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Caleb W. Skeath

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Via Electronic Mail

November 29, 2022

Office of the Attorney General
Attn: Security Breach Notification
200 St. Paul Place
Baltimore, MD 21202

Re: Legal Notice of Information Security Breach Pursuant to Md. Code Ann., Com. Law § 14-3501 *et seq.*

To Whom It May Concern:

In accordance with the above-referenced provision of Maryland law, I write on behalf of Exeter Finance, LLC (“Exeter”) to inform you of an information security incident involving a third party, Bayview Asset Management, LLC (“Bayview”). Although it is our understanding that Bayview and/or its affiliates have previously notified regulators about this incident, Exeter is notifying you based on a determination that certain current and former Exeter employees may have been impacted.

In connection with a potential business transaction, Exeter previously granted Bayview access to certain information from Exeter, including Exeter employee information. Exeter understands from Bayview that on or about December 6, 2021, Bayview identified a security incident involving unauthorized access to its file servers. Bayview has informed Exeter that it took immediate steps to contain the incident, notify law enforcement, and to engage a forensic investigation firm in order to determine the scope of the cybersecurity incident and remediate any vulnerabilities. According to Bayview, its investigation determined that an unauthorized person obtained access to files on Bayview’s file storage servers between October 27, 2021 and December 7, 2021. On or about October 13, 2022, Bayview initially notified Exeter of the incident, after which point Exeter immediately began its own review of the information involved.

Based on the information provided by Bayview, Exeter determined on or about October 13, 2022 that the incident involved access by an unauthorized person to a file that contained the names, addresses, titles, salary information, and Social Security numbers for certain current and former Exeter employees. Bayview, in coordination with Exeter, has identified and notified on Exeter’s behalf three (3) potentially affected individuals who are residents of Maryland. In addition, Bayview is providing identity monitoring services to all individuals affected. Enclosed is a copy of the notification letter that was sent to affected individuals via first-class mail on November 23, 2022.

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The notification to individuals includes (1) a description of the incident and the type of personal information at issue; (2) the actions taken by Bayview to protect personal information from further possible unauthorized access; (3) an address and a toll-free phone number to call for further information and assistance; (4) information on how the individual may enroll in free credit monitoring and other complimentary services arranged by Bayview; (5) information about how to place a fraud alert or security freeze on a credit report; (6) the toll-free numbers and addresses for the major consumer reporting agencies; (7) the toll-free number, address, and website for the Federal Trade Commission and the Office of the Attorney General of Maryland, and a statement that individuals can obtain information on identity theft from these sources; and (8) advice that directs the individual to remain vigilant by reviewing account statements and monitoring free credit reports.

If you have any questions or need further information regarding this incident, please feel free to contact me.

Respectfully Submitted,

/s/

Caleb W. Skeath
Counsel to Exeter Finance,
LLC

Enclosure

COMMUNITY LOAN SERVICING, LLC
LAKEVIEW LOAN SERVICING, LLC
PINGORA LOAN SERVICING, LLC

<<Date>> (Format: Month Day, Year)

<<first_name>> <<middle_name>> <<last_name>> <<suffix>>
<<address_1>>
<<address_2>>
<<city>>, <<state_province>> <<postal_code>>
<<country>>

Dear <<first_name>> <<middle_name>> <<last_name>> <<suffix>>,

We understand the importance of protecting the information we maintain. We are writing to inform you of an incident that involved some of your information. This notice explains the incident, measures we have taken, and resources available to you.

A security incident involving unauthorized access to our file servers was identified in early December 2021. Steps were immediately taken to contain the incident, notify law enforcement, and a forensic investigation firm was engaged. The investigation determined that an unauthorized person obtained access to files on the file storage servers from October 27, 2021 to December 7, 2021. A dedicated team has been reviewing the accessed files since then to identify the content so we could notify individuals of the incident. On October 6, 2022, the file review process determined that some of your information, including your name and Social Security number, was included in the files. This information was provided to Bayview as part of its evaluation of a potential investment in Exeter Finance. On October 13, 2022, we informed Exeter of this determination.

We wanted to notify you of this incident and assure you that we take it seriously. Additional steps are being taken to further enhance our existing security measures. We have also engaged Kroll, a third party with monitoring expertise, to provide identity monitoring services at no cost to you for 24 months. The identity monitoring services include Credit Monitoring, Fraud Consultation, and Identity Theft Restoration.

Visit <https://enroll.krollmonitoring.com> to activate and take advantage of your identity monitoring services.

You have until <<b2b_text_6(activation deadline)>> to activate your identity monitoring services.

Membership Number: <<Membership Number s_n>>

For more information on your complimentary 24-month membership, as well as additional steps you can take in response to the incident, please see the additional information provided in this letter.

We regret that this incident occurred and apologize for any inconvenience. We wanted to notify you of this incident and assure you that we take it seriously. Additional steps are being taken to further enhance our existing security measures. If you have questions about this notice, please call (855) 541-3564 from 8:00 a.m. – 5:30 p.m., Central Time, Monday through Friday (excluding major US holidays).

Cristina Arroyo
SVP of Legal and Compliance
Community Loan Servicing LLC

Judith Tribble
SVP, Chief Compliance Officer
Lakeview Loan Servicing, LLC

Ron Bendalin
Chief Compliance Officer
Pingora Loan Servicing, LLC



TAKE ADVANTAGE OF YOUR IDENTITY MONITORING SERVICES

You have been provided with access to the following services from Kroll:

Triple Bureau Credit Monitoring

You will receive alerts when there are changes to your credit data at any of the three national credit bureaus—for instance, when a new line of credit is applied for in your name. If you do not recognize the activity, you'll have the option to call a Kroll fraud specialist, who will be able to help you determine if it is an indicator of identity theft.

Fraud Consultation

You have unlimited access to consultation with a Kroll fraud specialist. Support includes showing you the most effective ways to protect your identity, explaining your rights and protections under the law, assistance with fraud alerts, and interpreting how personal information is accessed and used, including investigating suspicious activity that could be tied to an identity theft event.

Identity Theft Restoration

If you become a victim of identity theft, an experienced Kroll licensed investigator will work on your behalf to resolve related issues. You will have access to a dedicated investigator who understands your issues and can do most of the work for you. Your investigator will be able to dig deep to uncover the scope of the identity theft, and then work to resolve it.

Kroll's activation website is only compatible with the current version or one version earlier of Chrome, Firefox, Safari and Edge.

To receive credit services, you must be over the age of 18 and have established credit in the U.S., have a Social Security number in your name, and have a U.S. residential address associated with your credit file.

ADDITIONAL STEPS YOU CAN TAKE

We remind you it is always advisable to be vigilant for incidents of fraud or identity theft by reviewing your account statements and free credit reports for any unauthorized activity over the next 12 to 24 months. You may obtain a copy of your credit report, free of charge, once every 12 months from each of the three nationwide credit reporting agencies. To order your annual free credit report, please visit www.annualcreditreport.com or call toll free at 1-877-322-8228. Contact information for the three nationwide credit reporting agencies is as follows:

- *Equifax*, PO Box 740241, Atlanta, GA 30374, www.equifax.com, 1-800-685-1111
- *Experian*, PO Box 2002, Allen, TX 75013, www.experian.com, 1-888-397-3742
- *TransUnion*, PO Box 2000, Chester, PA 19016, www.transunion.com, 1-800-916-8800

If you believe you are the victim of identity theft or have reason to believe your personal information has been misused, you should immediately contact the Federal Trade Commission and/or the Attorney General's office in your state. You should also contact your local law enforcement authorities and file a police report. Obtain a copy of the police report in case you are asked to provide copies to creditors to correct your records.

You can also obtain information from these sources about steps an individual can take to avoid identity theft as well as information about fraud alerts and security freezes. Contact information for the Federal Trade Commission is as follows:

- *Federal Trade Commission*, Consumer Response Center, 600 Pennsylvania Avenue NW, Washington, DC 20580, 1-877-IDTHEFT (438-4338), www.identitytheft.gov

Fraud Alerts and Credit or Security Freezes:

Fraud Alerts: There are two types of general fraud alerts you can place on your credit report to put your creditors on notice that you may be a victim of fraud—an initial alert and an extended alert. You may ask that an initial fraud alert be placed on your credit report if you suspect you have been, or are about to be, a victim of identity theft. An initial fraud alert stays on your credit report for one year. You may have an extended alert placed on your credit report if you have already been a victim of identity theft with the appropriate documentary proof. An extended fraud alert stays on your credit report for seven years.

To place a fraud alert on your credit reports, contact one of the nationwide credit reporting agencies. A fraud alert is free. The credit reporting agency you contact must tell the other two, and all three will place an alert on their versions of your report.

For those in the military who want to protect their credit while deployed, an Active Duty Military Fraud Alert lasts for one year and can be renewed for the length of your deployment. The credit reporting agencies will also take you off their marketing lists for pre-screened credit card offers for two years, unless you ask them not to.

Credit or Security Freezes: You have the right to put a credit freeze, also known as a security freeze, on your credit file, free of charge, which makes it more difficult for identity thieves to open new accounts in your name. That's because most creditors need to see your credit report before they approve a new account. If they can't see your report, they may not extend the credit.

How do I place a freeze on my credit reports? There is no fee to place or lift a security freeze. Unlike a fraud alert, you must separately place a security freeze on your credit file at each credit reporting agency. For information and instructions to place a security freeze, contact each of the credit reporting agencies at the addresses below:

- **Experian Security Freeze**, PO Box 9554, Allen, TX 75013, www.experian.com
- **TransUnion Security Freeze**, PO Box 2000, Chester, PA 19016, www.transunion.com
- **Equifax Security Freeze**, PO Box 105788, Atlanta, GA 30348, www.equifax.com

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 agency will provide you with 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.

How do I lift a freeze? A freeze remains in place until you ask the credit reporting agency to temporarily lift it or remove it altogether. If the request is made online or by phone, a credit reporting agency must lift a freeze within one hour. If the request is made by mail, then the credit reporting agency must lift the freeze no later than three business days after getting your request.

If you opt for a temporary lift because you are applying for credit or a job, and you can find out which credit reporting agency the business will contact for your file, you can save some time by lifting the freeze only at that particular credit reporting agency. Otherwise, you need to make the request with all three credit reporting agencies.

Pingora Loan Servicing's address is 1819 Wazee Street, Second Floor, Denver, Colorado 80202 and its phone number is 720-475-1292. Community Loan Servicing's address is 4425 Ponce de Leon Blvd., Suite 300, Coral Gables, Florida 33146 and its phone number is (855)-650-0099. Lakeview Loan Servicing's address is 4425 Ponce de Leon Blvd., Coral Gables, FL 33146 and its phone number is 855-880-2062.

Additional information for residents of the following states:

Maryland: You may contact and obtain information from your state attorney general at: *Maryland Attorney General's Office*, 200 St. Paul Place, Baltimore, MD 21202, 1-888-743-0023 / 1-410-576-6300, www.oag.state.md.us

New York: You may contact and obtain information from these state agencies: *New York Department of State Division of Consumer Protection*, One Commerce Plaza, 99 Washington Ave., Albany, NY 12231-0001, 518-474-8583 / 1-800- 697-1220, <http://www.dos.ny.gov/consumerprotection>; and *New York State Office of the Attorney General*, The Capitol, Albany, NY 12224-0341, 1-800-771-7755, <https://ag.ny.gov>