STATE OF NH
DEPT OF JUSTICE
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WILSON ELSER
WILSON ELSER MOSKOWITZ EDELMAN & DICKER LLP

January 27, 2017

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Attorney General Joseph Foster
Office of the Attorney General
33 Capitol Street
Concord, NH 03302

Re: Data Security Incident

Dear Attorney General Foster:

We represent the International Code Council ("ICC"), a member-focused association located in the District of Columbia, with respect to a recent potential data security incident described in more detail below. ICC takes the security and privacy of the information in its control very seriously, and is taking steps to prevent a similar incident from occurring in the future.

1. Nature of the security incident.

On December 16, 2016, ICC learned of an issue potentially impacting the processing of credit and debit card purchases made through its online store. ICC immediately took action to secure its system and conducted an investigation to determine what information may have been accessed. The independent forensics investigation, which took time, determined that customer payment card information, including name, address, and credit/debit card information, may have been compromised between the dates April 25, 2016 – May 24, 2016, and July 11, 2016 – September 14, 2016.

2. Number of New Hampshire residents affected.

Seventy-one (71) New Hampshire residents were affected by this security incident. Notification letters to those individuals were mailed on January 27, 2017, by first class mail. A sample copy of the notification letter is included with this letter.

3. Steps taken or plan to take relating to the incident.

ICC is taking steps to prevent a similar event from occurring in the future. These actions include updating the security of its website, servers, installing additional firewalls, and updating its security training. Notice is also being provided to the credit reporting agencies.

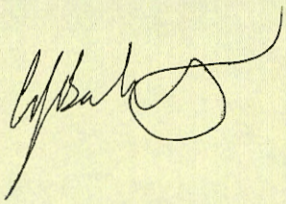
4. Contact information.

ICC remains dedicated to protecting the sensitive information in its control. If you have and questions or need additional information, please do not hesitate to contact me at Gregory.Bautista@wilsonelser.com or (914) 323-7000.

Please let us know if you have any questions.

Very truly yours,

Wilson Elser Moskowitz Edelman & Dicker LLP



Gregory J. Bautista

Enclosure

INTERNATIONAL CODE COUNCIL®

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

<<mail id>>
<<Name 1>>
<<Address 1>>
<<Address 2>>
<<City>><<State>><<Zip>>

<<Date>>

Dear <<Name 1>>,

We are writing to inform you of an incident at International Code Council ("ICC") that may have resulted in the disclosure of your name and payment card information. We take the security of your personal information very seriously, and sincerely apologize for any inconvenience this incident may cause. This letter contains information about steps you can take to protect yourself.

On December 16, 2016, we discovered an issue potentially impacting the processing of credit and debit card purchases made through our online store. We immediately took action to secure our system and conducted an investigation to determine what information may have been accessed. The independent forensics investigation, which took time, determined that customer payment card information, including name, address, and credit/debit card information may have been compromised between the dates April 25, 2016 – May 24, 2016, and July 11, 2016 - September 14, 2016. The security incident has been contained, and you may continue use your credit and debit cards securely.

We recommend that you check your current and past credit or debit card statements for unusual or suspicious activity, and if any is found, report it to your bank or credit card company. Additional tips for protecting your information can be found on the attached information sheet.

We want to assure you that we are taking steps to prevent a similar event from occurring in the future, and to protect the privacy and security of your information. These actions include updating the security of our website, servers, installing additional firewalls and updating our security training.

Please know that the protection and security of your personal information is our utmost priority, and we sincerely regret any inconvenience or concern this matter may cause you. If you have any questions or concerns, please call 844-893-3076, Monday through Friday, 8:00 am – 8:00 pm Central.

Sincerely,

John Belcik

John Belcik
Chief Operating Officer

Additional Important Information

For residents of Hawaii, Michigan, Missouri, Virginia, Vermont, and North Carolina: It is recommended by state law that you remain vigilant for incidents of fraud and identity theft by reviewing credit card account statements and monitoring your credit report for unauthorized activity.

For residents of Illinois, Iowa, Maryland, Missouri, North Carolina, Oregon, and West Virginia:
It is required by state laws to inform you that 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 nationwide three 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.

For residents of Iowa:
State law advises you to report any suspected identity theft to law enforcement or to the Attorney General.

For residents of Oregon:
State laws advise you to report any suspected identity theft to law enforcement, as well as the Federal Trade Commission.

For residents of Maryland, Illinois, and North Carolina:
You can obtain information from the Maryland and North Carolina Offices of the Attorneys General and the Federal Trade Commission about fraud alerts, security freezes, and steps you can take toward preventing identity theft.

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

North Carolina Office of the Attorney General
Consumer Protection Division
9001 Mail Service Center
Raleigh, NC 27699-9001
1-877-566-7226
www.ncdoj.com

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

For residents of *Massachusetts*:
It is required by state law that you are informed of your right to obtain a police report if you are a victim of identity theft.

For residents of all states:

Fraud Alerts: You can place fraud alerts with the three credit bureaus at one of the three major credit bureaus by phone and also via Experian's or Equifax's website. 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. The contact information for all three credit bureaus is below:

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

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, or 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, 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. The consumer reporting agency may charge a small fee to place, life, or remove a freeze, but is free if you are a victim of identity theft or the spouse of a victim of identity theft, and you have submitted a valid police report relating to the identity theft incident to the consumer reporting agency. You may obtain a 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
www.equifax.com/help/credit-freeze/en_cp

Experian Security Freeze
P.O. Box 9554
Allen, TX 75013
www.experian.com/freeze

TransUnion (FVAD)
P.O. Box 2000
Chester, PA 19022
www.transunion.com

More information can also be obtained by contacting the Federal Trade Commission listed above.