



Luxottica of America Inc.
4000 Luxottica Place
Mason, Ohio 45040

RECEIVED

OCT 28 2020

CONSUMER PROTECTION

October 27, 2020

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

To Whom It May Concern:

I write on behalf of Luxottica of America Inc. (“Luxottica”), an eyewear and eyecare corporation that owns optical retail locations across the country, including in New Hampshire. We also act as a service provider to other eye care practices in New Hampshire. We recently learned that an unauthorized actor made a series of automated requests for data to the Luxottica owned and managed web application used for appointment scheduling.

As soon as we learned of the incident, we immediately began an internal investigation and took our scheduling application offline to remediate the issue and ensure the security of our systems. We began working with third-party cybersecurity specialists to determine the full nature and scope of the event. We have taken measures designed to enhance our security controls and prevent this type of incident from recurring, including implementing additional access restrictions on the appointment scheduling platform. We also notified federal law enforcement of this matter.

A general timeline of the incident and the investigation is as follows:

- On August 9, 2020, an automated attack was carried out against the Luxottica appointment scheduling application using an account that was created on August 5, 2020.
- Between August 9, 2020 and August 28, 2020 Luxottica conducted an internal investigation to determine the extent and nature of the incident and to confirm whether patient records had been accessed and/or acquired.
- On August 28, 2020, Luxottica preliminarily concluded that the unauthorized actor may have accessed and acquired individual information from the appointment scheduling app and that the incident may be a “breach” under the Health Insurance Portability and Accountability Act of 1996, as amended, and applicable state law.
- On September 28, 2020, we provided notice of this incident to our eye care providers for whom we act as a service provider.

Based on our investigation, we have determined that the personal information involved in this incident may have included: full names and Social Security number (1 individual) or payment card information (1 individual). Luxottica is not aware of any misuse of personal information or harm to individuals as a result of this incident.



As noted above, on September 28, 2020, Luxottica provided notice to impacted practices for which it acts as a service provider. The notice included an offer from Luxottica to provide notice on behalf of these practices to impacted individuals and applicable regulators, including the Department of Health and Human Services. Because practices using the appointment scheduling tool do not always store address information within the application, the practices needed time to locate and upload address information in order to allow Luxottica to provide notice to impacted individuals. A list of the impacted eye care practices for which we are giving notice to New Hampshire residents is attached to this letter.

On October 27, 2020, we will begin providing notice to the approximately 2 impacted individuals residing in New Hampshire, describing the steps they can take to protect themselves and the specific personal information about them that was impacted.

We are providing these individuals with an offer for a complimentary two years of credit and identity monitoring services provided by Kroll Associates, Inc. An individual can enroll in these services online at <https://enroll.idheadquarters.com> or by calling toll free at (877) 540-1431.

Please do not hesitate to contact me at (513) 630-7600 if you have any questions. I also can be reached at 4000 Luxottica Place, Mason, Ohio 45040 and jgroppe@luxotticaretail.com.

Sincerely,

A handwritten signature in cursive script that reads "Jason Groppe".

Jason Groppe
Chief Privacy Officer
Luxottica of America



LIST OF IMPACTED EYE CARE PRACTICES

[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]