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October 31, 2018

VIA EMAIL

New Hampshire Office of the Attorney General  
Consumer Protection and Antitrust Bureau  
33 Capitol Street  
Concord, NH 03301  
DOJ-CPB@doj.nh.gov

Re: Data Security Breach at OXO

To the New Hampshire Attorney General's Office:

We are contacting you on behalf of our client, OXO, about a data security incident that occurred between July 1, 2018 and October 1, 2018 and involved the personal information of 21 residents of New Hampshire who were customers of OXO's e-commerce website, <https://www.oxo.com>. The incident involved an outside source inserting unauthorized code on OXO's website that collected information entered into the customer order pages on our website. The affected New Hampshire residents will be notified of this data breach immediately after your office has received this notification. Please note that in submitting this notice, OXO does not waive any rights or defenses regarding the applicability of New Hampshire law or personal jurisdiction.

### **What Happened**

On October 1, 2018, OXO learned that its website had been breached. The incident involved an outside source inserting unauthorized code on OXO's website that collected information entered into the customer order pages on our website. OXO has investigated the incident and at this point has determined that the potentially exposed information in this incident included name, billing and shipping address, and credit card information.

OXO immediately took steps to identify and remediate the security issue after learning of the intrusion. The investigation included a review of internal security systems to confirm that procedures already in place are strengthened and updated to further safeguard against a breach of data security in the future. OXO contacted a third-party, Kroll, who assisted with identifying locations for the impacted individuals and who gathered their contact information into a

October 31, 2018  
Page 2

consistent format for notification. This investigation was a time-consuming process, but OXO believed it was necessary to ensure appropriate precautions and next steps were taken.

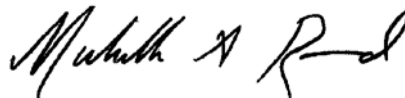
**Steps to Protect Your State Residents**

OXO is providing all potentially affected New Hampshire residents with written notice of the incident on or about November 1, 2018, following our notice to you. A copy of that notice is attached, excluding any identifying information. OXO is also providing access to free identity theft protection, credit monitoring, identity theft consultation and restoration for one year for affected individuals, and information on how to protect against identity theft and fraud.

OXO has already implemented additional security measures designed to prevent a recurrence of the breach, and to protect the privacy of OXO's valued customers. Upon discovering the unauthorized code, OXO immediately took actions to secure its site by working with recognized security consultants to conduct a thorough investigation of the incident and to determine additional measures designed to help prevent incidents of this kind in the future. OXO has investigated the nature of the malicious code, removed the unauthorized code, conducted systems scans and reviewed access credentials.

If you have any further questions regarding this incident, please do not hesitate to contact me either by telephone at (214) 969-2713, or by email at [mreed@akingump.com](mailto:mreed@akingump.com).

Sincerely,



Michelle A. Reed

Enclosure



<<Date>> (Format: Month Day, Year)

<<MemberFirstName>> <<MemberMiddleName>> <<MemberLastName>> <<Suffix>>  
<<Address1>>  
<<Address2>>  
<<City>>, <<State>> <<ZipCode>>

## Notice of Data Breach

Dear <<MemberFirstName>> <<MemberLastName>>,

We are writing to tell you about an unfortunate data security incident involving sophisticated criminal activity that may have exposed some of your personal information. We take the protection and proper use of your information very seriously. For this reason, we are contacting you directly to explain the circumstances of the incident.

### What happened?

On October 1, 2018, OXO learned that the security of certain personal information entered into our e-commerce website (<https://www.oxo.com>) may have been compromised. The incident involved an outside source inserting unauthorized code on OXO's website on or around July 1, 2018 that collected information entered into the customer order pages on our website.

### What information was involved?

OXO believes that unauthorized code may have allowed access to your name, billing and shipping address, and credit card information.

### What we are doing.

OXO values your business and deeply regrets that this incident occurred. Upon discovering the unauthorized code, OXO immediately took actions to secure its site by working with recognized security consultants to conduct a thorough investigation of the incident and to determine additional measures designed to help prevent incidents of this kind in the future. OXO has investigated the nature of the malicious code, removed the unauthorized code, conducted systems scans and reviewed access credentials.

To help relieve concerns and restore confidence following this incident, we have secured the services of Kroll to provide identity monitoring at no cost to you for one year. Kroll is a global leader in risk mitigation and response, and their team has extensive experience helping people who have sustained an unintentional exposure of confidential data. Your identity monitoring services include Credit Monitoring, Fraud Consultation, and Identity Theft Restoration.

Visit [my.idmonitoringservice.com](https://my.idmonitoringservice.com) to activate and take advantage of your identity monitoring services.

*You have until **January 29, 2019** to activate your identity monitoring services.*

Membership Number: <<Member ID>>

To receive credit services by mail instead of online, please call 1-833-228-5721. Additional information describing your services is included with this letter.

### What you can do.

Please review the enclosed "Additional Resources" section included with this letter. This section describes additional steps you can take to help protect yourself, including recommendations by the Federal Trade Commission regarding identity theft protection and details on how to place a fraud alert or a security freeze on your credit file.

**For more information.**

If you have questions, please call 1-833-228-5721, Monday through Friday from 8:00 a.m. to 5:00 p.m. Central Time. Please have your membership number ready.

Protecting your information is important to us. We trust that the services we are offering to you demonstrate our continued commitment to your security and satisfaction.

Sincerely,

Tessa Judge  
General Counsel

## ADDITIONAL RESOURCES

### Contact information for the three nationwide credit reporting agencies is:

**Equifax**, PO Box 740241, Atlanta, GA 30374, [www.equifax.com](http://www.equifax.com), 1-800-685-1111

**Experian**, PO Box 2104, Allen, TX 75013, [www.experian.com](http://www.experian.com), 1-888-397-3742

**TransUnion**, PO Box 2000, Chester, PA 19022, [www.transunion.com](http://www.transunion.com), 1-800-888-4213

**Free Credit Report.** It is recommended that you remain vigilant for incidents of fraud and identity theft by reviewing account statements and monitoring your credit report for 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 agencies.

To order your annual free credit report please visit **[www.annualcreditreport.com](http://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 from the U.S. Federal Trade Commission's ("FTC") website at [www.consumer.ftc.gov](http://www.consumer.ftc.gov)) to:

Annual Credit Report Request Service, P.O. Box 105281, Atlanta, GA 30348-5281.

#### **For Colorado, Georgia, Maine, Maryland, Massachusetts, New Jersey, Puerto Rico, and Vermont residents:**

You may obtain one or more (depending on the state) additional copies of your credit report, free of charge. You must contact each of the credit reporting agencies directly to obtain such additional report(s).

**Fraud Alert.** You may place a fraud alert in your file by calling one of the three nationwide credit reporting agencies above. 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.

**Security Freeze.** You have the ability 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 may be able to use an online process, an automated telephone line, or a written request to any of the three credit reporting agencies listed above. 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 credit reporting agencies may charge a fee to place a freeze, temporarily lift it or permanently remove it. The fee is waived if you are a victim of identity theft and have submitted a valid investigative or law enforcement report or complaint relating to the identity theft incident to the credit reporting agencies. (You must review your state's requirement(s) and/or credit bureau requirement(s) for the specific document(s) to be submitted.)

**For Massachusetts residents:** The fee for each placement of a freeze, temporary lift of a freeze, or removal of a freeze is \$5.

**Federal Trade Commission and State Attorneys General Offices.** 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 home state. You have certain rights under the Fair Credit Reporting Act, 15 USC § 1681 et seq. More information about these rights can be found at [www.consumerfinance.gov/learnmore](http://www.consumerfinance.gov/learnmore). You may also contact these agencies for information on how to prevent or avoid identity theft.

You may contact the **Federal Trade Commission**, Consumer Response Center, 600 Pennsylvania Avenue, NW, Washington, DC 20580, [www.ftc.gov/bcp/edu/microsites/idtheft/](http://www.ftc.gov/bcp/edu/microsites/idtheft/), 1-877-IDTHEFT (438-4338).

**For Maryland residents:** You may contact the Maryland Office of the Attorney General, Consumer Protection Division, 200 St. Paul Place, Baltimore, MD 21202, [www.oag.state.md.us](http://www.oag.state.md.us), 1-888-743-0023.

**For North Carolina residents:** You may contact the North Carolina Office of the Attorney General, Consumer Protection Division, 9001 Mail Service Center, Raleigh, NC 27699-9001, [www.ncdoj.gov](http://www.ncdoj.gov), 1-877-566-7226.

### Reporting of identity theft and obtaining a police report.

**For Iowa residents:** You are advised to report any suspected identity theft to law enforcement or to the Iowa Attorney General.

**For Massachusetts residents:** You have the right to obtain a police report if you are a victim of identity theft.

**For Oregon residents:** You are advised to report any suspected identity theft to law enforcement, the Federal Trade Commission, and the Oregon Attorney General.



## TAKE ADVANTAGE OF YOUR IDENTITY MONITORING SERVICES

You've been provided with access to the following services<sup>1</sup> from Kroll:

### **Single Bureau Credit Monitoring**

You will receive alerts when there are changes to your credit data—for instance, when a new line of credit is applied for in your name. If you do not recognize the activity, you'll have the option to call a Kroll fraud specialist, who can help you determine if it's an indicator of identity theft.

### **Fraud Consultation**

You have unlimited access to consultation with a Kroll fraud specialist. Support includes showing you the most effective ways to protect your identity, explaining your rights and protections under the law, assistance with fraud alerts, and interpreting how personal information is accessed and used, including investigating suspicious activity that could be tied to an identity theft event.

### **Identity Theft Restoration**

If you become a victim of identity theft, an experienced Kroll licensed investigator will work on your behalf to resolve related issues. You will have access to a dedicated investigator who understands your issues and can do most of the work for you. Your investigator can dig deep to uncover the scope of the identity theft, and then work to resolve it.

<sup>1</sup> Kroll's activation website is only compatible with the current version or one version earlier of Internet Explorer, Chrome, Firefox, and Safari. To receive credit services, you must be over the age of 18 and have established credit in the U.S., have a Social Security number in your name, and have a U.S. residential address associated with your credit file.