



November 12, 2021

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Via electronic-mail: attorneygeneral@doj.nh.gov

Office of the Attorney General
Consumer Protection Bureau
33 Capitol Street
Concord, New Hampshire 03302

Re: Our Client : Enesco Parent, LLC
Matter : August 13, 2021 Data Security Incident
Wilson Elser File # : 16516.01610

Dear Attorney General Formella,

We represent Enesco Parent, LLC d/b/a Enesco, LLC (“Enesco”), headquartered in Itasca, Illinois, with respect to a data security incident described in more detail below. Enesco takes the security and privacy of the information in its control seriously, and has taken steps to prevent a similar incident from occurring in the future.

This letter will serve to inform you of the nature of the security incident, what information has been compromised, and the steps that Enesco is taking to secure the integrity of its systems. We have also enclosed hereto a sample of the notifications made to the potentially impacted individuals, which includes an offer of free credit monitoring and other theft protection services.

1. Nature of the Security Incident

On August 13, 2021, Enesco, LLC (“Enesco”) detected and stopped a network security incident. An unauthorized third-party infiltrated the network. Enesco immediately shut off access to the network and engaged specialized third-party forensic and technical resources to respond to the incident. Enesco has secured and remediated its network and the data it maintains. On October 15, Enesco was alerted to data exfiltration that occurred on or before August 13.

Once the environment was secure, Enesco immediately initiated a comprehensive investigation into the extent of the unauthorized activity. While there has been no evidence of any identity theft

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or related fraud, it is possible that personal information including full name, mailing address, birth date, social security number, and potentially direct deposit information could have been exposed to an unauthorized party during the network compromise. Enesco maintains this employee and dependent information on the system for standard payroll and organizational purposes.

As of this writing, Enesco has not received any reports of related identity theft since the date of the incident.

2. Steps Taken

Upon detecting this incident, Enesco moved quickly to initiate an incident response, which included fully securing and remediating the network and the data maintained. Enesco conducted an investigation with the assistance of third-party forensic specialists and has reported this matter to the FBI. Enesco has implemented additional cybersecurity training and put in place additional technical and operational safeguards, including without limitation geo-fencing, firewall updates, and endpoint detection and response software. Enesco is also reviewing and altering its policies and procedures relating to the security of systems and servers, as well as its information life cycle management.

Enesco extended to all potentially impacted individuals an offer for free credit monitoring and identity theft protection through IDX. This service includes 12 months of credit monitoring, a \$1,000,000 insurance reimbursement policy, along with a fully managed ID theft recovery service, should the need arise. The notification letter and offer of free credit monitoring was mailed on November 2, 2021. Twenty five (25) New Hampshire residents are receiving notification letters.

3. Contact Information

Enesco remains dedicated to protecting the sensitive information in its control. If you have any questions or need additional information, please do not hesitate to contact me at Rachel.Cobble@WilsonElser.com or 205.709.8990.

Very truly yours,

Wilson Elser Moskowitz Edelman & Dicker LLP



Rachel Cobble, Esq.

Copy: Michael Kar, Esq. (Wilson Elser LLP)

Enclosure: *Sample Notification Letters*



P.O. Box 989728
West Sacramento, CA 95798-9728

To Enroll, Please Call:
1-833-608-3034
Or Visit:
<https://app.idx.us/account-creation/protect>
Enrollment Code: <<Enrollment>>

Via First-Class Mail

<<FirstName>> <<LastName>>
<<Address1>>
<<Address2>>
<<City>>, << <<Zip>>

November 2, 2021

Notice of Data Breach

Dear <<FirstName>> <<LastName>>,

We are writing in order to inform you of an incident that may have exposed your sensitive personal information. We take the privacy of your personal information seriously and want to provide you with information and resources you can use to protect your information.

What Happened and What Information was Involved:

Enesco, LLC (“Enesco”) detected and stopped a network security incident on August 13, 2021. An unauthorized third-party infiltrated our network. We immediately shut off access to the network and engaged specialized third-party forensic and technical resources to respond to the incident. Enesco has secured and remediated its network and the data that we maintain.

Once our environment was secure, we initiated a comprehensive investigation into the extent of the unauthorized activity. Although we have no evidence that your information was specifically misused, it is possible that during the network compromise your full name, mailing address, birthdate, social security number, and potentially direct deposit bank account information could have been exposed to an unauthorized party. We maintain this employee and dependent information on our system for standard payroll and organizational purposes.

As of this writing, Enesco has not received any reports of related identity theft since the date of the incident.

What We Are Doing:

Upon detecting this incident, we moved quickly to initiate our incident response, which included fully securing and remediating our network and the data that we maintain. As mentioned above, we conducted an investigation with the assistance of third-party forensic specialists. We have also reviewed and altered our tools and procedures relating to the security of our systems and servers.

Additionally, we have secured free identity protection services, including credit monitoring services and identity theft protection services through IDX for all affected individuals, as set forth in full below.

What You Can Do:

We value the safety of your personal information and are therefore providing you with access to IDX services at no charge. These services provide you with alerts for <<12/24>> months of credit and CyberScan monitoring, a \$1,000,000 insurance

reimbursement policy, and fully managed id theft recovery services from the date of enrollment. With this protection, IDX will help you resolve issues if your identity is compromised.

We encourage you to contact IDX with any questions and to enroll in free IDX services by calling 1-833-608-3034 or by going to <https://app.idx.us/account-creation/protect> and using the Enrollment Code provided above. IDX is available Monday through Friday 9 am – 9 pm Eastern Time. Please note the deadline to enroll is February 2, 2022.

We encourage you to take full advantage of this service offering. Representatives have been fully versed on the incident and can answer questions or concerns you may have regarding protection of your personal information.

For More Information:

Enclosed you will find additional information regarding the resources available to you, and the steps that you can take to further protect your personal information.

We recognize that you may have questions not addressed in this letter. If you have additional questions, please call the contact number listed above.

Enesco values the security of your personal data, and we apologize for any inconvenience that this incident has caused.

Sincerely,

A handwritten signature in dark ink, appearing to read "Rich Farruggia". The signature is fluid and cursive, with the first name "Rich" and last name "Farruggia" clearly distinguishable.

Rich Farruggia, CHRO
Enesco, LLC

Additional Information

Credit Reports: 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, 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.

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. You may make that request 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 (note that if you are requesting a credit report for your spouse or a minor under the age of 16, this information must be provided for him/her as well): (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; and (5) any applicable incident report or complaint with a law enforcement agency or the Registry of Motor Vehicles. The request must also include a copy of a government-issued identification card and a copy of a recent utility bill or bank or insurance statement. It is essential that each copy be legible, display your name and current mailing address, and the date of issue. As of September 21, 2018, it is free to place, lift, or remove a security freeze. You may also place a security freeze for children under the age of 16. You may obtain a free security freeze by contacting any one or more of the following national consumer reporting agencies:

Equifax Security Freeze P.O. Box 105788 Atlanta, GA 30348 1-800-349-9960 https://www.equifax.com/personal/credit-report-services/credit-freeze/	Experian Security Freeze P.O. Box 9554 Allen, TX 75013 1-888-397-3742 www.experian.com/freeze/center.html	TransUnion Security Freeze P.O. Box 160 Woodlyn, PA 19094 1-800-909-8872 www.transunion.com/credit-freeze
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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);
- TransUnion (<https://www.transunion.com/fraud-alerts>); or
- Experian (<https://www.experian.com/fraud/center.html>).

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. As of September 21, 2018, 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 located above.

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

File Police Report: You have the right to file or obtain a police report if you experience identity fraud. Please note that in order to file a crime report or incident report with law enforcement for identity theft, you will likely need to provide proof that you have been a victim. A police report is often required to dispute fraudulent items. You can generally report suspected incidents of identity theft to local law enforcement or to the Attorney General.

FTC and Attorneys General: You can further educate yourself regarding identity theft, fraud alerts, security freezes, and the steps you can take to protect yourself, by contacting the consumer reporting agencies, the Federal Trade Commission, or your state Attorney General.

The Federal Trade Commission can be reached at: 600 Pennsylvania Avenue NW, Washington, DC 20580, www.identitytheft.gov, 1-877-ID-THEFT (1-877-438-4338), TTY: 1-866-653-4261. The Federal Trade Commission also encourages those who discover that their information has been misused to file a complaint with them. You can obtain further information on how to file such a complaint by way of the contact information listed above. You have the right to

file a police report if you ever experience identity theft or fraud. Please note that in order to file a report with law enforcement for identity theft, you will likely need to provide some proof that you have been a victim. Instances of known or suspected identity theft should also be reported to law enforcement. This notice has not been delayed by law enforcement.

For Maryland residents, the Attorney General can be contacted at 200 St. Paul Place, 16th Floor, Baltimore, MD 21202, 1-888-743-0023, and www.oag.state.md.us.

For New Mexico residents, you have rights pursuant to the Fair Credit Reporting Act, such as the right to be told if information in your credit file has been used against you, the right to know what is in your credit file, the right to ask for your credit score, and the right to dispute incomplete or inaccurate information. Further, pursuant to the Fair Credit Reporting Act, the 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 credit reports to be provided to employers; you may limit "prescreened" offers of credit and insurance you get based on information in your credit report; and you may seek damages from violators. You may have additional rights under the Fair Credit Reporting Act not summarized here. Identity theft victims and active duty military personnel have specific additional rights pursuant to the Fair Credit Reporting Act. We encourage you to review your rights pursuant to the Fair Credit Reporting Act at www.consumerfinance.gov/f/201504_cfpb_summary_your-rights-under-fcra.pdf or by writing Consumer Response Center, Room 130-A, Federal Trade Commission, 600 Pennsylvania Ave. N.W., Washington, D.C. 20580.

For North Carolina residents, the Attorney General can be contacted at 9001 Mail Service Center, Raleigh, NC 27699-9001, 1-877-566-7226 or 1-919-716-6400, and www.ncdoj.gov.

For New York residents, the Attorney General may be contacted at Office of the Attorney General, The Capitol, Albany, NY 12224-0341, 1-800-771-7755, and <https://ag.ny.gov/>.

For Rhode Island residents, the Rhode Island Attorney General can be reached at 150 South Main Street, Providence, Rhode Island 02903, www.riag.ri.gov, and 1-401-274-4400. Under Rhode Island law, you have the right to obtain any police report filed in regard to this incident.