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MAR 25 2019

CHARITABLE TRUSTS UNIT

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March 22, 2019

VIA OVERNIGHT MAIL

Joseph Foster
Office of the Attorney General
33 Capitol St
Concord, NH 03301

Re: Incident Notification

Dear Attorney General Foster:

We are writing on behalf of Brighton Collectibles, LLC (“Brighton”) to notify you of a security incident involving 12 New Hampshire residents.

Brighton was recently notified by Torrey Commerce (“Torrey”), a contracted vendor that processes credit card transactions, that it was the target of a cybersecurity attack that resulted in the exposure of personal information of Brighton customers. The unauthorized individual may have gained access to the website Brighton used to process credit card transactions between January 28, 2019 and February 15, 2019. Since learning of the incident, Brighton has been working with Torrey to secure the information. A thorough investigation has been conducted by a forensic investigation firm to determine what happened, who was impacted and what information may have been affected. Based on this investigation, it was determined that some personal information was potentially accessible, including names, addresses, and payment card information.

On March 22, 2019, Brighton began mailing written notifications to potentially affected individuals by U.S. Mail, including 12 New Hampshire residents who are being notified of the incident in writing in accordance with N.H. Rev. Stat. Ann. § 359-C:20 in substantially the same form as the document enclosed herewith.¹ Brighton has provided a telephone number for potentially affected individuals to call with any questions they may have.

¹This report does not constitute a waiver of the Brighton’s objection that New Hampshire lacks personal jurisdiction over this matter.

Joseph Foster
March 22, 2019
Page 2

Brighton is working with Torrey to help prevent a similar incident and enhance existing security protocols, including implementing robust data security procedures.

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

Sincerely,

M. Scott Koller

M. Scott Koller
Partner

Enclosure



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>>

Dear <<Name 1>>:

Securing and protecting your confidential information is a top priority for Brighton Collectibles and it is a responsibility that we take very seriously. Regrettably, I am writing to inform you of an incident involving some of that information.

What Happened

On March 7, 2019, we learned that an unauthorized individual may have gained access to the website we used to process credit card transactions between January 28, 2019 and February 15, 2019. When we first learned of this incident, we took immediate steps to secure the information. A thorough investigation was conducted by a forensic investigation firm to determine what happened, who was impacted and what information may have been affected. We wanted to let you know this occurred and to assure you we take it very seriously.

What Information Was Involved

Information entered on our website during the checkout process between January 28, 2019 and February 15, 2019 may have been accessed. This information may include your name, payment card number ending in <<Last 4 Card #>>, expiration date, and security code.

What We Are Doing

Securing customers' information is a top priority and we have worked swiftly to address this issue. To further protect customer information, we are taking steps to enhance our existing security protocols including implementing robust data security procedures.

What You Can Do

Although we have no evidence that any of your information has been misused, you should always remain vigilant for incidents of fraud or identity theft by reviewing your free credit reports for any unauthorized activity. You should review your payment card account statements closely and report any unauthorized charges to your card issuer immediately because card network rules generally provide that cardholders are not responsible for unauthorized charges that are reported promptly. The phone number to call is usually on the back of your payment card. Please see the section that follows this notice for additional steps you may take to protect your information.

For More Information

Your confidence and trust are important to us, and we apologize for and deeply regret any inconvenience or concern this may cause. If you have any questions, please call 877-253-3605 Monday through Friday from 6:00 a.m. to 6:00 p.m. Pacific Time.

Sincerely,

Brighton Executive Management

Additional Steps You Can Take

We recommend that you remain vigilant for incidents of fraud or identity theft by reviewing your account statements and free credit reports for any unauthorized activity. You may obtain a copy of your credit report, free of charge, once every 12 months from each of the three nationwide credit reporting companies. To order your annual free credit report, please visit www.annualcreditreport.com or call toll free at 1-877-322-8228. Contact information for the three nationwide credit reporting companies is as follows:

Equifax, PO Box 740241, Atlanta, GA 30374, www.equifax.com, 1-800-685-1111
Experian, PO Box 2002, Allen, TX 75013, www.experian.com, 1-888-397-3742
TransUnion, PO Box 2000, Chester, PA 19016, www.transunion.com, 1-800-916-8800

If you believe you are the victim of identity theft or have reason to believe your personal information has been misused, you should immediately contact the Federal Trade Commission and/or the Attorney General's office in your state. You can obtain information from these sources about steps an individual can take to avoid identity theft as well as information about fraud alerts and security freezes. You should also contact your local law enforcement authorities and file a police report. Obtain a copy of the police report in case you are asked to provide copies to creditors to correct your records. Contact information for the Federal Trade Commission is as follows:

Federal Trade Commission, Consumer Response Center, 600 Pennsylvania Avenue NW, Washington, DC 20580, 1-877-IDTHEFT (438-4338), www.ftc.gov/idtheft

If you are a resident of Connecticut, Maryland, or North Carolina, you may contact and obtain information from your state attorney general at:

Connecticut Attorney General's Office, 55 Elm Street, Hartford, CT 06106, 1-860-808-5318, www.ct.gov/ag

Maryland Attorney General's Office, 200 St. Paul Place, Baltimore, MD 21202, www.oag.state.md.us, 1-888-743-0023 (toll free when calling within Maryland) (410) 576-6300 (for calls originating outside Maryland)

North Carolina Attorney General's Office, 9001 Mail Service Center, Raleigh, NC 27699, www.ncdoj.gov, 1-877-566-7226

Fraud Alerts: There are two types of fraud alerts you can place on your credit report to put your creditors on notice that you may be a victim of fraud—an initial alert and an extended alert. You may ask that an initial fraud alert be placed on your credit report if you suspect you have been, or are about to be, a victim of identity theft. An initial fraud alert stays on your credit report for at least 90 days. You may have an extended alert placed on your credit report if you have already been a victim of identity theft with the appropriate documentary proof. An extended fraud alert stays on your credit report for seven years. You can place a fraud alert on your credit report by contacting any of the three national credit reporting agencies.

Credit Freezes: You may have the right to put a credit freeze, also known as a security freeze, on your credit file, free of charge, so that no new credit can be opened in your name without the use of a PIN number that is issued to you when you initiate a freeze. A credit freeze is designed to prevent potential credit grantors from accessing your credit report without your consent. If you place a credit freeze, potential creditors and other third parties will not be able to get access to your credit report unless you temporarily lift the freeze. Therefore, using a credit freeze may delay your ability to obtain credit. There is no fee to place or lift a credit freeze. Unlike a fraud alert, you must separately place a credit freeze on your credit file at each credit reporting company. Since the instructions for how to establish a credit freeze differ from state to state, please contact the three major credit reporting companies as specified below to find out more information.

To place a security freeze on your credit report, you must submit a request through a toll-free telephone number, a secure electronic system maintained by the credit reporting agency, or by sending a written request via regular, certified, or overnight mail. To place a security freeze on your credit report, contact each of the credit reporting agencies at the addresses below:

Experian Security Freeze, PO Box 9554, Allen, TX 75013, www.experian.com
TransUnion Security Freeze, PO Box 2000, Chester, PA 19016, www.transunion.com
Equifax Security Freeze, PO Box 105788, Atlanta, GA 30348, www.equifax.com

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 the police report, investigative report, or complaint to a law enforcement agency concerning identity theft

The credit reporting agencies have one (1) business day after receiving your request by toll-free telephone or secure electronic means, or three (3) business days after receiving your request by mail, to place a security freeze on your credit report. The credit bureaus must also send written confirmation to you within five (5) business days and provide you with a unique personal identification number ("PIN") or password or both that can be used by you to authorize the removal or lifting of the security freeze.

To lift the security freeze in order to allow a specific entity or individual access to your credit report, or to lift a security freeze for a specified period of time, you must submit a request through a toll-free telephone number, a secure electronic system maintained by a credit reporting agency, or by sending a written request via regular, certified, or overnight mail to the credit reporting agencies and include proper identification (name, address, and Social Security number) and the PIN number or password provided to you when you placed the security freeze as well as the identity of those entities or individuals you would like to receive your credit report or the specific period of time you want the credit report available. The credit reporting agencies have one (1) business day after receiving your request by toll-free telephone or secure electronic means, or three (3) business days after receiving your request by mail, to lift the security freeze for those identified entities or for the specified period of time.

To remove the security freeze, you must submit a request through a toll-free telephone number, a secure electronic system maintained by a credit reporting agency, or by sending a written request via regular, certified, or overnight mail to each of the three credit bureaus and include proper identification (name, address, and Social Security number) and the PIN number or password provided to you when you placed the security freeze. The credit bureaus have one (1) business day after receiving your request by toll-free telephone or secure electronic means, or three (3) business days after receiving your request by mail, to remove the security freeze.

Fair Credit Reporting Act: You also have rights under the federal Fair Credit Reporting Act, which promotes the accuracy, fairness, and privacy of information in the files of consumer reporting agencies. The FTC has published a list of the primary rights created by the FCRA (<https://www.consumer.ftc.gov/articles/pdf-0096-fair-credit-reporting-act.pdf>), and that article refers individuals seeking more information to visit www.ftc.gov/credit. The FTC's list of FCRA rights includes:

- You have the right to receive a copy of your credit report. The copy of your report must contain all the information in your file at the time of your request.
- Each of the nationwide credit reporting companies – Equifax, Experian, and TransUnion – is required to provide you with a free copy of your credit report, at your request, once every 12 months.
- You are also entitled to a free report if a company takes adverse action against you, like denying your application for credit, insurance, or employment, and you ask for your report within 60 days of receiving notice of the action. The notice will give you the name, address, and phone number of the credit reporting company. You're also entitled to one free report a year if you're unemployed and plan to look for a job within 60 days; if you're on welfare; or if your report is inaccurate because of fraud, including identity theft.
- You have the right to ask for a credit score.
- You have the right to dispute incomplete or inaccurate information.
- 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 reports to be provided to employers.
- You may limit "prescreened" offers of credit and insurance you get based on information in your credit report.
- You may seek damages from violators.
- Identity theft victims and active duty military personnel have additional rights.