



MULLEN
COUGHLIN_{LLC}
ATTORNEYS AT LAW

Vincent F. Regan
Office: (267) 930-4842
Fax: (267) 930-4771
Email: vregan@mullen.law

426 W. Lancaster Avenue, Suite 200
Devon, PA 19333

August 20, 2020

VIA U.S. MAIL

Consumer Protection Bureau
Office of the New Hampshire Attorney General
33 Capitol Street
Concord, NH 03301

2020 AUG 28 AM 11:51
STATE OF NH
DEPT OF JUSTICE

Re: Notice of Data Event

Dear Sir or Madam:

We represent UWM-Foundation, the UWM-Real Estate Foundation, and the UWM-Research Foundation, (collectively, "UWM Foundation") located at 1440 East North Avenue Milwaukee, WI 53202, and are writing to notify your office of an incident that may affect the security of some personal information relating to one (1) New Hampshire resident. The investigation into this matter is ongoing, and this notice will be supplemented with any new significant facts learned subsequent to its submission. By providing this notice, UWM Foundation does not waive any rights or defenses regarding the applicability of New Hampshire law, the applicability of the New Hampshire data event notification statute, or personal jurisdiction.

Nature of the Data Event

On Thursday, July 16, 2020, UWM Foundation received notification from one of its third-party vendors, Blackbaud, Inc. ("Blackbaud"), of a cyber incident. Blackbaud is a cloud computing provider that offers customer relationship management and financial services tools to organizations, including UWM Foundation. Blackbaud reported that in May 2020, it experienced a ransomware incident that resulted in encryption of certain Blackbaud systems. Blackbaud reported the incident to law enforcement and worked with forensic investigators to investigate. Following its investigation, Blackbaud notified its customers that an unknown actor may have accessed or acquired certain Blackbaud customer data. Blackbaud reported that data was exfiltrated by the unknown actor at some point before Blackbaud locked the unknown actor out of the environment on May 20, 2020. Upon learning of the Blackbaud incident, UWM Foundation immediately began to determine what, if any, sensitive UWM Foundation data was potentially involved. This investigation included working diligently to gather further information from Blackbaud to understand the scope of the incident. On or about August 6, 2020, UWM Foundation received further information from Blackbaud that allowed us to determine the information potentially affected may have contained personal information.

The information that could have been subject to unauthorized access includes name, address, and Social Security Number.

Notice to New Hampshire Resident

On or about August 20, 2020, UWM Foundation provided written notice of this incident to all affected individuals, which includes one (1) New Hampshire resident. Written notice is being provided in substantially the same form as the letter attached here as *Exhibit A*.

Other Steps Taken and To Be Taken

Upon discovering the event, UWM Foundation moved quickly to investigate and respond to the incident, assess the security of UWM Foundation systems, and notify potentially affected individuals. UWM Foundation is working to review our existing policies and procedures regarding our third-party vendors, and working to evaluate additional measures and safeguards to protect against this type of incident in the future. UWM Foundation is providing access to credit monitoring services for twelve (12) months through Experian, to individuals whose personal information was potentially affected by this incident, at no cost to these individuals.

Additionally, UWM Foundation is providing impacted individuals with guidance on how to better protect against identity theft and fraud, including advising individuals to report any suspected incidents of identity theft or fraud to their credit card company and/or bank. UWM Foundation is providing individuals with 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. UWM Foundation is notifying other relevant state regulators.

Contact Information

Should you have any questions regarding this notification or other aspects of the data security event, please contact us at (267) 930-4842.

Very truly yours,



Vincent F. Regan of
MULLEN COUGHLIN LLC

EXHIBIT A



1440 East North Avenue
Milwaukee, WI 53202

August 20, 2020



F7241-L04-0000004 P001 T00001 *****MIXED AADC 159
SAMPLE A SAMPLE - L04 UWMF INDIVIDUAL SSN
APT 123
123 ANY ST
ANYTOWN, US 12345-6789



Dear Sample A Sample:

The UWM-Foundation and the UWM-Research Foundation (collectively, “UWM Foundation”) write to inform you of a recent incident that may affect the privacy of some of your information. On Thursday, July 16, 2020, UWM Foundation received notification from one of its third-party vendors, Blackbaud, Inc. (“Blackbaud”), of a cyber incident. Blackbaud is a cloud computing provider that offers customer relationship management and financial services tools to organizations, including UWM Foundation. This notice provides information about the Blackbaud incident, our response, and resources available to you to help protect your information from possible misuse, should you feel it necessary to do so.

Blackbaud reported that in May 2020, it experienced a ransomware incident that resulted in encryption of certain Blackbaud systems. Blackbaud reported the incident to law enforcement and worked with forensic investigators to investigate. Following its investigation, Blackbaud notified its customers that an unknown actor may have accessed or acquired certain Blackbaud customer data. Blackbaud reported that data was exfiltrated by the unknown actor at some point before Blackbaud locked the unknown actor out of the environment on May 20, 2020. Upon learning of the Blackbaud incident, UWM Foundation immediately began to determine what, if any, sensitive UWM Foundation data was potentially involved. This investigation included working diligently to gather further information from Blackbaud to understand the scope of the incident. On or about August 6, 2020, UWM Foundation received further information from Blackbaud that allowed us to determine the information potentially affected may have contained personal information.

Our investigation determined that the involved Blackbaud systems contained your name, address, and Social Security number. Please note that, to date, we have not received any information from Blackbaud that your information was specifically accessed or acquired by the unknown actor.

The confidentiality, privacy, and security of information in our care are among our highest priorities, and we take this incident very seriously. As part of our ongoing commitment to the security of information in our care, we are working to review our existing policies and procedures regarding our third-party vendors, and are working with Blackbaud to evaluate additional measures and safeguards to protect against this type of incident in the future. We will also be notifying state regulators, as required.

We encourage you to review the enclosed *Steps You Can Take to Help Protect Your Information*. There you will find general information on what you can do to help protect your personal information.

0000004

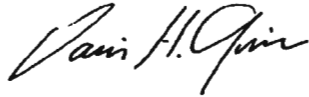


F7241-L04

We understand that you may have questions about the Blackbaud incident that are not addressed in this letter. If you have additional questions, please call our dedicated assistance line at (###) ###-#### between the hours of Monday – Friday, 6:00 a.m. to 8:00 p.m. PST and Saturday/Sunday 8:00 a.m. to 5:00 p.m. PST. You may also write to UWM Foundation at 1440 East North Avenue, Milwaukee, WI 53202.

We sincerely regret any inconvenience or concern this incident has caused.

Sincerely,

A handwritten signature in black ink, appearing to read "David H. Gilbert". The signature is written in a cursive style with a large initial "D".

David H. Gilbert-
President
UWM Foundation

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

P.O. Box 9554
Allen, TX 75013
1-888-397-3742

www.experian.com/freeze/center.html

TransUnion

P.O. Box 160
Woodlyn, PA 19094
1-888-909-8872

www.transunion.com/credit-freeze

Equifax

P.O. Box 105788
Atlanta, GA 30348-5788
1-800-685-1111

www.equifax.com/personal/credit-report-services

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.); and
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 9554
Allen, TX 75013
1-888-397-3742

www.experian.com/fraud/center.html

TransUnion

P.O. Box 2000
Chester, PA 19016
1-800-680-7289

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

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, 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

STEPS YOU CAN TAKE TO HELP PROTECT YOUR INFORMATION

Enroll in Credit and Identity Monitoring

To help protect your identity, we are offering a complimentary twelve (12) month membership of Experian's® IdentityWorksSM. 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: November 30, 2020** (Your code will not work after this date.)
- **Visit** the Experian IdentityWorks website to enroll: 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 (###) ###-#### by November 30, 2020. Be prepared to provide engagement number ENGAGE# 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, 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.*
- **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™:** 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**:** Provides coverage for certain costs and unauthorized electronic fund transfers.

* Offline members will be eligible to call for additional reports quarterly after enrolling

** The Identity Theft Insurance is underwritten and administered by American Bankers Insurance Company of Florida, an Assurant company. Please refer to the actual policies for terms, conditions, and exclusions of coverage. Coverage may not be available in all jurisdictions.

Monitor 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. 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 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.

0000004



F7241-L04

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 District of Columbia, Washington residents, the Office of Attorney General for the District of Columbia can be reached at: 441 4th Street NW, Suite 1100 South, Washington, D.C. 20001; 1-202-442-9828; <https://oag.dc.gov>.

For Maryland residents, the Attorney General can be contacted at 200 St. Paul Place, 16th Floor, Baltimore, MD 21202, 1-410-528-8662, www.oag.state.md.us.

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-fcra.pdf, or by writing Consumer Response Center, Room 130-A, Federal Trade Commission, 600 Pennsylvania Ave. N.W., Washington, D.C. 20580.

For North Carolina residents, the Attorney General can be contacted at 9001 Mail Service Center, Raleigh, NC 27699-9001, 1-877-566-7226 or 1-919-716-6000, www.ncdoj.gov. You can obtain information from the Attorney General or the Federal Trade Commission about preventing identity theft.

For New York residents, the Attorney General may be contacted at: Office of the Attorney General, The Capitol, Albany, NY 12224-0341; 1-800-771-7755; <https://ag.ny.gov/>.



