

KOLEY ■ JESSEN

July 7, 2023

**VIA EMAIL TO: DOJ-CPB@DOJ.NH.GOV**

Consumer Protection Bureau  
Office of the Attorney General New Hampshire Department of Justice  
33 Capitol Street  
Concord, NH 03301

RE: Notice of Vendor Data Security Incident Relating to New Hampshire Residents

Dear Attorney General Formella:

In accordance with New Hampshire's data breach notification statute (N.H. Rev. Stat. § 359-C:20, as amended), I hereby inform you that my client, Barton Cotton Religious Products & Services, LLC, received notification from its e-commerce platform vendor CommerceV3 on June 6, 2023, that, between November 24, 2021 and December 14, 2022, an unauthorized party obtained access to CommerceV3's systems. When CommerceV3 learned of the unauthorized access, it conducted a forensic investigation with the assistance of third-party cybersecurity specialists to assess whether any cardholder data was compromised as a result of the incident. On May 3, 2023, CommerceV3's investigation revealed that cardholder data collected on RPS's behalf was potentially accessed or acquired as a result of the incident.

Seventeen (17) New Hampshire residents may have been affected as a result of the incident. The types of personal information that may have been accessed included

RPS sent out notification letters to affected New Hampshire residents on June 30, 2023. A copy of the notification letter sent to residents is enclosed herewith.

If your office requires any further information regarding this matter, please contact me at

Sincerely,

Maureen E. Fulton

Enclosure

June 30, 2023

## **NOTICE OF DATA BREACH**

Dear Valued Customer:

Barton Cotton Religious Products & Services (“RPS”) values your business and respects the privacy of your information, which is why we are writing to let you know about a data security incident suffered by our third party vendor, an e-commerce platform owned and operated by CommerceV3, Inc. (“CommerceV3”), which may have involved your personal information. We are writing to provide you with information regarding the incident and steps you can take to protect your personal information.

### **WHAT IS COMMERCEV3?**

CommerceV3 is a e-commerce platform vendor we use to receive our customers’ payment card information when placing an order on our Religious Products and Services website, located at <http://rps.bartoncotton.com>.

### **WHAT HAPPENED?**

CommerceV3 notified RPS on June 6, 2023, that, between November 24, 2021 and December 14, 2022, an unauthorized party obtained access to CommerceV3’s systems. When CommerceV3 learned of the unauthorized access, it conducted a forensic investigation with the assistance of third-party cybersecurity specialists to assess whether any cardholder data was compromised as a result of the incident. On May 3, 2023, CommerceV3’s investigation revealed that cardholder data collected on RPS’s behalf was potentially accessed or acquired as a result of the incident.

### **WHAT INFORMATION WAS INVOLVED?**

The data potentially accessed and/or acquired as a result of the incident included your

### **WHAT WE ARE DOING**

CommerceV3 worked alongside the major card brands and banks during its forensic investigation. In response to the incident, CommerceV3 has implemented additional security measures designed to protect the privacy of its customers. RPS continues to work alongside CommerceV3 to ensure the security and privacy of your personal information remains a top priority.

### **WHAT YOU CAN DO**

Please review the attachment to this letter (Steps You Can Take to Further Protect Your Information) for further information on steps you can take to protect your information. The attachment provides precautionary measures you can take to protect your personal information, including placing a fraud alert and security freeze on your credit files, and obtaining a free credit report. Additionally, you should always remain vigilant in reviewing your financial account statements and credit reports for fraudulent or irregular activity on a regular basis.

### **FOR MORE INFORMATION**

Thank you for your patience and understanding. For further information and assistance, please contact the Religious Products and Services Call Center at \_\_\_\_\_ between 09:00 am - 05:00 am ET daily.

Sincerely,

Diane Dotterweich  
Vice President, Catholic Fundraising  
Barton Cotton Religious Products & Services, LLC  
3030 Waterview Avenue  
Baltimore, MD 21230

## Steps You Can Take to Further Protect Your Information

- **Consider Placing a Fraud Alert on Your Credit File**

You may 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

- **Consider 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. Using a security freeze may interfere with or delay your ability to apply for a new credit card, wireless phone, or any service that requires a credit check.

- **Obtain and Monitor Your Credit Report**

We recommend that you 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 1-877-322-

8228, or by completing an Annual Credit Report Request Form and mailing it to Annual Credit Report Request Service, P.O. Box 105283, Atlanta, GA 30348. You can access the request form at <https://www.annualcreditreport.com/requestReport/requestForm.action>. 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. Even if you do not find any suspicious activity on your initial credit reports, the Federal Trade Commission recommends that you check your credit reports periodically. Checking your credit report periodically can help you spot problems and address them quickly.

- **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, including your local law enforcement agency to file a police report, the state attorney general and the Federal Trade Commission. 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 [IdentityTheft.gov](http://IdentityTheft.gov), 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. For more information, please visit [IdentityTheft.gov](http://IdentityTheft.gov) or call 1-877-ID-THEFT (877-438-4338).

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.

### **State-Specific Notices**

**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](http://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](http://www.oag.state.md.us/Consumer), Telephone: 888-743-0023.

**Massachusetts Residents:** Under Massachusetts law, you have the right to obtain a police report in regard to this incident. If you are the victim of identity theft, you also have the right to file a police report and obtain a copy of it.

**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/](http://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/](http://www.doj.state.or.us/), Telephone: 877-877-9392

**Washington D.C. Residents:** You may obtain information about preventing identity theft from the Office of the Attorney General for the District of Columbia, 400 6th Street NW, Washington D.C. 20001, <https://oag.dc.gov/consumer-protection>, Telephone: 202-442-9828.

**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](http://www.consumer.ftc.gov/articles/pdf-0096-fair-credit-reporting-act.pdf) or [www.ftc.gov](http://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](http://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.);
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 13 Rhode Island residents impacted by this incident.