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CONSUMER PROTECTION

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May 28, 2020

VIA OVERNIGHT MAIL

Attorney General Gordon MacDonald
Office of the Attorney General
33 Capitol Street
Concord, NH 03301

Re: Incident Notification

Dear Attorney General MacDonald:

We are writing on behalf of our client, Dogeared, Inc. ("Dogeared"), to notify you of a security incident. Dogeared is located at 6053 Bristol Parkway, Culver City, California 90230.

Dogeared recently conducted an investigation of its e-commerce website, www.dogeared.com, after being notified that a customer received an alert about a purchase made on the website. Upon receiving this information, Dogeared immediately reviewed the code that operates its website and identified and removed code that Dogeared did not recognize. A cybersecurity firm was then engaged, and a thorough investigation was conducted to determine what had happened and what information may have been involved. Findings from the investigation indicated that the unauthorized code was present on the website from November 19, 2019, to December 30, 2019, and was capable of copying information entered by customers during the checkout process, including their names, addresses, payment card numbers, expiration dates, and card verification codes. Dogeared then reviewed the transaction history for the website and on April 6, 2020, finished identifying the customers who made purchases on the website during that time period.

Today, Dogeared is notifying 25 New Hampshire residents via U.S. mail.¹ A copy of the notification letter is enclosed. Dogeared is encouraging the residents to remain vigilant by

¹ This report is not, and does not constitute, a waiver of Dogeared's objection that New Hampshire lacks personal jurisdiction over Dogeared regarding any claims related to this data security incident.

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reviewing their account statements and free credit reports for unauthorized activity. In addition, Dogeared has also established a dedicated call center for individuals to call with questions.

To reduce the risk of a similar incident occurring in the future, Dogeared has implemented a number of additional security measures, including implementing a file monitoring tool to check the integrity of third-party scripts hosted on Dogeared's e-commerce website.

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

Sincerely,



Joseph L. Bruemmer

Enclosure



<<Date>> (Format: Month Day, Year)

<<first_name>> <<middle_name>> <<last_name>> <<suffix>>
<<address_1>>
<<address_2>>
<<city>>, <<state_province>> <<postal_code>>
<<country >>

Dear <<first_name>> <<middle_name>> <<last_name>> <<suffix>>,

Dogearred.com recognizes the importance of protecting information. We are writing to let you know that we recently identified and addressed an incident that may have involved your information. This notice explains the incident, the measures we have taken in response, and some additional steps you may consider taking.

We recently conducted an investigation of our e-commerce website, www.dogearred.com, after we were notified that a customer received an alert about a purchase made on the website. Upon receiving this information, we immediately reviewed the code that operates our website and identified and removed code that we did not recognize. A cybersecurity firm was then engaged, and a thorough investigation was conducted to determine what had happened and what information may have been involved. Findings from the investigation indicated that the unauthorized code was present on the website from November 19, 2019 to December 30, 2019, and was capable of copying information entered by customers during the checkout process. We then reviewed the transaction history for the website and on April 6, 2020, finished identifying the customers who made purchases on the website during that time period. Because you made a purchase during that time period, your information may have been involved, including your first and last name, address, and telephone number and the payment card number, expiration date, and card verification code for the payment card(s) ending in <<b2b_text_1 (Card Number(s))>>.

We wanted to notify you of this incident and to assure you that we take it very seriously. We encourage you to closely review your payment card account statements for any unauthorized activity. You should immediately report any unauthorized charges to the bank that issued your card, because payment card network rules generally provide that cardholders are not responsible for unauthorized charges that are timely reported. Information on additional steps you can take can be found on the following pages.

We regret that this occurred and apologize for any inconvenience. To help prevent a similar incident from occurring in the future, we have taken steps to further enhance our existing security measures, including implementing a file monitoring tool to check the integrity of third-party scripts hosted on our e-commerce website. If you have any questions, please call 1-???-???-????, Monday through Friday, between the hours of 8:00 a.m. to 5:30 p.m. Central Time, excluding major U.S. holidays.

Sincerely,

Marcia Maizel-Clarke
Founder
Dogearred.com

ADDITIONAL STEPS YOU CAN TAKE

We remind you it is always advisable to be 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

Fraud Alerts and Credit or Security Freezes:

Fraud Alerts: There are two types of general 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 one year. 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.

To place a fraud alert on your credit reports, contact one of the nationwide credit bureaus. A fraud alert is free. The credit bureau you contact must tell the other two, and all three will place an alert on their versions of your report.

For those in the military who want to protect their credit while deployed, an Active Duty Military Fraud Alert lasts for one year and can be renewed for the length of your deployment. The credit bureaus will also take you off their marketing lists for pre-screened credit card offers for two years, unless you ask them not to.

Credit or Security Freezes: You have the right to put a credit freeze, also known as a security freeze, on your credit file, free of charge, which makes it more difficult for identity thieves to open new accounts in your name. That's because most creditors need to see your credit report before they approve a new account. If they can't see your report, they may not extend the credit.

How do I place a freeze on my credit reports? There is no fee to place or lift a security freeze. Unlike a fraud alert, you must separately place a security freeze on your credit file at each credit reporting company. For information and instructions to place a security freeze, 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

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 bureau will provide you with 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.

How do I lift a freeze? A freeze remains in place until you ask the credit bureau to temporarily lift it or remove it altogether. If the request is made online or by phone, a credit bureau must lift a freeze within one hour. If the request is made by mail, then the bureau must lift the freeze no later than three business days after getting your request.

If you opt for a temporary lift because you are applying for credit or a job, and you can find out which credit bureau the business will contact for your file, you can save some time by lifting the freeze only at that particular credit bureau. Otherwise, you need to make the request with all three credit bureaus.

Additional Information for Residents of the Following States:

Connecticut: You may contact and obtain information from your state attorney general at: *Connecticut Attorney General's Office*, 165 Capitol Avenue, Hartford, CT 06106, 1-860-808-5318, www.ct.gov/ag

District of Columbia: Dogeared.com is located at 6053 Bristol Parkway, Culver City, California 90230 and can be reached at 310-846-4444. You may contact and obtain information from your attorney general at: *Office of the Attorney General for the District of Columbia*, 441 4th Street, NW, Washington, DC 20001, 1-202-727-3400, www.oag.dc.gov/

Maryland: Dogeared is located at 6053 Bristol Parkway, Culver City, California 90230 and can be reached at 310-846-4444. You may contact and obtain information from your state attorney general at: *Maryland Attorney General's Office*, 200 St. Paul Place, Baltimore, MD 21202, 1-888-743-0023 / 1-410-576-6300, www.oag.state.md.us

Massachusetts: Under Massachusetts law, you have the right to file and obtain a copy of a police report. You also have the right to request a security freeze, as described above. You may contact and obtain information from your state attorney general at: *Office of the Massachusetts Attorney General*, One Ashburton Place, Boston, MA 02108, 1-617-727-8400, www.mass.gov/ago/contact-us.html

New York: You may contact and obtain information from these state agencies: *New York Department of State Division of Consumer Protection*, One Commerce Plaza, 99 Washington Ave., Albany, NY 12231-0001, 518-474-8583 / 1-800-697-1220, <http://www.dos.ny.gov/consumerprotection/>; and *New York State Office of the Attorney General*, The Capitol, Albany, NY 12224-0341, 1-800-771-7755, <https://ag.ny.gov>

North Carolina: You may contact and obtain information from your state attorney general at: *North Carolina Attorney General's Office*, 9001 Mail Service Centre, Raleigh, NC 27699, 1-919-716-6000 / 1-877-566-7226, www.ncdoj.gov

Rhode Island: This incident involves fourteen individuals in Rhode Island. Under Rhode Island law, you have the right to file and obtain a copy of a police report. You also have the right to request a security freeze, as described above. You may contact and obtain information from your state attorney general at: *Rhode Island Attorney General's Office*, 150 South Main Street, Providence, RI 02903, 1-401-274-4400, www.riag.ri.gov

West Virginia: You have the right to ask that nationwide consumer reporting agencies place "fraud alerts" in your file to let potential creditors and others know that you may be a victim of identity theft, as described above. You also have a right to place a security freeze on your credit report, as described above.

A Summary of Your Rights Under the Fair Credit Reporting Act: The federal Fair Credit Reporting Act (FCRA) promotes the accuracy, fairness, and privacy of information in the files of consumer reporting agencies. There are many types of consumer reporting agencies, including credit bureaus and specialty agencies (such as agencies that sell information about check writing histories, medical records, and rental history records). Your major rights under the FCRA are summarized below. For more information, including information about additional rights, go to www.consumerfinance.gov/learnmore or write to: Consumer Financial Protection Bureau, 1700 G Street N.W., Washington, DC 20552.

- You must be told if information in your file has been used against you.
- You have the right to know what is in your file.
- 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 have a right to place a "security freeze" on your credit report, which will prohibit a consumer reporting agency from releasing information in your credit report without your express authorization.
- You may seek damages from violators.
- Identity theft victims and active duty military personnel have additional rights.