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May 3, 2021

**VIA E-MAIL**

Attorney General John Formella  
Office of the Attorney General  
33 Capitol Street  
Concord, NH 03302

Re: Notice of Data Event

Dear Attorney General Formella:

We represent Divvy Up, Inc. (“DivvyUp”) located at 914 Railroad Ave, Ste 117, Tallahassee, FL 32310, and are writing to notify your office of an incident that may affect the security of some personal information relating to 229 New Hampshire residents.

DivvyUp was recently notified by its website hosting company that its network security was compromised, allowing malware to be downloaded to the hosted website, permitting customer personal information to be inappropriately accessed by an unknown third party. The website hosting company took immediate action to prevent further unauthorized access and to secure the hosted website. DivvyUp commenced an investigation to determine how the incident occurred and what information, if any, was impacted.

On March 10, 2021, DivvyUp discovered that the third party had access to payment transactions made through the hosted website between December 1, 2020 and March 8, 2021. This would include customer names, addresses, and payment card information including the payment card number, CVC code, and expiration date for the card used to make a purchase on the website. PayPal transactions were and remain secure.

DivvyUp has taken steps to prevent a reoccurrence, to include ensuring that the website hosting company removed the malware, upgraded its security protocols, and DivvyUp retained a certified expert to conduct an external vulnerability scan confirming that the website hosting company’s corrective actions have removed the vulnerability.

On or about May 3, 2021, DivvyUp began mailing notifications to all potentially affected individuals. An example of the notification is attached. Notification has also been made to the three major credit reporting agencies.

Attorney General John Formella

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Should you have any questions regarding this notification or other aspects of the data security event, please contact me for any additional information.

Best Regards

A handwritten signature in blue ink, appearing to read "Kevin M. Scott", with a long horizontal flourish extending to the right.

Kevin M. Scott

Shareholder

KMS:lh

Attachment



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>>

**Notice of Data Breach**

Dear <<Name 1>>:

**What Happened?**

Recently, we were notified by our website hosting company that their network security was compromised, allowing malware to be downloaded to the hosted website. Your personal information may have been inappropriately accessed by an unknown third party. Upon discovering the attack, we took immediate action to stop any further access and investigated the incident.

**What Information was Involved?**

On March 10, 2021, we discovered that the third party had access to payment transactions made through the hosted website between December 1, 2020 and March 8, 2021. This would include your name, address, and payment card information including the payment card number, CVC code, and expiration date for the card you used to make a purchase on the website. PayPal transactions were and remain secure.

**What We are Doing**

We take the security of personal information very seriously, and we want to assure you that we've already taken appropriate steps to prevent a reoccurrence, including ensuring that the website hosting company removed the malware, upgraded its security protocols, and we retained a certified expert to conduct an external vulnerability scan confirming that the website hosting company's corrective actions have removed the vulnerability, allowing us to assure you that your transactions on our website remain secure.

**What You Can Do**

Although we have taken steps to protect your information from being used inappropriately, we recommend that you review your payment card account statements closely for any unauthorized transactions. If you suspect unauthorized activity on your payment card(s), you should report it to the bank that issued your card immediately. You are not responsible for unauthorized charges on your credit card in an amount over \$50 if you report the charges promptly within the adequate timeframe under the Fair Credit Billing Act. Please also review the enclosed "Additional Important Information" section included with this letter. This section describes additional steps you can take to help protect yourself, including recommendations by the Federal Trade Commission (FTC) regarding details on how to place a fraud alert or a security freeze on your credit file, should you choose to do so. You can also contact the FTC for more information.

**For More Information**

If you have additional questions or concerns regarding this incident, please call 855-535-1776 between 9:00 a.m. and 9:00 p.m. Eastern Time, Monday through Friday.

We take the security of all information in our systems seriously. Please know that the protection of your personal information is our utmost priority, and we sincerely regret any inconvenience that this matter may cause you.

Sincerely,

Mitch Nelson  
Co-Founder

### **Important Additional Information**

**For residents of Iowa:** You are advised to report any suspected identity theft to law enforcement or to the Attorney General.

**For residents of Oregon:** You are advised to report any suspected identity theft to law enforcement, including the Attorney General, and the Federal Trade Commission.

**For residents of New Mexico:** You are advised to review personal account statements and credit reports, as applicable, to detect errors resulting from the security incident. You have rights pursuant to the federal Fair Credit Reporting Act. Please visit [https://files.consumerfinance.gov/f/201504\\_cfpb\\_summary\\_your-rights-under-fcra.pdf](https://files.consumerfinance.gov/f/201504_cfpb_summary_your-rights-under-fcra.pdf) or see the contact information for the Federal Trade Commission listed below.

### **For residents of District of Columbia, Illinois, Maryland, New York, North Carolina, and Rhode Island:**

You can obtain information from the District of Columbia, Maryland, North Carolina, New York, and Rhode Island Offices of the Attorney General and the Federal Trade Commission about fraud alerts, security freezes, and steps you can take toward preventing identity theft.

**DC Attorney General**  
441 4th Street NW  
Washington, D.C.  
20001  
1-202-727-3400  
[www.oag.dc.gov](http://www.oag.dc.gov)

**Maryland Office of Attorney General**  
200 St. Paul Place  
Baltimore, MD 21202  
1-888-743-0023  
[www.oag.state.md.us](http://www.oag.state.md.us)

**Rhode Island Office of Attorney General**  
150 South Main Street  
Providence, RI 02903  
1-401-274-4400  
[www.riag.ri.gov](http://www.riag.ri.gov)

**North Carolina Attorney General**  
9001 Mail Service Ctr  
Raleigh, NC 27699  
1-877-566-7226  
[www.ncdoj.com](http://www.ncdoj.com)

**New York Attorney General**  
120 Broadway  
3rd Floor  
New York, NY 10271  
800-771-7755  
[www.ag.ny.gov](http://www.ag.ny.gov)

**Federal Trade Commission, Consumer Response Center**  
600 Pennsylvania Ave, NW Washington, DC 20580  
1-877-IDTHEFT (438-4338) [www.identitytheft.gov](http://www.identitytheft.gov)

**Massachusetts and Rhode Island residents:** You have the right to obtain a police report if you are a victim of identity theft.

### **For residents of all states:**

It is recommended that you remain vigilant for incidents of fraud and identity theft by reviewing payment card account statements and monitoring your credit reports for unauthorized activity. You may obtain a copy of your credit report, free of charge, whether or not you suspect any unauthorized activity on your account. You may obtain a free copy of your credit report from each of the three nationwide credit reporting agencies. To order your free credit report, please visit [www.annualcreditreport.com](http://www.annualcreditreport.com), or call toll-free at 1-877-322-8228. You can also order your annual free credit report by mailing a completed Annual Credit Report Request Form (available at <https://www.consumer.ftc.gov/articles/0155-free-credit-reports>) to: Annual Credit Report Request Service, P.O. Box 105281, Atlanta, GA, 30348-5281.

**Fraud Alerts:** You can place fraud alerts with the three credit bureaus by phone and online with Equifax ([https://assets.equifax.com/assets/personal/Fraud\\_Alert\\_Request\\_Form.pdf](https://assets.equifax.com/assets/personal/Fraud_Alert_Request_Form.pdf)), Experian (<https://www.experian.com/fraud/center.html>), or Transunion (<https://www.transunion.com/fraud-victim-resource/place-fraud-alert>). A fraud alert tells creditors to follow certain procedures, including contacting you, before they open any new accounts or change your existing accounts. For that reason, placing a fraud alert can protect you, but also may delay you when you seek to obtain credit. Initial fraud alerts last for one year. Victims of identity theft can also get an extended fraud alert for seven years. The phone numbers for all three credit bureaus are at the bottom of this page.

**Monitoring:** You should always remain vigilant and monitor your accounts for suspicious or unusual activity.

**Security Freeze:** You also have the right to place a security freeze on your credit report. A security freeze is intended to prevent credit, loans, and services from being approved in your name without your consent. To place a security freeze on your credit report, you need to make a request to each consumer reporting agency by certified mail, overnight mail, regular stamped mail, or by following the instructions found at the websites listed below. The following information must be included when requesting a security freeze for yourself or your spouse or a minor under 16: (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; (5) Proof of current address, such as current utility or telephone bill, bank or insurance statement; (6) legible photocopy of 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. It is essential that each copy be legible, display your name and current mailing address, and the date of issue. It is free to place, lift, or remove a security freeze.

**Equifax Security Freeze**  
P.O. Box 105788  
Atlanta, GA 30348-5788  
<https://www.equifax.com/personal/credit-report-services/>  
800-525-6285

**Experian Security Freeze**  
P.O. Box 9554  
Allen, TX 75013-9544  
<https://www.experian.com/help/>  
888-397-3742

**TransUnion Security Freeze**  
P.O. Box 2000  
Chester, PA 19014-0200  
<https://www.transunion.com/credit-help>  
800-680-7289