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August 26, 2020

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VIA E-MAIL (ATTORNEYGENERAL@DOJ.NH.GOV)
AND FEDERAL EXPRESS

The Honorable Gordon MacDonald
Attorney General of the State of New Hampshire
Office of the Attorney General
33 Capitol Street
Concord, NH 03301

Re: Notification of a Data Security Incident

Dear Attorney General MacDonald:

We represent Combe, Inc. (“Combe”) in connection with an incident that involved the personal information of eighteen (18) New Hampshire residents and provide this notice on behalf of Combe pursuant to N.H. REV. STAT. ANN. § 359-C:20.

This notice will be supplemented, if necessary, with any new significant facts discovered subsequent to its submission. While Combe is notifying you of this incident, Combe does not waive any rights or defenses relating to the incident or this notice, or the applicability of New Hampshire law on personal jurisdiction.

BACKGROUND OF THE INCIDENT

On April 13, 2020, Combe learned that an unauthorized third party placed computer code on the checkout page of two of its websites (<https://www.justformen.com/> and <https://www.vagisil.com/>). Upon learning of the incident, Combe promptly removed the malicious code and conducted an internal investigation. Combe also hired a leading computer forensic firm. On June 12, 2020, Combe determined that the code was active from March 2, 2020, until it was removed on April 13, 2020. The code was designed to collect information typed into the websites’ checkout page as customers made purchases and deliver that information to the unauthorized third party. This information included individuals’ names, email addresses, physical addresses, and credit or debit card information. It did not include individuals’ Social Security numbers or other financial information.

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NUMBER OF NEW HAMPSHIRE RESIDENTS AFFECTED

On July 30, 2020, Combe confirmed that the incident may have impacted eighteen (18) New Hampshire residents. Combe is notifying the impacted residents of the situation by letter today, August 26, 2020, via first-class, United States mail. Enclosed is sample of the notice letter that is being sent to the impacted New Hampshire residents.

STEPS TAKEN RELATED TO THE INCIDENT

Upon discovering the incident, Combe removed the malicious code from its websites. In addition, Combe conducted an investigation to identify the capability of that code and then identify the individuals whose information was entered on the websites during the at-risk window. Combe has also implemented steps to strengthen its website security, including removing the malicious code from its websites and patching its Magento e-commerce platform. Finally, as discussed above, Combe is notifying impacted individuals and providing them with information on how they can protect themselves against fraudulent activity and identity theft.

CONTACT INFORMATION

Please do not hesitate to contact me if you have any questions or if I can provide you with any further information concerning this matter.

Very truly yours,

A handwritten signature in black ink, appearing to read "Michael J. Waters".

Michael J. Waters

Enclosure

Combe Incorporated
Mail Handling Services
777 E Park Dr
Harrisburg, PA 17111



August 28, 2020

[Redacted]

Dear [Redacted],

Combe Incorporated ("Combe") values and respects your privacy and is committed to keeping your information confidential. Our commitment to these values includes notifying individuals if we believe the confidentiality of their personal information might have been compromised. Accordingly, we are writing to advise you of a recent incident that may have involved some of your personal information.

We recently learned that an unauthorized third party placed computer code that was capable of collecting information on the checkout page of our website from March 2, 2020 until April 10, 2020. Upon learning of the incident, we promptly removed the malicious code and conducted an internal investigation with the help of a leading computer forensic firm. We are notifying you because of your purchase on our website when the code was active. As a result of the unauthorized code, some of your information, including your name, email address, physical address, and credit card information ending in [Redacted], may have been obtained by the third party. **The incident did not impact your Social Security Number.**

We have already taken steps to alert the credit card companies of the incident, so that they can monitor your account for potential fraudulent activity. We also recommend that you check your debit or credit card statements for fraudulent charges. We take this situation very seriously and have taken additional technical steps to further secure Combe's website and prevent this type of incident from occurring in the future.

We value the trust you place in us to protect your privacy and apologize for any inconvenience or concern this incident might cause. For further information and assistance, please call 1-855-657-2227 from 8:00 a.m. to 5:00 p.m. ET.

Sincerely,

A handwritten signature in black ink that reads "John Ryan".

John Ryan
Director of Enterprise Ecommerce and Digital Marketing
Combe Incorporated

Additional Important Information

As mentioned above, your Social Security number was not impacted so we do not believe your identity is at risk as a result of this incident. Nonetheless, as a precautionary measure, we recommend that you remain vigilant to protect against potential fraud and/or identity theft by, among other things, reviewing your account statements and monitoring 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 should also promptly report any fraudulent activity or any suspected incidents of identity theft to proper law enforcement authorities, including the police and your state's attorney general, as well as the Federal Trade Commission ("FTC").

You may wish to review the tips provided by the FTC on fraud alerts, security/credit freezes and steps to you can take to avoid identity theft. For more information and to contact the FTC, please visit www.ftc.gov/idtheft or call 1-877-ID-THEFT (1-877-438-4338). You may also contact the FTC at: Federal Trade Commission, 600 Pennsylvania Avenue, NW, Washington, DC 20580.

Under Massachusetts law, you have the right to obtain any police report filed 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. Massachusetts law also allows consumers to place a security freeze on their credit reports. A security freeze can be placed without any charge. A security freeze prohibits a credit reporting agency from releasing any information from a consumer's credit report without written authorization. However, please be aware that placing a security freeze on your credit report may delay, interfere with, or prevent the timely approval of any requests you make for new loans, credit mortgages, employment, housing or other services.

To place a security freeze on your credit report, you must send a written request to each of the three major consumer reporting agencies by regular, certified or overnight mail at the addresses below or, if available, comply with the consumer reporting agencies' online security freeze request procedures:

Equifax Security Freeze
1-888-298-0045
www.equifax.com
P.O. Box 105788
Atlanta, GA 30348

Experian Security Freeze
1-888-397-3742
www.experian.com
P.O. Box 9554
Allen, TX 75013

TransUnion Security Freeze
1-888-909-8872
www.transunion.com
P.O. Box 160
Woodlyn, PA 19094

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. 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.); and
7. If you are a victim of identity theft, include a copy of either the police report, investigative report, or complaint to a law enforcement agency concerning identity theft.

The credit reporting agencies have three (3) business days after receiving your request 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, you must call or send a written request to the credit reporting agencies by mail or, if available, comply with the consumer reporting agencies' online procedures for lifting a security freeze, 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 identities 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 three (3) business days after receiving your request to lift the security freeze for those identified entities or for the specified period of time.

To remove the security freeze, you must send a written request to each of the three credit bureaus by mail or, if available, comply with the consumer reporting agencies' online procedures for removing a security freeze, 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 three (3) business days after receiving your request to remove the security freeze.

Credit Reports: You may obtain a free copy of your credit report once every 12 months from each of the three national credit reporting agencies by visiting www.annualcreditreport.com, by 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 105281, Atlanta, GA 30348. You can print a copy of the request form at <https://www.annualcreditreport.com/manualRequestForm.action>.

Alternatively, you may elect to purchase a copy of your credit report by contacting one of the three national credit reporting agencies. Contact information for the three national credit reporting agencies for the purpose of requesting a copy of your credit report or for general inquiries is as follows:

Equifax
1-866-349-5191
www.equifax.com
P.O. Box 740241
Atlanta, GA 30374

Experian
1-888-397-3742
www.experian.com
P.O. Box 9554
Allen, TX 75013

TransUnion
1-800-888-4213
www.transunion.com
P.O. Box 1000
Chester, PA 19016

Fraud Alerts: You may want to consider placing a fraud alert on your credit report. A fraud alert is free and will stay on your credit report for one (1) year. The alert informs creditors of possible fraudulent activity within your report and requests that the creditor contact you prior to establishing any new accounts in your name. To place a fraud alert on your credit report, contact any of the three national credit reporting agencies using the contact information listed above. Additional information is available at www.annualcreditreport.com.

Credit and Security Freezes: You may have the right to place a credit freeze, also known as a security 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 the 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. 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:

Equifax Security Freeze
1-888-298-0045
www.equifax.com
P.O. Box 105788
Atlanta, GA 30348

Experian Security Freeze
1-888-397-3742
www.experian.com
P.O. Box 9554
Allen, TX 75013

TransUnion Security Freeze
1-888-909-8872
www.transunion.com
P.O. Box 160
Woodlyn, PA 19094

Individuals interacting with credit reporting agencies have rights under the Fair Credit Reporting Act. We encourage you to review your rights under the Fair Credit Reporting Act by visiting www.consumerfinance.gov/f/201504_cfpb_summary_your-rights-under-fcra.pdf, or by requesting information in writing from the Consumer Response Center, Room 130-A, Federal Trade Commission, 600 Pennsylvania Ave. NW, Washington, DC 20580.

For residents of Iowa: Iowa residents can contact the Office of the Attorney general to obtain information about steps to take to avoid identity theft from the Iowa Attorney General's office at: Office of the Attorney General of Iowa, Hoover State Office Building, 1305 E. Walnut Street, Des Moines IA 50319, 515-281-5164.

For residents of Maryland: Maryland residents can contact the Office of the Attorney General to obtain information about steps one can take to avoid identity theft from the Maryland Attorney General's office at: Office of the Attorney General, 200 St. Paul Place, Baltimore, MD 21202, (888) 743-0023, www.oag.state.md.us

For residents of Rhode Island: We believe that this incident affected thirty-eight (38) Rhode Island residents. Rhode Island residents can contact the Office of the Attorney general at: Rhode Island Office of the Attorney General, 150 South Main Street, Providence, RI 02903, (401) 274-4400, www.riag.ri.gov. An individual has the right to obtain any police report filed in regard to this incident. If one is the victim of identity theft, they also have the right to file a police report and obtain a copy of it.

For residents of North Carolina: North Carolina residents can obtain information about preventing identity theft from the North Carolina Attorney General's Office at: North Carolina Attorney General's Office, Consumer Protection Division, 9001 Mail Service Center, Raleigh, NC 27699-9001; 877-5-NO-SCAM (Toll-free within North Carolina); 919-716-6000; www.ncdoj.gov.

For residents of New York State: New York residents can obtain information about preventing identity theft from the New York Attorney General's Office at: Office of the Attorney General for the State of New York, Bureau of Consumer Frauds & Protection, The Capitol, Albany, New York 12224-0341; <https://ag.ny.gov/consumer-frauds/identity-theft>; (800) 771-7755.