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## RECEIVED

JAN 19 2021

**CONSUMER PROTECTION** 

# VIA U.S. MAIL

Attorney General Gordon MacDonald Office of the Attorney General 33 Capitol Street Concord, NH 03301

## Re: Frame It Easy – Incident Notification

Dear Attorney General MacDonald:

McDonald Hopkins PLC represents Frame It Easy. I am writing to provide notification of an incident at Frame It Easy that may affect the security of personal information of approximately 27 New Hampshire residents. Frame It Easy's investigation is ongoing, and this notification will be supplemented with any new or significant facts or findings subsequent to this submission, if any. By providing this notice, Frame It Easy does not waive any rights or defenses regarding the applicability of New Hampshire law or personal jurisdiction.

January 7, 2021

Frame It Easy recently discovered that its e-commerce website was modified with malicious code that acted to capture payment card data as it was entered on the website in connection with a purchase. Frame It Easy immediately engaged external forensic investigators and data privacy professionals and commenced a prompt and thorough investigation into the incident. As a result of this review, Frame It Easy determined that the payment card information potentially accessed and/or acquired related to transactions made through its online store between October 29, 2020 – November 13, 2020. The information that may have been accessed and/or acquired in this incident included customer names, credit or debit card numbers, card expiration dates and CVVs (3 or 4 digit codes on the front or back of the cards). Frame It Easy discovered on December 3, 2020 that the affected residents completed transactions at its website during the window of compromise and their card information may be at risk. Frame It Easy does not store card data on its website; rather, this data was taken during the individual transaction(s).

Out of an abundance of caution, Frame It Easy wanted to inform you (and the affected residents) of the incident and to explain the steps that it is taking to help safeguard the affected residents against identity fraud. Frame It Easy is providing the affected residents with written notification of this incident commencing on or about January 8, 2021 in substantially the same form as the letter attached hereto. Frame It Easy is advising the affected residents about the process for placing fraud alerts and/or security freezes on their credit files and obtaining free credit reports. The affected residents are being advised to contact their financial institutions to

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inquire whether new cards should be issued to them. The affected residents are also being provided with the contact information for the consumer reporting agencies and the Federal Trade Commission.

At Frame It Easy, protecting the privacy of personal information is a top priority. Frame It Easy has implemented enhanced security safeguards to help protect against similar intrusions. Frame It Easy is also conducting ongoing monitoring of its website to ensure that it is secure and cleared of any malicious activity.

Should you have any questions regarding this notification, please contact me at (248) 220-1356 or dpaluzzi@mcdonaldhopkins.com. Thank you for your cooperation.

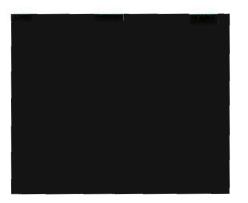
Sincerely,

Dominic A. Paluzzi

Encl.



Return Mail Processing Center P.O. Box 6336 Portland, OR 97228-6336



#### Dear

We are writing to make you aware of a recent data security incident involving potential unauthorized access to some of our customers' payment card data used at *www.FrameItEasy.com*. The privacy and security of your personal information is of utmost importance to Frame It Easy and we are routinely evaluating and improving our security and payment systems to ensure your information is secure.

#### What Happened?

We recently discovered that our e-commerce website was modified with malicious code that acted to capture payment card data as it was entered on the website in connection with a purchase. We immediately engaged external forensic investigators and data privacy professionals and commenced a prompt and thorough investigation into the incident. As a result of this review, we determined that the payment card information potentially accessed and/or acquired was related to transactions made through our online store between October 29, 2020 – November 13, 2020.

### What Information Was Involved?

The information that may have been accessed and/or acquired in this incident included customer name, credit or debit card number, card expiration date and CVV (3 or 4 digit code on the front or back of the card). We discovered on December 3, 2020 that you completed a transaction at our website during the window of compromise and the following card information may be at risk:

We do not store card data on our website; rather, this data was taken during the individual transaction(s).

#### What We Are Doing

Because we value our relationship with you, we wanted to make you aware of the incident. We also wanted to let you know what we are doing to further secure your information, and suggest steps you can take. Since learning of the incident, we have implemented enhanced security safeguards to help protect against similar intrusions. We are also conducting ongoing monitoring of our website to ensure that it is secure and cleared of any malicious activity.

#### What You Can Do

Below you will find precautionary measures you can take to protect your personal information. Additionally, you should always remain vigilant in reviewing your financial account statements for fraudulent or irregular activity on a regular basis.

As a best practice, you should also call your bank or card issuer if you see any suspicious transactions. The policies of the payment card brands such as Visa, MasterCard, American Express and Discover provide that you are not liable for any unauthorized charges if you report them in a timely manner. You should also ask your bank or card issuer whether a new card should be issued to you.

### For More Information

Your trust is a top priority for Frame It Easy and we deeply regret the inconvenience this may have caused. The privacy and protection of our customers' information is a matter we take seriously.

If you have any further questions regarding this incident, please call our dedicated and confidential toll-free response line to respond to questions at the state of the stat

Thank you,

Frame It Easy

#### - OTHER IMPORTANT INFORMATION -

#### 1. Placing a Fraud Alert.

You may 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. To place a fraud alert, call any <u>one</u> of the three major credit bureaus at the numbers listed below. As soon as one credit bureau confirms your fraud alert, they will notify the others.

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

#### 2. Consider Placing a Security Freeze on Your Credit File.

If you are very concerned about becoming a victim of fraud or identity theft, you may request a "Security Freeze" be placed on your credit file, at no charge. A security freeze prohibits, with certain specific exceptions, the consumer reporting agencies from releasing your credit report or any information from it without your express authorization. You may place a security freeze on your credit report by contacting <u>all three</u> nationwide credit reporting companies at the numbers below and following the stated directions or by sending a request in writing, by mail, to <u>all three</u> credit reporting companies:

Equifax Security Freeze	<b>Experian Security Freeze</b>	<b>TransUnion Security Freeze</b>
PO Box 105788	PO Box 9554	P.O. Box 2000
Atlanta, GA 30348	Allen, TX 75013	Chester, PA 19016
https://www.freeze.equifax.com 1-800-349-9960	http://experian.com/freeze 1-888-397-3742	http://www.transunion.com/securityfreeze 1-888-909-8872
1-800-349-9900	1-000-39/-3/42	1-000-909-0072

In order to place the security freeze, 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 company will send you a confirmation letter containing 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.

If your personal information has been used to file a false tax return, to open an account or to attempt to open an account in your name or to commit fraud or other crimes against you, you may file a police report in the City in which you currently reside.

#### 3. Obtaining a Free Credit Report.

Under federal law, you are entitled to one free credit report every 12 months from <u>each</u> of the above three major nationwide credit reporting companies. Call **1-877-322-8228** or request your free credit reports online at **www.annualcreditreport.com**. Once you receive your credit reports, review them for discrepancies. Identify any accounts you did not open or inquiries from creditors that you did not authorize. Verify all information is correct. If you have questions or notice incorrect information, contact the credit reporting company.

#### 4. Additional Helpful Resources.

Even if you do not find any suspicious activity on your initial credit reports, the Federal Trade Commission (FTC) recommends that you check your credit reports periodically. Checking your credit report periodically can help you spot problems and address them quickly.

If you find suspicious activity on your credit reports or have reason to believe your information is being misused, call your local law enforcement agency and file a police report. Be sure to obtain a copy of the police report, as many creditors will want the information it contains to absolve you of the fraudulent debts. You may also file a complaint with the FTC by contacting them on the web at www.ftc.gov/idtheft, by phone at 1-877-IDTHEFT (1-877-438-4338), or by mail at Federal Trade Commission, Consumer Response Center, 600 Pennsylvania Avenue, NW, Washington, DC 20580. Your complaint will be added to the FTC's Identity Theft Data Clearinghouse, where it will be accessible to law enforcement for their investigations. In addition, you may obtain information from the FTC about fraud alerts and security freezes.