



MULLEN
COUGHLIN_{LLC}
ATTORNEYS AT LAW

RECEIVED

MAR 09 2020

CONSUMER PROTECTION

Christopher J. DiIenno
Office: (267) 930-4775
Fax: (267) 930-4771
Email: cdiienzo@mullen.law

1275 Drummers Lane, Suite 302
Wayne, PA 19087

March 5, 2020

VIA U.S. MAIL

Consumer Protection Bureau
Office of the New Hampshire Attorney General
33 Capitol Street
Concord, NH 03301

Re: Notice of Data Event

Dear Sir or Madam,

We represent NYR Organic, Inc., who recently became aware of an event involving its affiliate, Neal's Yard (Natural Remedies) Limited (collectively referred to as "Neal's Yard Remedies") located at 745 Fifth Avenue, 5th Floor, New York, New York 10151, and are writing to notify your office of an incident that may affect the security of some personal information relating to seventy-five (75) 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, Neal's Yard Remedies 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

Recently, Neal's Yard Remedies became aware of suspicious activity related to a user's email account. We immediately launched an investigation to determine the full nature and scope of the email activity. With the assistance of computer forensics investigators, we learned that certain Neal's Yard Remedies user email accounts were accessed without authorization between August 21, 2019 and September 4, 2019.

Neal's Yard Remedies undertook a lengthy review of the email accounts and our systems to determine if they contained personal information. Neal's Yard Remedies then reviewed its systems further in an effort to determine address information for potentially impacted individuals. This lengthy review was completed on January 17, 2020, and we are notifying residents of your state in an abundance of caution because their information was present and potentially accessible at the time of the incident.

The information that could have been subject to unauthorized access includes name, address, Social Security number, and/or bank/financial account number.

March 5, 2020

Notice to New Hampshire Residents

On or about March 5, 2020, Neal's Yard Remedies provided written notice of this incident to all affected individuals, which includes seventy-five (75) 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, Neal's Yard Remedies moved quickly to investigate and respond to the incident, assess the security of Neal's Yard Remedies systems, and notify potentially affected individuals. Neal's Yard Remedies is also working to implement additional safeguards and training to its employees. Neal's Yard Remedies is providing access to credit monitoring services for two (2) years, through Experian, to individuals whose personal information was potentially affected by this incident, at no cost to these individuals.

Additionally, Neal's Yard Remedies 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. Neal's Yard Remedies 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.

Contact Information

Should you have any questions regarding this notification or other aspects of the data security event, please contact us at (267) 930-4775

Very truly yours,



Christopher J. DiIenno of
MULLEN COUGHLIN LLC

CJD/jcl

EXHIBIT A

NEAL'S YARD REMEDIES

NYR Organic, Inc., 745 Fifth Avenue, 5th Floor, New York, New York 10151

Return Mail Processing
PO Box 589
Claysburg, PA 16625-0589

March 5, 2020

F3823-L01-0000001 P001 T00001 *****MIXED AADC 159



SAMPLE A SAMPLE - L01 ADULT
APT ABC
123 ANY ST
ANYTOWN, US 12345-6789



Dear Sample,

NYR Organic, Inc. recently became aware of data security event involving its affiliate, Neal's Yard (Natural Remedies), Limited, (collectively "Neal's Yard Remedies") and writes to notify you of this event as it may affect the security of some of your personal information. We are providing you with information on the event, steps we have taken since discovering the incident, and what you may do to better protect your personal information should you feel it appropriate to do so.

What Happened? Recently, Neal's Yard Remedies became aware of suspicious activity related to a user's email account. We immediately launched an investigation to determine the full nature and scope of the email activity. With the assistance of computer forensics investigators, we learned that certain Neal's Yard Remedies user email accounts were accessed without authorization between August 21, 2019 and September 4, 2019.

Neal's Yard Remedies undertook a lengthy review of the email accounts and our systems to determine if they contained personal information, and later determined that information related to you was accessible during the period of potential compromise. Neal's Yard Remedies then reviewed its systems further in an effort to determine address information for potentially impacted individuals. This lengthy review was completed on January 17, 2020, and we are notifying you in an abundance of caution because your information was present and potentially accessible at the time of the incident.

What Information Was Involved? Neal's Yard Remedies cannot confirm specifically whether your information was actually viewed by the unauthorized individual(s). However, the Neal's Yard Remedies investigation confirmed the information present at the time of the incident includes your name and exposed data element, exposed data element/data element, and exposed data element.

What We Are Doing. The security of information in our care is among our highest priorities. Upon learning of this incident, we quickly took steps to confirm the security of our email system. We reset passwords for Neal's Yard Remedies' user and employee email accounts and reviewed our company policies and procedures relating to data security. In an abundance of caution, we are also notifying potentially affected individuals, including you, so that you may take further steps to best protect your personal information, should you feel it is appropriate to do so.

Although we are unaware of any actual or attempted misuse of your personal information as a result of this event, we secured the services of Experian to provide identity and credit monitoring services at no cost to you for 24 months. For more information on these services, please review the enclosed "Steps You Can Take to Protect Against Identity Theft and Fraud."

000001



What You Can Do. We encourage you to remain vigilant against incidents of identity theft and fraud, to review your account statements, and monitor your credit reports for suspicious activity for the next twelve (12) to twenty-four (24) months. You may also review the information contained in the attached *Steps You Can Take to Protect Your Information*. There you will also find more information on the credit monitoring and identity protection services we are making available to you. While Neal's Yard Remedies will cover the cost of these services, you will need to complete the activation process.

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, we established a dedicated assistance line at (877) 759-8886 which can be reached Monday through Friday from 6:00 a.m. to 6:00 p.m. Pacific Time and on Saturday and Sunday from 8:00 am to 5:00 pm Pacific Time. You may also write to us directly at Neal's Yard Remedies, 745 Fifth Avenue, 5th Floor, New York, New York 10151.

Neal's Yard Remedies takes the privacy and security of the personal information in our care very seriously. We sincerely regret any inconvenience or concern this incident may cause you.

Sincerely,

A handwritten signature in black ink, appearing to read "Stephen Tobitt", written in a cursive style.

Stephen Tobitt
Chief Executive Officer
NYR Organic, Inc.

Steps You Can Take to Protect Against Identity Theft and Fraud

Enroll in Credit Monitoring:

As an added precaution, and at no cost to you, we arranged to have Experian provide identity monitoring for 24 months. Experian is a global leader in risk mitigation and response, and their team has extensive experience helping people who have sustained an unintentional exposure of personal information. Your identity monitoring services include Credit Monitoring, Fraud Consultation, and Identity Theft Restoration. It is incumbent upon you to activate these services, as we are not able to act on your behalf to enroll you in the credit monitoring service. To activate your membership and start monitoring your personal information, please follow the steps below:

- Visit www.experianidworks.com/credit to activate and take advantage of your identity monitoring services.
- *You have until 5.31.20 to activate your identity monitoring services.*
- Activation Code: [REDACTED]
- Please be prepared to provide [REDACTED] when speaking to an agent.

Monitor Your Accounts

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 and to detect error over the next 12 to 24 months. 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

TransUnion
P.O. Box 2000
Chester, PA 19016
1-888-909-8872

Equifax
PO Box 105788
Atlanta, GA 30348-5788
1-800-685-1111

www.experian.com/freeze/center.html

www.transunion.com/credit-freeze

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.

0000001



F3823-L01

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 19106 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
--	--	---

Additional Information

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. 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, 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 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 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; <https://ag.ny.gov/>.

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 Rhode Island residents, the Rhode Island Attorney General can be reached at: 150 South Main Street, Providence, Rhode Island 02903, www.riag.ri.gov, 1-401-274-4400. Under Rhode Island law, you have the right to obtain any police report filed in regard to this incident. There are 59 Rhode Island residents impacted by this incident.