

April 25, 2023

RECEIVED

MAY 01 2023

VIA U.S. MAIL

John M. Formella
Office of the Attorney General
Consumer Protection Bureau
33 Capitol Street
Concord, NH 03301

CONSUMER PROTECTION

Re: Astral Brands, Inc. – Incident Notification

Dear Mr. Formella:

McDonald Hopkins PLC represents Astral Brands, Inc. (“Astral Brands”). I am writing to provide notification of an incident at Astral Brands that may affect the security of personal information of approximately four (4) New Hampshire residents. Astral Brands’ investigation is ongoing, and this notification will be supplemented with any new or significant facts or findings subsequent to this submission, if any. By providing this notice, Astral Brands does not waive any rights or defenses regarding the applicability of New Hampshire law or personal jurisdiction.

Astral Brands recently detected unauthorized access to its network as a result of a cybersecurity incident that resulted in the potential exposure of data we maintain. Upon learning of this issue, Astral Brands contained the threat by disabling all unauthorized access to its network and restoring its systems as needed. Astral Brands immediately started a thorough investigation of the matter and have been working with external cybersecurity professionals experienced in handling these types of incidents. After an extensive investigation and manual document review, on March 22, 2023, Astral Brands discovered that the unauthorized individual removed certain files from its network between September 16 and September 17, 2022 that may have contained some personal information for 4 New Hampshire residents. Specifically, the impacted data may include information contained within employee personnel files, including but not limited to:

[REDACTED]

Astral Brands wanted to inform you (and the affected residents) of the incident and to explain the steps that it is taking to help safeguard the affected residents against identity fraud. Astral Brands is providing the affected residents with written notification of this incident commencing on or about April 25, 2023 in substantially the same form as the letter attached hereto. Astral Brands is offering residents complimentary one-year membership with a credit monitoring service. Astral Brands will advise the affected residents to always remain vigilant in

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reviewing financial account statements for fraudulent or irregular activity on a regular basis. Astral Brands will advise the affected residents about the process for placing a fraud alert and/or security freeze on their credit files and obtaining free credit reports. The affected residents are also being provided with the contact information for the consumer reporting agencies and the Federal Trade Commission.

At Astral Brands, protecting the privacy of personal information is a top priority. Astral Brands is committed to maintaining the privacy of personal information in its possession and has taken many precautions to safeguard it. Astral Brands continually evaluates and modifies its practices to enhance the security and privacy of the personal information it maintains.

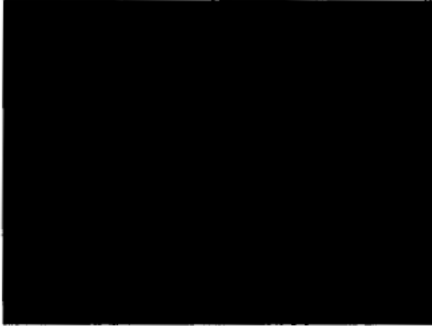
Should you have any questions regarding this notification, please contact me at))
. Thank you for your cooperation.

Sincerely,

Dominic A. Paluzzi



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



Dear 

We are writing with important information regarding a recent security incident. The privacy and security of the personal information we maintain is of the utmost importance to Astral Brands, Inc. ("Astral Brands"). We wanted to provide you with information about the incident, explain the services we are making available to you, and let you know that we continue to take significant measures to protect your personal information.

What Happened?

Astral Brands recently detected unauthorized access to our network as a result of a cybersecurity incident that resulted in the potential exposure of data we maintain.

What We Are Doing

Upon learning of this issue, we contained the threat by disabling all unauthorized access to our network and restoring our systems as needed. We immediately started a thorough investigation of the matter and have been working with external cybersecurity professionals experienced in handling these types of incidents. After an extensive investigation and manual document review, on March 22, 2023, we discovered that the unauthorized individual removed certain files from our network between September 16 and September 17, 2022 that may have contained some of your personal information.

What Information Was Involved

The impacted data may include information contained within your personal file, including but not limited to: your

What You Can Do

We have no reason to believe that your information has been or will be misused as a direct result of this incident. Out of an abundance of caution to protect you from potential misuse of your information, we have arranged for you to enroll, at no cost to you, in an online credit monitoring service (*myTrueIdentity*) for 12 months provided by TransUnion Interactive, a subsidiary of TransUnion®, one of the three nationwide credit reporting companies. For more information on identity theft prevention, including instructions on how to activate your complimentary one-year membership, please see the additional information provided in this letter.

This letter also provides other precautionary measures you can take to protect your information from potential misuse, including placing a fraud alert and/or security freeze on your credit files, and/or obtaining a free credit report. Additionally, you should always remain vigilant in reviewing your financial account statements and credit reports on a regular basis for fraudulent or irregular activity.

For More Information

Please accept our apologies that this incident occurred. We are committed to maintaining the privacy of personal information in our possession and have taken many precautions to safeguard it. We continually evaluate and modify our practices and internal controls to enhance the security and privacy of personal information.

If you have any further questions regarding th [REDACTED] please call our dedicated and confidential toll-free response line that we have set up to respond to questions at [REDACTED]. This response line is staffed with professionals familiar with this incident and knowledgeable on what you can do to protect against misuse of your information. The response line is available Monday through Friday, between the hours of 9:00 am and 9:00 pm, Eastern time.

Sincerely,

Astral Brands, Inc.

- OTHER IMPORTANT INFORMATION -

1. Enrolling in Complimentary 12-Month Credit Monitoring.



Activation Code: [REDACTED]

1-Bureau TransUnion Credit Monitoring Product Offering: (Online and Offline)

As a safeguard, we have arranged for you to enroll, at no cost to you, in an online credit monitoring service (*myTrueIdentity*) for [REDACTED] months provided by TransUnion Interactive, a subsidiary of TransUnion*, one of the three nationwide credit reporting companies.

To enroll in this service, go directly to the *myTrueIdentity* website at www.mytrueidentity.com and in the space referenced as "Enter Activation Code", enter the following unique 12-letter Activation Code [REDACTED] and follow the three steps to receive your credit monitoring service online within minutes.

If you do not have access to the internet and wish to enroll in a similar offline, paper-based credit monitoring service, via U.S. Mail delivery, please call the TransUnion Fraud Response Services toll-free hotline at 1-855-288-5422. When prompted, enter the following 6-digit telephone pass code [REDACTED] and follow the steps to enroll in the offline credit monitoring service, add an initial fraud alert to your credit file, or to speak to a TransUnion representative if you believe you may be a victim of identity theft.

Once you are enrolled, you will be able to obtain [REDACTED] > months of unlimited access to your TransUnion credit report and VantageScore® credit score by TransUnion. The daily credit monitoring service will notify you if there are any critical changes to your credit file at TransUnion*, including fraud alerts, new inquiries, new accounts, new public records, late payments, change of address, and more. The service also includes the ability to lock and unlock your TransUnion credit report online, access to identity restoration services that provide assistance in the event your identity is compromised to help you restore your identity and up to \$1,000,000 in identity theft insurance with no deductible. (Policy limitations and exclusions may apply.)

You can sign up for the *myTrueIdentity* online credit monitoring service anytime between now and [REDACTED]. Due to privacy laws, we cannot register you directly. Please note that credit monitoring services might not be available for individuals who do not have credit file at TransUnion*, or an address in the United States (or its territories) and a valid Social Security number, or who are under the age of 18. Enrolling in this service will not affect your credit score.

If you have questions about your *myTrueIdentity* online credit monitoring benefits or need help with your online enrollment, accessing your credit report, or passing identity verification, please contact the *myTrueIdentity* Customer Service Team toll-free at 1-844-787-4607, Monday-Friday: 8 a.m.-9 p.m., Saturday-Sunday: 8 a.m.-5 p.m. Eastern time.

2. **Placing a Fraud Alert on Your Credit File.**

Whether or not you choose to use the complimentary 12-month credit monitoring services, we recommend that you place an initial one-year "fraud alert" on your credit files, at no charge. A fraud alert tells creditors to contact you personally before they open any new accounts. To place a fraud alert, call any one of the three major credit bureaus at the numbers listed below. As soon as one credit bureau confirms your fraud alert, they will notify the others.

Equifax

P.O. Box 105069
Atlanta, GA 30348-5069
<https://www.equifax.com/personal/credit-report-services/credit-fraud-alerts/>
(800) 525-6285

Experian

P.O. Box 9554
Allen, TX 75013
<https://www.experian.com/fraud/center.html>
(888) 397-3742

TransUnion

Fraud Victim Assistance Department
P.O. Box 2000
Chester, PA 19016-2000
<https://www.transunion.com/fraud-alerts>
(800) 680-7289

3. **Placing a Security Freeze on Your Credit File.**

If you are very concerned about becoming a victim of fraud or identity theft, you may request a "security freeze" be placed on your credit file, at no charge. A security freeze prohibits, with certain specific exceptions, the consumer reporting agencies from releasing your credit report or any information from it without your express authorization. You may place a security freeze on your credit report by contacting all three nationwide credit reporting companies at the numbers below and following the stated directions or by sending a request in writing, by mail, to all three credit reporting companies:

Equifax Security Freeze

P.O. Box 105788
Atlanta, GA 30348
<https://www.equifax.com/personal/credit-report-services/credit-freeze/>
(800) 349-9960
(888) 298-0045

Experian Security Freeze

P.O. Box 9554
Allen, TX 75013
<http://experian.com/freeze>
(888) 397-3742

TransUnion Security Freeze

P.O. Box 160
Woodlyn, PA 19094
<https://www.transunion.com/credit-freeze>
(888) 909-8872

In order to place the security freeze, you'll need to supply your name, address, date of birth, Social Security number and other personal information. After receiving your freeze request, each credit reporting company will send you a confirmation letter containing 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.

If you do place a security freeze *prior* to enrolling in the credit monitoring service as described above, you will need to remove the freeze in order to sign up for the credit monitoring service. After you sign up for the credit monitoring service, you may refreeze your credit file.

4. **Obtaining a Free Credit Report.**

Under federal law, you are entitled to one free credit report every 12 months from each of the above three major nationwide credit reporting companies. Call 1-877-322-8228 or request your free credit reports online at www.annualcreditreport.com. Once you receive your credit reports, review them for discrepancies. Identify any accounts you did not open or inquiries from creditors that you did not authorize. Verify all information is correct. If you have questions or notice incorrect information, contact the credit reporting company.

5. **Additional Helpful Resources.**

Even if you do not find any suspicious activity on your initial credit reports, the Federal Trade Commission (FTC) recommends that you check your credit reports periodically. Checking your credit report periodically can help you spot problems and address them quickly.

If you find suspicious activity on your credit reports or have reason to believe your information is being misused, call your local law enforcement agency and file a police report. Be sure to obtain a copy of the police report, as many creditors will want the information it contains to absolve you of the fraudulent debts. You may also file a complaint with the FTC by contacting them on the web at www.ftc.gov/idtheft, by phone at 1-877-IDTHEFT (1-877-438-4338), or by mail at Federal Trade Commission, Consumer Response Center, 600 Pennsylvania Avenue, NW, Washington, DC 20580. Your complaint will be added to the FTC's Identity Theft Data Clearinghouse, where it will be accessible to law enforcement for their investigations. In addition, you may obtain information from the FTC about fraud alerts and security freezes.

If this notice letter states that your financial account information and/or credit or debit card information was impacted, we recommend that you contact your financial institution to inquire about steps to take to protect your account, including whether you should close your account or obtain a new account number.

If your personal information has been used to file a false tax return, to open an account or to attempt to open an account in your name or to commit fraud or other crimes against you, you may file a police report in the city in which you currently reside.

Iowa Residents: You may contact law enforcement or the Iowa Attorney General's Office to report suspected incidents of identity theft: Office of the Attorney General of Iowa, Consumer Protection Division, Hoover State Office Building, 1305 East Walnut Street, Des Moines, IA 50319, www.iowaattorneygeneral.gov, Telephone: 515-281-5164.

Maryland Residents: You may obtain information about avoiding identity theft from the Maryland Attorney General's Office: Office of the Attorney General of Maryland, Consumer Protection Division, 200 St. Paul Place, Baltimore, MD 21202, www.oag.state.md.us/Consumer, Telephone: 888-743-0023.

New York Residents: You may obtain information about preventing identity theft from the New York Attorney General's Office: Office of the Attorney General, The Capitol, Albany, NY 12224-0341; <https://ag.ny.gov/consumer-frauds-bureau/identity-theft>; Telephone: 800-771-7755.

North Carolina Residents: You may obtain information about preventing identity theft from the North Carolina Attorney General's Office: Office of the Attorney General of North Carolina, Consumer Protection Division, 9001 Mail Service Center, Raleigh, NC 27699-9001, www.ncdoj.gov/, Telephone: 877-566-7226 (Toll-free within North Carolina), 919-716-6000.

Oregon Residents: You may obtain information about preventing identity theft from the Oregon Attorney General's Office: Oregon Department of Justice, 1162 Court Street NE, Salem, OR 97301-4096, www.doj.state.or.us/, Telephone: 877-877-9392.

New Mexico Residents: You have rights under the federal Fair Credit Reporting Act (FCRA). These include, among others, the right to know what is in your file; to dispute incomplete or inaccurate information; and to have consumer reporting agencies correct or delete inaccurate, incomplete, or unverifiable information. For more information about the FCRA, please visit www.consumer.ftc.gov/articles/pdf-0096-fair-credit-reporting-act.pdf or www.ftc.gov.

In Addition, New Mexico Consumers Have the Right to Obtain a Security Freeze or Submit a Declaration of Removal

As noted above, you may obtain a security freeze on your credit report to protect your privacy and ensure that credit is not granted in your name without your knowledge. You may submit a declaration of removal to remove information placed in your credit report as a result of being a victim of identity theft. You have a right to place a security freeze on your credit report or submit a declaration of removal pursuant to the Fair Credit Reporting and Identity Security Act.

The security freeze is designed to prevent credit, loans, and services from being approved in your name without your consent. When you place a security freeze on your credit report, you will be provided with a personal identification number, password, or similar device to use if you choose to remove the freeze on your credit report or to temporarily authorize the release of your credit report to a specific party or parties or for a specific period of time after the freeze is in place. To remove the freeze or to provide authorization for the temporary release of your credit report, you must contact the consumer reporting agency and provide all of the following:

1. The unique personal identification number, password, or similar device provided by the consumer reporting agency;
2. Proper identification to verify your identity; and
3. Information regarding the third party or parties who are to receive the credit report or the period of time for which the credit report may be released to users of the credit report.

A consumer reporting agency that receives a request from a consumer to lift temporarily a freeze on a credit report shall comply with the request no later than three business days after receiving the request. As of September 1, 2008, a consumer reporting agency shall comply with the request within fifteen minutes of receiving the request by a secure electronic method or by telephone.

A security freeze does not apply in all circumstances, such as where you have an existing account relationship and a copy of your credit report is requested by your existing creditor or its agents for certain types of account review, collection, fraud control, or similar activities; for use in setting or adjusting an insurance rate or claim or insurance underwriting; for certain governmental purposes; and for purposes of prescreening as defined in the federal Fair Credit Reporting Act.

If you are actively seeking a new credit, loan, utility, telephone, or insurance account, you should understand that the procedures involved in lifting a security freeze may slow your own applications for credit. You should plan ahead and lift a freeze, either completely if you are shopping around or specifically for a certain creditor, with enough advance notice before you apply for new credit for the lifting to take effect. You should contact a consumer reporting agency and request it to lift the freeze at least three business days before applying. As of September 1, 2008, if you contact a consumer reporting agency by a secure electronic method or by telephone, the consumer reporting agency should lift the freeze within fifteen minutes. You have a right to bring a civil action against a consumer reporting agency that violates your rights under the Fair Credit Reporting and Identity Security Act.

To place a security freeze on your credit report, you must send a request to each of the three major consumer reporting agencies: Equifax, Experian, and TransUnion. You may contact these agencies using the contact information provided above.

Rhode Island Residents: You may contact law enforcement, such as the Rhode Island Attorney General's Office, to report incidents of identity theft or to learn about steps you can take to protect yourself from identity theft. You can contact the Rhode Island Attorney General at: Rhode Island Office of the Attorney General, 150 South Main Street, Providence, RI 02903, www.riag.ri.gov, 401-274-4400.

As noted above, you may obtain a security freeze on your credit report to protect your privacy and ensure that credit is not granted in your name without your knowledge. You have a right to place a "security freeze" on your credit report pursuant to chapter 48 of title 6 of the Identity Theft Prevention Act of 2006.

The security freeze is designed to prevent credit, loans, and services from being approved in your name without your consent. When you place a security freeze on your credit report, within five (5) business days you will be provided a personal identification number or password to use if you choose to remove the freeze on your credit report or to temporarily authorize the release of your credit report for a specific period of time after the freeze is in place. To provide that authorization, you must contact the consumer reporting agency and provide all of the following:

1. The unique personal identification number or password provided by the consumer reporting agency.
2. Proper identification to verify your identity.
3. The proper information regarding the period of time for which the report shall be available to users of the credit report.

A consumer reporting agency that receives a request from a consumer to temporarily lift a freeze on a credit report shall comply with the request no later than three (3) business days after receiving the request.

A security freeze does not apply to circumstances where you have an existing account relationship and a copy of your report is requested by your existing creditor or its agents or affiliates for certain types of an account review, collection, fraud control, or similar activities.

If you are actively seeking a new credit, loan, utility, telephone, or insurance account, you should understand that the procedures involved in lifting a security freeze may slow your own applications for credit. You should plan ahead and lift a freeze -- either completely, if you are shopping around, or specifically for a certain creditor -- with enough advance notice before you apply for new credit for the lifting to take effect.

You have a right to bring a civil action against someone who violates your rights under the credit reporting laws. The action can be brought against a consumer reporting agency or a user of your credit report.

To place a security freeze on your credit report, you must send a request to each of the three major consumer reporting agencies: Equifax, Experian, and TransUnion. These agencies can be contacted using the contact information provided above.

In order to request a security freeze, you may 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. Complete address;
5. Prior addresses;
6. Proof(s) of identification (state driver's license or ID card, military identification, birth certificate, etc.); and
7. If you are a victim of identity theft, a copy of either the police report, investigative report, or complaint to a law enforcement agency concerning identity theft.

There were [REDACTED] Rhode Island residents impacted by this incident.