that those files contained certain information related to Fulton Bank customers.

This incident did not involve Fulton Bank's business systems, nor were they impacted by the event at OSC.

Fulton Bank was formally notified by OSC of the incident on August 11, 2022. On August 25, 2022, Fulton Bank's analysis of the data determined that the incident involved information for twelve New Hampshire residents.

OSC is mailing notification letters via First Class mail to these customers on August 30, 2022. OSC is offering impacted individuals a complimentary, two-year membership to credit monitoring and identity theft protection services and will operate a toll-free call center that

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individuals can call to obtain more information regarding the incident. A copy of the notification letter is attached.

Please do not hesitate to contact me if you have any questions regarding this matter.

Sincerely,

M. Scott Koller
Partner

Enclosure



INSURANCE SERVICES

P.O. Box 989728

West Sacramento, CA 95798-9728

To Enroll, Please Call:

(833) 423-2938

Or Visit:

<https://response.idx.us/OSCFulton>

Enrollment Code: <<ENROLLMENT>>

<<FIRST NAME>> <<LAST NAME>>

<<ADDRESS1>>

<<ADDRESS2>>

<<CITY>>, <<STATE>> <<ZIP>>

<<Country>>

August 30, 2022

Notice of Data <<Event/Breach>>

Dear <<FIRST NAME>> <<LAST NAME>>:

Overby-Seawell Company (“OSC”) writes to notify you of an incident that affected the privacy of some of your information. OSC is a vendor that provides property insurance validation for banks and lenders, including Fulton Bank, N.A. To perform these services, OSC was provided certain information related to a property you own or a loan for which you co-signed. This letter includes details of the incident, our response, and steps you may take to better protect against possible misuse of your information, should you feel it appropriate to do so.

What Happened? On July 5, 2022, OSC discovered suspicious activity on certain computer systems. We immediately launched an investigation with the assistance of third-party forensic specialists to determine the nature and scope of the activity. Our investigation determined that there was unauthorized access to specific OSC servers beginning on May 26, 2022. We learned on July 11, 2022, that certain information was stolen from OSC’s network. OSC undertook a review of the impacted files and later determined that those files contained certain information related to you. Fulton Bank’s business systems were not impacted by the incident.

What Information Was Involved? OSC determined that the following information related to you was present within the impacted files: your name, loan number, mailing address, collateral address, telephone number, loan amount, loan maturity date, and insurance policy information. Your social security number was also contained in those files.

What We Are Doing. Upon discovery, we immediately commenced an investigation to confirm the nature and scope of the incident. We reported this incident to law enforcement and are cooperating and assisting in the investigation. We are taking steps to implement additional safeguards and review policies and procedures relating to data privacy and security.

As an added precaution, we are also offering you complimentary access to 24 months of credit monitoring and related services through IDX. You will need to enroll yourself in these services if you wish to do so, as we are not able to activate the services on your behalf. Please review the instructions contained in the attached *Steps You Can Take to Help Protect Your Personal Information* for additional detail on these services.

What You Can Do. OSC encourages you to remain vigilant against incidents of identity theft and fraud over the next 12 to 24 months by reviewing your account statements and monitoring free credit reports for suspicious activity and to detect errors. You can review the enclosed *Steps You Can Take to Help Protect Your Personal Information* for additional details on how to take steps to protect your information, should you feel it is necessary to do so.

For More Information. We understand that you may have questions about this incident that are not addressed in this letter. If so, we invite you to call (833) 423-2938 or go to <https://response.idx.us/OSCFulton>. Our call center is available Monday through Sunday, from 9:00 a.m. to 9:00 p.m. Eastern Time, excluding Holidays. Additionally, you can write to us at Overby-Seawell Company, Attention: Incident Response, 3550 George Busbee Parkway NW, Kennesaw, GA 30144.

We sincerely regret any inconvenience or concern this incident may cause you.

Sincerely,

Keith Gilroy
Division President
Overby-Seawell Company

STEPS YOU CAN TAKE TO HELP PROTECT YOUR PERSONAL INFORMATION

Credit Monitoring Enrollment Instructions

- 1. Website and Enrollment.** Go to <https://response.idx.us/OSCFulton> and follow the instructions for enrollment using your Enrollment Code provided at the top of the letter. Please note the deadline to enroll is November 30, 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 (833) 423-2938 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
1-888-298-0045	1-888-397-3742	1-833-395-6938
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 Massachusetts Residents, Under Massachusetts law, you have the right to obtain any police report filed in regard to this incident. If you are the victim of identity theft, you also have the right to file a police report and obtain a copy of it.

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

For North Carolina residents, the North Carolina Attorney General may be contacted at: 9001 Mail Service Center, Raleigh, NC 27699-9001; 1-877-566-7226 or 1-919-716-6000; and www.ncdoj.gov.

For Rhode Island residents, the Rhode Island Attorney General may be reached at: 150 South Main Street, Providence, RI 02903; www.riag.ri.gov; and 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 16 Rhode Island residents impacted.