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# **BakerHostetler**

#### AUG 17 2018

# CONSUMER PROTECTION Baker & Hostetler LLP

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August 16, 2018

#### VIA OVERNIGHT MAIL

Joseph Foster Office of the Attorney General 33 Capitol St Concord, NH 03301

Re:

Incident Notification

Dear Attorney General Foster:

On behalf of our client, LA Fashion Enterprise LTD ("LA Fashion"), we are writing to notify you of a security incident involving one New Hampshire resident.

On May 15, 2018, LA Fashion was made aware by payment card networks of patterns of unauthorized charges occurring on payment cards after they were legitimately used at its ecommerce website, www.lasula.co.uk. Upon learning this, LA Fashion immediately hired a leading cybersecurity firm to assist in its investigation. On June 4, 2018, LA Fashion learned that an unauthorized third party may have obtained access to the servers that operate its website and installed malware designed to access payment card data.

On June 28, 2018, findings from the investigation show that an unauthorized third party could have captured information as it was being entered on the site during the checkout process for orders placed from December 7, 2017 to May 22, 2018. The information that may have been affected includes customers' names, addresses, email addresses, payment card numbers, expiration dates, and security codes (CVV).

LA Fashion notified potentially affected customers by email on July 19, 2018. Additionally, commencing today, LA Fashion is mailing a notification letter to one New Hampshire resident in accordance with N.H. Rev. Stat. Ann. § 359-C:20 in substantially the same form as the attached letter. LA Fashion has provided contact information for potentially affected individuals to contact with questions. LA Fashion is also recommending that potentially

Joseph Foster August 16, 2018 Page 2

affected individuals remain vigilant to the possibility of fraud by reviewing their account statements and credit reports over the last 12 months for unauthorized activity.

LA Fashion takes the privacy and protection of personal information very seriously. To help prevent this type of incident from happening again, LA Fashion has remediated the ecommerce website and continues to work to strengthen the security of its e-commerce website.

Please do not hesitate to contact me if you have any questions regarding this matter.

Sincerely,

Gerald J. Ferguson

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Partner

**Enclosure** 



C/O GCG PO Box 10623 Dublin OH, 43017-9232

[First Name] [Last Name] [Address Line 1] [Address Line 2]

August 16, 2018

Dear [First Name] [Last Name],

At Lasula, we regard the privacy of your personal information to be of the utmost importance and we continue to do all that we can to ensure that your data is protected from improper disclosure to others. We are writing to provide some additional information regarding an incident we previously notified you about on 19 July 2018. This notice describes the incident in further detail and provides some steps you can take to further protect your information.

On 15 May 2018, we were made aware by payment card networks of patterns of unauthorized charges occurring on payment cards after they were legitimately used at our e-commerce website, www.lasula.co.uk. Upon learning this, we immediately began an investigation and hired a leading cybersecurity firm to assist.

The investigation determined that an unauthorized third party may have obtained access to the servers that operate our website and installed malware designed to access payment card data. On 28 June 2018, findings from the investigation show that an unauthorized third party could have captured information as it was being entered on the site during the checkout process for orders placed from 7 December 2017 to 22 May 2018. The information that may have been affected included your name, address, email address, payment card number, expiration date, and security code (CVV).

We remind you to remain vigilant to the possibility of fraud by reviewing your account statements over the last 12 months for any unauthorized activity. You should immediately report any unauthorized charges to your financial institution because the payment card network rules generally state that cardholders are not responsible for fraudulent charges that are timely reported. You should also review the additional information on the following page.

Again, we apologize most sincerely for this situation and wish to express our regret for any distress or inconvenience that it may cause you. To help prevent this type of incident from happening again, we have remediated the e-commerce website and continue to work to strengthen the security of our website. If you have any questions, or you need further assistance, please email <u>Secure@lasula.co.uk</u> or call +44 (161) 745-8698.

Sincerely,

Lasula Data Team

### MORE INFORMATION ON WAYS TO PROTECT YOURSELF

We remind you to remain vigilant for incidents of fraud or identity theft by reviewing your account statements and free credit reports for any unauthorized activity. You may obtain a copy of your credit report, free of charge, once every 12 months from each of the three nationwide credit reporting companies. To order your annual free credit report, please visit <a href="https://www.annualcreditreport.com">www.annualcreditreport.com</a> or call toll free at 1-877-322-8228. Contact information for the three nationwide credit reporting companies is as follows:

Equifax, PO Box 740241, Atlanta, GA 30374, <a href="https://www.equifax.com">www.equifax.com</a>, 1-800-685-1111 Experian, PO Box 2002, Allen, TX 75013, <a href="https://www.experian.com">www.experian.com</a>, 1-888-397-3742 Trans Union, PO Box 2000, Chester, PA 19016, <a href="https://www.transunion.com">www.transunion.com</a>, 1-800-916-8800

If you believe you are the victim of identity theft or have reason to believe your personal information has been misused, you should immediately contact the Federal Trade Commission and/or the Attorney General's office in your state. You can obtain information from these sources about steps an individual can take to avoid identity theft as well as information about fraud alerts and security freezes. You should also contact your local law enforcement authorities and file a police report. Obtain a copy of the police report in case you are asked to provide copies to creditors to correct your records. Contact information for the Federal Trade Commission is as follows:

Federal Trade Commission, Consumer Response Center, 600 Pennsylvania Avenue, NW Washington, DC 20580, 1-877-IDTHEFT (438-4338), <a href="https://www.ftc.gov/idtheft">www.ftc.gov/idtheft</a>

If you are a resident of Connecticut, Maryland, North Carolina or Rhode Island, you may contact and obtain information from your state attorney general at:

Connecticut Attorney General's Office, 55 Elm Street, Hartford, CT 06106, 1-860-808-5318, www.ct.gcv/ag

Maryland Attorney General's Office, 200 St. Paul Place, Baltimore, MD 21202, <a href="www.oag.state.rid.üs">www.oag.state.rid.üs</a>, 1-888-743-0023 (toll free when calling within Maryland) 1-410-576-6300 (for calls originating outside Maryland)

North Carolina Attorney General's Office, 9001 Mail Service Center, Raleigh, NC 27699, <a href="https://www.ncdoj.gov">www.ncdoj.gov</a>, 1-877-566-7226

Rhode Island Attorney General's Office, 150 South Main Street, Providence, RI 02903, www.riag.ri.gov, 1-401-274-4400

If you are a resident of Rhode Island, note that pursuant to Rhode Island law, you have the right to file and obtain a copy of any police report. The number of individuals affected by this incident is 34,097.

Fraud Alerts: There are two types of fraud alerts 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.

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.

To place a security freeze on your credit report, you must send a written request to each of the three major reporting agencies by regular, certified, or overnight mail at the addresses below:

Equifax Security Freeze, PO Box 105788, Atlanta, GA 30348, <a href="www.equifax.com">www.equifax.com</a>
Experian Security Freeze, PO Box 9554, Allen, TX 75013, <a href="www.experian.com">www.experian.com</a>
TransUnion Security Freeze, PO Box 2000, Chester, PA 19016, <a href="www.transunion.com">www.transunion.com</a>

In order to request a security freeze, you will need to provide the following information:

- 1. Your full name (including middle initial as well as Jr., Sr., II, III, etc.)
- 2. Social Security number
- 3. Date of birth
- 4. If you have moved in the past five (5) years, provide the addresses where you have lived over the prior 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, military identification, etc.)
- 7. If you are a victim of identity theft, include a copy of the police report, investigative report, or complaint to a law enforcement agency concerning identity theft

The credit reporting agencies have three (3) business days after receiving your request to place a security freeze on your credit report. The credit bureaus must also send written confirmation to you within five (5) business days and provide you with a unique personal identification number ("PIN") or password or both that can be used by you to authorize the removal or lifting of the security freeze.

To lift the security freeze in order to allow a specific entity or individual access to your credit report, you must call or send a written request to the credit reporting agencies by mail and include proper identification (name, address, and Social Security number) and the PIN number or password provided to you when you placed the security freeze as well as the identity of those entities or individuals you would like to receive your credit report or the specific period of time you want the credit report available. The credit reporting agencies have three (3) business days after receiving your request to lift the security freeze for those identified entities or for the specified period of time.

To remove the security freeze, you must send a written request to each of the three credit bureaus by mail and include proper identification (name, address, and Social Security number) and the PIN number or password provided to you when you placed the security freeze. The credit bureaus have three (3) business days after receiving your request to remove the security freeze.

Fair Credit Reporting Act: You also have rights under the federal Fair Credit Reporting Act, which promotes the accuracy, fairness, and privacy of information in the files of consumer reporting agencies. The FTC has published a list of the primary rights created by the FCRA (https://www.consumer.ftc.gov/articles/pdf-0096-fair-credit-reporting-act.pdf), and that article refers individuals seeking more information to visit www.ftc.gov/credit. The FTC's list of FCRA rights includes:

- You have the right to receive a copy of your credit report. The copy of your report must contain all the information in your file at the time of your request.
- Each of the nationwide credit reporting companies Equifax, Experian, and TransUnion is required to provide you with a free copy of your credit report, at your request, once every 12 months.
- You are also entitled to a free report if a company takes adverse action against you, like denying your application for credit, insurance, or employment, and you ask for your report within 60 days of receiving notice of the action. The notice will give you the name, address, and phone number of the credit reporting company. You're also entitled to one free report a year if you're unemployed and plan to look for a job within 60 days; if you're on welfare; or if your report is inaccurate because of fraud, including identity theft.
- You have the right to ask for a credit score.
- You have the right to dispute incomplete or inaccurate information.
- 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. And you must give your consent for reports to be provided to employers.
- You may limit "prescreened" offers of credit and insurance you get based on information in your credit report.
- · You may seek damages from violators.
- Identity theft victims and active duty military personnel have additional rights.