

MAY 03 2022

CONSUMER PROTECTION

April 29, 2022

VIA U.S. MAIL

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

**Re: University Title Company– Incident Notification**

Dear Sir or Madam:

McDonald Hopkins PLC represents University Title Company (“UTC”). I am writing to provide notification of an incident at UTC that may affect the security of personal information of two (“2”) New Hampshire residents. UTC’s investigation is ongoing, and this notification will be supplemented with any new or significant facts or findings subsequent to this submission, if any. By providing this notice, UTC does not waive any rights or defenses regarding the applicability of New Hampshire law or personal jurisdiction.

UTC recently detected potential unauthorized access to its network that involved personal information. Upon learning of this issue, UTC contained and secured the threat and commenced a prompt and thorough investigation. UTC immediately launched an investigation in consultation with outside cybersecurity professionals who regularly investigate and analyze these types of situations to help determine whether any sensitive data had been compromised because of the incident. The investigation determined that the unauthorized individual(s) potentially removed certain files and folders from portions of UTC’s network between August 2, 2021 and August 3, 2021. On March 30, 2022, following an extensive review and analysis of the data at issue, UTC discovered that the impacted data contained personal information such as full names, Social Security numbers and financial account information.

UTC has no indication that any information has been misused. Nevertheless, out of an abundance of caution, UTC is providing notice to the affected residents commencing on April 29, 2022 in substantially the same form as the document attached hereto. UTC is also offering one year of complimentary credit monitoring to the affected residents. Additionally, UTC will advise the affected residents to always remain vigilant in reviewing financial account statements for fraudulent or irregular activity on a regular basis. UTC will further advise the affected residents about the process for placing a fraud alert and/or security freeze on their credit files and obtaining free credit reports. The affected residents are also being provided with the contact information for the consumer reporting agencies and the Federal Trade Commission.

Should you have any questions regarding this notification, please contact me at (248) 593-2952 or [cbattersby@mcdonaldhopkins.com](mailto:cbattersby@mcdonaldhopkins.com). Thank you for your cooperation.

Very truly yours,

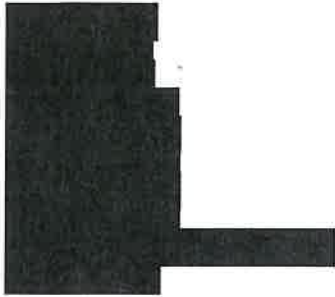
A handwritten signature in blue ink, appearing to read 'Colin M. Battersby', written in a cursive style.

Colin M. Battersby

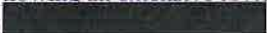


Return Mail Processing Center  
P.O. Box 6336  
Portland, OR 97228-6336

**IMPORTANT INFORMATION  
PLEASE REVIEW CAREFULLY**



We are writing with important information regarding a recent security incident. The privacy and security of the personal information we maintain is of the utmost importance to University Title Company. We wanted to provide you with information about the incident, explain the services we are making available to you, and let you know that we continue to take significant measures to protect your personal information.

University Title Company recently detected potential unauthorized access to its network that involved personal information. Upon learning of this issue, we contained and secured the threat and commenced a prompt and thorough investigation. We immediately launched an investigation in consultation with outside cybersecurity professionals who regularly investigate and analyze these types of situations to help determine whether any sensitive data had been compromised because of the incident. Our investigation determined that the unauthorized individual(s) potentially removed certain files and folders from portions of our network between August 2, 2021 and August 3, 2021. On March 30, 2022, following an extensive review and analysis of the data at issue, we discovered that the impacted data contained your full name and 

**[IF AG324 – Adult SSN]**

<<To date, we are not aware of any reports of identity fraud or improper use of your information as a direct result of this incident. Nevertheless, out of an abundance of caution, we want to make you aware of the incident. To protect you from potential misuse of your information, we are offering a complimentary one-year membership in Equifax<sup>®</sup> Complete Premier. Equifax<sup>®</sup> Complete Premier is completely free to you and enrolling in this program will not hurt your credit score. For more information on identity theft prevention and Equifax<sup>®</sup> Complete Premier including instructions on how to activate your complimentary one-year membership, please see the additional information provided in this letter.>>

**[IF AG325 – Adult SSN 2 YR]**

<<To date, we are not aware of any reports of identity fraud or improper use of your information as a direct result of this incident. Nevertheless, out of an abundance of caution, we want to make you aware of the incident. To protect you from potential misuse of your information, we are offering a complimentary two-year membership in Equifax<sup>®</sup> Complete Premier. Equifax<sup>®</sup> Complete Premier is completely free to you and enrolling in this program will not hurt your credit score. For more information on identity theft prevention and Equifax<sup>®</sup> Complete Premier including instructions on how to activate your complimentary two-year membership, please see the additional information provided in this letter.>>

This letter also provides other precautionary measures you can take to protect your personal information, including placing a Fraud Alert and Security Freeze on your credit files, and obtaining a free credit report. Additionally, you should always remain vigilant in reviewing your financial account statements and credit reports for fraudulent or irregular activity on a regular basis.

Please accept our apologies that this incident occurred. We are committed to maintaining the privacy of personal information in our possession and have taken many precautions to safeguard it. We continually evaluate and modify our practices and internal controls to enhance the security and privacy of your personal information.

If you have any further questions regarding this [REDACTED] please call our dedicated and confidential toll-free response line that we have set up to respond to questions at [REDACTED]. This response line is staffed with professionals familiar with this incident and knowledgeable on what you can do to protect against misuse of your information. The response line is available Monday through Friday, 9 am to 9 pm Eastern Time.

Sincerely,

[REDACTED]

[REDACTED]

University Title Company



- OTHER IMPORTANT INFORMATION -

[IF AG324 - Adult SSN] <<1. [Enrolling in Complimentary 12-Month Credit Monitoring.>>](#)

[IF AG325 - Adult SSN 2 YR] <<1. [Enrolling in Complimentary 24-Month Credit Monitoring.>>](#)



Enter your Activation Code: [REDACTED]  
Enrollment Deadline: [REDACTED]

**Equifax Complete™ Premier**

\*Note: You must be over age 18 with a credit file to take advantage of the product

**Key Features**

- Annual access to your 3-bureau credit report and VantageScore<sup>1</sup> credit scores
- Daily access to your Equifax credit report and 1-bureau VantageScore credit score
- 3-bureau credit monitoring<sup>2</sup> with email notifications of key changes to your credit reports
- WebScan notifications<sup>3</sup> when your personal information, such as Social Security Number, credit/debit card or bank account numbers are found on fraudulent Internet trading sites
- Automatic fraud alerts<sup>4</sup>, which encourages potential lenders to take extra steps to verify your identity before extending credit, plus blocked inquiry alerts and Equifax credit report lock<sup>5</sup>
- Identity Restoration to help restore your identity should you become a victim of identity theft, and a dedicated Identity Restoration Specialist to work on your behalf
- Up to \$1,000,000 of identity theft insurance coverage for certain out of pocket expenses resulting from identity theft<sup>6</sup>.
- Lost Wallet Assistance if your wallet is lost or stolen, and one-stop assistance in canceling and reissuing credit, debit and personal identification cards.

**Enrollment Instructions**

Go to [www.equifax.com/activate](http://www.equifax.com/activate)

Enter your unique Activation Code of [REDACTED] then click "Submit" and follow these 4 steps:

**1. Register:**

Complete the form with your contact information and click "Continue".

*If you already have a myEquifax account, click the 'Sign in here' link under the "Let's get started" header.*

*Once you have successfully signed in, you will skip to the Checkout Page in Step 4*

**2. Create Account:**

Enter your email address, create a password, and accept the terms of use.

**3. Verify Identity:**

To enroll in your product, we will ask you to complete our identity verification process.

**4. Checkout:**

Upon successful verification of your identity, you will see the Checkout Page.

Click 'Sign Me Up' to finish enrolling.

**You're done!**

The confirmation page shows your completed enrollment.

Click "View My Product" to access the product features.

<sup>1</sup>The credit scores provided are based on the VantageScore® 3.0 model. For three-bureau VantageScore credit scores, data from Equifax®, Experian®, and TransUnion® are used respectively. Any one-bureau VantageScore uses Equifax data. Third parties use many different types of credit scores and are likely to use a different type of credit score to assess your creditworthiness. <sup>2</sup>Credit monitoring from Experian and TransUnion will take several days to begin. <sup>3</sup>WebScan searches for your Social Security Number; up to 5 passport numbers, up to 6 bank account numbers, up to 6 credit/debit card numbers, up to 6 email addresses, and up to 10 medical ID numbers. WebScan searches thousands of Internet sites where consumers' personal information is suspected of being bought and sold, and regularly adds new sites to the list of those it searches. However, the Internet addresses of these suspected Internet trading sites are not published and frequently change, so there is no guarantee that we are able to locate and search every possible Internet site where consumers' personal information is at risk of being traded. <sup>4</sup>The Automatic Fraud Alert feature is made available to consumers by Equifax Information Services LLC and fulfilled on its behalf by Equifax Consumer Services LLC. <sup>5</sup>Locking your Equifax credit report will prevent access to it by certain third parties. Locking your Equifax credit report will not prevent access to your credit report at any other credit reporting agency. Entities that may still have access to your Equifax credit report include: companies like Equifax Global Consumer Solutions, which provide you with access to your credit report or credit score, or monitor your credit report as part of a subscription or similar service; companies that provide you with a copy of your credit report or credit score, upon your request; federal, state and local government agencies and courts in certain circumstances; companies using the information in connection with the underwriting of insurance, or for employment, tenant or background screening purposes; companies that have a current account or relationship with you, and collection agencies acting on behalf of those whom you owe; companies that authenticate a consumer's identity for purposes other than granting credit, or for investigating or preventing actual or potential fraud; and companies that wish to make pre-approved offers of credit or insurance to you. To opt out of such pre-approved offers, visit [www.optoutprescreen.co](http://www.optoutprescreen.co) <sup>6</sup>The Identity Theft Insurance benefit is underwritten and administered by American Bankers Insurance Company of Florida, an Assurant company, under group or blanket policies issued to Equifax, Inc., or its respective affiliates for the benefit of its Members. Please refer to the actual policies for terms, conditions, and exclusions of coverage. Coverage may not be available in all jurisdictions.

**2. Placing a Fraud Alert on Your Credit File.**

[IF AG324 - Adult SSN]

<<Whether or not you choose to use the complimentary 12-month credit monitoring services, we recommend that you place an initial one-year "Fraud Alert" on your credit files, at no charge. A fraud alert tells creditors to contact you personally before they open any new accounts. To place a fraud alert, call any one of the three major credit bureaus at the numbers listed below. As soon as one credit bureau confirms your fraud alert, they will notify the others.>>



**[IF AG325 – Adult SSN 2 YR]**

<<Whether or not you choose to use the complimentary 24-month credit monitoring services, we recommend that you place an initial one-year "Fraud Alert" on your credit files, at no charge. A fraud alert tells creditors to contact you personally before they open any new accounts. To place a fraud alert, call any one of the three major credit bureaus at the numbers listed below. As soon as one credit bureau confirms your fraud alert, they will notify the others.>>

**Equifax**

P.O. Box 105788  
Atlanta, GA 30348

<https://www.equifax.com/personal/credit-report-services/credit-fraud-alerts/>  
(800) 525-6285

**Experian**

P.O. Box 9554  
Allen, TX 75013

<https://www.experian.com/fraud/center.html>  
(888) 397-3742

**TransUnion LLC**

P.O. Box 6790  
Fullerton, PA 92834-6790

<https://www.transunion.com/fraud-alerts>  
(800) 680-7289

**3. Consider Placing a Security Freeze on Your Credit File.**

If you are very concerned about becoming a victim of fraud or identity theft, you may request a "Security Freeze" be placed on your credit file, at no charge. A security freeze prohibits, with certain specific exceptions, the consumer reporting agencies from releasing your credit report or any information from it without your express authorization. You may place a security freeze on your credit report by contacting all three nationwide credit reporting companies at the numbers below and following the stated directions or by sending a request in writing, by mail, to all three credit reporting companies:

**Equifax Security Freeze**

P.O. Box 105788  
Atlanta, GA 30348

<https://www.equifax.com/personal/credit-report-services/credit-freeze/>  
1-800-349-9960

**Experian Security Freeze**

P.O. Box 9554  
Allen, TX 75013

<http://experian.com/freeze>  
1-888-397-3742

**TransUnion Security Freeze**

P.O. Box 2000  
Chester, PA 19016

<http://www.transunion.com/creditfreeze>  
1-888-909-8872

In order to place the security freeze, you'll need to supply your name, address, date of birth, Social Security number and other personal information. After receiving your freeze request, each credit reporting company will send you a confirmation letter containing a unique PIN (personal identification number) or password. Keep the PIN or password in a safe place. You will need it if you choose to lift the freeze.

If your personal information has been used to file a false tax return, to open an account or to attempt to open an account in your name or to commit fraud or other crimes against you, you may file a police report in the City in which you currently reside.

If you do place a security freeze *prior* to enrolling in the credit monitoring service as described above, you will need to remove the freeze in order to sign up for the credit monitoring service. After you sign up for the credit monitoring service, you may refreeze your credit file.

**4. Obtaining a Free Credit Report.**

Under federal law, you are entitled to one free credit report every 12 months from each of the above three major nationwide credit reporting companies. Call **1-877-322-8228** or request your free credit reports online at [www.annualcreditreport.com](http://www.annualcreditreport.com). 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 all information is correct. If you have questions or notice incorrect information, contact the credit reporting company.

**5. Additional Helpful Resources.**

Even if you do not find any suspicious activity on your initial credit reports, the Federal Trade Commission (FTC) recommends that you check your credit reports periodically. Checking your credit report periodically can help you spot problems and address them quickly.

If you find suspicious activity on your credit reports or have reason to believe your information is being misused, call your local law enforcement agency and file a police report. Be sure to obtain a copy of the police report, as many creditors will want the information it contains to absolve you of the fraudulent debts. You may also file a complaint with the FTC by contacting them on the web at [www.ftc.gov/idtheft](http://www.ftc.gov/idtheft), by phone at 1-877-IDTHEFT (1-877-438-4338), or by mail at Federal Trade Commission, Consumer Response Center, 600 Pennsylvania Avenue, NW, Washington, DC 20580. Your complaint will be added to the FTC's Identity Theft Data Clearinghouse, where it will be accessible to law enforcement for their investigations. In addition, you may obtain information from the FTC about fraud alerts and security freezes.

If this notice letter states that your financial account information and/or credit or debit card information was impacted, we recommend that you contact your financial institution to inquire about steps to take to protect your account, including whether you should close your account or obtain a new account number.

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<<Massachusetts Residents: Under Massachusetts law, you have the right to obtain a police report in regard to this incident. If you are the victim of identity theft, you also have the right to file a police report and obtain a copy of it.

**Washington D.C. Residents:** You may obtain information about preventing identity theft from the Office of the Attorney General for the District of Columbia, 400 6th Street NW, Washington D.C. 20001, <https://oag.dc.gov/consumer-protection>. Telephone: 202-442-9828.>>



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**Iowa Residents:** You may contact law enforcement or the Iowa Attorney General's Office to report suspected incidents of identity theft: Office of the Attorney General of Iowa, Consumer Protection Division, Hoover State Office Building, 1305 East Walnut Street, Des Moines, IA 50319, [www.iowaattorneygeneral.gov](http://www.iowaattorneygeneral.gov). Telephone: 515-281-5164.

**Maryland Residents:** You may obtain information about avoiding identity theft from the Maryland Attorney General's Office: 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: 888-743-0023.

**New York Residents:** You may obtain information about preventing identity theft from the New York Attorney General's Office: Office of the Attorney General, The Capitol, Albany, NY 12224-0341; <https://ag.ny.gov/consumer-frauds-bureau/identity-theft>; Telephone: 800-771-7755.

**North Carolina Residents:** You may obtain information about preventing identity theft from the North Carolina Attorney General's Office: Office of the Attorney General of North Carolina, Consumer Protection Division, 9001 Mail Service Center, Raleigh, NC 27699-9001, [www.ncdoj.gov/](http://www.ncdoj.gov/). Telephone: 877-566-7226.

**Oregon Residents:** You may obtain information about preventing identity theft from the Oregon Attorney General's Office: 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.

**New Mexico Residents:** You have rights under the federal Fair Credit Reporting Act (FCRA). These include, among others, the right to know what is in your file; to dispute incomplete or inaccurate information; and to have consumer reporting agencies correct or delete inaccurate, incomplete, or unverifiable information. For more information about the FCRA, please visit [www.consumer.ftc.gov/articles/pdf-0096-fair-credit-reporting-act.pdf](http://www.consumer.ftc.gov/articles/pdf-0096-fair-credit-reporting-act.pdf) or [www.ftc.gov](http://www.ftc.gov).

*In Addition, New Mexico Consumers Have the Right to Obtain a Security Freeze or Submit a Declaration of Removal*

As noted above, you may obtain a security freeze on your credit report to protect your privacy and ensure that credit is not granted in your name without your knowledge. You may submit a declaration of removal to remove information placed in your credit report as a result of being a victim of identity theft. You have a right to place a security freeze on your credit report or submit a declaration of removal pursuant to the Fair Credit Reporting and Identity Security Act.

The security freeze is designed to prevent credit, loans, and services from being approved in your name without your consent. When you place a security freeze on your credit report, you will be provided with a personal identification number, password, or similar device to use if you choose to remove the freeze on your credit report or to temporarily authorize the release of your credit report to a specific party or parties or for a specific period of time after the freeze is in place. To remove the freeze or to provide authorization for the temporary release of your credit report, you must contact the consumer reporting agency and provide all of the following:

1. The unique personal identification number, password, or similar device provided by the consumer reporting agency;
2. Proper identification to verify your identity; and
3. Information regarding the third party or parties who are to receive the credit report or the period of time for which the credit report may be released to users of the credit report.

A consumer reporting agency that receives a request from a consumer to lift temporarily a freeze on a credit report shall comply with the request no later than three business days after receiving the request. As of September 1, 2008, a consumer reporting agency shall comply with the request within fifteen minutes of receiving the request by a secure electronic method or by telephone.

A security freeze does not apply in all circumstances, such as where you have an existing account relationship and a copy of your credit report is requested by your existing creditor or its agents for certain types of account review, collection, fraud control, or similar activities; for use in setting or adjusting an insurance rate or claim or insurance underwriting; for certain governmental purposes; and for purposes of prescreening as defined in the federal Fair Credit Reporting Act.

If you are actively seeking a new credit, loan, utility, telephone, or insurance account, you should understand that the procedures involved in lifting a security freeze may slow your own applications for credit. You should plan ahead and lift a freeze, either completely if you are shopping around or specifically for a certain creditor, with enough advance notice before you apply for new credit for the lifting to take effect. You should contact a consumer reporting agency and request it to lift the freeze at least three business days before applying. As of September 1, 2008, if you contact a consumer reporting agency by a secure electronic method or by telephone, the consumer reporting agency should lift the freeze within fifteen minutes. You have a right to bring a civil action against a consumer reporting agency that violates your rights under the Fair Credit Reporting and Identity Security Act.

To place a security freeze on your credit report, you must send a request to each of the three major consumer reporting agencies: Equifax, Experian, and TransUnion. You may contact these agencies using the contact information provided above.

**Rhode Island Residents:** You may contact law enforcement, such as the Rhode Island Attorney General's Office, to report incidents of identity theft or to learn about steps you can take to protect yourself from identity theft. You can contact the Rhode Island Attorney General at: Rhode Island Office of the Attorney General, 150 South Main Street, Providence, RI 02903, [www.riag.ri.gov](http://www.riag.ri.gov), 401-274-4400.

As noted above, you may obtain a security freeze on your credit report to protect your privacy and ensure that credit is not granted in your name without your knowledge. You have a right to place a "security freeze" on your credit report pursuant to chapter 48 of title 6 of the Identity Theft Prevention Act of 2006.

The security freeze is designed to prevent credit, loans, and services from being approved in your name without your consent. When you place a security freeze on your credit report, within five (5) business days you will be provided a personal identification number or password to use if you choose to remove the freeze on your credit report or to temporarily authorize the release of your credit report for a specific period of time after the freeze is in place. To provide that authorization, you must contact the consumer reporting agency and provide all of the following:

1. The unique personal identification number or password provided by the consumer reporting agency.
2. Proper identification to verify your identity.
3. The proper information regarding the period of time for which the report shall be available to users of the credit report.

A consumer reporting agency that receives a request from a consumer to temporarily lift a freeze on a credit report shall comply with the request no later than three (3) business days after receiving the request.

A security freeze does not apply to circumstances where 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 an account review, collection, fraud control, or similar activities.

If you are actively seeking a new credit, loan, utility, telephone, or insurance account, you should understand that the procedures involved in lifting a security freeze may slow your own applications for credit. You should plan ahead and lift a freeze -- either completely, if you are shopping around, or specifically for a certain creditor -- with enough advance notice before you apply for new credit for the lifting to take effect.

You have a right to bring a civil action against someone who violates your rights under the credit reporting laws. The action can be brought against a consumer reporting agency or a user of your credit report.

To place a security freeze on your credit report, you must send a request to each of the three major consumer reporting agencies: Equifax, Experian, and TransUnion. These agencies can be contacted using the contact information provided above.

In order to request a security freeze, you may 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. Complete address;
5. Prior addresses;
6. Proof(s) of identification (state driver's license or ID card, military identification, birth certificate, etc.);
7. If you are a victim of identity theft, a copy of either the police report, investigative report, or complaint to a law enforcement agency concerning identity theft.

There were 2 Rhode Island residents impacted by this incident.>>