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January 15, 2019

WRITER'S DIRECT NUMBER: (317) 236-2391 DIRECT FAX: (317) 592-4736 EMAIL: <u>Stephen.Reynolds@icemiller.com</u>

CONFIDENTIAL

Via Certified Mail

Consumer Protection Bureau Office of the New Hampshire Attorney General Attn: Security Breach Notification 33 Capitol Street Concord, NH 03301 Phone: (603) 271-3643 Fax: (603) 271-2110

RE: Written Notification of a Security Breach



Dear Sirs:

On behalf of my client, Century Spring Corp. ("Century Spring"), I am hereby submitting written notification of security breach, in compliance with N.H. Rev. Stat. §§ 359-C:20(I)(b).

On September 28, 2018, Century Spring received information about possible unauthorized modifications to Century Spring's online ordering website. Century Spring began investigating and hired a leading computer security and forensics firm to assist with the investigation. Century Spring identified that an unauthorized party modified its online ordering website to collect certain customer information without authorization. Century Spring removed the unauthorized modification, took further measures to secure its online ordering website, and reported the incident to payment card networks. On November 26, 2018, the investigation determined what information was collected and that the time period the unauthorized modification affected Century Spring's online ordering website was from July 13, 2018 through October 2, 2018. The information that may have been collected included customers' order information—specifically, first and last name, billing address, email address, telephone number, credit card number, expiration date, and card security code (CVV2).

At this time, we believe the security incident may have involved unauthorized access to the information of seventeen (17) New Hampshire residents. A copy of the notice that was mailed to impacted residents on January 8, 2019, is enclosed herewith.

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If you require further information about this matter, please contact me by telephone at (317) 236-2391 or via email at stephen.reynolds@icemiller.com.

Very truly yours,

ICE MILLER LLP

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Stephen E. Reynolds

Enclosure: Copy of Notice



Century Spring Corp 5959 Triumph Street Commerce, CA 90040

January 8, 2019



NOTICE OF DATA BREACH

Dear Sample A Sample,

We are writing to inform you of a security incident which may have involved some of your personal information. We take the privacy and security of your personal information seriously and for this reason want you to understand what we are doing to address this issue and what steps you can take to protect yourself.

What Happened

On September 28, 2018, we received information about possible unauthorized modifications to our online ordering website. We began investigating and hired a leading computer security and forensics firm to assist with the investigation. We identified that an unauthorized user modified our online ordering website to collect certain customer information without authorization. We removed the unauthorized modification, took further measures to secure our online ordering website, and reported the incident to payment card networks. On November 26, 2018, the investigation determined what information was collected and the time period that the unauthorized modification affected our online ordering website.

What Information Was Involved

The information that may have been collected included customers' order information—specifically, first and last name, billing address, email address, telephone number, credit card number, expiration date, and card security code (CVV2). The information would have been collected for any orders placed on our online ordering website between July 13, 2018, and October 2, 2018. We are notifying you because you placed one or more orders during this period and your information may have been collected, including your payment card used to place the order(s).

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What We Are Doing

When we first learned of this activity on September 28, 2018, we launched an internal investigation. We also hired a computer security and forensics firm to conduct a forensics investigation of our website. On October 2, 2018, we removed the unauthorized modification. We have also taken steps to further restrict and monitor access to our online ordering website and enhanced our online ordering website security procedures.

What You Can Do

We encourage you to remain vigilant in monitoring your account statements and transactions for incidents of fraud and identity theft, and to promptly report such incidents. You should immediately report any such charges to the financial institution that issued your payment card. Generally, cardholders are not responsible for unauthorized charges that are reported in a timely manner. You may reach your financial institution via the phone number on the back of your payment card.

If your payment card used to place an order during this time period has already been cancelled or replaced, you should review your prior statements for any unauthorized activity. The enclosed Reference Guide includes additional information on general steps you can take to monitor and protect your personal information.

For More Information

If you have questions regarding this incident, please contact us at (866) 971-6943.

Sincerely,

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John Teeter Senior Vice President Century Spring Corporation

Reference Guide

Order Your Free Credit Report

To order your free annual credit report, visit www.annualcreditreport.com, call toll-free at (877) 322-8228, or complete the Annual Credit Report Request Form on the U.S. Federal Trade Commission's ("FTC") website at www.ftc.gov and mail it to Annual Credit Report Request Service, P.O. Box 105281, Atlanta, GA 30348-5281. The three credit bureaus provide free annual credit reports only through the website, toll-free number or request form.

Upon receiving your credit report, review it carefully. Errors may be a warning sign of possible identity theft. Here are a few tips of what to look for:

- Look for accounts you did not open.
- Look in the "inquiries" section for names of creditors from whom you have not requested credit. Some companies bill under names other than their store or commercial names; the credit bureau will be able to tell if this is the case.
- Look in the "personal information" section for any inaccuracies in information (such as home address and Social Security Number).

If you see anything you do not understand, call the credit bureau at the telephone number on the report. You should notify the credit bureaus of any inaccuracies in your report, whether due to error or fraud, as soon as possible so the information can be investigated and, if found to be in error, corrected. If there are accounts or charges you did not authorize, immediately notify the appropriate credit bureau by telephone and in writing. Information that cannot be explained should also be reported to your local police or sheriff's office because it may signal criminal activity.

Contact the U.S. Federal Trade Commission

If you detect any unauthorized transactions in any of your financial accounts, promptly notify the appropriate payment card company or financial institution. If you detect any incidence of identity theft or fraud, promptly report the matter to your local law enforcement authorities, state Attorney General and the FTC.

You can contact the FTC to learn more about how to protect yourself from becoming a victim of identity theft by using the contact information below:

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



Place a Fraud Alert on Your Credit File

To protect yourself from possible identity theft, consider placing a fraud alert on your credit file. A fraud alert helps protect against the possibility of an identity thief opening new credit accounts in your

name. When a credit grantor checks the credit history of someone applying for credit, the credit grantor gets a notice that the applicant may be the victim of identity theft. The alert notifies the credit grantor to take steps to verify the identity of the applicant. You can place a fraud alert on your credit report by calling any one of the toll-free fraud numbers provided below. You will reach an automated telephone system that allows flagging of your file with a fraud alert at all three credit bureaus.

Equifax Fraud Reporting	
1-866-349-5191	
P.O. Box 105069	
Atlanta, GA 30348-5069	
www.alerts.equifax.com	

Experian Fraud Reporting 1-888-397-3742 P.O. Box 9554 Allen, TX 75013 www.experian.com TransUnion Fraud Reporting 1-800-680-7289 P.O. Box 2000 Chester, PA 19022-2000 www.transunion.com

Security Freezes

You have the right to put a security freeze, also known as a credit freeze, on your credit file, 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 security freeze is designed to prevent potential credit grantors from accessing your credit report without your consent. If you place a security 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 security freeze may delay your ability to obtain credit.

As of September 21, 2018, you have the right to request a credit freeze from a consumer reporting agency, free of charge. Unlike a fraud alert, you must separately place a security freeze on your credit file at each credit bureau. To place a security freeze on your credit report you must contact the credit reporting agency by phone, mail, or secure electronic means and provide proper identification of your identity. The following information must be included when requesting a security freeze (note that if you are requesting a credit report for your spouse, this information must be provided for him/her as well): (1) full name, with middle initial and any suffixes; (2) Social Security number; (3) date of birth; (4) current address and any previous addresses for the past five years; and (5) any applicable incident report or complaint with a law enforcement agency or the Registry of Motor Vehicles. The request must also include a copy of a government-issued identification card and a copy of a recent utility bill or bank or insurance statement. It is essential that each copy be legible, display your name and current mailing address, and the date of issue.

Below, please find relevant contact information for the three consumer reporting agencies:

Equifax Security Freeze	eze Experian Security Freeze	TransUnion	
1-800-685-1111	1-888-397-3742	1-888-909-8872	
P.O. Box 105788	P.O. Box 9554	P.O. Box 2000	
Atlanta, GA 30348	Allen, TX 75013	Chester, PA 19016	
www.equifax.com	www.experian.com	www.transunion.com	

Once you have submitted your request, the credit reporting agency must place the security freeze no later than 1 business day after receiving a request by phone or secure electronic means, and no later than 3 business days after receiving a request by mail. No later than five business days after placing the security freeze, the credit reporting agency will send you confirmation and information on how you can remove the freeze in the future.

Right to Obtain a Police Report

You have the right to obtain a police report with respect 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.

For Residents of California

Visit the California Office of Privacy Protection (<u>www.privacy.ca.gov</u>) for additional information on protection against identity theft.

For Residents of Maryland

You may also obtain information about preventing and avoiding identity theft from the Maryland Office of the Attorney General:

Maryland Office of the Attorney General Consumer Protection Division, 200 St. Paul Place, Baltimore, MD 21202, 1-888-743-0023, <u>www.oag.state.md.us</u> .

For Residents of New Mexico

You have a right to place a security freeze on your credit report or submit a declaration of removal with a consumer reporting agency pursuant to the Fair Credit Reporting and Identity Security Act. Please see above for more information on security freezes.

For Residents of North Carolina

You may also obtain information about preventing and avoiding identity theft from the North Carolina Attorney General's Office:

North Carolina Attorney General's Office, Consumer Protection Division, Mail Service Center 9001, Raleigh, NC 27699-9001, 1-877-5-NO-SCAM, <u>www.ncdoj.gov</u>.

For Residents of Oregon

State laws advise you to report any suspected identity theft to law enforcement, the Oregon Attorney General, as well as the Federal Trade Commission. Contact information for the Oregon Attorney General is as follows:

Oregon Department of Justice, Office of the Attorney General, 1162 Court Street NE, Salem, OR 97301-4096, **1-877-877-9392**, <u>www.doj.state.or.us</u>

For Residents of Kentucky

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You may also obtain information about preventing and avoiding identity theft from the Kentucky Attorney General's Office:

Office of the Attorney General of Kentucky, 700 Capitol Avenue, Suite 118 Frankfort, Kentucky 40601, 1-502-696-5300, <u>www.ag.ky.gov</u>.

For Residents of Iowa

You may contact law enforcement or the Iowa Attorney General's office to report suspected incidents of identity theft. The Iowa Attorney General's Office can be reached at:

Iowa Attorney General's Office, Director of Consumer Protection Division, 1305 E. Walnut Street, Des Moines, IA 50319, 1-515-281-5926, <u>www.iowaattorneygeneral.gov</u>.

As a resident of Iowa, beginning July 1, 2018, consumer reporting agencies are prohibited from charging you a fee for placing, removing, suspending or reinstating a security freeze.

A security freeze prevents potential creditors and other third parties from accessing credit reports without your approval. Typically, businesses will not open credit card or loan accounts without checking your credit history. You must contact each of the credit reporting agencies individually online or by postal mail.

There is **no cost** to place or lift a security freeze. For more information, see detailed instructions entitled "Placing a Security Freeze on Your Credit Report to Protect Yourself from Identity Theft" at the Iowa Attorney General website at <u>https://www.iowaattorneygeneral.gov/for-consumers/general-consumer-information/identity-theft/security-freeze-identity-theft/</u>.