



MULLEN
COUGHLIN_{LLC}
ATTORNEYS AT LAW

RECEIVED
JAN 15 2019
CONSUMER PROTECTION

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January 11, 2019

INTENDED FOR ADDRESSEE(S) ONLY

VIA U.S. MAIL

Attorney General Gordon J. MacDonald
Office of the New Hampshire Attorney General
Attn: Security Breach Notification
33 Capitol Street
Concord, NH 03301

Re: Notice of Data Event

Dear Attorney General MacDonald:

We represent International E-Z UP, Inc. ("E-Z UP") located at 1900 Second Street, Norco, California, 92860, and are writing to notify your office of an incident that may affect the security of payment information relating to seventy-six (76) New Hampshire residents. The investigation into this matter is ongoing, and this notice will be supplemented with any new significant facts learned subsequent to its submission. By providing this notice, E-Z UP does not waive any rights or defenses regarding the applicability of New Hampshire law, the applicability of the New Hampshire data event notification statute, or personal jurisdiction.

Nature of the Data Event

On or around October 8, 2018, E-Z UP was notified by its credit card processor of suspicious activity related to certain credit cards used in transactions on its website. E-Z UP immediately launched an investigation into this report. Through this investigation, E-Z UP determined that malicious code was inserted into their e-commerce site which captured credit card transactions between May 11, 2018 through August 2, 2018, and transmitted customer payment information to an unauthorized party. The malicious code was removed from E-Z UP's e-commerce site. Additional security measures were taken to further secure the website and customer payment information. E-Z UP has also been working to identify those customers whose payment information may be affected.

The information that could have been subject to unauthorized access includes name, credit card number, CVV and expiration date.

Notice to New Hampshire Residents

On or about January 11, 2019, E-Z UP began providing written notice of this incident to affected individuals, which includes seventy-six (76) New Hampshire residents. Written notice is being provided in substantially the same form as the letter attached here as *Exhibit A*.

Other Steps Taken and To Be Taken

Upon discovering the event, E-Z UP moved quickly to investigate and respond to the incident, assess the security of E-Z UP systems, and notify potentially affected individuals. E-Z UP is also working to review its policies and procedures and implement additional security measures.

Additionally, E-Z UP is providing impacted individuals with guidance on how to better protect against identity theft and fraud, including advising individuals to report any suspected incidents of identity theft or fraud to their credit card company and/or bank. E-Z UP is providing individuals with information on how to place a fraud alert and security freeze on one's credit file, information on protecting against tax fraud, the contact details for the national consumer reporting agencies, information on how to obtain a free credit report, a reminder to remain vigilant for incidents of fraud and identity theft by reviewing account statements and monitoring free credit reports, and encouragement to contact the Federal Trade Commission, their state Attorney General, and law enforcement to report attempted or actual identity theft and fraud. E-Z UP is notifying state regulators and the consumer reporting agencies as necessary.

Contact Information

Should you have any questions regarding this notification or other aspects of the data security event, please contact us at (267) 930-4786.

Very truly yours,



Ryan C. Loughlin of
MULLEN COUGHLIN LLC

RCL: ajd
Enclosure

EXHIBIT A



Return Mail Processing Center
PO 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>>

RE: Notice of Data Breach

Dear <<Name 1>>,

International E-Z UP, Inc. ("E-Z UP") writes to inform you of a recent event that may affect the security of your payment information used at E-Z UP's website. We are making you aware of the event, so you may take steps to better protect against the possibility of identity theft or fraud, should you feel it necessary to do so.

What Happened? On or around October 8, 2018, E-Z UP was notified by its credit card processor of suspicious activity related to certain credit cards used in transactions on its website. E-Z UP immediately launched an investigation into this report. Through this investigation, E-Z UP determined that malicious code was inserted into their e-commerce site which captured credit card transactions between May 11, 2018 through August 2, 2018, and transmitted customer payment information to an unauthorized party. The malicious code was removed from E-Z UP's e-commerce site. Additional security measures were taken to further secure the website and customer payment information. E-Z UP has also been working to identify those customers whose payment information may be affected.

What Information Was Involved? As someone who provided payment information while the malicious code was present, it is possible that your payment information including your name, credit card number, CVV, and expiration date may be affected by this incident.

What We Are Doing. The confidentiality, privacy, and security of information in our care is one of our highest priorities. Upon learning of this incident, we took steps to secure our e-commerce site and to find out what happened. As part of our ongoing commitment to the security of the information in our care, we are reviewing our existing policies and procedures and working to implement additional security measures.

What You Can Do. You may review the enclosed "Steps You Can Take to Prevent Identity Theft and Fraud" to learn more about how to better protect against fraud and identity theft.

For More Information. We understand you may have questions about this incident that are not addressed in this letter. To ensure your questions are answered in a timely manner, you can call our dedicated assistance line at 1-877-845-8058, Monday through Friday from 6:00 a.m. to 6:00 p.m. Pacific Time. You may also write to us at 1900 Second Street, Norco, California 92860.

E-Z UP takes the privacy and security of our customer's payment information very seriously. We sincerely regret any inconvenience or concern this incident may cause you.

Sincerely,

Katie Melzer
Chief Financial Officer
International E-Z UP, Inc.

Steps You Can Take to Protect Against Identity Theft and Fraud

We encourage you to remain vigilant against incidents of identity theft and fraud, to review your account statements, and to monitor your credit reports for suspicious activity. Under U.S. law you are entitled to one free credit report annually from each of the three major credit reporting bureaus. To order your free credit report, visit www.annualcreditreport.com or call, toll-free, 1-877-322-8228. You may also contact the three major credit bureaus directly to request a free copy of your credit report.

You have the 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. The security freeze is designed to prevent credit, loans, and services from being approved in your name without your consent. However, you should be aware that using a security freeze to take control over who gets access to the personal and financial information in your credit report may delay, interfere with, or prohibit the timely approval of any subsequent request or application you make regarding a new loan, credit, mortgage, or any other account involving the extension of credit. Pursuant to federal law, you cannot be charged to place or lift a security freeze on your credit report. Should you wish to place a security freeze, please contact the major consumer reporting agencies listed below:

Experian

PO Box 9554
Allen, TX 75013
1-888-397-3742
www.experian.com/freeze/center.html

TransUnion

P.O. Box 2000
Chester, PA 19016
1-888-909-8872
www.transunion.com/credit-freeze

Equifax

PO Box 105788
Atlanta, GA 30348-5788
1-800-685-1111
www.equifax.com/personal/credit-report-services

In order to request a security freeze, you will need to provide the following information:

1. Your full name (including middle initial as well as Jr., Sr., II, III, etc.);
2. Social Security number;
3. Date of birth;
4. If you have moved in the past five (5) years, provide the addresses where you have lived over the prior five years;
5. Proof of current address, such as a current utility bill or telephone bill;
6. A legible photocopy of a government-issued identification card (state driver's license or ID card, military identification, etc.);
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.

As an alternative to a security freeze, you have the right to place an initial or extended “fraud alert” on your file at no cost. An initial fraud alert is a 1-year alert that is placed on a consumer's credit file. Upon seeing a fraud alert display on a consumer's credit file, a business is required to take steps to verify the consumer's identity before extending new credit. If you are a victim of identity theft, you are entitled to an extended fraud alert, which is a fraud alert lasting seven years. Should you wish to place a fraud alert, please contact any one of the agencies listed below:

Experian

P.O. Box 2002
Allen, TX 75013
1-888-397-3742
www.experian.com/fraud/center.html

TransUnion

P.O. Box 2000
Chester, PA 19016
1-800-680-7289
www.transunion.com/fraud-victim-resource/place-fraud-alert

Equifax

P.O. Box 105069
Atlanta, GA 30348
1-888-766-0008
www.equifax.com/personal/credit-report-services

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 and your state Attorney General. This notice has not been delayed by law enforcement.

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, www.ncdoj.gov.

For Maryland residents, the Attorney General can be contacted at 200 St. Paul Place, 16th Floor, Baltimore, MD 21202, 1-888-743-0023, 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 violator. 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 by visiting 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 Rhode Island Residents: The Rhode Island Attorney General can be reached at: 150 South Main Street, Providence, Rhode Island 02903, www.riag.ri.gov, 1-401-247-4400. Under Rhode Island law, you have the right to obtain any police report filed in regard to this incident. There are 32 Rhode Island residents impacted by this incident.