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RECEIVED

JUL 14 2017

CONSUMER PROTECTION

July 10, 2017

VIA U.S. MAIL

Attorney General Gordon J. MacDonald
Office of the New Hampshire Attorney General
Attn: Security Breach Notification
33 Capitol Street
Concord, NH 03301

Re: Notice of Data Security Incident

Dear Attorney General MacDonald:

We represent Movement Mortgage (“Movement”), 8024 Calvin Hall Road, Indian Land, SC 29707, and are writing to notify you of a recent incident that may affect the security of the personal information of (3) New Hampshire residents. The investigation into this incident is ongoing and will be supplemented with any new significant facts learned subsequent to its submission. By providing this notice, Movement does not waive any rights or defenses regarding the applicability of New Hampshire law or personal jurisdiction.

Nature of the Data Security Incident

On September 8, 2016, Movement became aware of unauthorized access to certain employee email accounts as the result of a sophisticated phishing attack on its email system. In response, Movement launched an investigation and brought in an outside computer forensics expert in order to restore the security of its systems and determine whether any information stored within its email system was subject to unauthorized access. The forensic investigation later determined that an employee email account was subject to unauthorized log-ins by an unknown individual between early August of 2016 and early October of 2016. While Movement is unaware of any actual or attempted misuse of personal information relating to this incident, Movement is providing notice to potentially affected individuals in an abundance of caution because its investigation could not rule out that personal information have been subject to unauthorized access and/or acquisition.

Based upon this finding, an intensive forensic review of the impacted email contents was performed to identify all individuals for whom personally identifiable information (“PII”) was contained within the impacted Movement email contents. The large volume and variety of documents in need of review required a combination of automated forensic tools and manual document review by a

Mullen.Law

Attorney General Gordon J. MacDonald

July 7, 2017

Page 2

forensics expert to check this data for the presence of PII. Once all potentially affected individuals were identified, Movement engaged in an additional process of identifying and confirming address information for the affected population, which involved both a review of Movement's internal records and the National Change of Address ("NCOA") database address verification, which was facilitated by an outside vendor.

The types of PII relating to New Hampshire residents determined to be stored within the impacted Movement email contents were not identical for every potentially affected individual, and they included the following: Name, payment card information.

Notice to New Hampshire Residents

On July 5, 2017, Movement mailed written notice of this incident to potentially impacted individuals, including (3) New Hampshire residents. Such notice is being provided in substantially the same form as the letters attached here as *Exhibit A*.

Other Steps Taken to Be Taken

Movement is offering potentially affected individuals complimentary access to twelve (12) months of free credit monitoring and identity protection services with Kroll. Additionally, Movement is providing potentially affected individuals with information on how to protect against identity theft and fraud, including information on how to contact the Federal Trade Commission, the state attorney general, and law enforcement to report any attempted or actual identity theft and fraud. In addition to providing notice of this incident to you, Movement is providing written notice of this incident to other state regulators and the three major consumer reporting agencies, as required by applicable law. Movement is taking steps to enhance security measures in place to prevent similar incidents in the future.

Contact Information

Should you have any questions regarding this notification or other aspects of the data security incident, please contact me at (267) 930-4798.

Very Truly Yours,



James E. Prendergast of
MULLEN COUGHLIN LLC

JEP:ab
Enclosure

Exhibit A



MOVEMENTMORTGAGE

<<MemberFirstName>> <<MemberMiddleName>> <<MemberLastName>> <<Date>> (Format: Month Day, Year)
<<Address1>>
<<Address2>>
<<City>>, <<State>> <<ZipCode>>

Re: Notice of Data Breach

Dear <<MemberFirstName>> <<MemberLastName>>,

Movement Mortgage, LLC ("Movement"), is writing to notify you of an incident that may affect the security of your personal information. Although we are unaware of any actual or attempted misuse of your information, we are providing you with information regarding the incident, steps we have taken since discovering the incident, and what you can do to protect against identity theft and fraud should you feel it is appropriate to do so.

What Happened? On September 8, 2016, Movement became aware of suspicious logins to certain company email accounts by an unknown source as the result of sophisticated phishing attacks on its email system. In response, Movement began an investigation and brought in an outside computer forensics expert to determine which employee email accounts were subject to unauthorized logins and what types of information inside those email accounts might be affected. It was confirmed that between approximately early August of 2016 and early October 2016, a company email account containing your personal information was subject to unauthorized log-ins by an unknown source.

What Information Was Involved? Movement's investigation determined that data relating to your personal information was stored within an affected company email account at the time unauthorized log-in's to that account occurred. The types of your personal information that may have been stored with the affected email account include your <<ClientDef1>> <<ClientDef2>> (name, driver's license or state identification card number, bank account number, and payment card information, including card number, expiration date, and card security code)

Please note that Movement's investigation determined that **your Social Security number was NOT stored** in the affected email account and is not affected as a result of this incident.

What Are We Doing? At Movement Mortgage we take your privacy and the security of your personal information very seriously. We are taking steps to enhance data security protections to prevent similar incidents in the future, including already having changed the log-in credentials for the company email accounts impacted as a result of this incident. We are also notifying certain government regulators and the major consumer reporting agencies about this incident.

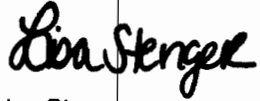
To help relieve concerns and restore confidence following this incident, we have secured the services of Kroll to provide identity monitoring at no cost to you for one year. Kroll is a global leader in risk mitigation and response, and their team has extensive experience helping people who have sustained an unintentional exposure of confidential data. Enclosed within this letter is a description of the complimentary monitoring services and instructions on how to enroll and receive them, as well as additional information on *Steps You Can Take to Protect against Identity Theft and Fraud*.

What Can You Do? You can review the attached *Steps You Can Take to Protect against Identity Theft and Fraud*. You can also enroll to receive the complimentary access to 1 free year of identity monitoring services being offered to you.

For More Information: We recognize that you may have questions that are not answered in this letter. We have established a confidential, toll-free hotline to assist you with questions regarding this incident, the credit monitoring and identity restoration services we are making available, and steps you can take to protect yourself against identity theft and fraud. The hotline is available Monday through Friday, 9:00 a.m. to 6:00 p.m., EST, at 1-866-599-7347. When calling, please have your membership number ready.

We sincerely regret any inconvenience this incident may cause. Movement Mortgage remains committed to safeguarding information in our care and will continue to take proactive steps to enhance data security.

Sincerely,

A handwritten signature in black ink that reads "Lisa Stenger". The signature is written in a cursive, flowing style.

Lisa Stenger
Associate Director, Compliance
Movement Mortgage

Additional Details Regarding Your 1-Year Kroll Membership

Your identity monitoring services include Credit Monitoring, a Current Credit Report, Web Watcher, Public Persona, Quick Cash Scan, \$1 Million Identity Fraud Loss Reimbursement, Fraud Consultation, and Identity Theft Restoration. To enroll and receive these services, please follow the steps listed below:

Visit kroll.idmonitoringservice.com to enroll and take advantage of your identity monitoring services. You will need your unique Membership Number: <<Member ID>>

To receive credit services by mail instead of online, please call 1-866-599-7347.

You've been provided with access to the following services from Kroll:

- **Triple Bureau Credit Monitoring and Single Bureau Credit Report**
Your current credit report is available for you to review. You will also receive alerts when there are changes to your credit data at any of the three national credit bureaus—for instance, when a new line of credit is applied for in your name. If you do not recognize the activity, you'll have the option to call a Kroll fraud specialist, who can help you determine if it's an indicator of identity theft.
- **Web Watcher**
Web Watcher monitors internet sites where criminals may buy, sell, and trade personal identity information. An alert will be generated if evidence of your personal identity information is found.
- **Public Persona**
Public Persona monitors and notifies when names, aliases, and addresses become associated with your Social Security number. If information is found, you'll receive an alert.
- **Quick Cash Scan**
Quick Cash Scan monitors short-term and cash-advance loan sources. You'll receive an alert when a loan is reported, and you can call a Kroll fraud specialist for more information.
- **\$1 Million Identity Fraud Loss Reimbursement**
Reimburses you for out-of-pocket expenses totaling up to \$1 million in covered legal costs and expenses for any one stolen identity event. All coverage is subject to the conditions and exclusions in the policy.
- **Fraud Consultation**
You have unlimited access to consultation with a Kroll fraud specialist. Support includes showing you the most effective ways to protect your identity, explaining your rights and protections under the law, assistance with fraud alerts, and interpreting how personal information is accessed and used, including investigating suspicious activity that could be tied to an identity theft event.
- **Identity Theft Restoration**
If you become a victim of identity theft, an experienced Kroll licensed investigator will work on your behalf to resolve related issues. You will have access to a dedicated investigator who understands your issues and can do most of the work for you. Your investigator can dig deep to uncover the scope of the identity theft, and then work to resolve it.

Steps You Can Take to Protect Against Identity Theft and Fraud

You may take action directly to further protect against possible identity theft or financial loss. We encourage you to remain vigilant against incidents of identity theft and fraud, to review your account statements, and to monitor your 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.

At no charge, you can also have these credit bureaus place a "fraud alert" on your file that alerts creditors to take additional steps to verify your identity prior to granting credit in your name. Note, however, that because it tells creditors to follow certain procedures to protect you, it may also delay your ability to obtain credit while the agency verifies your identity. As soon as one credit bureau confirms your fraud alert, the others are notified to place fraud alerts on your file. Should you wish to place a fraud alert, or should you have any questions regarding your credit report, please contact any one of the agencies listed below.

Equifax

P.O. Box 105069
Atlanta, GA 30348
800-525-6285
www.equifax.com

Experian

P.O. Box 2002
Allen, TX 75013
888-397-3742
www.experian.com

TransUnion

P.O. Box 2000
Chester, PA 19016
800-680-7289
www.transunion.com

You may also place a security freeze on your credit reports. A security freeze prohibits a credit bureau from releasing any information from a consumer's credit report without the consumer's written authorization. However, please be advised that placing a security freeze on your credit report may delay, interfere with, or prevent the timely approval of any requests you make for new loans, credit mortgages, employment, housing, or other services. If you have been a victim of identity theft, and you provide the credit bureau with a valid police report, it cannot charge you to place, lift or remove a security freeze. In all other cases, a credit bureau may charge you a fee to place, temporarily lift, or permanently remove a security freeze. You will need to place a security freeze separately with each of the three major credit bureaus listed above if you wish to place a freeze on all of your credit files.

To find out more on how to place a security freeze, you can use the following contact information:

Equifax Security Freeze

P.O. Box 105788
Atlanta, GA 30348
1-800-685-1111
<https://www.freeze.equifax.com>

Experian Security Freeze

P.O. Box 9554
Allen, TX 75013
1-888-397-3742
www.experian.com/freeze/center.html

TransUnion

P.O. Box 2000
Chester, PA 19016
1-888-909-8872
www.transunion.com/securityfreeze

You can further educate yourself regarding identity theft, and the steps you can take to protect yourself, by contacting your state Attorney General or the Federal Trade Commission. The Federal Trade Commission also encourages those who discover that their information has been misused to file a complaint with them. The Federal Trade Commission can be reached at: 600 Pennsylvania Avenue, NW, Washington, DC 20580, www.ftc.gov/idtheft, 1-877-ID-THEFT (1-877-438-4338); TTY: 1-866-653-4261. Instances of known or suspected identity theft should be reported to law enforcement, your Attorney General, and the FTC. You can also further educate yourself about placing a fraud alert or security freeze on your credit file by contacting the FTC or your state's Attorney General. **For Maryland residents**, the Attorney General can be reached at: 200 St. Paul Place, 16th Floor, Baltimore, MD 21202; 1-888-743-0023; and www.oag.state.md.us. **For North Carolina residents**, the Attorney General can be contacted at 9001 Mail Service Center, Raleigh, NC 27699-9001, 1-919-716-6400, www.ncdoj.gov. **For Rhode Island Residents**: the Attorney General can be contacted by mail at 150 South Main Street, Providence, RI 02903; by phone at (401) 274-4400; and online at www.riag.ri.gov. A total of approximately (62) Rhode Island residents may be impacted by this incident.