## STATE OF NH DEPT OF JUSTICE

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# BakerHostetler

### Baker&Hostetler LLP

312 Walnut Street Suite 3200 Cincinnati, OH 45202-4074

T 513.929.3400 F 513.929.0303 www.bakerlaw.com

Craig A. Hoffman direct dial: 513.929.3491 choffman@bakerlaw.com

August 17, 2015

## VIA OVERNIGHT DELIVERY

Office of the Attorney General 33 Capitol Street Concord, NH 03301 Attn: Attorney General Joseph Foster

Re: Incident Notification

Dear Attorney General Foster:

Our client, Totally Promotional, understands the importance of the privacy and confidentiality of the personal information provided by its customers. On July 6, 2015, Totally Promotional received calls from some of its customers who used payment cards on its website and then saw unauthorized charges on their cards. Totally Promotional immediately began an investigation and engaged a computer security firm to investigate. Based on the investigation, Totally Promotional believes that an unauthorized individual may have accessed customer information from June 23, 2015 to July 10, 2015. This information may include customers' names, mailing and email addresses, payment card account numbers, expiration dates and verification codes. Totally Promotional stopped the attack.

Totally Promotional began notifying potentially affected customers by email on August 13, 2015 and by mail on August 14, 2015. Totally Promotional provided those customers with additional information on steps that can be taken to protect their information. Totally Promotional is providing a telephone number and email address that potentially affected customers can contact with questions. Totally Promotional is also recommending that potentially affected customers remain vigilant by reviewing their account statements and credit reports for unauthorized activity.

Atlanta Chicago Houston Los Angeles Cincinnati New York Cleveland Orlando Columbus Philadelphia Costa Mesa Denver Seattle Washington, DC Attorney General Joseph Foster August 17, 2015 Page 2

In addition to stopping the attack, Totally Promotional has taken additional actions to strengthen and enhance the security of its system and conducted a review of its practices, policies, and procedures, and implemented enhanced measures to prevent something like this from happening in the future.

Notification was sent to 14 New Hampshire residents pursuant to New Hampshire statute in substantially the same form enclosed with this letter.

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

Sincerely,

Craig A. Hoffman

**Enclosure** 



08/13/2015

Dear Valued Customer,

Totally Promotional values your business and respects the privacy of your information, which is why, as a precautionary measure, we are writing to let you know about a data security incident that may involve your credit card information.

Totally Promotional recently learned that cyber criminals forced their way into our systems, gaining access to some customer credit card information. As a part of the ongoing investigation, it was also determined that certain customer information including names, mailing addresses, and email addresses were also taken.

Totally Promotional values your privacy and deeply regrets that this incident occurred. Once the issue became known, our IT Department moved swiftly to address the problem. We have actively taken steps to guard against something like this happening again. We have done the following in the wake of this situation:

- 1. Hired a team of data security experts to investigate how this happened.
- 2. Closed the access point that the cyber attackers used and removed the malware they left behind.
- 3. Submitted to a series of internal and external security audits.
- 4. Communicated that our customers will have zero liability for any fraudulent charges arising from this breach of information.

The company also is working closely with all major credit card suppliers to ensure the incident is properly addressed.

We have compiled an informative letter entitled Steps You Can Take to Further Protect Your Information which provides further information on steps you can take to protect your information.

Sincerely,

Thomas R Casad

Thomas R. Casad, President, Totally Promotional

## 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 by reviewing 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 also should 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.

To file a complaint with the FTC, go to www.ftc.gov/idtheft or call 1-877-ID-THEFT (877-438-4338). Complaints filed with the FTC will be added to the FTC's Identity Theft Data Clearinghouse, which is a database made available to law enforcement agencies.

#### 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 http://www.annualcreditreport.com, 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 print a copy of the request form at

https://www.annualcreditreport.com/cra/requestformfinal.pdf.

Or you can elect to purchase a copy of your credit report by contacting one of the three national credit reporting agencies. Contact information for the three national credit reporting agencies for the purpose of requesting a copy of your credit report or for general inquiries is provided below:

Equifax (800) 685-1111 www.equifax.com P.O. Box 740241 Atlanta, GA 30374 Experian (888) 397-3742 www.experian.com 535 Anton Blvd., Suite 100 Costa Mesa, CA 92626 TransUnion (800) 916-8800 www.transunion.com P.O. Box 6790 Fullerton, CA 92834

#### FRAUD ALER

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 http://www.annualcreditreport.com.

## STEPS YOU CAN TAKE TO FURTHER PROTECT YOUR INFORMATION

#### SECURITY FREEZE

In some US 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. [Additionally, if you request a security freeze from a consumer reporting agency there may be a fee up to \$5 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 ON IDENTITY THEFT

You may wish to review the tips provided by the Federal Trade Commission on how to avoid identity theft. For more information, please visit http://www.ftc.gov/idtheft or call 1-877-ID-THEFT (877-438-4338). [A copy of Taking Charge: What to Do if Your Identity is Stolen, a comprehensive guide from the FTC to help you guard against and deal with identity theft, can be found on the FTC's website athttp://www.ftc.gov/bcp/edu/pubs/consumer/idtheft/idt04.shtm.]

[Maryland residents may also wish to review information provided by the Maryland Attorney General on how to avoid identity theft at http://www.oag.state.md.us/idtheft, or by sending an email to idtheft@oag.statemd.us, or calling 410-576-6491.]

[North Carolina residents may wish to review information provided by the North Carolina Attorney General at http://www.ncdoj.gov, by calling 877-566-7226, or writing to 9001 Mail Service Center, Raleigh, NC 27699.]