

# FREEMAN MATHIS & GARY

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RECEIVED

JAN 16 2018

CONSUMER PROTECTION

January 9, 2018

## VIA U.S. MAIL

Attorney General Joseph Foster  
Office of the Attorney General  
New Hampshire Department of Justice  
33 Capitol Street  
Concord, NH 03301

### **Re: Notice of Breach in the Security of Personal Information**

To Whom It May Concern:

I represent Tennessee Valley Title Insurance Company ("Tennessee Valley" or "the Company"). This letter is being provided pursuant to N.H. Rev. Stat. § 359-C:20, which requires that your office be notified in the event of a breach in the security of personal information affecting residents of the state of New Hampshire.

Tennessee Valley Title Insurance Company ("Tennessee Valley") provides title insurance services throughout Eastern Tennessee. Tennessee Valley recently learned that, on October 13, 2017, the email account of one of its employees was accessed by an unauthorized individual not affiliated with Tennessee Valley. Tennessee Valley's investigation of the incident suggests that the individual used his or her access to the email account only for sending messages from the account with misinformation in them, not for accessing other emails in the account. However, the Company cannot confirm which, if any, emails in the account the individual accessed and whether there was any resulting acquisition to or access of information therein. Therefore, out of an abundance of caution, it has notified all potentially affected individuals about this issue. In that regard, it is possible that the individual may have had access to email(s) that were in the compromised account and which contained the following personally identifiable information: name, address, Social Security number, date of birth, driver's license or government identification card number, account number, or debit or credit card number. This incident affected 180 individuals, but only 2 residents of New Hampshire.

Tennessee Valley takes the protection of such information seriously and is taking steps to continue investigating this incident, help mitigate the potential for harm, and prevent this from happening again. It has secured the affected email account, changed all passwords used to log in to its computers and email accounts, and is evaluating additional measures to further strengthen its data security. Tennessee Valley also has reported the incident to law enforcement and will

Attorney General Joseph Foster  
January 5, 2018  
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cooperate with any investigation.

In addition, written notice was mailed to all affected individuals on December 27, 2017. A sample of that notice is enclosed for your records. As an added precaution, Tennessee Valley is offering all affected individuals 12 months of free Experian® credit monitoring, Identity Restoration services, as well as \$1 million in identity theft insurance.

I believe this provides you with all information necessary for your purposes and to comply with New Hampshire law. However, if you have any questions or need further information, please contact me.

Very truly yours,

**FREEMAN MATHIS & GARY, LLP**



David A. Cole

DAC/rmf  
Enclosure

**TvT**  
**TENNESSEE VALLEY TITLE**  
*Insurance Company*

800 S. GAY STREET  
SUITE 1700  
KNOXVILLE, TN 37929-9707  
(865) 523-6254

1225 E. WEISGARBER ROAD  
SUITE N100  
KNOXVILLE, TN 37909  
(865) 690-1047

December 27, 2017

<<First Name>> <<Last Name>>

<<Address>>

Dear <<First Name>>,

Tennessee Valley Title Insurance Company ("Tennessee Valley") provides title insurance services throughout Eastern Tennessee. We take the issue of privacy seriously and, as part of that commitment, we are sending you this letter to make you aware of an issue that affects your personal information. Please read this letter carefully.

We recently learned that, on October 13, 2017, the email account of one of our employees was accessed by an unauthorized individual not affiliated with Tennessee Valley. Our investigation of the incident suggests that the individual used his or her access to the email account only for sending messages from the account with misinformation in them, not for accessing other emails in the account. However, we cannot confirm which, if any, emails in the account the individual accessed and whether there was any resulting acquisition to or access of information therein. Therefore, out of an abundance of caution, we are notifying all potentially affected individuals about this issue. In that regard, it is possible that the individual may have had access to email(s) that were in the compromised account and which contained information about you, including your name, address, Social Security number, date of birth, driver's license or government identification card number, account number, or debit or credit card number.

Tennessee Valley takes the protection of such information seriously and is taking steps to continue investigating this incident, help mitigate the potential for harm, and prevent this from happening again. We have secured the affected email account, changed all passwords used to log in to our computers and email accounts, and are evaluating additional measures to further strengthen our data security. We also have reported the incident to law enforcement and will cooperate with any investigation.

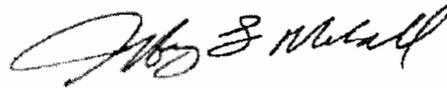
As an additional precautionary measure to safeguard your information from potential misuse, we have partnered with Experian® to provide Identity Restoration services as well as its IdentityWorks<sup>SM</sup> product for one year at no charge to you. You will automatically be provided with Identity Restoration services, and it requires no further action from you at this time. To receive the benefits of the IdentityWorks<sup>SM</sup> product, however, you will need to complete the enrollment process by **March 31, 2018**. More information on the Experian® services being offered is provided in the attached material, which also contains instructions about how to enroll

in IdentityWorks<sup>SM</sup> (including your personal activation code). If you choose to take advantage of this product, it will provide you with a free copy of your Experian® credit report, credit monitoring with all three of the national credit bureaus, as well as \$1 million in identity theft insurance.

For additional information on steps you may take to help protect your information from potential misuse, please refer to the enclosed document titled "Additional Steps to Help Protect Your Information."

We are very sorry for any concern or inconvenience this incident has caused or may cause you, and we encourage you to take advantage of the Experian® services being offered. If you have any other questions or concerns that you would like to discuss, please call Rose Anne Creekmore at (865) 824-4703.

Sincerely,

A handwritten signature in black ink, appearing to read "Jeffrey L. McCall". The signature is fluid and cursive, with the first name "Jeffrey" being more prominent and the last name "McCall" following in a similar style.

Jeffrey L. McCall

## Additional Steps to Help Protect Your Information

- 1. Review your credit reports.** We recommend that you remain vigilant by reviewing account statements and monitoring credit reports. Under federal law, you also are entitled every 12 months to one free copy of your credit report from each of the three major credit reporting companies listed below. To obtain a free annual credit report, go to [www.annualcreditreport.com](http://www.annualcreditreport.com) or call 1-877-322-8228. You may wish to stagger your requests so that you receive a free report by one of the three credit bureaus every four months. If you discover any incorrect information on your report, you should report it immediately to the credit reporting agency.
- 2. Report suspected fraud.** You have the right to file a police report if you ever experience identity 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. A police report is often required to dispute fraudulent items. You should report suspected incidents of identity theft to local law enforcement, your state's Attorney General, and/or the Federal Trade Commission.
- 3. Place Fraud Alerts with the three credit bureaus.** If you choose to place a fraud alert, we recommend you do this after activating any credit monitoring. You can place a fraud alert at one of the three major credit bureaus by phone and also via Experian's or Equifax's website. A fraud alert tells creditors to follow certain procedures, including contacting you, before they open any new accounts or change your existing accounts. For that reason, placing a fraud alert can protect you, but also may delay you when you seek to obtain credit. The contact information for all three bureaus is as follows:

Equifax  
1-800-525-6285  
P.O. Box 740256  
Atlanta, GA 30374  
[www.alerts.equifax.com](http://www.alerts.equifax.com)

Experian  
1-888-397-3742  
P.O. Box 9554  
Allen, TX 75013  
[www.experian.com](http://www.experian.com)

TransUnion  
1-800-680-7289  
P.O. Box 2000  
Chester, PA 19022  
[www.transunion.com](http://www.transunion.com)

It is only necessary to contact ONE of these bureaus and use only ONE of these methods. As soon as one of the three bureaus confirms your fraud alert, the others are notified to place alerts on their records as well. You will receive confirmation letters in the mail and will then be able to order all three credit reports, free of charge, for your review.

- 4. Security Freeze.** By placing a security freeze, someone who fraudulently acquires your personal identifying information will not be able to use that information to open new accounts or borrow money in your name. You will need to contact the three national credit reporting bureaus listed above in writing to place the freeze. Keep in mind that when you place the freeze, you will not be able to borrow money, obtain instant credit, or get a new credit card until you temporarily lift or permanently remove the freeze. The cost of placing the freeze varies by the state you live in and for each credit reporting bureau. The Credit Bureau may charge a fee of up to \$5.00 to place a freeze, lift, or remove a freeze. However, if you are a victim of identity theft and have filed a report with your local law enforcement agency or submitted an ID Theft Complaint Form with the Federal Trade Commission, there may be no charge to place the freeze.
- 5. You can obtain additional information** about the steps you can take to avoid identity theft from the following agencies. The Federal Trade Commission also encourages those who discover that their information has been misused to file a complaint with them.

- **California Residents:** Visit the California Office of Privacy Protection, [www.privacy.ca.gov](http://www.privacy.ca.gov), for additional information on protection against identity theft.
- **Kentucky Residents:** Office of the Attorney General of Kentucky, 700 Capitol Avenue, Suite 118 Frankfort, Kentucky 40601, [www.ag.ky.gov](http://www.ag.ky.gov), Telephone: 1-502-696-5300.
- **Maryland Residents:** Office of the Attorney General of Maryland, Consumer Protection Division 200 St. Paul Place Baltimore, MD 21202, [www.oag.state.md.us/Consumer](http://www.oag.state.md.us/Consumer), Telephone: 1-888-743-0023.
- **North Carolina Residents:** Office of the Attorney General of North Carolina, 9001 Mail Service Center, Raleigh, NC 27699-9001, [www.ncdoj.com/](http://www.ncdoj.com/), Telephone: 1-919-716-6400.
- **Oregon Residents:** Oregon Department of Justice, 1162 Court Street NE, Salem, OR 97301-4096, [www.doj.state.or.us](http://www.doj.state.or.us), Telephone: 877-877-9392
- **Rhode Island Residents:** Office of the Attorney General, 150 South Main Street, Providence, Rhode Island 02903, [www.riag.ri.gov](http://www.riag.ri.gov), Telephone: 401-274-4400
- **All US Residents:** Identity Theft Clearinghouse, Federal Trade Commission, 600 Pennsylvania Avenue, NW Washington, DC 20580, <https://www.consumer.ftc.gov>, 1-877-IDTHEFT (438-4338)



## ADDITIONAL DETAILS REGARDING EXPERIAN® SERVICES BEING OFFERED

You will automatically receive Experian's Identity Restoration services, and no enrollment is required. Experian's Identity Restoration services will help you to investigate and resolve each incident of fraud that occurred from the date of this incident, including, as appropriate, helping you contact 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 contact government agencies to help restore your identity to its proper condition. 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.

If you have questions about the Experian® services being offered, need assistance with Identity Restoration that arose as a result of this incident or would like an alternative to enrolling in Experian® IdentityWorks <sup>SM</sup> online, please contact Experian's customer care team at (877) 890-9332 by **March 31, 2018**. Be prepared to provide Engagement Number **DB04427** as proof of eligibility for the Identity Restoration services by Experian®.

You can contact Experian® **immediately** regarding any fraud issues, and have access to the following features once you enroll in Experian® IdentityWorks <sup>SM</sup>:

- **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®, 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 <sup>SM</sup> membership has expired.
- **\$1 Million Identity Theft Insurance\*\*:** Provides coverage for certain costs and unauthorized electronic fund transfers.

A credit card is **not** required for enrollment in Experian® IdentityWorks <sup>SM</sup>.

To enroll in Experian® IdentityWorks <sup>SM</sup>, please follow the steps below:

- Ensure that you **enroll by: March 31, 2018**. (Your code will not work after this date.)
- Visit the Experian® IdentityWorks <sup>SM</sup> website to enroll:  
<https://www.experianidworks.com/3bcreditone>.
- Provide your **activation code: <<CODE>>**

\* 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.