

Buchanan Ingersoll & Rooney PC

Kyle D. Black
412 562 1544
kyle.black@bipc.com

One Oxford Centre
301 Grant Street, 20th Floor
Pittsburgh, PA 15219-1410
T 412 562 8800
F 412 562 1041

August 5, 2019

VIA E-MAIL

Attorney General Gordon MacDonald
New Hampshire Department of Justice
33 Capitol Street
Concord, NH 03301
Email: attorneygeneral@doj.nh.gov

Re: Notification of Identity Thefts and Possible Data Breach -- Eleven (11) New Hampshire Residents Receiving Notification

Dear Attorney General MacDonald:

This notification is provided on behalf of our client, TBI Mortgage Company (“TBIM”), located in Horsham, Pennsylvania. TBIM maintains, among other data points, the names, social security numbers, dates of birth, and email and street addresses for loan applicants and borrowers on TBIM’s systems as part of its mortgage application and related processes.

Beginning in June 2019, TBIM started receiving reports from a small percentage of its customers that they had experienced identity theft. TBIM immediately took the following actions: commenced an investigation to try to determine if a compromise of the TBIM system could be responsible for these identity theft occurrences; retained a nationally-recognized cybersecurity firm; and instituted multiple measures to strengthen security controls throughout the system. TBIM also notified and is continuing to work closely with the vendor partners who provide cloud-based software, customer portal management, credit reports, and other discrete components of the loan application process. These third parties have advised TBIM that they have not identified any compromises in their systems.

Our client has put into place a comprehensive team, including a second cybersecurity firm, to address this situation until either the identity theft reports cease or the source of any compromise has been discovered and remediated. To date, the forensic investigators have not found any compromise of TBIM’s computer systems and only a small percentage of TBIM’s customers appear to have been affected. TBIM has taken multiple steps to enhance the security of its customers’ information, including implementing additional safeguards in its mortgage application process to limit the range and use of information, further restricting access to customers’ personally identifiable information, and scanning its systems for viruses, malware, and possible leaks. TBIM also notified the Federal Bureau of Investigation.

Because TBIM and its forensic investigators have not located any compromise of its computer systems, the date or dates on which a compromise, if any, occurred cannot be known. In light of these incidents,

August 5, 2019

Page - 2 -

TBIM is providing notice and offering twelve (12) months of complimentary credit monitoring and identity theft protections to the residents of the State of New Hampshire whose personal information is maintained on TBIM's systems. A copy of the notification letter being sent today to state residents is enclosed with this letter.

Please contact me should you have any questions.

Very truly yours,

A handwritten signature in cursive script, appearing to read "Kyle D. Black".

Kyle D. Black

KDB/

0097502-000001

Enclosure

4832-8291-0878, v. 1

TBI Mortgage Company
250 Gibraltar Rd
Horsham, PA 19044



August 5, 2019

Subject: Notice of Data Security Incident

Dear :

TBI Mortgage Company (TBIM) takes the privacy and security of your personal information very seriously. We want to inform you of recent reports that we have received from approximately one percent of our customers relating to identity theft. Although we have not identified any compromise of TBIM systems, we want to make sure that you have the resources to help prevent this from happening to you by offering twelve (12) free months of credit monitoring and identity restoration services and providing additional information about steps you can take to help protect your personal information.

What Happened? In June 2019, we began to receive customer reports relating to identity theft. As soon as we became aware of this issue, we immediately launched an investigation and engaged cybersecurity and forensics experts to determine whether we have been compromised. We have found no indication of a compromise of TBIM systems.

What Information May Be Involved? The information involved in the identity thefts that have been reported to us has included the name, Social Security number, email and street address, and date of birth of the identity theft victims.

What Are We Doing? Although we have not discovered any indication of a compromise of TBIM systems, we have implemented additional internal procedures and safeguards to further protect our systems from cyber security incidents. Because we want to be proactive and assist our customers in taking steps to protect against possible identity theft, we have arranged with Experian (one of the three major credit reporting companies) to offer you twelve months of credit monitoring and identity restoration at no cost to you. Due to privacy laws, we are not able to enroll you directly. You can activate your free 12-month participation by following the instructions included in this letter. We encourage you to take advantage of this offer. The program has two components, described below.

1. **Credit Monitoring.** A free 12-month membership to **Experian IdentityWorks Credit 3B**. This product helps detect possible misuse of your personal information and provides you with identity protection services focused on immediately identifying and resolving identity theft. IdentityWorks Credit 3B is completely free to you and enrolling in this program will not hurt your credit score. For more information on identity theft prevention and IdentityWorks Credit 3B, including instructions on how to activate your complimentary one-year membership, please see the information sheet attached to this letter.

2. **Identity Restoration.** If you believe there was fraudulent use of your information or identity theft, and would like to discuss how to resolve those issues, you may reach out to an Experian agent using the contact information for Experian below. If, after discussing your situation with an agent, it is determined that identity restoration support is needed, an Experian Identity Restoration agent will be available to work with you to investigate and resolve each incident of fraud that occurred from the date of the incident (including, as appropriate, helping you with contacting creditors to dispute charges and close accounts; assisting you in placing a freeze on your credit file with the three major credit reporting companies; and assisting you with contacting government agencies to help restore your identity to its proper condition).

Please note that this identity restoration offer 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. You will also find self-help tips and information about identity protection at this site.

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 for more information. If you have any questions about IdentityWorks, need help understanding something on your credit report or suspect that an item on your credit report may be fraudulent, please contact Experian's customer care team at 877-288-8057.

For More Information: More information about how to protect your personal information appears on the following pages under Additional Actions to Help Reduce Your Chances of Identity Theft. If you have any concerns or questions, please call our dedicated customer service line at 1-877-470-0222 between 8:00 AM – 5:00 PM ET, Monday through Friday:

We deeply regret any worry or inconvenience this matter may cause you, and we strongly encourage you to be on the alert for any suspicious activity and to take advantage of the tools offered above to protect your information from theft and abuse.

Sincerely,



Stephen Audet
President

ACTIVATE IDENTITYWORKS CREDIT 3B NOW IN THREE EASY STEPS

1. ENROLL by: **10/29/2019** (Your code will not work after this date.)
2. VISIT the **Experian IdentityWorks website** to enroll: <https://www.experianidworks.com/3bcredit>
3. PROVIDE the **Activation Code**:

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 877-288-8057. Be prepared to provide engagement number **DB13939** as proof of eligibility for the identity restoration services by Experian.

ADDITIONAL DETAILS REGARDING YOUR 12-MONTH EXPERIAN IDENTITYWORKS CREDIT 3B MEMBERSHIP:

A credit card is **not** required for enrollment in Experian IdentityWorks Credit 3B.

You can contact Experian **immediately without needing to enroll in the product** regarding any fraud issues. Identity Restoration specialists are available to help you address credit and non-credit related fraud.

Once you enroll in Experian IdentityWorks, you will have access to the following additional features:

- **Experian credit report at signup:** See what information is associated with your credit file. Daily credit reports are available for online members only. Offline members will be eligible to call for additional reports quarterly after enrolling.
- **Credit Monitoring:** Actively monitors Experian, Equifax and Transunion files for indicators of 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:** Provides coverage for certain costs and unauthorized electronic fund transfers. This Identity theft insurance is underwritten by insurance company subsidiaries or affiliates of American International Group, Inc. (AIG). This description is only a summary 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.

**Activate your membership today at <https://www.experianidworks.com/3bcredit>
or call 877-288-8057 to register with the activation code above.**

ADDITIONAL ACTIONS TO HELP REDUCE YOUR CHANCES OF IDENTITY THEFT

PLACE A 90-DAY FRAUD ALERT ON YOUR CREDIT FILE

An **initial 90-day fraud alert** indicates to anyone requesting your credit file that you suspect you are a victim of fraud. When you or someone else attempts to open a credit account in your name, increase the credit limit on an existing account or obtain a new card on an existing account, the lender should take steps to verify that you have authorized the request. If the creditor cannot verify this, the request should not be satisfied. You may contact one of the credit reporting companies below for assistance.

Equifax
1-800-525-6285
www.equifax.com

Experian
1-888-397-3742
www.experian.com

TransUnion
1-800-680-7289
www.transunion.com

PLACE A SECURITY FREEZE ON YOUR CREDIT FILE

By law, you are entitled—at no charge—to place a credit freeze on all the credit agency reports about you, and to lift that freeze when you wish at no charge. Information about what to do to set up a credit freeze is available here: <https://www.consumer.ftc.gov/blog/2018/09/free-credit-freezes-are-here> .

Placing a freeze on your credit report will prevent lenders and others from accessing your credit report in connection with new credit application, which will prevent them from extending credit. A security freeze generally does not apply to circumstances in which you have an existing account relationship, and a copy of your report is requested by your existing creditor or its agents or affiliates for certain types of account review, collection, fraud control or similar activities. With a security freeze in place, you will be required to take special steps when you wish to apply for any type of credit. This process is also completed through each of the credit reporting companies.

ORDER YOUR FREE ANNUAL CREDIT REPORTS

Visit www.annualcreditreport.com or call 877-322-8228. Once you receive your credit reports, review them for discrepancies. Identify any accounts you did not open or inquiries from creditors that you did not authorize. Verify that all information is correct. If you have questions or notice incorrect information, contact the credit reporting company.

MANAGE YOUR PERSONAL INFORMATION

Take steps such as carrying only essential documents with you, being aware of whom you are sharing your personal information with and shredding receipts, statements and other sensitive information.

USE TOOLS FROM CREDIT PROVIDERS

Carefully review your credit reports and bank, credit card and other account statements. Be proactive and create alerts on credit cards and bank accounts that notify you of activity. If you discover unauthorized or suspicious activity on your credit report or by any other means, file an identity-theft report with your local police and contact a credit reporting company.

OBTAIN MORE INFORMATION ABOUT IDENTITY THEFT AND WAYS TO PROTECT YOURSELF

The U.S. Federal Trade Commission has an identity theft hotline: 877-438-4338; TTY: 1-866-653-4261. They also provide information online at www.ftc.gov/idtheft.

ADDITIONAL FREE RESOURCES:

You can obtain information from the consumer reporting agencies, the FTC or from your respective state Attorney General about steps you can take toward preventing identity theft. You may report suspected identity theft to local law enforcement, including to the FTC or to the Attorney General in your state. Residents of Maryland, North Carolina, and Rhode Island can obtain more information from their Attorneys General using the contact information below.

Federal Trade Commission
600 Pennsylvania Ave, NW
Washington, DC 20580
consumer.ftc.gov, and
www.ftc.gov/idtheft
1-877-438-4338

Maryland Attorney General
200 St. Paul Place
Baltimore, MD 21202
oag.state.md.us
1-888-743-0023

North Carolina Attorney General
9001 Mail Service Center
Raleigh, NC 27699
ncdoj.gov
1-877-566-7226

Rhode Island Attorney General
150 South Main Street
Providence, RI 02903
<http://www.riag.ri.gov>
401-274-4400

You also have certain rights under the Fair Credit Reporting Act (FCRA): These rights include knowing what is in your file; disputing incomplete or inaccurate information; and requiring consumer reporting agencies correct or delete inaccurate, incomplete, or unverifiable information. For more information about the FCRA, please visit <https://www.consumer.ftc.gov/articles/pdf-0096-fair-credit-reporting-act.pdf>.