



MULLEN
COUGHLIN_{LLC}
ATTORNEYS AT LAW

RECEIVED

SEP 04 2018

CONSUMER PROTECTION

Paul McGurkin Jr.
Office: 267-930-4798
Fax: 267-930-4771
Email: pmcgurkin@mullen.law

1275 Drummers Lane, Suite 302
Wayne, PA 19087

August 31, 2018

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 LLC (“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 twenty-eight (28) New Hampshire residents. Movement’s response to this incident is ongoing, and this notice 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, the applicability of the New Hampshire data incident notification statute, or personal jurisdiction.

Nature of the Data Security Incident

Earlier this year Movement discovered that several employee email accounts were sending phishing emails. Movement quickly launched an investigation, with the assistance of a third party forensic investigator, to understand the nature and scope of the event and determine whether any sensitive data was at risk. The forensic investigator confirmed that numerous employee email accounts were subject to unauthorized access between October 9, 2017 and March 29, 2018. A review of the affected email accounts was performed using a combination of automated forensic tools and manual document review to determine whether they contained any personal information. On August 1, 2018, Movement determined that the affected email accounts contained personal information of certain loan applicants.

Mullen.law

Attorney General Gordon J. MacDonald
August 31, 2018
Page 2

The types of personal information found within the email accounts included different combinations of name and Social Security number, driver's license number, passport number, taxpayer identification numbers, credit card numbers, and/or bank account information.

Notice to New Hampshire Residents

On August 31, 2018, Movement will begin mailing written notice of this incident to potentially impacted individuals, including twenty-eight (28) New Hampshire residents. Such notice is being provided in substantially the same form as the letter attached here as *Exhibit A*.

Other Steps Taken

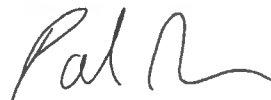
Movement is offering affected individuals complimentary access to one year of free credit monitoring and identity restoration services through Experian. Additionally, Movement is providing potentially affected individuals with information on how to protect against identity theft and fraud, including 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 will be providing notice to other state regulators.

Movement has taken several immediate steps to protect against similar incidents in the future. Upon learning of this incident, the email login credentials for all employee email accounts were quickly reset to prevent further unauthorized access. Movement is now specifically monitoring all email accounts for suspicious logins and has implemented multi-factor authentication on all email accounts. Movement is currently reviewing its existing information security procedures and implementing additional training and education for employees to prevent similar future incidents. They have also increased their Information Technology security staff and will continue to implement additional system scanning and monitoring programs going forward.

Contact Information

Should you have any questions regarding this notification or other aspects of the data security incident, please contact me at (267) 930-4788.

Very truly yours,



Paul T. McGurkin, Jr. of
MULLEN COUGHLIN LLC

PTM:plm
Enclosure

EXHIBIT A



Return Mail Processing Center
P.O. Box 6336
Portland, OR 97228-6336

<<Mail ID>>
<<Name 1>>
<<Name 2>>
<<Address 1>>
<<Address 2>>
<<Address 3>>
<<Address 4>>
<<Address 5>>
<<City>><<State>><<Zip>>
<<Country>>

<<Date>>

Re: Notice of Data Breach

Dear <<Name 1>>:

Movement Mortgage LLC (“Movement”) is writing to notify you of an incident that may affect the security of some 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? Earlier this year Movement discovered several of our employee email accounts were sending phishing emails. Movement quickly launched an investigation, with the assistance of a third party forensic investigator, to understand the nature and scope of the event, and whether any sensitive data was at risk. The forensic investigator confirmed that numerous employee email accounts were subject to unauthorized access between October 9, 2017 and March 29, 2018. We then reviewed the affected email accounts to determine whether they contained any personal information. On August 1, 2018, Movement Mortgage determined that the affected email accounts contained personal information of certain loan applicants, including you.

<<Data Element Paragraph>>

What Are We Doing? Information privacy and security are among our highest priorities. Movement has strict security measures to protect the information in our possession. Upon learning of this incident, we quickly reset the email login credentials for all employee email accounts to prevent further unauthorized access. We are currently implementing additional training and education for employees to prevent similar future incidents. We are also specifically monitoring all email accounts for suspicious log-ins and implemented multi-factor authentication on all email accounts. We have also increased our Information Technology security staff and will continue to implement additional system scanning and monitoring programs going forward.

What Can You Do? Although we are not aware of any actual or attempted misuse of your information, we arranged to have Experian protect your identity for 1 year at no cost to you as an added precaution. Please review the instructions contained in the attached “Steps You Can Take to Protect Your Information” to enroll in and receive these services. Movement will cover the cost of this service; however, you will need to enroll yourself in the credit monitoring service.

For More Information: We recognize that you may have questions not addressed in this letter. If you have additional questions, please call our dedicated assistance line at 866-287-3696 (toll free), Monday through Friday, 9:00 a.m. to 9:00 p.m., ET.

We sincerely regret any inconvenience this incident may cause you. Movement remains committed to safeguarding information in our care and we will continue to take steps to ensure the security of our systems.

Sincerely,

A handwritten signature in black ink, appearing to be 'Joseph Dinolfo', written in a cursive style.

Joseph Dinolfo
Director of Compliance, Movement Mortgage