

JONES DAY

90 SOUTH SEVENTH STREET • SUITE 4950 • MINNEAPOLIS, MINNESOTA 55402
TELEPHONE: +1.612.217.8800 • JONESDAY.COM

DIRECT NUMBER: (612) 217-8853
RMARTINEZ@JONESDAY.COM

June 3, 2022

BY U.S. MAIL

Consumer Protection Bureau
Office of the Attorney General
33 Capitol Street
Concord, NH 03301

RECEIVED

JUN 07 2022

CONSUMER PROTECTION

Re: Notice of Data Security Incident

To Whom It May Concern,

I am writing on behalf of our client, ECS Tuning, LLC operating as Rennline Automotive (“Rennline”), to notify you of a data security issue at Freestyle Solutions, Inc. (“Freestyle”), a third-party software vendor headquartered in New Jersey that formerly operated Rennline’s e-commerce website.

Freestyle provides shopping cart and payment processing functionality for its business customers’ e-commerce websites. On March 2, 2022, Freestyle notified its business customers, including Rennline, that it had identified malware on Freestyle’s systems and had retained outside data security experts to conduct an investigation to determine what business customers and information may have been affected. On May 17, 2022, Freestyle notified Rennline that its investigation had determined that payment card information of some Rennline customers submitted to the website between September 21, 2020, and February 3, 2022, may have been acquired by an unauthorized party. Freestyle’s investigation determined that the affected information consisted of cardholder names, payment card numbers, expiration dates, security codes (CVV), billing address and transaction details (such as product type, price and quantity). The website did not collect Social Security numbers or debit card PINs and therefore they were not affected.

Rennline is notifying 74 New Hampshire residents whose information was determined to have been affected. Notice will be mailed as expeditiously as possible, beginning on or about June 3, 2022. A sample of the notification letter sent to the affected residents is attached.

Rennline conducted a diligent investigation to identify and notify potentially affected customers promptly. It also confirmed that law enforcement authorities and payment card companies have been notified. Since learning of the incident, Rennline has stopped using Freestyle for its e-commerce website and has moved its website to a new third-party provider’s platform.

NH DEPT OF JUSTICE
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If you have any questions, please contact me at 612-217-8853.

Sincerely,

Richard Martinez

Enclosure



RENNLINE
Return Mail Processing Center
P.O. Box 6336
Portland, OR 97228-6336

<<Date>>

<<Original First Name>> <<Original Last Name>>
<<Original Address 1>>
<<Original City>>, <<Original State>> <<Original Zip Code>>

Re: Notice of Data Security Incident

Dear <<Original First Name>> <<Original Last Name>>:

We are writing to make you aware of a data security incident at Freestyle Solutions, Inc. ("Freestyle"), a third-party software vendor that formerly operated Rennline Automotive's ("Rennline") e-commerce website, that may have affected your payment card information. This letter explains what happened and provides information about what you can do in response. We are taking this matter very seriously and sincerely regret any concern it may cause you.

What Happened

Freestyle provides shopping cart and payment processing functionality for its business customers' e-commerce websites. On March 2, 2022, Freestyle notified Rennline that it had identified malware on Freestyle's systems and had retained outside data security experts to conduct an investigation to determine what information may have been affected. Freestyle recently notified Rennline that its investigation had determined that payment card information that some Rennline customers submitted to the website between September 21, 2020, and February 3, 2022, may have been acquired by an unauthorized party.

What Information Was Involved

Freestyle informed us that, based on its investigation, the malware was designed to collect cardholder name, payment card number, expiration date, card verification code (CVV), billing address and transaction details (such as product type, price and quantity). The website did not collect Social Security numbers or debit card PINs and therefore they were not affected.



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What We Are Doing

We conducted a diligent investigation to identify and notify potentially affected customers promptly. We also confirmed that law enforcement authorities and the payment card brands had been notified. Since learning of the incident, we have stopped using Freestyle for our e-commerce website and have moved our website to a new third-party provider's platform.

What You Can Do

We recommend that you remain vigilant and take steps to protect against identity theft or fraud. Monitor your accounts and credit reports and promptly report any signs of suspicious activity to your financial institution or card issuer.

Information about how to obtain a free credit report, security freezes, and other guidance is provided in the attached "Additional Resources" document, which we encourage you to review.

As always, please be cautious of any unsolicited communications that ask you to provide your personal information over the telephone or online and avoid clicking on links or downloading attachments from suspicious emails.

For More Information

If you have any questions or concerns, please call 844-287-4726 Monday–Friday from 9am to 9pm Eastern Time.

Sincerely,

Tom Rittenburg
VP – Rennline Automotive Division



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Portland, OR 97228-6336

ADDITIONAL RESOURCES

You may obtain a free copy of your credit report from each of the three credit reporting agencies by visiting www.annualcreditreport.com. You can request information regarding fraud alerts and security freezes, from the following credit reporting agencies:

- Equifax, <https://www.equifax.com/personal/credit-report-services>, 1-800-525-6285, P.O. Box 740256, Atlanta, GA 30374
- Experian, <https://www.experian.com/help>, 1-888-397-3742, P.O. Box 9554, Allen, TX 75013
- TransUnion, <https://www.transunion.com/credit-help>, 1-800-680-7289, P.O. Box 2000, Chester, PA 19016

There is no charge to place a security freeze on your credit. To place a security freeze on your credit, you may need to provide the following information:

- Your full name (including middle initial as well as Jr., Sr., II, III, etc.)
- Social Security number
- Date of birth
- The addresses where you have lived over the prior five years
- Proof of current address such as a current utility bill or telephone bill
- A legible photocopy of a government-issued identification card (state driver's license or ID card, military identification, etc.)

You can also receive information from the Federal Trade Commission ("FTC") regarding fraud alerts, security freezes, and how to avoid and report identity theft: <https://www.consumer.ftc.gov>, 1-877-438-4338, 600 Pennsylvania Avenue, NW, Washington, D.C. 20580.

Additional information:

- **For District of Columbia residents:** You may contact the Office of the Attorney General for the District of Columbia, 400 6th Street, NW, Washington, District of Columbia 20001-0189, www.oag.dc.gov, 1-202-727-3400.
- **For Iowa residents:** You are advised to report any suspected identity theft to law enforcement or to the Office of the Attorney General of Iowa, Hoover State Office Building, 1305 E. Walnut Street, Des Moines, Iowa 50319-0106, www.iowaattorneygeneral.gov, 1-888-777-4590.
- **For Maryland residents:** To obtain information about steps you can take to avoid identity theft, you may contact the Maryland Office of the Attorney General, Consumer Protection Division, 200 St. Paul Place, Baltimore, Maryland 21202, www.oag.state.md.us, 1-888-743-0023.
- **For Massachusetts residents:** 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.
- **For New Mexico residents:** You have rights under the Fair Credit Reporting Act (FCRA). These include, among others, the right to know what is in your file; to dispute incomplete or inaccurate information; to have consumer reporting agencies correct or delete inaccurate, incomplete, or unverifiable information. For more information about the FCRA, and your rights pursuant to the



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FCRA, please visit https://files.consumerfinance.gov/f/201504_cfpb_summary_your-rights-under-fcra.pdf.

- **For North Carolina residents:** To obtain information about how to prevent identity theft, you may contact the North Carolina Office of the Attorney General, Consumer Protection Division, 9001 Mail Service Center, Raleigh, North Carolina 27699-9001, www.ncdoj.gov, 1-877-566-7226.
- **For New York residents:** You may contact the New York State Office of the Attorney General, The Capitol, Albany, NY 12224-0341, <https://ag.ny.gov/>, 1-800-771-7755. You may also contact the New York Department of State Division of Consumer Protection, One Commerce Plaza, 99 Washington Ave., Albany, New York 12231-0001, www.dos.ny.gov/consumerprotection, 1-800-697-1220.
- **For Oregon residents:** You are advised to report any suspected identity theft to law enforcement, the Federal Trade Commission, and the Oregon Attorney General, Oregon Department of Justice, 1162 Court St. NE, Salem, Oregon 97301-4096, www.doj.state.or.us, 1-877-877-9392.
- **For Rhode Island residents:** You may contact the Office of the Attorney General of Rhode Island, 150 South Main Street, Providence, Rhode Island 02903, www.riag.ri.gov, (401) 274-4400. In Rhode Island, you may file or obtain a police report.
- Contact information for the other Attorneys General is available at www.naag.org/current-attorneys-general.php.