January 21, 2022

## Via E-Mail

Consumer Protection Bureau
Office of the Attorney General
33 Capitol Street
Concord, NH 03301
DOJ-CPB@doj.nh.gov

To Whom It May Concern:

I write on behalf of Nuna Baby Essentials, Inc. ("Nuna") to provide notice of a security incident potentially affecting 120 New Hampshire residents.

Nuna recently learned that its website contained malicious code, apparently from March 26, 2020 until the website underwent a previously planned revamp on April 7, 2021. The code appears to have been designed to send payment card information that users entered into the payment page of Nuna's website to an unauthorized third party. Nuna's investigation determined, on December 22, 2021, that the payment card information submitted by the New Hampshire residents — including payment card number, expiration date, and CCV/CVV code — may have been compromised as a result of this incident.

Please note that we have received no information indicating that the personal information of the New Hampshire residents has actually been misused. Nevertheless, out of an abundance of caution, we will send a notification to all potentially affected New Hampshire residents on January 21, 2022, along with an offer of identity theft protection services at no cost to them. A template copy of the notification sent to New Hampshire residents is attached to this letter.

We have also contacted law enforcement regarding this incident and will cooperate in their investigations.

If you have any questions concerning this matter, please do not hesitate to contact our counsel Ms. Zoe Argento at 303.362.2876 or <a href="mailto:ZArgento@littler.com">ZArgento@littler.com</a>.

Very truly yours,

Sally Chu

Group Compliance Officer Nuna Baby Essentials, Inc.



[NAME] [MAILING ADDRESS] [CITY], [STATE] [ZIP]

January 21, 2022

## Dear [NAME],

Nuna Baby Essentials, Inc. ("Nuna") values its customers and is committed to protecting your personal information. Unfortunately, we are writing to inform you of an information security incident that could potentially affect you, and to share with you the steps that Nuna is taking to address it.

On December 22, 2021, Nuna discovered that malicious code was on its website from March 26, 2020 until the website underwent a previously planned revamp on April 7, 2021. Upon learning of the incident, Nuna immediately investigated. This investigation determined that the payment card information you submitted to Nuna's website — including payment card number, expiration date, CCV/CVV code, and billing and shipping address — may have been compromised as a result of this incident.

Please note that we have no information indicating that your personal information has actually been misused. We also want to emphasize that Nuna does not collect other personal information about its customers on its website, such as Social Security number, personal identification number (PIN), drivers' license number, or banking information.

Nevertheless, out of an abundance of caution, Nuna is offering you one year of identity protection services, <u>at no cost to you</u>, through Experian, one of the three nationwide credit bureaus. Your one-year membership in Experian's IdentityWorks<sup>SM</sup> product provides identity restoration services, fraud detection tools, and other benefits, which include monitoring your Experian credit file.

Starting today, you can call Experian's identity restoration agents to assist you to investigate and resolve any incidents of fraud. You may take advantage of this benefit, at any time, until April 30, 2023, by calling Experian at 1-877-288-8057. No enrollment or activation is necessary. The terms and conditions for identity restoration are located at: <a href="https://www.experianIDWorks.com/restoration">www.experianIDWorks.com/restoration</a>.

While identity restoration is immediately available to you, we also encourage you to activate the fraud detection tools available through IdentityWorks<sup>SM</sup>. This product provides you with identity detection, credit monitoring, and resolution of identity theft.

If you wish to enroll in IdentityWorks<sup>SM</sup>, you will need to do the following:

- **1. Visit** the IdentityWorks<sup>SM</sup> web site: <a href="https://www.experianidworks.com/credit">https://www.experianidworks.com/credit</a> or call 1-877-288-8057 to enroll and provide Engagement Number [Number].
- 2. PROVIDE your Activation Code: [Activation Code].

Enrollment Deadline: April 30, 2022 (your Activation Code will not work after this date).

If you have any questions concerning IdentityWorks<sup>SM</sup>, or if you prefer to enroll by telephone for delivery of your membership via US mail, please call Experian at **1-877-288-8057**. Be prepared to provide Engagement Number **[Number]** as proof of eligibility for the identity protection product by Experian.

In addition to the offer of IdentityWorks<sup>SM</sup>, we have included with this letter additional information on steps you can take to protect the security of your personal information. We urge you to review this information carefully.

Nuna takes seriously both the security of your payment card information and this incident, and as such, please be assured that Nuna is taking steps to prevent a recurrence. We are in the process of reviewing our already robust information security safeguards to identify ways to enhance them. We also have reported this incident to law enforcement and will cooperate with their investigations.

Nuna sincerely apologizes for this incident and regrets any inconvenience it may cause you. Should you have any questions or concerns regarding this incident, please do not hesitate to contact us at (855) 686-2891.

Sincerely,

Nate Saint President

Nuna Baby Essentials, Inc.

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## **Steps To Protect The Security Of Your Personal Information**

By taking the following steps, you can help reduce the risk that your personal information may be misused.

- **1**. **Enroll in IdentityWorks<sup>SM</sup>**. You must personally activate identity monitoring for it to be effective. The notice letter contains instructions and information on how to activate your IdentityWorks<sup>SM</sup> membership. Experian's IdentityWorks<sup>SM</sup> product will provide the following:
  - **Experian credit report at signup**: See what information is associated with your credit file. Daily credit reports are available for online members only<sup>1</sup>.
  - Credit Monitoring: Actively monitors your credit files at Experian for indicators of fraud.
  - Identity Restoration: Identity restoration specialists are immediately available to help you
    address credit and non-credit related fraud.
  - Experian IdentityWorks<sup>SM</sup> ExtendCARE: You will receive the same high level of identity restoration support even after your IdentityWorks<sup>SM</sup> membership expires.
  - \$1 Million Identity Theft Insurance<sup>2</sup>: Provides coverage for certain costs and unauthorized electronic fund transfers.

Please direct questions about the IdentityWorks<sup>SM</sup> product to Experian. A credit card is not required for enrollment in IdentityWorks<sup>SM</sup>. Enrollment in IdentityWorks<sup>SM</sup> will not affect your credit score. The Terms and Conditions for this offer are located at <a href="https://www.experianlowerks.com/restoration">www.experianlowerks.com/restoration</a>.

- 2. Review your credit reports. You can receive free credit reports by placing a fraud alert. Under federal law, you also are entitled every 12 months to one free copy of your credit report from each of the three national credit bureaus. To obtain a free annual credit report, go to <a href="https://www.annualcreditreport.com">www.annualcreditreport.com</a> or call 1-877-322-8228. You may wish to stagger your requests so that you receive a free report from one of the three credit bureaus every four months. Errors in this information may be signs of possible identity theft. You should notify the consumer reporting agencies of any inaccuracies in your report, whether due to error or fraud, as soon as possible so the information can be investigated and, if found to be in error, corrected.
- **3. Review your account statements.** You should carefully review for suspicious activity the statements that you receive from credit card companies, banks, utilities, and other services.
- **4. Remain vigilant and respond to suspicious activity.** If you receive an e-mail or mail alert from Experian, contact an IdentityWorks<sup>SM</sup> identity resolution agent toll-free at 1-877-288-8057 or visit <a href="https://www.ExperianIDWorks.com/restoration">www.ExperianIDWorks.com/restoration</a> for additional information. If you notice suspicious activity on an account statement, for example a purchase you did not make or an account you did not open, report it to your payment card company or merchant. You can use the number on the card to report fraudulent activity to the payment card company. You should also consider reporting such activity to Nuna, your local police department, your state's attorney general, and the Federal Trade Commission.

<sup>&</sup>lt;sup>1</sup> Offline members will be eligible to call for additional reports quarterly after enrolling.

<sup>&</sup>lt;sup>2</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.

**5.** You have the right to place a "security freeze" on your credit report. A security freeze will prohibit a consumer reporting agency from releasing information in your credit file without your express authorization. The security freeze is designed to prevent credit, loans, and services from being approved in your name without your consent. Please understand that placing a security freeze on your credit file may delay, interfere with, or prevent the timely approval of any subsequent request or application you make for a new loan, mortgage, or any other account involving the extension of credit.

A security freeze does not apply to a person or entity, or its affiliates, or collection agencies acting on behalf of the person or entity, with which you have an existing account that requests information in your credit report for the purposes of reviewing or collecting the account. Reviewing the account includes activities related to account maintenance, monitoring, credit line increases, and account upgrades and enhancements.

To place a security freeze on your credit file, contact the three nationwide credit bureaus, listed below. You will need to provide appropriate proof of your identity to the credit bureau, which will include your name, address, date of birth, Social Security number, and other personal information. After receiving your freeze request, each credit bureau will provide you with 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.

The contact information for all three credit bureaus is as follows:

 Equifax
 Experian
 TransUnion

 P.O. Box 105788
 P.O. Box 9554
 P.O. Box 160

 Atlanta, GA 30348
 Allen, TX 75013
 Woodlyn, PA 19094

 1-888-298-0045
 1-888-397-3742
 1-888-909-8872

 www.equifax.com
 www.experian.com
 www.transunion.com

**6. Consider placing a fraud alert with one of the three nationwide credit bureaus.** You can place an initial fraud alert by contacting one of the three nationwide credit bureaus listed above. A fraud alert can make it more difficult for someone to get credit in your name because it tells creditors to follow certain procedures to protect you. It also may delay your ability to obtain credit. You may place a fraud alert in your file by calling just one of the three nationwide credit bureaus listed above. As soon as that bureau processes your fraud alert, it will notify the other two, which then also must place fraud alerts in your file.

An initial fraud alert stays in your file for at least one year. To place this alert, a credit bureau will require you to provide appropriate proof of your identity, which may include your Social Security number. If you are the victim of identity theft, you are entitled to an extended fraud alert, which is a fraud alert lasting seven years.

An initial fraud alert entitles you to a copy of all the information in your file at each of the three nationwide credit bureaus listed above. These additional disclosures may help you detect signs of fraud, for example, whether fraudulent accounts have been opened in your name or whether someone has reported a change in your address.

**7. Additional Information.** You may obtain information about fraud alerts and security freezes and additional information about steps you can take to avoid identity theft from the following: Identity Theft Clearinghouse, Federal Trade Commission, 600 Pennsylvania Avenue, NW, Washington, DC 20580; <a href="http://www.ftc.gov/idtheft/">http://www.ftc.gov/idtheft/</a>; (877) IDTHEFT (438-4338).