

BakerHostetler

Baker&Hostetler LLP

2929 Arch Street
Cira Centre, 12th Floor
Philadelphia, PA 19104-2891

T 215.568.3100
F 215.568.3439
www.bakerlaw.com

David B. Sherman
direct dial: 215.564.8380
dshe@bakerlaw.com

August 18, 2021

VIA E-MAIL (DOJ-CPB@DOJ.NH.GOV)

Attorney General John Formella
Office of the Attorney General
33 Capitol Street
Concord, NH 03301

Re: Incident Notification

Dear Attorney General Formella:

We are writing to provide supplemental information about a security incident experienced by our client, Hudson Envelope of New Jersey Corp. (“Hudson”), a stationery manufacturing company headquartered in Northvale, New Jersey. Our initial notice to you was dated June 30, 2021.

As explained in the previous letter, Hudson discovered that unauthorized code designed to capture cardholder data was present on the web server that hosts Hudson’s e-commerce website between June 2020 and January 2021. Accordingly, on June 30, 2021, Hudson mailed notification letters to individuals who placed orders and completed the checkout process on the website while the unauthorized code was present.

Recently, Hudson discovered additional suspicious activity involving its e-commerce website. In response, Hudson promptly launched an investigation. Through its investigation, Hudson discovered that its perimeter access control tool was misconfigured when Hudson implemented it as a remedial measure following its prior discovery of unauthorized code on its web server. As a result, another unauthorized code was inserted onto Hudson’s web server and remained there between February 2, 2021 and June 18, 2021. Hudson immediately removed the code upon discovery.

While present on the web server, the new unauthorized code could have potentially captured cardholder names, billing and shipping addresses, email addresses, telephone numbers, payment card numbers, expiration dates, and card security codes (CVV) submitted by customers who placed orders and completed the checkout process on the website. On July 19, 2021, Hudson discovered that 23 New Hampshire residents placed an order on the website while the unauthorized code was present.

August 18, 2021

Page 2

Beginning on August 18, 2021, Hudson is providing written notice via United States Postal Service mail to the New Hampshire residents whose information was potentially accessed by an unauthorized party.¹ A sample copy of the letter is enclosed. The notice letter also provides a dedicated telephone number that notice recipients can call with any questions they may have.

To help prevent a similar incident from occurring in the future, Hudson corrected the misconfiguration in its perimeter access control tool. Hudson has also implemented enhanced logging and additional security features within its e-commerce environment and continues to provide cybersecurity training to its employees.

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

Sincerely,

A handwritten signature in black ink, appearing to read "David B. Sherman". The signature is fluid and cursive, with the first name "David" being the most prominent.

David B. Sherman
Partner

¹ This notice does not waive Hudson's objection that New Hampshire lacks personal jurisdiction over it regarding any claims related to this incident.



<<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>>,

Hudson Envelope (“Hudson”) is committed to protecting the confidentiality and security of the information we maintain. We are writing to inform you about an incident that may have involved some of your information. This notice explains the incident, measures we have taken in response, and additional steps you can take to protect your information.

Hudson recently discovered suspicious activity involving its e-commerce website. In response, we promptly launched an investigation. Through this investigation, we discovered that unauthorized code designed to capture cardholder data was present on the web server that hosts our e-commerce website between February 2, 2021 and June 18, 2021. Upon discovery, we immediately removed the code from our system. While present on the web server, the unauthorized code could have captured cardholder data, including cardholder names, billing and shipping addresses, email addresses, telephone numbers, payment card numbers, expiration dates, and card security codes (CVV), entered during the checkout process by customers who placed orders on the website. To identify individuals whose information might have been involved, we reviewed order information for customers who placed orders on the website while the unauthorized code was present. On July 19, 2021, we discovered that you placed an order on the website while the unauthorized code was present.

We encourage you to review your payment card statements for any unauthorized charges. You should immediately report any such charges to your card issuer because payment card network rules generally provide that cardholders are not responsible for unauthorized charges that are timely reported. The telephone number to call is usually on the back of your payment card. You can find information about additional steps you can take to protect your information on the following pages.

We regret any concern or inconvenience this may cause you. To help prevent a similar incident from occurring in the future, we have implemented enhanced logging and additional security features within our e-commerce environment and continue to provide cybersecurity training to our employees. If you have questions, please call 1-855-731-3335, Monday – Friday, from 9:00 a.m. until 6:30 p.m., Eastern Time, excluding some U.S. holidays.

Sincerely,

Andrew Jacobs
CEO

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: 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.

Hudson Envelope's address is 185 Legrand Avenue, Northvale, NJ 07647 and its phone number is 201-567-6666.

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 Ave, Hartford, CT 06106, 1-860-808-5318, www.ct.gov/ag

District of Columbia: 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: 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

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 26 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 NW, 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.