



December 22, 2022

Department of Professional & Financial Regulation Bureau of Consumer Credit Protection 35 State House Station Augusta, Maine 04333

Dear Sir or Madam:

We represent Northpoint Mortgage, Inc. ("Northpoint") located at 198 Charlton Road, Suite 4, Sturbridge, MA 01566. We are writing to notify your office of an incident that may affect the security of certain personal information relating to one hundred fourteen (114) Maine 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 Northpoint Mortgage does not waive any rights or defenses regarding the applicability of Maine law, the applicability of the Maine data event notification statute, or personal jurisdiction.

## Nature of the data event

On or about November 29, 2022, Northpoint identified an incident where mortgage loan information relating to certain borrowers may have been sent by employees to another mortgage lender. Upon learning of this incident, Northpoint immediately launched an investigation to determine and confirm the nature and scope of the potential disclosure of personal information. That investigation determined that employees of Northpoint downloaded and shipped certain borrower files from Northpoint's Loan Origination Software the day before they tendered their resignation and emailed the borrower information to their new employer.

The information downloaded by the loan officer and his assistant included name, address, date of birth, Social Security number as well as employment history, asset lists, and credit Bureau data. On or about December 21, 2022, Northpoint sent written notice of this is incident to all affected individuals which includes

approximately 114 Maine Residents. Written notice is being provided in substantially the same form as the letter attached here as **Exhibit A.** 

# Other steps taken or to be taken

Upon discovering the event, Northpoint moved quickly to investigate and respond to the incident, assess the security of Northpoint's systems and to notify potentially affected individuals. As a component of this response, Northpoint also engaged with the former employees and third-party who received the consumer information. Northpoint is not aware of any further disclosure of the personal information, and further has been advised that all transferred data has been removed and deleted.

Northpoint is also providing access to credit monitoring services for 12 months through Experian upon request to individuals whose personal information was potentially affected by this institute incident, at no cost to these individuals.

Northpoint is additionally providing impacted individuals with guidance 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

## **Contact information**

Should you have any questions regarding this notification or other aspects of the data security event please contact us.

Very truly yours

Eric J. Uhl

David P. Ginzer



December 20, 2022

Name Street City, State Zip

Dear Name,

At Northpoint Mortgage we take the security of your information seriously and want to let you know about an isolated incident related to your personal financial information. The purpose of this letter is to provide you with details, explain the services we are offering to you to monitor your financial information going forward, and to let you know that we continue to take significant measures to protect your information.

On or about November 21, 2022, a licensed Mortgage Loan Originator with whom you were, or had previously, conducted business, accessed your data and caused it to be exported to another lender where the Loan Originator intended to take up employment. Upon learning of the incident, Northpoint promptly commenced an internal investigation and was able to determine that the incident impacted your loan application information. That loan application information may include information such as your name, address, date of birth, social security number, as well as employment history, asset lists, and credit bureau data. Although this information was removed from Northpoint's systems, we do not believe this information has been further compromised. The now former employee and company the data was shared with are cooperating to destroy the data permanently and irrevocably. At this time, we do not have any indication that your information has been further compromised.

To protect you from any potential misuse of your information moving forward, we would like to offer you a complementary 12-month membership with Experian credit monitoring. To activate your membership and start monitoring your personal information please follow the steps below:

- Ensure that you enroll by: 03/31/2023 (Your code will not work after this date.)
- **Visit** the Experian IdentityWorks website to enroll: https://www.experianidworks.com/credit
- Provide your activation code:

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 877.890.9332 by 03/31/2022. Be prepared to provide **engagement number B082927** as proof of eligibility for the identity restoration services by Experian.



#### ADDITIONAL DETAILS REGARDING YOUR 12-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 agents 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.
- Up to \$1 Million Identity Theft Insurance\*\*: Provides coverage for certain costs and unauthorized electronic fund transfers.

If you believe there was fraudulent use of your information and would like to discuss how you may be able to resolve those issues, please reach out to an Experian agent at 877.890.9332. 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 (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).

Even though we have no indication that your personal information has been used to commit fraud or otherwise further compromised, we would also like to provide you with other precautionary measures you can take to protect your personal information, including placing a fraud alert and or security freeze on your credit files and obtaining a free credit report. In addition, you should always remain vigilant in reviewing all your financial account statements for fraudulent or irregular activity.

Please be assured that we continually review our security policies and procedures with all our employees. We truly apologize for any inconvenience or worry this issue may cause you. We have addressed it with all the parties involved and reiterated the requirements and importance of handling and safeguarding customer information as well as following established policy.

We sincerely regret that this situation occurred. If you have any further questions or concerns regarding this incident or the attached information on how to protect your personal information, please reach out directly to our Compliance & Risk Officer, Robert Mildish at 207-558-1880 x130.

<sup>\*</sup> Offline members will be eligible to call for additional reports quarterly after enrolling

<sup>\*\*</sup> 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.



## **Other Important Information**

Please contact the National Credit Bureaus for any specific requirements or instructions to place, lift or remove a credit freeze. Each credit bureau has specific requirements for placing, lifting, or removing a freeze.

Equifax Security Freeze P.O. Box 105788 Atlanta, GA 30348 1-800-349-9960 myequifax.com

P.O. Box 9554
Allen, TX 75013
1-888-397-3742
experian.com

Transunion Security Freeze P.O. Box 160 Woodlyn, PA 19094 1-800-916-8800 transunion.com

### **Free Annual Credit Report**

You may receive a free annual credit report at www.annualcreditreport.com, by calling 877-322-8228 or in the mail by writing to Annual Credit Report Request Service, P.O. Box 105281, Atlanta, GA 30348-5281.

## Placing a Fraud Alert on Your Credit File

Whether or not you choose to use the complimentary 12-month credit monitoring services, you may still choose to place an initial one-year "Fraud Alert" on your credit files, at no charge. A fraud alert tells creditors to contact you personally before they open any new accounts. For instructions on how to place a fraud alert, call, write or visit the websites of all three major credit reporting agencies.