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COUGHLIN_{LLC}
ATTORNEYS AT LAW

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JAN 22 2019

CONSUMER PROTECTION

Paul T. McGurkin, Jr.
Office: 267-930-4788
Fax: 267-930-4771
Email: pmcgurkin@mullen.law

1275 Drummers Lane, Suite 302
Wayne, PA 19087

January 17, 2019

VIA U.S. MAIL

Attorney General Gordon J. MacDonald
Office of the New Hampshire Attorney General
Attn: Security Breach Notification
33 Capitol Street
Concord, NH 03301

Re: Notice of Data Security Incident

Dear Attorney General MacDonald:

We represent Aetrex Worldwide, Inc. ("Aetrex"), located at 414 Alfred Avenue, Teaneck, NJ 07666. We are writing to notify your office of an incident that may affect the security of personal information relating to ninety-one (91) New Hampshire residents. The investigation into this matter is ongoing, and this notice will be supplemented with any new significant facts learned subsequent to its submission. By providing this notice, Aetrex does not waive any rights or defenses regarding the applicability of New Hampshire law, the applicability of the New Hampshire data event notification statute, or personal jurisdiction.

Nature of the Data Event

Aetrex was recently contacted by representatives of the credit card industry regarding potential fraud related to credit cards used on its website. Aetrex immediately launched an internal investigation and hired a third party forensic investigator to determine the nature and scope of the event. On December 13, 2018, the investigation determined that an unauthorized party was able to insert malicious code into Aetrex's website and obtain customer payment card information entered into the website between June 22, 2018 and November 20, 2018, and during a brief period on December 4, 2018. Aetrex compared these dates to its transaction records to determine the identities of customers whose payment card information were used during these time periods. On or around December 17, 2018, Aetrex confirmed the identities of the individuals whose payment card information may have been impacted.

The information that could have been subject to unauthorized access includes cardholder name, address, credit card number, expiration date, and CVV.

Notice to New Hampshire Residents

On January 17, 2019, Aetrex will mail written notice of this incident to all affected individuals, which includes ninety-one (91) New Hampshire residents. Written notice is being provided in substantially the same form as the letter attached here as *Exhibit A*.

Other Steps Taken and To Be Taken

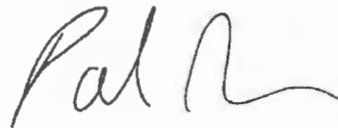
Upon discovering the event, Aetrex moved quickly to investigate and respond to the incident, assess the security of Aetrex systems, and notify potentially affected individuals. Aetrex is also working to implement additional safeguards and training to its employees.

Additionally, Aetrex is providing impacted individuals with guidance on how to better protect against identity theft and fraud, including advising individuals to report any suspected incidents of identity theft or fraud to their credit card company and/or bank. Aetrex is providing individuals with information on how to place a fraud alert and security freeze on one's credit file, information on protecting against tax fraud, the contact details for the national consumer reporting agencies, information on how to obtain a free credit report, a reminder to remain vigilant for incidents of fraud and identity theft by reviewing account statements and monitoring free credit reports, and encouragement to contact the Federal Trade Commission, their state Attorney General, and law enforcement to report attempted or actual identity theft and fraud. Aetrex is also providing written notice of this incident to other state regulators, as necessary.

Contact Information

Should you have any questions regarding this notification or other aspects of the data security event, please contact us at (267) 930-4788.

Very truly yours,



Paul T. McGurkin of
MULLEN COUGHLIN LLC

PTM/plm
Enclosure

EXHIBIT A



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

<<Mail ID>>
<<Name 1>>
<<Name 2>>
<<Address 1>>
<<Address 2>>
<<Address 3>>
<<Address 4>>
<<Address 5>>
<<City>><<State>><<Zip>>
<<Country>>

<<Date>>

Re: Notice of Data Breach

Dear <<Name 1>>:

We value your business and respect the privacy of your information. Aetrex Worldwide, Inc. (“Aetrex”), is writing to let you know about a recent event that may have impacted the privacy of some of your payment card information. We want to provide you with information on the event, the steps we have taken to protect you, and steps you may take to better protect against the possibility of fraud, should you feel it is necessary to do so. This notice does not apply to telephone or non-Internet orders.

What Happened? Aetrex recently was contacted by representatives of the credit card industry regarding potential fraud related to a small number of credit/debit cards that were used on our website. We immediately launched an internal investigation and hired third-party forensic investigators. We determined that an unauthorized third-party was able to insert a malicious code into our website to obtain customer payment card information entered into our website between June 22, 2018, and November 20, 2018, and during a few hours on December 4, 2018, possibly impacting our customers whose payment card information was used during these time periods. On or around December 17, 2018, we confirmed the identities of the individuals whose payment card information may have been impacted.

What Information Was Involved? The information potentially at risk as a result of the event includes the cardholder’s name, address, credit card number, expiration date, and CVV.

What We Are Doing. We take this incident and the security of your information very seriously. We removed the unauthorized code that led to the vulnerability and implemented additional security measures to reduce the likelihood of a similar incident from happening in the future. We are providing this notice to those who may be affected so that they can take steps to prevent against possible fraud, should they feel it is necessary to do so. We will also notify any required state regulators and the credit reporting agencies about this incident.

What You Can Do. You can find out more about how to protect against potential fraud in the enclosed *Steps You Can Take to Better Protect Your Information*. We encourage you to remain vigilant against incidents of fraud by reviewing your credit/debit card account statements regularly and keeping a close eye on your credit card activity. If you see any suspicious activity, please report it to the bank that issued your credit card.

For More Information. If you have additional questions, please call our dedicated assistance line at 877-231-0954, Monday through Friday, from 9:00 am to 9:00 pm, Eastern Time.

We sincerely regret any inconvenience or concern this incident has caused.

Sincerely,

Brad Kinnas
Vice President E-Commerce & Digital Marketing
Aetrex Worldwide, Inc.

STEPS YOU CAN TAKE TO BETTER PROTECT YOUR INFORMATION

We encourage you to remain vigilant against incidents of identity theft and fraud, to review your account statements, and to monitor your credit reports for suspicious activity. Under U.S. law you are entitled to one free credit report annually from each of the three major credit reporting bureaus. To order your free credit report, visit www.annualcreditreport.com or call, toll-free, 1-877-322-8228. You may also contact the three major credit bureaus directly to request a free copy of your credit report.

You have the right to place a “security freeze” on your credit report, which will prohibit a consumer reporting agency from releasing information in your credit report without your express authorization. The security freeze is designed to prevent credit, loans, and services from being approved in your name without your consent. However, you should be aware that using a security freeze to take control over who gets access to the personal and financial information in your credit report may delay, interfere with, or prohibit the timely approval of any subsequent request or application you make regarding a new loan, credit, mortgage, or any other account involving the extension of credit. Pursuant to federal law, you cannot be charged to place or lift a security freeze on your credit report. Should you wish to place a security freeze, please contact the major consumer reporting agencies listed below:

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|---|---|---|
| Experian PO Box 9554 Allen, TX 75013 1-888-397-3742 www.experian.com/freeze/center.html | TransUnion P.O. Box 2000 Chester, PA 19016 1-888-909-8872 www.transunion.com/credit-freeze | Equifax PO Box 105788 Atlanta, GA 30348-5788 1-800-685-1111 www.equifax.com/personal/credit-report-services |
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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 either the police report, investigative report, or complaint to a law enforcement agency concerning identity theft.

As an alternative to a security freeze, you have the right to place an initial or extended “fraud alert” on your file at no cost. An initial fraud alert is a one-year alert that is placed on a consumer’s credit file. Upon seeing a fraud alert display on a consumer’s credit file, a business is required to take steps to verify the consumer’s identity before extending new credit. If you are a victim of identity theft, you are entitled to an extended fraud alert, which is a fraud alert lasting seven years. Should you wish to place a fraud alert, please contact any one of the agencies listed below:

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|---|---|--|
| Experian P.O. Box 2002 Allen, TX 75013 1-888-397-3742 www.experian.com/fraud/center.html | TransUnion P.O. Box 2000 Chester, PA 19016 1-800-680-7289 www.transunion.com/fraud-victim-resource/place-fraud-alert | Equifax P.O. Box 105069 Atlanta, GA 30348 1-888-766-0008 www.equifax.com/personal/credit-report-services |
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You can further educate yourself regarding identity theft, fraud alerts, security freezes, and the steps you can take to protect yourself, by contacting the consumer reporting agencies, the Federal Trade Commission, or your state Attorney General.

The Federal Trade Commission can be reached at: 600 Pennsylvania Avenue NW, Washington, DC 20580, www.identitytheft.gov, 1-877-ID-THEFT (1-877-438-4338); TTY: 1-866-653-4261. The Federal Trade Commission also encourages those who discover that their information has been misused to file a complaint with them. You can obtain further information on how to file such a complaint by way of the contact information listed above. You have the right to file a police report if you ever experience identity theft or fraud. Please note that in order to file a report with law enforcement for identity theft, you will likely need to provide some proof that you have been a victim. Instances of known or suspected identity theft should also be reported to law enforcement and your state Attorney General. This notice has not been delayed by law enforcement.

For North Carolina residents, the Attorney General can be contacted at 9001 Mail Service Center, Raleigh, NC 27699-9001, 1-877-566-7226 or 1-919-716-6400, www.ncdoj.gov.

For Maryland residents, the Attorney General can be contacted at 200 St. Paul Place, 16th Floor, Baltimore, MD 21202, 1-888-743-0023, www.oag.state.md.us.

For New Mexico residents, you have rights pursuant to the Fair Credit Reporting Act, such as the right to be told if information in your credit file has been used against you, the right to know what is in your credit file, the right to ask for your credit score, and the right to dispute incomplete or inaccurate information. Further, pursuant to the Fair Credit Reporting Act, the 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; you must give your consent for credit reports to be provided to employers; you may limit "prescreened" offers of credit and insurance you get based on information in your credit report; and you may seek damages from violators. You may have additional rights under the Fair Credit Reporting Act not summarized here. Identity theft victims and active duty military personnel have specific additional rights pursuant to the Fair Credit Reporting Act. We encourage you to review your rights pursuant to the Fair Credit Reporting Act by visiting www.consumerfinance.gov/f/201504_cfpb_summary_your-rights-under-fcra.pdf, or by writing Consumer Response Center, Room 130-A, Federal Trade Commission, 600 Pennsylvania Ave. N.W., Washington, D.C. 20580.

For Rhode Island Residents: The Rhode Island Attorney General can be reached at: 150 South Main Street, Providence, Rhode Island 02903, www.riag.ri.gov, 1-401-247-4400. Under Rhode Island law, you have the right to obtain any police report filed in regard to this incident. There are 55 Rhode Island residents impacted by this incident.