



Norton Rose Fulbright US LLP  
Tabor Center  
1200 17th Street, Suite 1000  
Denver, Colorado 80202-5835  
United States

Direct line +1 303 801 2732  
david.navetta@nortonrosefulbright.com

Tel +1 303 801 2700  
Fax +1 303 801 2777  
nortonrosefulbright.com

June 23, 2017

**Via E-Mail (consumer@iowa.gov)**

Consumer Protection Division  
Security Breach Notifications  
Office of the Attorney General of Iowa  
1305 E. Walnut Street  
Des Moines, Iowa 50319-0106

**Re: Legal Notice of Information Security Incident**

Dear Sirs or Madams:

I write on behalf of my client, Caliber Home Loans, Inc. ("Caliber"), to inform you of a security incident involving personal information provided to Caliber that affected certain Iowa residents. Caliber is notifying these individuals and outlining some steps they may take to help protect themselves.

Based upon an extensive investigation, it appears that unauthorized individuals gained the ability to access a limited number of electronically-stored loan files, and may have had access to other documents containing personally-identifying information. In addition, the unauthorized individuals may have had access to sufficient information in order to gain access to certain customers' online Caliber accounts, if the customer had not previously set up such an account.

The files and documents that were subject to unauthorized access may have contained certain customers' sensitive or identifying information, such as social security number, driver's license number, military or other government ID number, or date of birth; financial account names, numbers, and statements; digital signatures, and/or information that an individual may be able to use to access a customer's online Caliber account or data storage sites containing borrower submissions. A limited number of customers' files may also have contained information related to health insurance, including member ID numbers.

Caliber takes the privacy of personal information seriously, and deeply regrets that this incident occurred. Caliber took steps to address and contain this incident promptly after it was discovered, including engaging outside forensic experts to assist in investigating and remedying the situation. Caliber is reviewing its security policies and configuring and updating its systems to improve their security. In addition, we have contacted law enforcement and will continue to cooperate in their investigation of this incident.

Affected individuals are being notified via written letter, which includes an offer for two years of complimentary identity protection and fraud resolution services. These notifications will begin mailing on or around June 23, 2017. A form copy of the notice being sent to affected Iowa residents is included for your reference.

If you have any questions or need further information regarding this incident, please contact me at (303) 801-2732 or [david.navetta@nortonrosefulbright.com](mailto:david.navetta@nortonrosefulbright.com).

Very truly yours,



David Navetta  
Partner  
Co-Chair, Data Protection, Privacy & Access  
to Information

DJN/smm  
Enclosure



Caliber Home Loans, Inc.  
P.O. Box 24610  
Oklahoma City, OK 73137

June 23, 2017

##C8802-L02-0123456 0001 00000001 \*\*\*\*\*ALL FOR AADC 159

SAMPLE A SAMPLE



123 ANY ST  
ANYTOWN, US 12345-6789  
COUNTRY



Dear Sample A Sample,

Caliber Home Loans, Inc. has learned that, like so many other companies, it has been the victim of a security incident that may affect the personal information of certain individuals who have sought home loans from or with the assistance of Caliber, or provided information in connection with such loans. I want to let you know what happened, and outline steps that you can take to effectively safeguard your personal information. We sincerely apologize for any concern that this notice may cause you, but we hope that the below information and resources that we have provided are helpful.

**What Happened**

Based upon an extensive investigation conducted by a leading forensic firm, it appears that beginning on approximately January 18, 2017, unauthorized individuals gained the ability to access a limited number of electronically-stored loan files, and may have had access to other documents containing personally-identifying information. In addition, the unauthorized individuals may have had access to sufficient information in order to gain access to certain customers' online Caliber accounts, if the customer had not previously set up such an account.

**What Information Was Involved?**

The files and documents that were subject to unauthorized access may have contained certain customers' sensitive or identifying information, such as social security number, driver's license number, military or other government ID number, or date of birth; financial account names, numbers, and statements; digital signatures, and/or information that an individual may be able to use to access a customer's online Caliber account or data storage sites containing borrower submissions. A limited number of customers' files may also have contained information related to health insurance, including member ID numbers.

**What Caliber is Doing to Support Customers**

Once the incident was discovered, we promptly took steps to address and contain it, including engaging outside forensic experts to assist us in investigating and remedying the situation. We are reviewing our security policies and configuring and updating our systems to improve their security. In addition, we have contacted law enforcement and will continue to cooperate in their investigation of this incident.

0123456



**Enrollment in Identity Protection Services**

We have engaged Experian to offer you complimentary fraud resolution and identity protection services for two years. These services help detect possible misuse of your personal information and provide you with identity protection services focused on immediate identification and resolution of identity theft.

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 (contact information is included below). If, after discussing your account with an agent, it is determined that identity restoration support is needed, then an Experian Identity Restoration agent will be available to

C8802-L02

work with you to investigate and resolve each incident of fraud that occurred from the date of the incident. An Experian agent will also assist you with contacting credit grantors to dispute charges and close accounts; placing a freeze on your credit file with the three major credit bureaus; and contacting government agencies to help restore your identity to its proper condition, as appropriate.

Please note that this offer is available to you for two years from the date of this letter and does not require any action on your part at this time. For self-help tips and information about identity protection and additional details on the offer, visit [www.ExperianIDWorks.com/restoration](http://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<sup>SM</sup> as a complimentary two-year membership. This product provides superior identity detection and resolution of identity theft. To start monitoring your personal information follow the steps below:

- Ensure that you **enroll by: September 30, 2017** (Your code will not work after this date.)
- **Visit** the Experian IdentityWorks website to enroll: **[www.experianidworks.com/3bcredit2](http://www.experianidworks.com/3bcredit2)**
- 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 (866) 274-3891 by **September 30, 2017**. Be prepared to provide your engagement number **ENGAGEMENT** as proof of eligibility for the identity restoration services by Experian.

#### **Additional details regarding your 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, Equifax and Transunion files for indicators of fraud.
- ◆ **Identity Restoration:** Identity Restoration specialists are immediately available to help you address credit and non-credit related fraud.
- ◆ **Experian IdentityWorks ExtendCARE<sup>TM</sup>:** You receive the same high-level of Identity Restoration support even after your Experian IdentityWorks membership has expired.
- ◆ **\$1 Million Identity Theft Insurance<sup>\*\*</sup>:** Provides coverage for certain costs and unauthorized electronic fund transfers.

#### ***What You Can do to Protect Your Information***

There are additional actions you can consider taking to reduce the chances of identity theft or fraud on your accounts. Please refer to [www.ExperianIDWorks.com/restoration](http://www.ExperianIDWorks.com/restoration) for this information. In addition, please review the "Information About Identity Theft Protection" reference guide, enclosed here, which describes additional steps you may take to help protect yourself, including recommendations from the Federal Trade Commission regarding identity theft protection and details regarding placing a fraud alert or a security freeze on your credit file.

#### ***For More Information***

If you have any questions, please feel to contact us toll-free at (866) 274-3891. We value the trust of our customers and thank you for your continued support.

Sincerely,



Patrick Hickey  
Executive Vice President

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

\*\* Identity theft insurance is underwritten by insurance company subsidiaries or affiliates of American International Group, Inc. (AIG). The description herein is a summary and intended for informational purposes only and does not include all terms, conditions and exclusions of the policies described. Please refer to the actual policies for terms, conditions, and exclusions of coverage. Coverage may not be available in all jurisdictions

## **Information about Identity Theft Protection**

We recommend that you review your credit and debit card account statements as soon as possible in order to determine if there are any discrepancies or unusual activity listed. You should remain vigilant and continue to monitor your statements for unusual activity going forward. If you see anything you do not understand or that looks suspicious, or if you suspect that any fraudulent transactions have taken place, you should call the bank that issued your credit or debit card immediately.

As a precaution, you may regularly review statements from your accounts and periodically obtain your credit report from one or more of the national credit reporting companies. You may obtain a free copy of your credit report online at [www.annualcreditreport.com](http://www.annualcreditreport.com), by calling toll-free 1-877-322-8228, or by mailing an Annual Credit Report Request Form (available at [www.annualcreditreport.com](http://www.annualcreditreport.com)) to: Annual Credit Report Request Service, P.O. Box 105281, Atlanta, GA, 30348-5281. You may also purchase a copy of your credit report by contacting one or more of the three national credit reporting agencies listed at the bottom of this page.

You should remain vigilant with respect to reviewing your account statements and credit reports, and you should promptly report any suspicious activity or suspected identity theft to us and to the proper law enforcement authorities, including local law enforcement, your state's attorney general, and/or the Federal Trade Commission ("FTC"). You may contact the FTC or your state's regulatory authority to obtain additional information about avoiding and protection against identity theft: Federal Trade Commission, Consumer Response Center 600 Pennsylvania Avenue, NW, Washington, DC 20580, 1-877-IDTHEFT (438-4338), [www.ftc.gov/idtheft](http://www.ftc.gov/idtheft)

**For residents of Maryland:** You may also obtain information about preventing and avoiding identity theft from the Maryland Office of the Attorney General: Maryland Office of the Attorney General, Consumer Protection Division, 200 St. Paul Place, Baltimore, MD 21202, 1-888-743-0023, [www.oag.state.md.us](http://www.oag.state.md.us)

**For residents of North Carolina:** You may also obtain information about preventing and avoiding identity theft from North Carolina Attorney General's Office: North Carolina Attorney General's Office, Consumer Protection Division, 9001 Mail Service Center, Raleigh, NC 27699-9001, 1-877-5-NO-SCAM, [www.ncdoj.gov](http://www.ncdoj.gov)

**For residents of Rhode Island:** You may also obtain information about preventing and avoiding identity theft from the Rhode Island Office of the Attorney General: Rhode Island Office of the Attorney General, Consumer Protection Unit, 150 South Main Street, Providence, RI 02903, 401-274-4400, <http://www.riag.ri.gov>.

**Fraud Alerts:** There are two types of fraud alerts that 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 at least 90 days. 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. You can place a fraud alert on your credit report by contacting any of the three national credit reporting agencies at the addresses or toll-free numbers listed at the bottom of this page.

**Credit Freezes:** You may have the right to put a credit freeze, also known as a security freeze, on your credit file, so that no new credit can be opened in your name without the use of a PIN number that is issued to you when you initiate a freeze. A credit freeze is designed to prevent potential credit grantors from accessing your credit report without your consent. If you place a credit freeze, potential creditors and other third parties will not be able to get access to your credit report unless you temporarily lift the freeze. Therefore, using a credit freeze may delay your ability to obtain credit. In addition, you may incur fees to place, lift and/or remove a credit freeze. Credit freeze laws vary from state to state. The cost of placing, temporarily lifting, and removing a credit freeze also varies by state, generally \$5 to \$20 per action at each credit reporting company. Unlike a fraud alert, you must separately place a credit freeze on your credit file at each credit reporting company. Since the instructions for how to establish a credit freeze differ from state to state, please contact the three major credit reporting companies as specified below to find out more information.

You can obtain more information about fraud alerts and credit freezes by contacting the FTC or one of the national credit reporting agencies listed below.

### **National Credit Reporting Agencies**

Equifax ([www.equifax.com](http://www.equifax.com))  
P.O. Box 740241  
Atlanta, GA 30374  
800-685-1111

Experian ([www.experian.com](http://www.experian.com))  
P.O. Box 2002  
Allen, TX 75013  
888-397-3742

TransUnion ([www.transunion.com](http://www.transunion.com))  
P.O. Box 1000  
Atlanta, GA 30348  
877-322-8228

**Fraud Alerts:** P.O. Box 105069, Atlanta, GA 30374  
**Credit Freezes:** P.O. Box 105788, Atlanta, GA 30348

**Fraud Alerts and Security Freezes:** P.O. Box 9554, Allen, TX 75013

**Fraud Alerts and Security Freezes:** P.O. Box 2000, Chester, PA 19022  
888-909-8872

0123456



