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September 28, 2023

VIA E-MAIL

Office of the Attorney General
Attn: Security Breach Notification
200 St. Paul Place
Baltimore, MD 21202
E-mail: idtheft@oag.state.md.us

Re: Notice of Data Event

To Whom It May Concern:

We represent V.I.P. Mortgage, Inc., and its subsidiaries, (collectively “VIP”), located at 9221 East Via de Ventura, Scottsdale, AZ 85258, and are writing to notify your Office of an incident that may affect the security of certain information relating to Maryland residents. This notice will be supplemented with any new significant facts learned subsequent to its submission. By providing this notice, VIP does not waive any rights or defenses regarding the applicability of Maryland law, the applicability of the Maryland data event notification statute, or personal jurisdiction.

Nature of the Data Event

In December 2022, VIP discovered suspicious activity on its computer network and that certain systems were inaccessible as a result of a malware attack. VIP immediately took steps to ensure the security of the network and launched an investigation. The investigation determined that an unauthorized actor gained access to VIP systems between December 9, 2022, and December 10, 2023 and may have accessed or acquired certain data on VIP’s systems. As part of the investigation, VIP conducted a thorough and comprehensive review of the impacted systems in order to determine whether any sensitive information was present at the time of the incident and to whom the information relates. This review was completed on or about August 29, 2023, and VIP then took steps to notify potentially impacted individuals. While the information varies for each individual, the information that could have been subject to unauthorized access includes name, Social Security number, and/or government issued identification information.

Notice to Maryland Residents

On or about September 28, 2023, VIP provided written notice of this incident to four (4) Maryland residents. 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, VIP moved quickly to investigate and respond to the incident, assess the security of VIP systems, identify potentially affected individuals, and notified federal law enforcement of the event. VIP is also working to implement additional safeguards and training to its employees to prevent a similar event from occurring again in the future. Out of an abundance of caution, VIP is providing access to complimentary credit monitoring services for twelve (12) months, through Experian, to individuals whose information was potentially affected by this incident.

Additionally, VIP 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, and 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.

VIP is providing written notice of this incident to relevant state regulators, as necessary, and to the three major credit reporting agencies, Equifax, Experian, and TransUnion.

Contact Information

Should you have any questions regarding this notification or other aspects of the data security event, please contact us at (267) 930-4637.

Very truly yours,

A handwritten signature in black ink, appearing to read 'Gregory Lederman', with a stylized, flowing script.

Gregory Lederman of
MULLEN COUGHLIN LLC

GCL/jlm
Enclosure

EXHIBIT A



Return Mail Processing
PO Box 999
Suwanee, GA 30024

15 2 5056 *****AUTO**ALL FOR AADC 808

SAMPLE A. SAMPLE - Individual

APT ABC



123 ANY ST

ANYTOWN, US 12345-6789



September 28, 2023

NOTICE OF [SECURITY INCIDENT] / [DATA BREACH]

Dear Sample A. Sample:

V.I.P. Mortgage, Inc. and its subsidiaries (“VIP”) write to inform you of a recent event that may impact some of your information. VIP takes this event very seriously and the confidentiality, privacy, and security of information in VIP’s care is one of our highest priorities. While we are not aware of any actual or attempted misuse of your information, we are providing information regarding the event, our response, and resources to help further protect your information, should you feel it necessary to do so.

What Happened? In December 2022, VIP discovered suspicious activity on its computer network and that certain systems were inaccessible as a result of malware attack. VIP immediately took steps to ensure the security of the network and launched an investigation. The investigation determined that an unauthorized actor gained access to VIP systems between December 9, 2022 and December 10, 2022 and may have accessed or acquired certain data on VIP’s systems.

What Information Was Involved? As part of the investigation, VIP conducted a thorough and comprehensive review of the impacted systems in order to determine whether any sensitive information was present at the time of the incident and to whom the information relates. This review was completed on or about August 29, 2023 and VIP is notifying you because the investigation determined that some of your information may have been accessed by the unauthorized actor. The information related to you includes your name and [Extra1]. To date, VIP is unaware of any actual or attempted misuse of your information as a result of this event and is providing you with this notice out of an abundance of caution.

What We Are Doing. VIP takes this event and the security of information in our care very seriously. Upon learning of the event, we moved quickly to respond and investigate the event, assess the security of our network, and notify potentially impacted individuals. As part of our ongoing commitment to information security, we are currently reviewing our policies and procedures, as well as assessing new cybersecurity tools, to reduce the risk of a similar event from occurring in the future. VIP also notified law enforcement and will be notifying relevant regulators, as required.

VIP is also offering you [12/24] months of complimentary credit monitoring through Experian. You must enroll in these services as VIP cannot do so on your behalf. Enrollment instructions can be found in the enclosed *Steps You Can Take to Help Protect Your Information* below.

What You Can Do. We encourage you to remain vigilant against incidents of identity theft and fraud by reviewing your account statements and monitoring your free credit reports for suspicious activity and to detect errors. Please review the enclosed *Steps You Can Take to Help Protect Your Information*, which includes further information on what you can do to protect your information against misuse, should you feel it necessary to do so. Additionally, VIP encourages you to enroll in the complimentary credit monitoring being offered.

For More Information. VIP understands you may have questions about this event that are not addressed in this letter. If you have additional questions, please contact our dedicated assistance line 833-671-0407 Monday through Friday, 9 am - 11 pm EST, Saturday and Sunday 11 am - 8 pm EST (excluding major U.S. holidays). Please be prepared to provide [Engagement Number]. You may also write to VIP at 9221 East Via de Ventura, Scottsdale, AZ 85258

We sincerely apologize for any inconvenience this may cause.

Sincerely,

V.I.P. Mortgage

STEPS YOU CAN TAKE TO HELP PROTECT YOUR INFORMATION

Enroll in Monitoring Services

To help protect your identity, we are offering complimentary access to Experian IdentityWorksSM for [12/24] months.

If you believe there was fraudulent use of your information as a result of this incident and would like to discuss how you may be able to resolve those issues, please reach out to an Experian agent. If, after discussing your situation with an agent, it is determined that identity restoration support is needed then an Experian Identity Restoration agent is available to work with you to investigate and resolve each incident of fraud that occurred from the date of the incident (including, as appropriate, helping you with contacting 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 with contacting government agencies to help restore your identity to its proper condition).

Please note that Identity Restoration is available to you for [12/24] months from the date of this letter and does not require any action on your part at this time. The Terms and Conditions for this offer are located at www.ExperianIDWorks.com/restoration.

While identity restoration assistance is immediately available to you, we also encourage you to activate the fraud detection tools available through Experian IdentityWorks as a complimentary [12/24]-month membership. This product provides you with superior identity detection and resolution of identity theft. To start monitoring your personal information, please follow the steps below:

- Ensure that you **enroll by** December 31, 2023 (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 that arose as a result of this incident, or would like an alternative to enrolling in Experian IdentityWorks online, please contact Experian's customer care team at 833-671-0407 by December 31, 2023. Be prepared to provide engagement number [Engagement Number] as proof of eligibility for the Identity Restoration services by Experian.

ADDITIONAL DETAILS REGARDING YOUR [12/24]-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 specialists are immediately available to help you address credit and non-credit related fraud.
- **Experian IdentityWorks ExtendCARETM:** You receive the same high-level of Identity Restoration support even after your Experian IdentityWorks membership has expired.
- **\$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 Your Accounts

Under U.S. law, a consumer is entitled to one free credit report annually from each of the three major credit reporting bureaus, Equifax, Experian, and TransUnion. To order a free credit report, visit www.annualcreditreport.com or call, toll-free, 1-877-322-8228. Consumers may also directly contact the three major credit reporting bureaus listed below to request a free copy of their credit report.

Consumers have the right to place an initial or extended “fraud alert” on a credit 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 consumers are the victim of identity theft, they are entitled to an extended fraud alert, which is a fraud alert lasting seven years. Should consumers wish to place a fraud alert, please contact any of the three major credit reporting bureaus listed below.

As an alternative to a fraud alert, consumers have the right to place a “credit freeze” on a credit report, which will prohibit a credit bureau from releasing information in the credit report without the consumer’s express authorization. The credit freeze is designed to prevent credit, loans, and services from being approved in a consumer’s name without consent. However, consumers should be aware that using a credit freeze to take control over who gets access to the personal and financial information in their credit report may delay, interfere with, or prohibit the timely approval of any subsequent request or application they make regarding a new loan, credit, mortgage, or any other account involving the extension of credit. Pursuant to federal law, consumers cannot be charged to place or lift a credit freeze on their credit report. To request a credit freeze, individuals may need to provide some or all of the following information:

1. Full name (including middle initial as well as Jr., Sr., II, III, etc.);
2. Social Security number;
3. Date of birth;
4. Addresses for the prior two to 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, etc.); and
7. A copy of either the police report, investigative report, or complaint to a law enforcement agency concerning identity theft if they are a victim of identity theft.

Should consumers wish to place a credit freeze or fraud alert, please contact the three major credit reporting bureaus listed below:

Equifax	Experian	TransUnion
https://www.equifax.com/personal/credit-report-services/	https://www.experian.com/help/	https://www.transunion.com/credit-help
1-888-298-0045	1-888-397-3742	1-800-916-8800
Equifax Fraud Alert, P.O. Box 105069 Atlanta, GA 30348-5069	Experian Fraud Alert, P.O. Box 9554, Allen, TX 75013	TransUnion Fraud Alert, P.O. Box 2000, Chester, PA 19016
Equifax Credit Freeze, P.O. Box 105788 Atlanta, GA 30348-5788	Experian Credit Freeze, P.O. Box 9554, Allen, TX 75013	TransUnion Credit Freeze, P.O. Box 160, Woodlyn, PA 19094

Additional Information

Consumers may further educate themselves regarding identity theft, fraud alerts, credit freezes, and the steps they can take to protect your personal information by contacting the consumer reporting bureaus, the Federal Trade Commission, or their state Attorney General. The Federal Trade Commission may be reached at: 600 Pennsylvania Avenue NW, Washington, D.C. 20580; www.identitytheft.gov; 1-877-ID-THEFT (1-877-438-4338); and 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. Consumers can obtain further information on how to file such a complaint by way of the contact information listed above. Consumers have the right to file a police report if they ever experience identity theft or fraud. Please note that in order to file a report with law enforcement for identity theft, consumers will likely need to provide some proof that they have been a victim. Instances of known or suspected identity theft should also be reported to law enforcement and the relevant state Attorney General. This notice has not been delayed by law enforcement.

For Maryland residents, the Maryland Attorney General may be contacted at: 200 St. Paul Place, 16th Floor, Baltimore, MD 21202; 1-410-576-6300 or 1-888-743-0023; and <https://www.marylandattorneygeneral.gov/>.

For New Mexico residents, consumers have rights pursuant to the Fair Credit Reporting Act, such as the right to be told if information in their credit file has been used against them, the right to know what is in their credit file, the right to ask for their credit score, and the right to dispute incomplete or inaccurate information. Further, pursuant to the Fair Credit Reporting Act, the consumer reporting bureaus must correct or delete inaccurate, incomplete, or unverifiable information; consumer reporting agencies may not report outdated negative information; access to consumers' files is limited; consumers must give consent for credit reports to be provided to employers; consumers may limit "prescreened" offers of credit and insurance based on information in their credit report; and consumers may seek damages from violators. Consumers 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 consumers to review their 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 New York residents, the New York Attorney General may be contacted at: Office of the Attorney General, The Capitol, Albany, NY 12224-0341; 1-800-771-7755; or <https://ag.ny.gov>.

For North Carolina residents, the North Carolina Attorney General may be contacted at: 9001 Mail Service Center, Raleigh, NC 27699-9001; 1-877-566-7226 or 1-919-716-6000; and www.ncdoj.gov.