



MULLEN  
COUGHLIN<sup>LLC</sup>  
ATTORNEYS AT LAW

RECEIVED

NOV 08 2018

CONSUMER PROTECTION

M. Alexandra Belton  
Office: 267-930-4773  
Fax: 267-930-4771  
Email: [abelton@mullen.law](mailto:abelton@mullen.law)

1275 Drummers Lane, Suite 302  
Wayne, PA 19087

October 31, 2018

**VIA U.S. 1<sup>st</sup> CLASS MAIL**

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

**Re: Supplemental Notice of Data Event**

Dear Attorney General MacDonald:

We represent Star Title Partners of Palm Harbor, LLC (“Star Title”), 30522 US Hwy 19 N, Ste. 101, Palm Harbor, FL 34684 and write to supplement our October 26, 2018 notice to your office, a copy of which is attached hereto as *Exhibit 1*, regarding a recent data incident. By providing this supplemental notice, Star Title does not waive any rights or defenses regarding the applicability of New Hampshire State law, the New Hampshire data event notification statute, or personal jurisdiction.

Based on the ongoing effort to identify address information for individuals whose data was present in the email account impacted by this incident, on or about October 31, 2018, Star Title will provide notice of this incident to additional five (5) New Hampshire residents. Written notice will be provided in substantially the same form as notification letter included in our October 26, 2018 submission to your office as *Exhibit A*.

Should you have any questions regarding this notification or other aspects of the data event, please contact us at 267-930-4773.

Very truly yours,

M. Alexandra Belton of  
MULLEN COUGHLIN LLC

MAB:ncl  
Enclosure

# **EXHIBIT 1**



MULLEN  
COUGHLIN LLC  
ATTORNEYS AT LAW

M. Alexandra Belton  
Office: 267-930-4773  
Fax: 267-930-4771  
Email: [abelton@mullen.law](mailto:abelton@mullen.law)

1275 Drummers Lane, Suite 302  
Wayne, PA 19087

October 26, 2018

**VIA U.S. 1<sup>st</sup> CLASS 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 Event**

Dear Attorney General MacDonald:

We represent Star Title Partners of Palm Harbor, LLC (“Star Title”), 30522 US Hwy 19 N, Ste. 101, Palm Harbor, FL 34684, and write to notify your office of an incident that may affect the security of personal information relating to approximately two (2) New Hampshire residents. The investigation into this event is ongoing, and this notice will be supplemented with any new significant facts learned subsequent to its submission. By providing this notice, Star Title does not waive any rights or defenses regarding the applicability of New Hampshire law or personal jurisdiction.

**Nature of the Data Event**

On or around June 4, 2018, Star Title learned of suspicious activity in an employee’s email account. Star Title immediately began an investigation to confirm the nature and scope of this incident. Through the investigation, which included working with third party forensic investigators, Star Title determined that an unauthorized actor may have had access to emails in the impacted account prior to June 4, 2018. Star Title has been working diligently, with the assistance of those investigators, to determine what records may have been present in the affected emails, to whom those records related, and correct contact information for those individuals and businesses. Those efforts determined that certain emails impacted by this event contained personal information. This information potentially affected by this incident related to New Hampshire residents includes name and bank name/account number/routing number.

**Notice to New Hampshire Residents**

On July 19, 2018, Star Title began providing notice to individuals whose data was present in the affected emails. Based on the ongoing investigation and efforts to identify those records which were present in the emails, as well as correct contact information for the individuals to whom those records relate, on October 26, 2018, Star Title will begin providing notice of this incident to additional individuals whose information

Attorney General Gordon J. MacDonald  
October 26, 2018  
Page 2

was present in the affected emails, which includes two (2) New Hampshire residents. Written notice will be provided in substantially the same form as the letter attached hereto as *Exhibit A*.

#### **Other Steps Taken and to Be Taken**

Upon learning of suspicious activity in an employee's email account, Star Title immediately commenced an investigation to confirm the nature and scope of the incident and to identify what information may be affected. Star Title also took steps to prevent further unauthorized access to the email account by changing the user's password. While Star Title has measures in place to protect information in its systems, it is reviewing its existing policies and procedures. Star Title is also providing potentially affected individuals with notice of this incident. This notice will include an offer of access to one (1) year of complimentary credit monitoring and identity monitoring services, including identity restoration services, through Experian. Additionally, Star Title is providing potentially impacted individuals with guidance on how to better protect against identity theft and fraud, including information on how to place a fraud alert and security freeze on one's credit file, the contact details for the national consumer reporting agencies, information on how to obtain a free credit report, a reminder to remain vigilant for incidents of fraud and identity theft by reviewing account statements and monitoring free credit reports, and encouragement to contact the Federal Trade Commission, their state Attorney General, and law enforcement to report attempted or actual identity theft and fraud. Star Title has notified federal law enforcement and is also providing written notice of this incident to other state regulators as required by law.

#### **Contact Information**

Should you have any questions regarding this notification or other aspects of the data security event, please contact us at 267-930-4773.

Very truly yours,



M. Alexandra Belton of  
MULLEN COUGHLIN LLC

MAB:ncl  
Enclosure

# **EXHIBIT A**

October 26, 2018

##E1396-L01-0123456 0004 00000032 \*\*\*\*\* ALL FOR AADC 331

SAMPLE A SAMPLE - Notice



APT ABC

123 ANY ST

ANYTOWN, US 12345-6789



## Re: Notice of Data Privacy Incident

Dear Sample A Sample,

We write to inform you of an incident that may impact the privacy of some of your personal information and to provide you with information about the incident, our response, and steps you may take to better protect against possible misuse of your personal information, should you feel it appropriate to do so.

**What Happened?** On or around June 4, 2018, Star Title Partners of Palm Harbor, LLC (“Star Title”) learned of suspicious activity in an employee’s email account. Star immediately began an investigation to confirm the nature and scope of this incident. Through the investigation, which included working with third party forensic investigators, we determined that an unauthorized actor may have had to access emails in the impacted account prior to June 4, 2018. The investigation also determined that certain emails impacted by this event contained personal information.

Since learning of this incident, Star Title has been working diligently, with the assistance of third party forensic investigators, to determine what records may have been present in the affected emails, to whom those records related, and correct contact information for those individuals. Based on our investigation, we have determined that certain information related to you was present in the account at the time of the event.

**What Information was Involved?** Our investigation determined that the emails impacted by this event contained your Extra 1, and name. **To date, our investigation has found no evidence that your information has been subject to actual or attempted misuse as a result of this incident.**

**What We Are Doing.** The confidentiality, privacy, and security of information in our care is one of our highest priorities. Upon learning of the event, we immediately commenced an investigation to confirm the nature and scope of the incident and to identify what information may be affected. We also took steps to prevent further unauthorized access to the email account by changing the user’s password. While we have measures in place to protect information in our systems, we are reviewing our existing policies and working to implement additional safeguards.

As an added precaution, we are offering you access to one (1) year of credit monitoring and identity theft repair services through Experian at no cost to you. We encourage you to enroll in these services as we are unable to enroll on your behalf.

0123456



*What You Can Do.* Please review the enclosed "Steps You Can Take to Protect Your Information," which contains information on what you can do to better protect against possible misuse of your information, as well as information on the credit monitoring and identity theft protection services we are offering and instructions on how to enroll.

*For More Information.* We understand you may have questions that are not answered in this letter. If you have questions, please contact our dedicated assistance line at (877) 220-1388, Monday-Friday from 9am – 7pm EST.

Sincerely,



Anne Cordell  
General Manager  
Star Title Partners

## **STEPS YOU CAN TAKE TO PROTECT YOUR INFORMATION**

### **Enroll in Credit Monitoring**

To help protect your identity, we are offering you access to a complimentary one-year membership of Experian's® IdentityWorks<sup>SM</sup>. 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:** December 31, 2018 (Your code will not work after this date.)
- **Visit** the Experian IdentityWorks website to enroll: <https://www.experianidworks.com/credit>
- Provide your **activation code:** ABCDEFGHI

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 December 31, 2018. Be prepared to provide engagement number DB09110 as proof of eligibility for the identity restoration services by Experian.

### **ADDITIONAL DETAILS REGARDING YOUR 12-MONTH EXPERIAN IDENTITYWORKS MEMBERSHIP:**

A credit card is **not** required for enrollment in Experian IdentityWorks.

You can contact Experian **immediately** regarding any fraud issues. You also have access to the following features once you enroll in Experian IdentityWorks:

- ◆ **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 file for indicators of fraud.
- ◆ **Identity Restoration:** Identity Restoration agents are immediately available to help you address credit and non-credit related fraud.
- ◆ **Experian IdentityWorks ExtendCARE<sup>TM</sup>:** You receive the same high-level of Identity Restoration support even after your Experian IdentityWorks membership has expired.
- ◆ **Up to \$1 Million Identity Theft Insurance<sup>\*\*</sup>:** Provides coverage for certain costs and unauthorized electronic fund transfers.

If you believe there was fraudulent use of your information and would like to discuss how you may be able to resolve those issues, please reach out to an Experian agent at 877.890.9332, Monday-Friday 9am to 9pm PST and Sat/Sun 11am to 8pm PST. If, after discussing your situation with an agent, it is determined that Identity Restoration support is needed, then an Experian Identity Restoration agent is available to work with you to investigate and resolve each incident of fraud that occurred (including, as appropriate, helping you with contacting credit grantors to dispute charges and close accounts; assisting you in placing a freeze on your credit file with the three major credit bureaus; and assisting you with contacting government agencies to help restore your identity to its proper condition).

Please note that this Identity Restoration support is available to you for one year from the date of this letter and does not require any action on your part at this time. The Terms and Conditions for this offer are located at [www.ExperianIDWorks.com/restoration](http://www.ExperianIDWorks.com/restoration). You will also find self-help tips and information about identity protection at this site.

### **Monitor Your Accounts**

We encourage you to remain vigilant against incidents of identity theft and fraud, to review your account statements, and to monitor your credit reports for suspicious activity and to detect error over the next 12 to 24 months. 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](http://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 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:

**Experian**  
PO Box 9554  
Allen, TX 75013  
1-888-397-3742  
[www.experian.com/freeze/center.html](http://www.experian.com/freeze/center.html)

**TransUnion**  
P.O. Box 2000  
Chester, PA 19016  
1-800-909-8872  
[www.transunion.com/credit-freeze](http://www.transunion.com/credit-freeze)

**Equifax**  
PO Box 105788  
Atlanta, GA 30348-5788  
1-800-685-1111  
[www.equifax.com/personal/credit-report-services](http://www.equifax.com/personal/credit-report-services)

0123456





In order 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 (5) years, provide the addresses where you have 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.);
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 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 agencies listed below:

#### **Experian**

P.O. Box 2002  
Allen, TX 75013  
1-888-397-3742

[www.experian.com/fraud/center.html](http://www.experian.com/fraud/center.html)

#### **TransUnion**

P.O. Box 2000  
Chester, PA 19106  
1-800-680-7289

[www.transunion.com/fraud-victim-resource/place-fraud-alert](http://www.transunion.com/fraud-victim-resource/place-fraud-alert)

#### **Equifax**

P.O. Box 105069  
Atlanta, GA 30348  
1-888-766-0008

[www.equifax.com/personal/credit-report-services](http://www.equifax.com/personal/credit-report-services)

#### **Additional Information**

You can further educate yourself regarding identity theft, fraud alerts, security freezes, and the steps you can take to protect yourself, by contacting the consumer reporting agencies, the Federal Trade Commission, or your state Attorney General.

The Federal Trade Commission can be reached at: 600 Pennsylvania Avenue NW, Washington, DC 20580, [www.identitytheft.gov](http://www.identitytheft.gov), 1-877-ID-THEFT (1-877-438-4338); 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 North Carolina residents**, the Attorney General can be contacted at 9001 Mail Service Center, Raleigh, NC 27699-9001, 1-877-566-7226 or 1-919-716-6400, [www.ncdoj.gov](http://www.ncdoj.gov).

**For Maryland residents**, the Attorney General can be contacted at 200 St. Paul Place, 16th Floor, Baltimore, MD 21202, 1-888-743-0023, [www.oag.state.md.us](http://www.oag.state.md.us). Star Title Partners of Palm Harbor LLC is located at 30522 US Hwy 19 N., Ste. 101, Palm Harbor, FL 34684.

**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-fera.pdf](http://www.consumerfinance.gov/f/201504_cfpb_summary_your-rights-under-fera.pdf), or by writing Consumer Response Center, Room 130-A, Federal Trade Commission, 600 Pennsylvania Ave. N.W., Washington, D.C. 20580.

**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](http://www.riag.ri.gov), 1-401-247-4400. Under Rhode Island law, you have the right to obtain any police report filed in regard to this incident. There are no Rhode Island residents impacted by this incident.

\* 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.



MULLEN  
COUGHLIN

1275 Drummers Lane, Suite 302  
Wayne, Pennsylvania 19087



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