



**MULLEN
COUGHLIN** LLC
ATTORNEYS AT LAW

STATE OF NH
DEPT OF JUSTICE

2020 AUG 31 PM 2: 14

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

August 25, 2020

VIA U. S. MAIL

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

Re: Notice of Data Event

Dear Sir or Madam:

We represent Westcor Land Title Insurance Company (“Westcor”) located at 875 Concourse Parkway South, Suite 200, Maitland, FL 32751, and are writing to notify your office of an incident that may affect the security of some personal information relating to 151 New Hampshire residents. 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, Westcor 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 January 12, 2020, Westcor became aware of unusual activity on its network. Westcor conducted an immediate investigation and determined that the network was partially impacted by malware. Third-party forensic investigators were engaged to assist in the investigation to determine the nature and scope of the event and identify what personal information may have been impacted by this event.

Through the investigation Westcor identified a database containing sensitive information that was accessed by the unauthorized individual(s) during this event. The database contained individuals’ names and certain data relating to those individuals. However, the names were not easily associated with the data relating to those individuals. To match the individual with any associated data, particular tools and a specialized understanding of the database is required. As such, Westcor began an extensive review of its records to properly identify the addresses and associated data for the affected individuals. This review concluded on July 10, 2020.

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The accessible information relating to potentially impacted New Hampshire residents may vary by individual but includes their name and Social Security number.

Notice to New Hampshire Residents

On August 25, 2020, Westcor began providing written notice of this incident to potentially affected individuals, which includes 151 New Hampshire residents. Written notice is being provided in substantially the same form as the letter attached hereto as *Exhibit A*.

Other Steps Taken and To Be Taken

Upon discovering the event, Westcor moved quickly to investigate and respond to the incident, assess the security of Westcor systems, and notify potentially affected individuals. Westcor is also working to implement additional safeguards and training to its employees. Westcor is providing access to complimentary credit monitoring services for twelve (12) months through Experian to individuals whose personal information was potentially affected by this incident.

Additionally, Westcor 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. Westcor is providing individuals with information on how to place a fraud alert and security freeze on one's credit file, information on protecting against tax fraud, 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.

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

VFR/mep

EXHIBIT A

WESTCOR
LAND TITLE INSURANCE COMPANY
Return Mail Processing
PO Box 589
Claysburg, PA 16625-0589

August 25, 2020

F7292-L04-0000004 P001 T00001 *****MIXED AADC 159
SAMPLE A SAMPLE - L04 STANDARD
APT 123
123 ANY ST
ANYTOWN, US 12345-6789



Dear Sample A Sample:

Westcor Land Title Insurance Company (“Westcor”), is writing to advise you of a recent event that may impact the security of certain personal information related to you. We write to provide you with information about the event, steps taken since discovering the event, and what you can do to better protect against potential misuse of your information, should you feel it is appropriate to do so.

What Happened? On January 12, 2020, Westcor became aware of unusual activity on its network. Westcor conducted an immediate investigation and determined that the network was partially impacted by malware. Third-party forensic investigators were engaged to assist in the investigation to determine the nature and scope of the event, and identify what personal information may have been impacted by this event.

Through the investigation, Westcor identified a database containing sensitive information that was accessed by the unauthorized individual(s) during this event. The database contained individuals’ names and certain data relating to those individuals. However, the names were not easily associated with the data relating to those individuals. To match the individual with any associated data, particular tools and a specialized understanding of the database is required. As such, Westcor began an extensive review of its records to properly identify the addresses and associated data for the affected individuals. This review concluded on July 10, 2020.

What Information Was Involved? The following information about you was included in the impacted database: your name, EXTRA1 ITEM1, ITEM2, ETC. While the data relating to you was not readily associated with your name, we are notifying you out of an abundance of caution.

What We Are Doing. Westcor is committed to, and takes very seriously, its responsibility to protect all data entrusted to us. As part of our ongoing commitment to the privacy of personal information in our care, we reviewed our existing policies and procedures, and are working to implement additional safeguards to further secure the information contained within our network. Westcor is also notifying regulatory authorities, as required by law.

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F7292-L04

As an added precaution, we are also offering twelve (12) months of complimentary access to credit monitoring, fraud consultation, and identity theft restoration services through Experian's® IdentityWorksSM. Individuals who wish to receive these services must enroll by following the attached enrollment instructions.

What You Can Do. You can review the enclosed *Steps You Can Take to Protect Your Personal Information*. You can also enroll to receive the complimentary services being offered to you.

For More Information. We understand that you may have questions or concerns that are not addressed in this letter. Please call the dedicated assistance line that we have established regarding this incident by dialing (877) 659-0604 Monday through Friday from 6:00 am to 8:00 pm PST, Saturday and Sunday from 8:00 am to 5:00 pm PST, excluding U.S. holidays.

Westcor sincerely regrets any inconvenience or concern this incident may have caused you.

Sincerely,
Westcor Land Title Insurance Company

Steps You Can Take to Protect Your Personal Information

Enroll in Complimentary Credit Monitoring

As an added precaution and at no cost to you, we are providing twelve (12) months of credit monitoring and identity protection services through Experian's® IdentityWorksSM. 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:
<https://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 (877) 659-0604 by November 30, 2020. Be prepared to provide engagement number ENGAGEMENT as proof of eligibility for the identity restoration services by Experian.

Monitor Your 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.

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
PO 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
PO Box 105788
Atlanta, GA 30348-5788
1-800-685-1111
www.equifax.com/personal/credit-report-services



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.);
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
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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 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.

California Residents: Visit the California Office of Privacy Protection (www.oag.ca.gov/privacy) 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, 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, Telephone: 1-888-743-0023. **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 a 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. You can 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. **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/>. **North Carolina Residents:** Office of the Attorney General of North Carolina, 9001 Mail Service Center Raleigh, NC 27699-9001, www.ncdoj.gov, Telephone: 1-919-716-6400. **Oregon Residents:** Oregon Department of Justice, 1162 Court Street NE, Salem, OR 97301-4096, 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, Telephone: 401-274-4400. Under Rhode Island law, you have the right to obtain any police report filed in regard to this incident. There are 81 Rhode Island residents impacted by this incident. **All US Residents:** Identity Theft Clearinghouse, Federal Trade Commission, 600 Pennsylvania Avenue, NW Washington, DC 20580; www.consumer.gov/idtheft; 1-877-IDTHEFT (438-4338); and, TTY: 1-866-653-4261.

