

# BakerHostetler

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RECEIVED

JUL 10 2017

CONSUMER PROTECTION

July 7, 2017

### VIA OVERNIGHT MAIL

Joseph Foster  
Office of the Attorney General  
33 Capitol St  
Concord, NH 03301

Re: *Incident Notification*

Dear Attorney General Foster:

Our client, Starwood Property Trust and Starwood Mortgage Capital (“Starwood”), submits this notice after learning of a security incident that may have involved personal information for two (2) New Hampshire residents. On May 17, 2017, Starwood learned that through a “phishing attack” sent to numerous companies, an unauthorized individual gained access to a Starwood employee’s email account. When Starwood learned of this, they immediately secured the email account, reset passwords, contacted federal law enforcement, and began an investigation.

It appears the goal of the phishing attack was to initiate unauthorized wire transfers from Starwood’s account. However, Starwood’s existing safeguards detected and prevented any attempted transfers and they have no evidence of any unauthorized transactions or financial activity. Starwood conducted a thorough review of the employee’s email account and determined that it may have contained some personal information, including names, addresses, dates of birth, bank account numbers, and Social Security numbers.

Joseph Foster  
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Starwood began notifying individuals by U.S. Mail on July 6, 2017 in accordance with N.H. Rev. Stat. Ann. § 359-C:20 in substantially the same form as the document enclosed herewith. Starwood also included a company phone number on all mailed notification letters for individuals to contact with any additional questions concerning the incident.

To help prevent something like this from happening again, Starwood is reinforcing their information security training program with an emphasis on the detection and avoidance of phishing email scams and reviewing their internal procedures related to requests for sensitive information.

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

Sincerely,

A handwritten signature in black ink that reads "M. Scott Koller". The signature is written in a cursive style with a large, prominent "M" and "K".

M. Scott Koller  
Counsel

Enclosure



591 West Putnam Avenue  
Greenwich, Connecticut 06830



<<Mail ID>>  
<<Name 1>>  
<<Address 1>>  
<<Address 2>>  
<<City>>, <<State>>, <<Zip>>  
<<Country>>

<<Date>>

Dear <<Name1>>,

We are writing to share with you important information about a security incident that involved some of your personal information, as well as steps we are taking in response, and the resources we are making available to you. You are receiving this letter because our company or one of our affiliates received some of your information in connection with a potential commercial real estate transactions or financing in which you were involved. On our around June 19, 2017, we determined that your information may have been accessible to an unauthorized individual. We cannot confirm that the unauthorized individual did actually access or acquire your information, but we cannot rule it out.

**What Happened?**

On May 17, 2017, we learned that through a “phishing” attack sent to numerous companies, an unauthorized individual gained access to a Starwood employee’s email account. When we learned of this, we immediately secured the email account, reset passwords, contacted federal law enforcement, and began an investigation. It appears that the goal of the phishing attack was to initiate unauthorized wire transfers from our accounts. Our existing safeguards detected and prevented any attempted transfers, and we have no evidence of any unauthorized transactions or financial activity taking place.

**What Information Was Involved?**

We conducted a thorough review of the employee’s email account and determined that it may have contained some personal information, including your name, address, date of birth, bank account number, and Social Security number.

**What We Are Doing**

While we have no reason to believe that your information has been misused in any way, we are letting you know this happened and assure you we take it very seriously. As a precaution, we are offering all affected individuals a free one-year membership of Experian’s® IdentityWorks. This product helps detect possible misuse of personal information and provides identity protection services focused on immediate identification and resolution of identity theft. It also includes \$1 Million Identity Theft Insurance and access to a toll-free US-based Identify Theft Resolution agent who will guide affected individuals through the process of fraud resolution from start to finish. Agents will investigate each incident; help with contacting credit grantors to dispute charges and close accounts (including credit, debit, and medical insurance cards); assist with freezing credit files; contact government agencies. IdentityWorks is completely free to you and enrolling in this program will not hurt your credit score.

**What You Can Do**

We encourage you to take advantage of the identity theft protection services being offered. For more information on identity theft prevention and IdentityWorks, including instructions on how to activate your complimentary membership, please see the additional information provided in this letter.

**For More Information**

We deeply regret any inconvenience this incident may cause. To help prevent something like this from happening again, we are reinforcing our information security training program with an emphasis on the detection and avoidance of phishing email scams and reviewing our internal procedures related to requests for sensitive information.

If you have questions regarding this incident, please call (203) 422-8191 from 9:00 AM to 6:00 PM EST or email [asossen@Starwood.com](mailto:asossen@Starwood.com).

Sincerely,

*Andrew J. Sossen*

Starwood Property Trust, Inc.  
Chief Operating Officer & General Counsel

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

1. Ensure that you **enroll by:** <<Enrollment Deadline>> (Your code will not work after this date.)
2. **Visit** the Experian IdentityWorks website to enroll: [www.experianidworks.com/creditone](http://www.experianidworks.com/creditone)
3. Provide your **activation code:** <<Enrollment Code>>

If you have questions about the product, need assistance with identity restoration that arose as a result of this incident or would like an alternative to enrolling in Experian IdentityWorks online, please contact Experian's customer care team at 877-890-9332 by September 30, 2017. Be prepared to provide engagement number <<PC Engagement Number>> as proof of eligibility for the identity restoration services by Experian.

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

You can contact Experian **immediately** regarding any fraud issues, and 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.<sup>1</sup>
- **Credit Monitoring:** Actively monitors Experian, Equifax and Transunion files for indicators of fraud.
- **Identity Restoration:** Identity Restoration specialists are immediately available to help you address credit and non-credit related fraud.
- **Experian IdentityWorks ExtendCARE™:** You receive the same high-level of Identity Restoration support even after your Experian IdentityWorks membership has expired.
- **\$1 Million Identity Theft Insurance<sup>2</sup>:** Provides coverage for certain costs and unauthorized electronic fund transfers.

**What you can do to protect your information:** There are additional actions you can consider taking to reduce the chances of identity theft or fraud on your account(s). Please refer to [www.ExperianIDWorks.com/restoration](http://www.ExperianIDWorks.com/restoration)

### Additional Steps You Can Take

Even if you choose not to take advantage of this free credit monitoring service, we recommend that you remain vigilant to the possibility of fraud and identity theft by reviewing your credit card, bank, and other financial statements for any unauthorized activity. You may also obtain a copy of your credit report, free of charge, directly from each of the three nationwide credit reporting agencies once every 12 months. To order your credit report, please visit [www.annualcreditreport.com](http://www.annualcreditreport.com) or call toll free at 877-322-8228. Contact information for the three nationwide credit reporting agencies is as follows:

**Equifax**  
P.O. Box 740241  
Atlanta, GA 30374  
[www.equifax.com](http://www.equifax.com)  
(800) 685-1111

**Experian**  
P.O. Box 2002  
Allen, TX 75013  
[www.experian.com](http://www.experian.com)  
(888) 397-3742

**TransUnion**  
P.O. Box 2000  
Chester, PA 19016  
[www.transunion.com](http://www.transunion.com)  
(800) 680-7289

If you believe that you are the victim of identity theft or have reason to believe that your personal information has been misused, you should immediately contact the Federal Trade Commission and/or the Office of the Attorney General in your home state. Contact information for the Federal Trade Commission is as follows:

Federal Trade Commission  
600 Pennsylvania Avenue, NW  
Washington, DC 20580  
[www.ftc.gov/idtheft](http://www.ftc.gov/idtheft)  
1-877-438-4338

You can obtain information from these sources about steps an individual can take to avoid identity theft as well as information about fraud alerts and security freezes. You should also contact your local law enforcement authorities and file a police report. Obtain a copy of the police report in case you are asked to provide copies to creditors to correct your records.

<sup>1</sup> Offline members will be eligible to call for additional reports quarterly after enrolling.

<sup>2</sup> 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.