KILPATRICK TOWNSEND
ATTORNEYS AT LAW

KILPATRICK TOWNSEND & STOCKTON LLP
[redacted]

[redacted]
m

December 4, 2014

Attorney General Joseph Foster
Office of the Attorney General
Attn: Security Breach Notification
33 Capitol Street
Concord, NH 03301

Re: Data Breach Notification

Dear Attorney General Foster:

In the first week of November, E-conolight, a Wisconsin-based company that sells high-quality, value-priced indoor and outdoor lighting fixtures and accessories, was made aware by its website hosting company, Lyons Consulting Group (Lyons), of a malware attack on Lyons. Immediately upon learning of the issue, E-conolight took the proactive step of informing all potentially affected customers – both individuals and businesses – by email and letter if necessary of what it had just learned, so that all of its customers could protect themselves.

Lyons informed E-conolight that the malware infiltration of the Lyons-configured Magmi module which works with the Magento shopping cart application occurred in September and was discovered and quickly removed during the first week of November. E-conolight immediately informed the FBI and began an extensive investigation of its own. E-conolight has determined that the incident may have affected forty-two (42) New Hampshire residents and businesses and is about to offer all such residents and businesses fraud protection services from AllClear ID for 12 months from the notification date, at no cost to those individuals and businesses and with no enrollment required. Under this program, dedicated investigators will be available via a toll-free line to recover financial losses, restore credit, and make sure customer identities are returned to their proper condition. AllClear ID maintains an A+ rating at the Better Business Bureau.

The security of its customers is of the highest concern to E-conolight, and it will it will take additional steps to ensure the integrity of its e-commerce website even after a determination has been made by a PCI Forensic Investigator that all malicious software has been removed from the Lyons' system and its system is otherwise PCI-DSS compliant. E-conolight expects to receive satisfactory evidence from Lyons that Lyons has adopted a comprehensive set of safeguards so as to prevent the re-occurrence of such an incident, or E-Conolight will commence a relationship with a new website host within the next few months.

Please do not hesitate to contact me at [redacted] if you have any questions. Attached is a copy of the notification letter that will be issued on December 5th.

Very truly yours,

[redacted]

e-conolight®

e-conolight c/o Processing Center • P.O. BOX 142589 • Austin, TX 78714

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ACD1234

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JOHN Q. SAMPLE
1234 MAIN STREET
ANYTOWN US 12345-6789

December 5, 2014

Dear John Sample,

In the first week of November, E-conolight was made aware by its website hosting company of a malware attack on its website, www.e-conolight.com. Immediately after learning about the issue, we took the proactive step of notifying all potentially affected customers – both individuals and businesses – so that they would know to check their payment card and bank statements in order to protect themselves by getting their cards reissued.

Our website hosting company informed us that the malware infiltration occurred in September and was discovered and quickly removed during the first week of November. While our website host has assured us that this malware problem has been eliminated completely and our internal investigation, while ongoing, to date has not indicated otherwise, this unauthorized access may have impacted visitors to our website who made credit or debit card purchases or entered personal or business information on www.e-conolight.com over the past two months.

We previously notified or tried to notify you about this issue by email or letter. This letter is a more formal notice, containing details on the fraud protection service we are offering all of our individual and business customers who were potentially affected by this security incident.

We have received no indication yet that your information has been misused. We recommend that you remain vigilant for incidences of fraud, however, by regularly reviewing your account statements. Our customers' trust is a top priority for E-conolight, and we deeply regret the inconvenience this may cause.

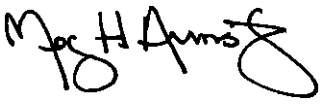
As an added precaution, we have arranged to have AllClear ID protect your identity for 12 months at no cost to you. The following identity protection services start on the date of this notice, and you can use them at any time during the next 12 months:

> **AllClear Secure**: The team at AllClear ID is ready and standing by if you need help protecting your identity. This protection is automatically available to you with no enrollment required. If a problem arises, simply call **(877) 615-3764** using the reference code **Redemption Code**, and a dedicated investigator will handle the work to recover financial losses, restore your credit, and make sure your identity is returned to its proper condition. AllClear ID maintains an A+ rating at the Better Business Bureau. Please see the last page of this letter for details.

We take the protection of your personal information seriously and are diligently taking action to prevent a recurrence. Both E-conolight and our hosting company continue to investigate every aspect of the security of our website to help ensure that our customers never face this issue again on www.e-conolight.com.

If you have further questions or concerns about this incident, please contact Customer Service at (877) 615-3764. We sincerely regret any inconvenience or difficulty caused by this incident.

Sincerely,



Meg H. Armstrong, V.P. – eCommerce
e-conolight
1501 96th Street, Sturtevant, WI 53177

Information about Identity Theft Prevention

We recommend that you regularly review statements from your accounts and periodically obtain your credit report from one or more of the national credit reporting companies. You may obtain a free copy of your credit report online at www.annualcreditreport.com, by calling toll-free 1-877-322-8228, or by mailing an Annual Credit Report Request Form (available at www.annualcreditreport.com) to: Annual Credit Report Request Service, P.O. Box 105281, Atlanta, GA, 30348-5281. You may also purchase a copy of your credit report by contacting one or more of the three national credit reporting agencies listed below.

Equifax, P.O. Box 105139, Atlanta, Georgia 30374-0241, 1-800-685-1111, www.equifax.com
Experian, P.O. Box 2002, Allen, TX 75013, 1-888-397-3742, www.experian.com
TransUnion, P.O. Box 6790, Fullerton, CA 92834-6790, 1-800-916-8800, www.transunion.com

When you receive your credit reports, review them carefully. Look for accounts or creditor inquiries that you did not initiate or do not recognize. Look for information, such as home address and Social Security number, that is not accurate. If you see anything you do not understand, call the credit reporting agency at the telephone number on the report.

We recommend you remain vigilant with respect to reviewing your account statements and credit reports, and promptly report any suspicious activity or suspected identity theft to us and to the proper law enforcement authorities, including local law enforcement, your state's attorney general and/or the Federal Trade Commission ("FTC"). You may contact the FTC or your state's regulatory authority to obtain additional information about avoiding identity theft.

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

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, www.oag.state.md.us

For residents of Massachusetts: You also have the right to obtain a police report.

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
9001 Mail Service Center, Raleigh, NC 27699-9001, 1-877-5-NO-SCAM, www.ncdoj.gov

The next 2 paragraphs are regarding incidents involving personal health information. Disregard if not applicable to your situation.

We recommend that you regularly review the explanation of benefits statement that you receive from your insurer. If you see any service that you believe you did not receive, please contact your insurer at the number on the statement. If you do not receive regular explanation of benefits statements, contact your provider and request them to send such statements following the provision of services in your name or number.

You may want to order copies of your credit reports and check for any medical bills that you do not recognize. If you find anything suspicious, call the credit reporting agency at the phone number on the report. Keep a copy of this notice for your records in case of future problems with your medical records. You may also want to request a copy of your medical records from your provider, to serve as a baseline. If you are a California resident, we suggest that you visit the web site of the California Office of Privacy Protection at www.privacy.ca.gov to find more information about your medical privacy.

Fraud Alerts: There are also two types of fraud alerts that 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 calling the toll-free fraud number of any of the three national credit reporting agencies listed below.

Equifax: 1-800-525-6285, www.equifax.com
Experian: 1-888-397-3742, www.experian.com
TransUnion: 1-800-680-7289, www.transunion.com

Credit Freezes (for Non-Massachusetts Residents): You may have the right to put 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 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. In addition, you may incur fees to place, lift and/or remove a credit freeze. Credit freeze laws vary from state to state. The cost of placing, temporarily lifting, and removing a credit freeze also varies by state, generally $5 to $20 per action at each credit reporting company. *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, P.O. Box 105788, Atlanta, GA 30348, www.equifax.com
Experian, P.O. Box 9554, Allen, TX 75013, www.experian.com
TransUnion, LLC, P.O. Box 2000, Chester, PA, 19022-2000, www.transunion.com

You can obtain more information about fraud alerts and credit freezes by contacting the FTC or one of the national credit reporting agencies listed above.

Credit Freezes (for Massachusetts Residents): Massachusetts law gives you the right to place a security freeze on your consumer reports. A security freeze is designed to prevent credit, loans and services from being approved in your name without your consent. Using a security freeze, however, may delay your ability to obtain credit. You may request that a freeze be placed on your credit report by sending a request to a credit reporting agency by certified mail, overnight mail or regular stamped mail to the address below:

Equifax, P.O. Box 105788, Atlanta, GA 30348, www.equifax.com
Experian, P.O. Box 9554, Allen, TX 75013, www.experian.com
TransUnion, LLC, P.O. Box 2000, Chester, PA, 19022-2000, www.transunion.com

Unlike a fraud alert, you must separately place a credit freeze on your credit file at each credit reporting company. The following information should be included when requesting a security freeze (documentation for you and your spouse must be submitted when freezing a spouse's credit report): full name, with middle initial and any suffixes; Social Security number; date of birth (month, day and year); current address and previous addresses for the past five (5) years; and applicable fee (if any) or incident report or complaint with a law enforcement agency or the Department of Motor Vehicles. The request should also include a copy of a government-issued identification card, such as a driver's license, state or military ID card, and a copy of a utility bill, bank or insurance statement. Each copy should be legible, display your name and current mailing address, and the date of issue (statement dates must be recent). The credit reporting company may charge a reasonable fee of up to $5 to place a freeze or lift or remove a freeze, unless you are a victim of identity theft or the spouse of a victim of identity theft, and have submitted a valid police report relating to the identity theft to the credit reporting company.

Terms of Use for AllClear Secure

If you become a victim of fraud using your personal information without authorization, AllClear ID will help recover your financial losses and restore your identity. Benefits include:

- Automatic 12 months of coverage;
- No cost to you – ever. AllClear Secure is paid for by the participating Company.

Services Provided

If you suspect identity theft, simply call AllClear ID to file a claim. AllClear ID will provide appropriate and necessary remediation services ("Services") to help restore the compromised accounts and your identity to the state prior to the incident of fraud. Services are determined at the sole discretion of AllClear ID and are subject to the terms and conditions found on the AllClear ID website. AllClear Secure is not an insurance policy, and AllClear ID will not make payments or reimbursements to you for any financial loss, liabilities or expenses you incur.

Coverage Period

You are automatically protected from the date the breach incident occurred, as communicated in the breach notification letter you received from Company until twelve (12) months after the date of the breach notification letter (the "Coverage Period"). Fraud Events that occurred prior to your Coverage Period are not covered by AllClear Secure services.

Eligibility Requirements

To be eligible for Services under AllClear Secure coverage, you must fully comply, without limitations, with your obligations under the terms herein, you must be a citizen eighteen or legal resident, (18) years of age or older, reside in the United States, and have a valid U.S. Social Security number. Minors under eighteen (18) years of age may be eligible, but must be sponsored by a parent or guardian. The Services cover only you and your personal financial and medical accounts that are directly associated with your valid U.S. Social Security number, including but not limited to credit card, bank, or other financial accounts and/or medical accounts.

How to File a Claim

If you become a victim of fraud covered by the AllClear Secure services, you must:

- Notify AllClear ID by calling 1.855.434.8077 to report the fraud prior to expiration of your Coverage Period;
- Provide proof of eligibility for AllClear Secure by providing the redemption code on the notification letter you received from the sponsor Company;
- Fully cooperate and be truthful with AllClear ID about the Event and agree to execute any documents AllClear ID may reasonably require;
- Fully cooperate with AllClear ID in any remediation process, including, but not limited to, providing AllClear ID with copies of all available investigation files or reports from any institution, including, but not limited to, credit institutions or law enforcement agencies, relating to the alleged theft.

Coverage under AllClear Secure Does Not Apply to the Following:

Any expense, damage or loss:

- Due to
  - Any transactions on your financial accounts made by authorized users, even if acting without your knowledge
  - Any act of theft, deceit, collusion, dishonesty or criminal act by you or any person acting in concert with you, or by any of your authorized representatives, whether acting alone or in collusion with you or others (collectively, your "Misrepresentation")
- Incurred by you from an Event that did not occur during your coverage period;
- In connection with an Event that you fail to report to AllClear ID prior to the expiration of your AllClear Secure coverage period.

Other Exclusions:

- AllClear ID will not pay or be obligated for any costs or expenses other than as described herein, including without limitation fees of any service providers not retained by AllClear ID; AllClear ID reserves the right to investigate any asserted claim to determine its validity;
- AllClear ID is not an insurance company, and AllClear Secure is not an insurance policy; AllClear ID will not make payments or reimbursements to you for any loss or liability you may incur;
- AllClear ID is not a credit repair organization, is not a credit counseling service, and does not promise to help you improve your credit history or rating beyond resolving incidents of fraud; and
- You are expected to protect your personal information in a reasonable way at all times. Accordingly, you will not recklessly disclose or publish your Social Security number or any other personal information to those who would reasonably be expected to improperly use or disclose that Personal Information, such as, by way of example, in response to "phishing" scams, unsolicited emails, or pop-up messages seeking disclosure of personal information.

Opt-out Policy

If for any reason you wish to have your information removed from the eligibility database for AllClear Secure, please contact AllClear ID:

E-mail	**Mail**	**Phone**
support@allclearid.com	AllClear ID, Inc. 823 Congress Avenue Suite 300 Austin, Texas 78701	1.855.434.8077