

# CRAIG, DEACHMAN ASSOCIATES

ATTORNEYS AT LAW

#### VIA EMAIL & REGULAR MAIL

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

Re: Notice of Data Security Incident

Dear Attorney General MacDonald:

This firm represents Atlantic Innovations, LLC (AI) organized in the State of New Hampshire, that operates as an online retailer known as Too Timid with regard to a recent data security incident described in greater detail below. This letter is being sent on behalf of AI because information belonging to New Hampshire residents may have been affected by a recent data security incident.

#### 1. Nature of the security incident.

On December 30, 2020, AI was notified by Shopify of a breach of its customer data. CIG contracts with Shopify to host and manage its e-commerce platform. It was discovered by Shopify that one or possibly two rouge employees accessed and downloaded data belonging to some of AI's customers from New Hampshire. Shopify has notified the appropriate federal authorities and has informed AI that, to date, their investigation has determined that the data accessed by the employee(s) was limited to names, email address, order history and last four digits of the credit card used. While it is not the practice of AI or Too Timid to collect other substantive personal information beyond account numbers, there is no indication that such financial account information may have been affected by the incident nor has Shopify notified AI of any misuse of any data.

#### 2. Number of New Hampshire residents affected.

Approximately 1,681 residents of New Hampshire may have been affected by this incident. As of the date of this letter AI through is online platform, Too Timid, has or will be notifying the potentially affected New Hampshire residents by Friday January 15, 2021 via email. A sample copy of the notification email is being provided with this correspondence.

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## 3. Steps taken relating to the incident.

AI continues to work with Shopify to address any other security issues but for all purposes hereunder it appears this was a onetime incident orchestrated by employees and not from an outside the company cyber-attack. Nevertheless, AI and Too Timid have examined its own safeguards to determine what improvements could be made to its data security and their e-commerce infrastructure.

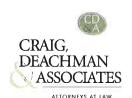
### 4. Contact Information.

AI remains dedicated to protecting the personal information in its control and committed to working with Shopify to ensure that personal date will remain secure. If you have any questions or need additional information, please do not hesitate to contact me at (603)665-9111 or by e-mail at <a href="mailto:mvanzanten@cda-law.com">mvanzanten@cda-law.com</a>.

Should you have any questions or other concerns please do not hesitate to contact me. Thank you.

MVZ/bms

Enclosure CC: Client



#### <Sample Notice>

To our valued customer,

Too Timid makes every effort to address the ever-increasing risk of cybercrime. In spite of these efforts, we are reaching out to you to let you know that Shopify, the company that hosts and manages our e-commerce platform, recently informed us of a security breach incident. Based on available evidence Shopify has determined that the breach occurred on or about April 10, 2020. Shopify is a well-known all-in-one ecommerce platform provider not only for Too Timid, but also manages well over 1 million well known branded websites.

This incident was not the result of a technical vulnerability in Shopify's platform but rather, the unauthorized conduct of rogue support agents. Shopify terminated the individuals' access to Shopify's network, launched an investigation, referred the matter to law enforcement, and implemented additional security measures on our platform.

Shopify has indicated that this incident was limited to names, addresses, emails, product orders and just the last 4-digits of the credit card used. We have been assured by Shopify that your full payment details, including the full card number, expiration data and security codes, were not compromised by this security breach incident. Shopify has also communicated with us that TooTimid is not alone in this incident. You may be receiving notifications from other ecommerce retailers that you've shopped with online. The heart of TooTimid.com is in protecting your privacy and earning your trust. So it is important that we let you know that we are working hard with Shopify to obtain additional details about the investigation and handling of this matter. We will continue to work with Shopify, to ensure that they are taking the necessary steps to prevent an incident like this one from recurring again in the future. They have assured us that they have notified the appropriate law enforcement agencies and we have no reason to believe that any other data was obtained.

Please see our FAQ Page with information about this incident, and we will continue to update this page with new information from Shopify as we are updated. Shopify has complete confidence that any orders our customers place on our site are safe and secure.

As consumers ourselves, we value your trust in us tremendously and want you to know we are here for you. If you have any questions, please feel free to contact us at helpdesk@tootimid.com and we will be sure to respond to your questions in a timely manner.

Thank you,

**TooTimid** 

