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December 14, 2018

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Office of the Attorney General
33 Capitol Street
Concord, NH 03301

RECEIVED

DEC 17 2018

CONSUMER PROTECTION

Re: Notice of Data Breach

To Whom it May Concern:

Pursuant to relevant state law, NFM Lending ("NFM"), a client of Bryan Cave Leighton Paisner LLP (our "Firm"), is providing notice of a data security breach to your office. NFM will soon notify 15 individuals who reside in your state that one or more unauthorized individuals were able to access the email accounts of seven NFM employees potentially exposing personal information of NFM customers. Letters to affected individuals are being sent by first class U.S. mail to consumers starting on December 14, 2018.

As described in the attached example notification, between late May and early August of 2018, one or more unauthorized individuals accessed the email accounts of seven NFM employees. During this access the unauthorized individuals may have acquired NFM customer information contained in those email accounts. NFM discovered this access in early August and immediately took steps to exclude the unauthorized individuals. At that time NFM also began an investigation into the unauthorized access including determining which NFM customers may have had personal information contained in the affected email accounts. NFM concluded that analysis on November 6, 2018.

The email accounts contained documents that included personal information that is used by NFM to process loans. The affected NFM employees email accounts had these materials for legitimate business purposes. The accounts contained information including customers' name and Social Security numbers and may have included other information related to the loan application process. Law enforcement has been notified of this incident via a report through IC3.gov.

NFM is providing affected individuals with 2 years of ID Experts' credit monitoring and identity theft protection services. Information regarding these services, as well as additional information to assist individuals, is included in the notification sent to the affected individuals. NFM has set up a call center and website through ID Experts to address any questions or concerns from impacted individuals. NFM has adopted enhanced security practices to prevent a similar incident from occurring in the future, including the implementation of additional technical security measures and retraining and reeducation of its workforce, and is actively monitoring accounts for any suspicious activity.

If you would like any additional information concerning the incident, please contact me at your convenience.

Sincerely,

s/ Joshua James

Joshua A. James

Attachments



C/O ID Experts
PO Box 10444
Dublin, OH 43017-4044

To Enroll, Please Call:
(855) 382-6438
Or Visit:
<https://ide.myidcare.com/nfmlending>
Enrollment Code: <<XXXXXXXX>>

<<First Name>> <<Last Name>>
<<Address1>> <<Address2>>
<<City>>, <<State>> <<Zip>>

December 14, 2018

Notice of Data Breach

Dear <<First Name>> <<Last Name>>,

We are writing to inform you of a data security incident that may involve your personal information. Unauthorized individuals were able to access the email accounts of seven NFM Lending (“NFM”) employees. NFM has excluded the unauthorized individuals from its systems and analyzed its records to determine what customers’ information may have been included in the affected email accounts. You are receiving this letter because some of your personal information may have been included in the affected email accounts.

What Happened

Between late May and early August of 2018, one or more unauthorized individuals accessed the email accounts of seven NFM employees. During this access the unauthorized individuals may have acquired NFM customer information contained in those email accounts. NFM discovered this access in early August and immediately took steps to exclude the unauthorized individuals. At that time NFM also began an investigation into the unauthorized access including determining which NFM customers may have had personal information contained in the affected email accounts. NFM concluded that analysis on November 6, 2018.

What Information Was Involved

The email accounts contained documents that included personal information that is used by NFM to process loans. The affected NFM employees email accounts had these materials for legitimate business purposes. The accounts contained information including customers’ name and Social Security numbers and may have included other information related to your loan application process.

What We Are Doing

Following the discovery, NFM took several steps to address the incident including:

- Immediately securing the accessed email accounts
- Verifying no other NFM email accounts were accessed
- Investigating what personal information may have been accessed
- Implementing technical safeguards to help prevent similar incidents in the future

In addition, we are offering identity theft protection services through ID Experts®, the data breach and recovery services expert, to provide you with MyIDCare™. MyIDCare services include: 24 months of credit and CyberScan monitoring, a \$1,000,000 insurance reimbursement policy, and fully managed id theft recovery services. With this protection, MyIDCare will help you resolve issues if your identity is compromised.

What You Can Do

We encourage you to contact ID Experts with any questions and to enroll in free MyIDCare services by calling (855) 382-6438 or going to <https://ide.myidcare.com/nfmlending> and using the Enrollment Code provided above. MyIDCare experts are available Monday through Friday from 5 am - 5 pm Pacific Time. Please note the deadline to enroll is March 14, 2019.

Also, please review the section of this notice titled "Important Information: Recommendations You Can Take to Protect Your Identity." It contains additional information about steps you can take to avoid identity theft.

For More Information

You will find detailed instructions for enrollment on the enclosed Recommended Steps document. Also, you will need to reference the enrollment code at the top of this letter when calling or enrolling on online, so please do not discard this letter.

Please call (855) 382-6438 or go to <https://ide.myidcare.com/nfmlending> for assistance or for any additional questions you may have.

Sincerely,
NFM Legal

(Enclosure)



Recommended Steps to help Protect your Information

- 1. Website and Enrollment.** Go to <https://ide.myidcare.com/nfmlending> and follow the instructions for enrollment using your Enrollment Code provided at the top of the letter.
- 2. Activate the credit monitoring** provided as part of your MyIDCare 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, MyIDCare will be able to assist you.
- 3. Telephone.** Contact MyIDCare at (855) 382-6438 to gain additional information about this event and speak with knowledgeable representatives about the appropriate steps to take to protect your credit identity.

Important Information: Recommendations You Can Take to Protect Your Identity

Review Your Accounts and Credit Reports

You should regularly review statements from your accounts and periodically obtain your credit report from one or more of the national consumer reporting agencies. Pursuant to the Fair Credit Reporting Act (FCRA), you may obtain a free copy of your credit report online at www.annualcreditreport.com or by calling toll free 1.877.322.8228. For more information about the FCRA, please visit <https://www.consumer.ftc.gov/articles/pdf-0096-fair-credit-reporting-act.pdf>. You may also contact one or more of the three national consumer reporting agencies listed below.

Fraud Alerts and Security Freezes

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 credit reporting agencies listed below.

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 may delay, interfere with, or prevent the timely approval of any requests you make for new loans, credit mortgages, employment, housing, or other services. You may now freeze and unfreeze your credit file for free, and do so online, by phone, or by mail.

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 request a security freeze, you may need to supply your full name, address, date of birth, Social Security number, current address, all addresses for up to five previous years, email address, a copy of your state identification card or driver’s license, and a copy of a utility bill, bank or insurance statement, or other statement proving residence.

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

Equifax Security Freeze
P.O. Box 105788
Atlanta, GA 30348
1-800-349-9960
www.freeze.equifax.com
www.equifax.com

Experian Security Freeze
P.O. Box 9554
Allen, TX 75013
1-888-397-3742
www.experian.com/freeze/
www.experian.com

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

Additional Steps to Avoid Identity Theft

- ***Be vigilant and review financial accounts and credit reports to detect suspicious activity.*** Notify your financial institutions of any unusual activity.
- ***Contact your local Social Security Administration office to notify them of any potential identity theft.*** Additional information regarding your Social Security Number can be found online at: www.consumer.ftc.gov/articles/0248-do-you-need-new-social-security-number.
- ***Be Suspicious of Phishing Emails.*** We will not at any time request that you submit personal information by e-mail. If you receive an email requesting personal information or log-in credentials that seems to come from us, do not respond to it, click on a link in the email, or open any attachments in the email.

Suggestions If You Are a Victim of Identity Theft

- ***File a police report.*** You should report instances of known or suspected identity theft to law enforcement, the Federal Trade Commission, and your state Attorney General. The FTC and your State Attorney General can also provide information about steps to avoid identity theft. 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 crime report or incident report with law enforcement for identity theft, you will likely need to provide some kind of proof that you have been a victim. This notice has not been delayed as the result of a law enforcement investigation.
- ***Contact the U.S. Federal Trade Commission (FTC).*** The FTC provides useful information to identity theft victims and maintains a database of identity theft cases for use by law enforcement agencies. File a report with the FTC by calling the FTC's Identity Theft Hotline: 1- 877-IDTHEFT (438-4338); online at www.identitytheft.gov; or by mail at Identity Theft Clearinghouse, Federal Trade Commission, 600 Pennsylvania Ave., N.W., Washington, D.C. 20580. Also request a copy of the publication, "Take Charge: Fighting Back Against Identity Theft," from <http://www.ftc.gov/bcp/edu/pubs/consumer/idtheft/idt04.pdf>. The FTC also has additional information about security freezes and fraud alerts.
- ***Keep a record of your contacts.*** Start a file with copies of your credit reports, the police reports, any correspondence, and copies of disputed bills. It is also helpful to keep a log of your conversations with creditors, law enforcement officials, and other relevant parties.

State Specific Information

For Maryland residents, in addition to the FTC and credit reporting agencies, you can obtain more information about steps to avoid ID theft from the Attorney General who can be reached at: 200 St. Paul Place, 16th Floor, Baltimore, MD 21202; tel. 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 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 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 North Carolina residents**, in addition to the FTC and credit reporting agencies, you can obtain more information about steps to avoid ID theft from the Attorney General who can be reached at: 9001 Mail Service Center, Raleigh, NC 27699-9001; toll-free at 1-877-566-7226; by phone at 1-919-716-6400; and online at 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.