

**BakerHostetler**

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FEB 23 2019

**CONSUMER PROTECTION**

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February 21, 2019

**VIA OVERNIGHT MAIL**

Gordon MacDonald  
Office of the Attorney General  
33 Capitol St.  
Concord, NH 03301

*Re: Notice of Security Incident*

Dear Attorney General MacDonald:

We are writing on behalf of our client, Rennline Automotive (“Rennline”), to notify your office of a security incident involving New Hampshire residents.<sup>1</sup>

Rennline operates the e-commerce store [rennline.com](http://rennline.com). On January 18, 2019, Rennline discovered suspicious code on the website. Rennline removed the code and worked with a leading cyber security firm to investigate the incident. The investigation determined that the unauthorized code was added by an unauthorized individual so that payment card information entered by purchasers on the e-commerce website was copied and sent to an unauthorized server. The code was active between May 28, 2018 and June 13, 2018, June 15, 2018 and July 12, 2018, July 20, 2018 and August 13, 2018, and August 22, 2018 and January 18, 2019. For customers who placed an order on the site during one of those time periods, payment card information was at risk of being collected by the unauthorized individual. This includes the names, shipping and billing addresses, order information, payment card numbers, card types, card expiration dates, and card verification codes (CVVs) (if provided).

To help prevent this type of incident from happening again, Rennline is taking steps to strengthen the security of its website. Law enforcement has been informed and Rennline will cooperate with their investigation. Rennline is providing a phone number that customers can contact with any questions they may have. Rennline is also recommending that potentially affected

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<sup>1</sup> This report is not a waiver of any objection that New Hampshire lacks personal jurisdiction over Rennline.

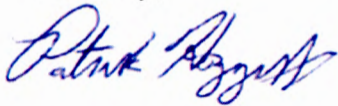
Gordon MacDonald  
Office of the Attorney General  
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individuals remain vigilant to the possibility of fraud by reviewing their account statements and credit reports for any unauthorized activity.

Beginning today, Rennline will notify 26 New Hampshire residents via U.S. mail in accordance with N.H. RSA § 359-C:20 4 in substantially the same form as the attached letter.

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

Sincerely,

A handwritten signature in blue ink, appearing to read "Patrick Haggerty".

Patrick H. Haggerty  
Partner

Enclosure



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

<<Mail ID>>  
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<<City>><<State>><<Zip>>  
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<<Date>>

Dear <<Name 1>>:

Rennline Automotive, which operates the e-commerce store, rennline.com, values the relationship we have with our customers and understands the importance of protecting your information. We are writing to inform you that we recently identified and addressed a security incident that may have involved your information. This notice explains the incident, measures that have been taken, and some steps you can take in response.

On January 18, 2019, we discovered unauthorized code on our website. The unauthorized code was removed, and we worked with a leading cyber security firm to investigate the incident. The investigation determined that the unauthorized code was added by an unauthorized individual so that payment card information entered by purchasers on our e-commerce website was copied and sent to an unauthorized server. The code was active between May 28, 2018 and June 13, 2018; June 15, 2018 and July 12, 2018; July 20, 2018 and August 13, 2018; and August 22, 2018 and January 18, 2019. Because you made a purchase on the website during those time frames, it is possible that your information was involved. This information includes your name, shipping and billing address, order information, payment card number ending in <<card last 4>>, card type, card expiration date, and the card verification code (CVV) (if provided).

We encourage you to closely review your payment card statements for any unauthorized charges. You should immediately report any such charges to the bank that issued your card. If reported timely, payment card network rules generally provide that cardholders are not responsible for unauthorized charges. Information on additional steps you can take can be found on the following pages.

We regret that this incident occurred and apologize for any inconvenience. To help prevent this type of incident from happening again, we are taking steps to strengthen the security of our website and have already moved to a more secure check-out method. If you have any questions about this matter, please call 877-890-8134, Monday to Friday, from 9:00 a.m. to 9:00 p.m., Eastern Time.

Sincerely,

Tom Rittenburg  
VP – Rennline Automotive Division

## **MORE INFORMATION ON WAYS TO PROTECT YOURSELF**

We recommend that you remain 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](http://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](http://www.equifax.com), 1-800-685-1111  
*Experian*, PO Box 2002, Allen, TX 75013, [www.experian.com](http://www.experian.com), 1-888-397-3742  
*TransUnion*, PO Box 2000, Chester, PA 19016, [www.transunion.com](http://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, [www.ftc.gov/idtheft](http://www.ftc.gov/idtheft), 1-877-IDTHEFT (438-4338)

**If you are a resident of Connecticut, Maryland, or North Carolina**, you may contact and obtain information from your state attorney general at:

- *Connecticut Attorney General's Office*, 55 Elm Street, Hartford, CT 06106, 1-860-808-5318, [www.ct.gov/ag](http://www.ct.gov/ag)
- *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](http://www.oag.state.md.us)
- *North Carolina Attorney General's Office*, 9001 Mail Service Centre, Raleigh, NC 27699, 1-919-716-6400 /1-877-566-7226, [www.ncdoj.gov](http://www.ncdoj.gov)

**Fraud Alerts:** There are two types of 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 at least 90 days. 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. You can place a fraud alert on your credit report by contacting any of the three national credit reporting agencies.

**Credit Freezes:** You have the right to put a credit freeze, also known as a security freeze, on your credit file, free of charge, so that no new credit can be opened in your name without the use of a PIN number that is issued to you when you initiate a freeze. A security freeze is designed to prevent potential credit grantors from accessing your credit report without your consent. If you place a security freeze, potential creditors and other third parties will not be able to get access to your credit report unless you temporarily lift the freeze. Therefore, using a security freeze may delay your ability to obtain credit.

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](http://www.experian.com)  
**TransUnion Security Freeze**, PO Box 2000, Chester, PA 19016, [www.transunion.com](http://www.transunion.com)  
**Equifax Security Freeze**, PO Box 105788, Atlanta, GA 30348, [www.equifax.com](http://www.equifax.com)

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 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 the police report, investigative report, or complaint to a law enforcement agency concerning identity theft.

The credit reporting agencies have one business day after receiving your request by toll-free telephone or secure electronic means, or three business days after receiving your request by mail, to place a security freeze on your credit report. The credit bureaus must also send written confirmation to you within five business days and provide you with a unique personal identification number (“PIN”) or password or both that can be used by you to authorize the removal or lifting of the security freeze.

To lift the security freeze in order to allow a specific entity or individual access to your credit report, or to lift a security freeze for a specified period of time, you must submit a request through a toll-free telephone number, a secure electronic means maintained by a credit reporting agency, or by sending a written request via regular, certified, or overnight mail to the credit reporting agencies and include proper identification (name, address, and Social Security number) and the PIN number or password provided to you when you placed the security freeze as well as the identity of those entities or individuals you would like to receive your credit report or the specific period of time you want the credit report available. The credit reporting agencies have one business day after receiving your request by toll-free telephone or secure electronic means, or three business days after receiving your request by mail, to lift the security freeze for those identified entities or for the specified period of time.

To remove the security freeze, you must submit a request through a toll-free telephone number, a secure electronic means maintained by a credit reporting agency, or by sending a written request via regular, certified, or overnight mail to each of the three credit bureaus and include proper identification (name, address, and Social Security number) and the PIN number or password provided to you when you placed the security freeze. The credit bureaus have one business day after receiving your request by toll-free telephone or secure electronic means, or three business days after receiving your request by mail, to remove the security freeze.

**Fair Credit Reporting Act:** You also have rights under the federal Fair Credit Reporting Act, which promotes the accuracy, fairness, and privacy of information in the files of consumer reporting agencies. The FTC has published a list of the primary rights created by the FCRA (<https://www.consumer.ftc.gov/articles/pdf-0096-fair-credit-reporting-act.pdf>), and that article refers individuals seeking more information to visit [www.ftc.gov/credit](http://www.ftc.gov/credit). The FTC’s list of FCRA rights includes:

- You have the right to receive a copy of your credit report. The copy of your report must contain all the information in your file at the time of your request.
- Each of the nationwide credit reporting companies – Experian, TransUnion and Equifax – is required to provide you with a free copy of your credit report, at your request, once every 12 months.
- You are also entitled to a free report if a company takes adverse action against you, like denying your application for credit, insurance, or employment, and you ask for your report within 60 days of receiving notice of the action. The notice will give you the name, address, and phone number of the credit reporting company. You’re also entitled to one free report a year if you’re unemployed and plan to look for a job within 60 days; if you’re on welfare; or if your report is inaccurate because of fraud, including identity theft.
- 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 may seek damages from violators.
- Identity theft victims and active duty military personnel have additional rights.