MULLEN COUGHLIN LLC
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1275 Drummers Lane, Suite 302
Wayne, PA 19087

January 12, 2018

VIA U.S. 1st CLASS MAIL
Iowa Attorney General
Consumer Protection Division
1305 E. Walnut Street
Des Moines, IA 50319

Re: Notice of Data Security Incident

Dear Sir or Madam:

We represent Guaranteed Rate, Inc. ("Guaranteed Rate"), 3940 N. Ravenswood, Chicago, IL 60613, and are writing to notify you of a recent incident that may affect the security of the personal information of six hundred and twenty-six (626) Iowa residents. Guaranteed Rate's response to this incident is ongoing, and this notice will be supplemented with any new significant facts learned subsequent to its submission. By providing this notice, Guaranteed Rate does not waive any rights or defenses regarding the applicability of Iowa law, the applicability of the Iowa data incident notification statute, or personal jurisdiction.

Nature of the Data Security Incident

In late August and early September of 2017, Guaranteed Rate was the target of email phishing attacks and attempts by unknown actors to contact Guaranteed Rate borrowers by email and instruct them to wire mortgage closing funds using fraudulent wiring instructions. In a limited number of cases, unsuspecting borrowers wired their closing funds to an unknown actor using the fraudulent wiring instructions. Several of these borrowers were able to recover the funds from the receiving financial institution, and Guaranteed Rate elected to reimburse the remaining impacted borrowers who were unable to recover their lost funds.

In response to the above activity, Guaranteed Rate immediately contacted law enforcement and launched an investigation with the assistance of a leading outside computer forensics expert. On or around September 13, 2017, Guaranteed Rate confirmed a limited number of company email accounts had been accessed by unknown actors as the result of the phishing attacks. Guaranteed Rate continued to perform a thorough review of all email logs to determine the potential extent of

the compromise. Once affected email accounts were identified, Guaranteed Rate then began a lengthy and thorough review of the email accounts, with the help of the computer forensics expert, to identify individuals whose personal information was affected in relation to this incident. The email accounts were subject to unauthorized access between the dates of June 9 and October 2, 2017.

An intensive forensic review of the impacted email accounts contents was performed to identify all individuals for whom personal information ("PI") was contained within the impacted email accounts. The large volume and variety of documents in need of review required a combination of automated forensic tools and manual document review to check this data for the presence of PI. Once the affected individuals were identified on or around January 7, 2018, Guaranteed Rate engaged in an additional process of identifying and confirming address information for the affected population, which involved both a review of Guaranteed Rate's internal records, as well as the address verification processes performed by an outside vendor.

The types of PI relating to Iowa residents determined to be stored within the impacted Guaranteed Rate email accounts were not identical for every potentially affected individual, and they included the following: Social Security number, driver's license number, and financial account information. Those individuals affected included current and former Guaranteed Rate employees, a limited number of employee beneficiaries, and Guaranteed Rate mortgage borrowers and applicants.

Notice to Iowa Residents

On January 12, 2018, Guaranteed Rate began mailing written notice of this incident to potentially impacted individuals, including six hundred and twenty-six (626) Iowa residents. Such notice is being provided in substantially the same form as the letter attached here as ***Exhibit A.***

Other Steps Taken to Be Taken

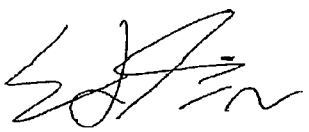
Guaranteed Rate is offering potentially affected individuals complimentary access to two years of free credit and identity monitoring and identity repair services through AllClear ID. Additionally, Guaranteed Rate is providing potentially affected individuals with information on how to protect against identity theft and fraud, including information on how to contact the Federal Trade Commission, the state attorney general, and law enforcement to report any attempted or actual identity theft and fraud. In addition to providing notice of this incident to you, Guaranteed Rate is providing or has provided written notice of this incident to other state regulators, the three major consumer reporting agencies, the FBI, and the United States Secret Service.

Guaranteed Rate has taken several immediate steps to protect against similar incidents in the future, including the following: forcing a mandatory password re-set for all employees; providing mandatory phishing training for all employees; implementing multiple disclosures to borrowers making them aware of wire transfer scams; sending multiple communications to title companies reminding them of wire transfer scams. In addition, Guaranteed Rate is taking steps towards implementing additional security safeguards to protect sensitive data stored within its systems.

Contact Information

Should you have any questions regarding this notification or other aspects of the data security incident, please contact me at (267) 930-4776.

Very truly yours,



Edward J. Finn of
MULLEN COUGHLIN LLC

EJF:ncl
Enclosure

EXHIBIT A

guaranteedRate®

Processing Center • P.O. BOX 141578 • Austin, TX 78714

00002
ACD1234

145566
JOHN Q. SAMPLE
1234 MAIN STREET
ANYTOWN US 12345-6789

January 12, 2018

Re: Notice of Data Security Breach

Dear John Sample:

Guaranteed Rate, Inc. ("Guaranteed Rate") is writing to notify you of an incident that may affect the security of your personal information. We are providing you with information regarding the incident, steps we have taken since discovering the incident, and what you can do to protect against identity theft and fraud.

What Happened? In response to email phishing targeting Guaranteed Rate employees and other suspicious activity, we launched an investigation with the assistance of a leading outside computer forensics expert. On or around September 13, 2017, we confirmed a limited number of company email accounts were accessed by unknown actors as the result of these phishing attacks. We then began a thorough review of the email accounts to identify individuals whose personal information was affected. This process has been ongoing and we confirmed on or around January 7, 2018 the individuals impacted and the types of personal information that were affected. Based on our investigation, we have reason to believe that your personal information was viewed and/or downloaded by these unknown actors at some time between June 9 and October 2, 2017.

What Information Was Involved? Our investigation indicates that the following types of your personal information were viewed or downloaded by the unknown actors: Social Security number and name.

What Are We Doing? Guaranteed Rate takes your privacy and the security of your personal information very seriously. We are continually taking steps to enhance data security protections to protect your information, including already having changed the log-in credentials for all company email accounts. We are also providing additional training and educational material to our employees. As an added precaution, we are offering you access to two years of free credit and identity monitoring and identity repair services through AllClear ID. Enclosed within this letter is a description of the complimentary services and instructions on how to enroll to receive them, as well as additional information on *Steps You Can Take to Protect Against Identity Theft and Fraud.*

What Can You Do? You can review the attached *Steps You Can Take to Protect Against Identity Theft and Fraud.* You can also enroll to receive the free services being offered to you.

01-02-2-00

For More Information: We recognize that you may have questions that are not answered in this letter. We have established a confidential, toll-free hotline to assist you with questions regarding this incident, the free services we are making available, and steps you can take to protect yourself against identity theft and fraud. The hotline is available Monday through Saturday, 9:00 a.m. to 9:00 p.m., ET, at 1-855-431-2167.

We sincerely regret any inconvenience this incident may cause. Guaranteed Rate remains committed to safeguarding information in our care and will continue to take proactive steps to enhance data security.

Sincerely,

Guaranteed Rate, Inc.

Steps You Can Take to Protect Against Identity Theft and Fraud

As an added precaution, we have arranged to have AllClear ID protect your identity for 24 months at no cost to you. The following identity protection services start on the date of this notice and you can use them at any time during the next 24 months.

AllClear Identity Repair: This service is automatically available to you with no enrollment required. If a problem arises, simply call 1-855-431-2167 and a dedicated investigator will help recover financial losses, restore your credit and make sure your identity is returned to its proper condition.

AllClear Credit Monitoring: This service offers additional layers of protection including credit monitoring and a $1 million identity theft insurance policy. **For a child under 18 years old,** AllClear ID ChildScan identifies acts of credit, criminal, medical or employment fraud against children by searching thousands of public databases for use of your child's information. To use this service, you will need to provide your personal information to AllClear ID. You may sign up online at enroll.allclearid.com or by phone by calling 1-855-431-2167 using the following redemption code: Redemption Code.

Please note: Additional steps may be required by you in order to activate your phone alerts and monitoring options.

In addition to enrolling to receive the above services, you may take additional action directly to further protect against possible identity theft or financial loss. We encourage you to remain vigilant against incidents of identity theft and fraud, to review your account statements, and to monitor your credit reports and explanation of benefits forms 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.

At no charge, you can also have these credit bureaus place a "fraud alert" on your file that alerts creditors to take additional steps to verify your identity prior to granting credit in your name. Note, however, that because it tells creditors to follow certain procedures to protect you, it may also delay your ability to obtain credit while the agency verifies your identity. As soon as one credit bureau confirms your fraud alert, the others are notified to place fraud alerts on your file. Should you wish to place a fraud alert, or should you have any questions regarding your credit report, please contact any one of the agencies listed below.

Equifax	Experian	TransUnion
P.O. Box 105069	P.O. Box 2002	P.O. Box 2000
Atlanta, GA 30348	Allen, TX 75013	Chester, PA 19016
1-800-525-6285	1-888-397-3742	1-800-680-7289
www.equifax.com	www.experian.com	www.transunion.com

You may also place a security freeze on your credit reports. A security freeze prohibits a credit bureau from releasing any information from a consumer's credit report without the consumer's written authorization. However, please be advised that placing a security freeze on your credit report may delay, interfere with, or prevent the timely approval of any requests you make for new loans, credit mortgages, employment, housing, or other services. If you have been a victim of identity theft, and you provide the credit bureau with a valid police report, it cannot charge you to place, lift, or remove a security freeze. In all other cases, a credit bureau may charge you a fee to place, temporarily lift, or permanently remove a security freeze. You will need to place a security freeze separately with each of the three major credit bureaus listed above if you wish to place a freeze on all of your credit files.

To find out more on how to place a security freeze, you can use the following contact information:

Equifax Security Freeze	Experian Security Freeze	TransUnion
P.O. Box 105788	P.O. Box 9554	P.O. Box 2000
Atlanta, GA 30348	Allen, TX 75013	Chester, PA 19016
1-800-685-1111	1-888-397-3742	1-888-909-8872
https://www.freeze.equifax.com	www.experian.com/freeze/center.html	www.transunion.com/securityfreeze

You can also contact the IRS at www.irs.gov/Individuals/Identity-Protection for helpful information and guidance on steps you can take to prevent a fraudulent tax return from being filed in your name and what to do if you become the victim of such fraud. You can also visit www.irs.gov/uac/Taxpayer-Guide-to-Identity-Theft for more information.

You can further educate yourself regarding identity theft, and the steps you can take to protect yourself, by contacting your state Attorney General or the Federal Trade Commission. The Federal Trade Commission also encourages those who discover that their information has been misused to file a complaint with them. The Federal Trade Commission can be reached at: 600 Pennsylvania Avenue, NW, Washington, DC 20580; www.ftc.gov/idtheft; 1-877-ID-THEFT (1-877-438-4338); and TTY: 1-866-653-4261. Instances of known or suspected identity theft should be reported to law enforcement, your Attorney General, and the FTC. You can also further educate yourself about placing a fraud alert or security freeze on your credit file by contacting the FTC or your state's Attorney General.

This notice has not been delayed as a result of a law enforcement investigation.

For Maryland residents, the Attorney General can be reached at: 200 St. Paul Place, 16th Floor, Baltimore, MD 21202; 1-888-743-0023; and 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 violators. 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; 1-919-716-6400; and www.ncdoj.gov.

For Rhode Island residents, the Attorney General can be contacted by mail at 150 South Main Street, Providence, RI 02903; by phone at (401) 274-4400; and online at www.riag.ri.gov. Approximately 1,488 Rhode Island residents may have been impacted by this incident.

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COUGHLIN

1275 Drummers Lane, Suite 302
Wayne, Pennsylvania 19087

UNITED STATES POSTAGE
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0000898458 JAN 12 2018
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Iowa Attorney General
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1305 E. Walnut Street
Des Moines, IA 50319

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