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October 25, 2018

# **VIA EMAIL**

Attorney General Gordon MacDonald Office of the Attorney General New Hampshire Department of Justice 33 Capitol Street Concord, NH 03301

Email: <a href="mailto:DOJ-CPB@doj.nh.gov">DOJ-CPB@doj.nh.gov</a>

Re: Notification of Data Security Incident

Dear Attorney General MacDonald:

We represent STL International, Inc. d/b/a Teeter ("Teeter") in connection with a recent data security incident which is described in greater detail below. Teeter takes the security and privacy of the personal information within its control very seriously and is taking steps to prevent a similar incident from occurring in the future.

### 1. Nature of the security incident.

On September 13, 2018, Teeter discovered that malicious code had been installed on the Teeter e-commerce web platform. As soon as Teeter discovered the incident, Teeter took immediate steps to remove the malicious code and to secure all payment card information. Teeter also launched an investigation and retained a leading forensics firm to determine what happened and whether customer payment card information had been accessed or acquired without authorization. The incident appears to have impacted payment card information (names, card numbers, expiration dates, and security codes) belonging to customers who utilized the Teeter e-commerce web platform to purchase products from April 11, 2018 to September 13, 2018. Teeter only recently identified the individuals impacted as a result of this data security incident.

# 2. Number of New Hampshire residents affected.

Teeter notified 78 New Hampshire residents regarding this data security incident. Notification letters were mailed via electronic mail on a rolling basis between October 22, 2018 and October 25, 2018. A sample copy of the letter is enclosed.

### 3. Steps taken relating to the incident.

Teeter has taken affirmative steps to prevent a similar situation from arising in the future and to protect the privacy and security of all information in its possession. In addition to the steps described above, Teeter is working with the United States Secret Service to hold the perpetrators

of this incident accountable. Teeter also reported the matter to the payment card brands in order to protect customer payment card information and prevent fraudulent activity. Finally, Teeter has taken steps to enhance the security of customer information and the Teeter e-commerce web platform in order to prevent similar incidents from occurring in the future.

### 4. Contact information.

Teeter is dedicated to protecting the sensitive information that is in its control. If you have any questions or need additional information, please do not hesitate to contact me at (720)292-2052, or by e-mail at <a href="mailto:Alyssa.Watzman@LewisBrisbois.com">Alyssa.Watzman@LewisBrisbois.com</a>.

Sincerely,

/s/ Alyssa R. Watzman

Alyssa R. Watzman of LEWIS BRISBOIS BISGAARD & SMITH LLP

**Enclosure** 



## <<Date>>

```
<<First Name>> <<Last Name>>
<<Address1>>
<<Address2>>
<<City>>, <<State>> <<Zip Code>>
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Subject: Notice of Data Breach

Dear <<First Name>> <<Last Name>>:

I am writing to inform you of a data security incident that may have affected your payment card information. At Teeter, we take the privacy and security of your information very seriously and regret any concern that this incident may cause you. That is why we are contacting you and informing you about steps that can be taken to help protect your information.

**What Happened?** On September 13, 2018, we discovered that malicious code had been installed on the Teeter e-commerce web platform. As soon as we discovered the incident, we took immediate steps to remove the malicious code and to secure all payment card information. We also launched an investigation and retained a leading forensics firm to determine what happened and whether customer payment card information had been accessed or acquired without authorization. This letter serves to inform you of the incident and to share with you steps that you can take to help protect your information.

**What Information Was Involved?** We believe that the malware could have comprised payment card information belonging to customers who utilized our e-commerce web platform to purchase products from April 11, 2018 to September 13, 2018. The affected payment card information may have included names, card numbers, expiration dates, and security codes.

What Are We Doing? As soon as Teeter discovered the incident, we took the steps described above. We are also working with the United States Secret Service in an attempt to hold the perpetrators accountable. In addition, we reported the matter to the payment card brands in order to protect your payment card information and prevent fraudulent activity. We are also providing you with information about steps that you can take to help protect your personal information. Finally, we take the security of all information that we store in our systems very seriously and have taken steps to enhance the security of Teeter customer information and our e-commerce web platform in order to prevent similar incidents from occurring in the future.

**What You Can Do:** You can follow the recommendations on the following page to protect your personal information. We recommend that you review your current and past credit and debit card account statements for discrepancies or unusual activity. If you see anything that you do not understand or that looks suspicious, or if you suspect that any fraudulent transactions have taken place, you should call the bank that issued the credit or debit card immediately.

**For More Information:** Further information about how to protect your personal information appears on the following page. If you have questions please call << Phone Number>>.

Thank you for your loyalty to Teeter and your patience through this incident. We take your trust in us and this matter very seriously. Please accept our sincere apologies and know that we deeply regret any worry or inconvenience that this may cause you.

Sincerely,

<<Insert Signature>>

Rick Tigges Chief Financial Officer

#### STEPS YOU CAN TAKE TO FURTHER PROTECT YOUR INFORMATION

**Review Your Account Statements and Notify Law Enforcement of Suspicious Activity:** As a precautionary measure, we recommend that you remain vigilant and review your account statements and credit reports closely. If you detect any suspicious activity on an account, you should promptly notify the financial institution or company with which the account is maintained. You should also promptly report any fraudulent activity or any suspected incidence of identity theft to proper law enforcement authorities, your state attorney general, and/or the Federal Trade Commission (the "FTC").

**Copy of Credit Report:** You may obtain a free copy of your credit report from each of the three major credit reporting agencies once every 12 months by visiting <a href="http://www.annualcreditreport.com/">http://www.annualcreditreport.com/</a>, calling toll-free 877-322-8228, or by completing an Annual Credit Report Request Form and mailing it to Annual Credit Report Request Service, P.O. Box 105281, Atlanta, GA 30348. You can also contact one of the following three national credit reporting agencies:

Equifax	Experian	TransUnion	Free Annual Report
P.O. Box 105851	P.O. Box 9532	P.O. Box 1000	P.O. Box 105281
Atlanta, GA 30348	Allen, TX 75013	Chester, PA 19016	Atlanta, GA 30348
1-800-525-6285	1-888-397-3742	1-877-322-8228	1-877-322-8228
www.equifax.com	www.experian.com	www.transunion.com	www.annualcreditreport.com

**Fraud Alert:** You may want to consider placing a fraud alert on your credit report. An initial fraud alert is free and will stay on your credit file for at least 90 days. The alert informs creditors of possible fraudulent activity within your report and requests that the creditor contact you prior to establishing any accounts in your name. To place a fraud alert on your credit report, contact any of the three credit reporting agencies identified above. Additional information is available at <a href="http://www.annualcreditreport.com">http://www.annualcreditreport.com</a>.

**Security Freeze:** In some U.S. states, you have the right to put a security freeze on your credit file. This will prevent new credit from being opened in your name without the use of a PIN number that is issued to you when you initiate the freeze. A security freeze is designed to prevent potential creditors from accessing your credit report without your consent. As a result, using a security freeze may interfere with or delay your ability to obtain credit. You must separately place a security freeze on your credit file with each credit reporting agency. If you request a security freeze from a consumer reporting agency there may be a fee up to \$10 to place, lift or remove the security freeze. In order to place a security freeze, you may be required to provide the consumer reporting agency with information that identifies you including your full name, Social Security number, date of birth, current and previous addresses, a copy of your state-issued identification card, and a recent utility bill, bank statement or insurance statement.

**Additional Free Resources**: You can obtain information from the consumer reporting agencies, the FTC or from your respective state Attorney General about steps you can take toward preventing identity theft. You may report suspected identity theft to local law enforcement, including to the FTC or to the Attorney General in your state. Residents of Maryland, North Carolina, and Rhode Island can obtain more information from their Attorneys General using the contact information below.

Federal Trade	Maryland Attorney	North Carolina Attorney	Rhode Island
Commission	General	General	Attorney General
600 Pennsylvania Ave, NW	200 St. Paul Place	9001 Mail Service Center	150 South Main Street
Washington, DC 20580	Baltimore, MD 21202	Raleigh, NC 27699	Providence, RI 02903
consumer.ftc.gov, and	oag.state.md.us	ncdoj.gov	http://www.riag.ri.gov
www.ftc.gov/idtheft	1-888-743-0023	1-877-566-7226	401-274-4400
1-877-438-4338			

You also have certain rights under the Fair Credit Reporting Act (FCRA): These rights include knowing what is in your file; disputing incomplete or inaccurate information; and requiring consumer reporting agencies correct or delete inaccurate, incomplete, or unverifiable information. For more information about the FCRA, please visit https://www.consumer.ftc.gov/articles/pdf-0096-fair-credit-reporting-act.pdf.