



July 14, 2021

Norton Rose Fulbright US LLP  
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United States

**Via E-mail (DOJ-CPB@doj.nh.gov)**

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Dear Sir or Madam:

I am writing on behalf of my client, RG HOLDCO LLC (“RG”), to provide notice of a security incident.<sup>1</sup> RG is the parent company to Revision Skincare and Goodier Cosmetics.

On April 23, 2021, RG identified a cybersecurity incident in which an unauthorized actor used malware to encrypt certain systems within its environments. In response, RG immediately took steps to secure its systems, launched an investigation, and a leading cybersecurity firm was engaged to assist. They also notified federal law enforcement and continue to support their investigation.

RG’s investigation determined that the unauthorized actor gained access to certain systems within its environments at various times from approximately March 24, 2021 and April 23, 2021. During this time period, the unauthorized actor appears to have obtained some data from RG’s systems. RG conducted a review of the data to identify individuals whose personal information may have been involved. On June 21, 2021, RG completed its review of the data and determined it contained some personal information of one New Hampshire resident, including name, date of birth, Social Security number, and financial account number.

Today, RG is sending a notification letter via First Class Mail to the one New Hampshire resident whose information may have been involved in the incident. This notice is being provided in accordance with NH Rev. Stat. § 359-C:20. Enclosed is a sample copy of the letter. The organization is offering two years of complimentary credit monitoring and identity protection services from Experian as well as a toll free hotline for the individual to call with any questions they may have.

To help prevent a similar incident from occurring in the future, the organization implemented additional security measures designed to enhance the security of its network, systems, and data, including enhancing network restrictions, privileged access management solution, and firewalls; implementing an advanced endpoint detection and response tool; and engaging a third-party firm to provide additional security monitoring. RG also continues to evaluate additional steps that may be taken to further increase its defenses going forward.

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<sup>1</sup> This notice is not, and does not constitute, a waiver of RG HOLDCO’s objection that New Hampshire lacks personal jurisdiction over it regarding any claims related to this data security incident.

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If you have any questions or need additional information regarding this incident, please do not hesitate to contact me.

Respectfully submitted,



Will Daugherty  
Partner

Enclosure



Return Mail Processing  
 PO Box 999  
 Suwanee, GA 30024

4 3 865 \*\*\*\*\*AUTO\*\*ALL FOR AADC 750

SAMPLE A. SAMPLE - L01 - Master

APT ABC



123 ANY ST

ANYTOWN, US 12345-6789



July 14, 2021

Dear Sample A. Sample:

Revision Skincare and Goodier Cosmetics, owned and operated by RG Holdco LLC (“RG”), take the privacy and security of personal information very seriously. We are writing to let you know about a data security incident we recently identified and addressed that may have involved some of your personal information. This notice explains the incident, the measures we have taken in response, and the steps you may consider taking to help protect your information.

On April 23, 2021, RG identified a cybersecurity incident in which an unauthorized actor used malware to encrypt certain systems within our environments. In response, we immediately took steps to secure our systems, launched an investigation, and a leading cybersecurity firm was engaged to assist. We also notified federal law enforcement. Our investigation determined that the unauthorized actor gained access to certain systems within the RG environments at various times between approximately March 24, 2021 and April 23, 2021. During this time period, the unauthorized actor appears to have obtained some data from RG’s systems. We conducted a review of the data to identify individuals whose personal information may have been involved. On June 21, 2021, we completed our review of the data and determined it contained some of your personal information, including your name[Extra1].

We do not have any evidence of fraud or misuse of your personal information as a result of this incident, but we wanted to make you aware of the incident and provide you with additional information on steps you may consider taking. As a precaution, **we are offering you a complimentary two-year membership in Experian® IdentityWorks<sup>SM</sup> Credit 3B.** This product helps detect possible misuse of your personal information and provides you with identity protection services focused on immediate identification and resolution of identity theft. IdentityWorks is completely free to you and enrolling in this program will not hurt your credit score. **For more information on IdentityWorks, including instructions on how to activate your complimentary two-year membership, as well as additional steps you may take to help protect your information, please see the additional information provided in the following pages.**

The security of your personal information is important to us and we sincerely regret that this incident occurred. To help prevent a similar incident from occurring in the future, RG implemented additional security measures designed to enhance the security of our network, systems, and data. Additionally, we continue to support federal law enforcement’s investigation.

If you have any questions, please call (800) 960-1799 toll-free Monday through Friday from 8 am – 10 pm Central, or Saturday and Sunday from 9 am – 7 pm Central (excluding major U.S. holidays). Be prepared to provide your engagement number [REDACTED]

Sincerely,

Francine Bean  
 Vice President, Human Resources  
 Revision Skincare

## ACTIVATE IDENTITYWORKS IN THREE EASY STEPS

To start monitoring your personal information, please follow the steps below:

- Ensure that you **enroll by October 31, 2021** (Your code will not work after this date.)
- **Visit** the Experian IdentityWorks website to enroll: <https://www.experianidworks.com/3bcredit>
- Provide your **activation code**: [REDACTED]

If you have questions about the product, need assistance with Identity Restoration that arose as a result of this incident or would like an alternative to enrolling in Experian IdentityWorks online, please contact Experian's customer care team at **(800) 960-1799** by **October 31, 2021**. Be prepared to provide engagement number [REDACTED] as proof of eligibility for the Identity Restoration services by Experian.

### ADDITIONAL DETAILS REGARDING YOUR 24-MONTH EXPERIAN IDENTITYWORKS MEMBERSHIP

A credit card is not required for enrollment in Experian IdentityWorks. You can contact Experian **immediately** regarding any fraud issues, and have access to the following features once you enroll in Experian IdentityWorks:

- **Experian credit report at signup:** See what information is associated with your credit file. Daily credit reports are available for online members only.\*
- **Credit Monitoring:** Actively monitors Experian, Equifax and Transunion files for indicators of fraud.
- **Identity Restoration:** Identity Restoration specialists are immediately available to help you address credit and non-credit related fraud.
- **Experian IdentityWorks ExtendCARE™:** You receive the same high-level of Identity Restoration support even after your Experian IdentityWorks membership has expired.
- **\$1 Million Identity Theft Insurance\*\*:** Provides coverage for certain costs and unauthorized electronic fund transfers.

If you believe there was fraudulent use of your information as a result of this incident and would like to discuss how you may be able to resolve those issues, please reach out to an Experian agent. If, after discussing your situation with an agent, it is determined that identity restoration support is needed then an Experian Identity Restoration agent is available to work with you to investigate and resolve each incident of fraud that occurred from the date of the incident (including, as appropriate, helping you with contacting credit grantors to dispute charges and close accounts; assisting you in placing a freeze on your credit file with the three major credit bureaus; and assisting you with contacting government agencies to help restore your identity to its proper condition).

Please note that Identity Restoration is available to you for 24 months from the date of this letter and does not require any action on your part at this time. The Terms and Conditions for this offer are located at [www.ExperianIDWorks.com/restoration](http://www.ExperianIDWorks.com/restoration).

\* Offline members will be eligible to call for additional reports quarterly after enrolling.

\*\* The Identity Theft Insurance is underwritten and administered by American Bankers Insurance Company of Florida, an Assurant company. Please refer to the actual policies for terms, conditions, and exclusions of coverage. Coverage may not be available in all jurisdictions.

## ADDITIONAL STEPS YOU CAN TAKE

**Free Credit Report.** Regardless of whether you choose to take advantage of the complimentary identity monitoring, it is always advisable to be vigilant for incidents of fraud or identity theft by reviewing your account statements and free credit reports for any unauthorized activity. If you identify any unauthorized charges on your financial account statements, you should immediately report any such charges to your financial institution. 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. 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. Contact information for the three nationwide credit reporting companies is as follows

<b>Equifax</b>	<b>Experian</b>	<b>TransUnion</b>
Phone: 1-800-685-1111 P.O. Box 740256 Atlanta, Georgia 30348 <a href="http://www.equifax.com">www.equifax.com</a>	Phone: 1-888-397-3742 P.O. Box 9554 Allen, Texas 75013 <a href="http://www.experian.com">www.experian.com</a>	Phone: 1-888-909-8872 P.O. Box 105281 Atlanta, GA 30348-5281 <a href="http://www.transunion.com">www.transunion.com</a>

**Security Freeze.** Security freezes, also known as credit freezes, restrict access to your credit file, making it harder for identity thieves to open new accounts in your name. You can freeze and unfreeze your credit file for free. You also can get a free freeze for your children who are under 16. And if you are someone's guardian, conservator or have a valid power of attorney, you can get a free freeze for that person, too.

How will these freezes work? Contact all three of the nationwide credit reporting agencies – Equifax, Experian, and TransUnion. If you request a freeze online or by phone, the agency must place the freeze within one business day. If you request a lift of the freeze, the agency must lift it within one hour. If you make your request by mail, the agency must place or lift the freeze within three business days after it gets your request. You also can lift the freeze temporarily without a fee.

Don't confuse freezes with locks. They work in a similar way, but locks may have monthly fees. If you want a free freeze guaranteed by federal law, then opt for a freeze, not a lock.

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. You may obtain information from the credit reporting agencies and the FTC about security freezes.

**For New Mexico residents:** You may obtain a security freeze on your credit report to protect your privacy and ensure that credit is not granted in your name without your knowledge. You may submit a declaration of removal to remove information placed in your credit report as a result of being a victim of identity theft. You have a right to place a security freeze on your credit report or submit a declaration of removal pursuant to the Fair Credit Reporting and Identity Security Act. For more information, including information about additional rights, go to [www.consumerfinance.gov/learnmore](http://www.consumerfinance.gov/learnmore) or write to: Consumer Financial Protection Bureau, 1700 G Street N.W., Washington, DC 20552.

**Fraud Alerts.** A fraud alert tells businesses that check your credit that they should check with you before opening a new account. An initial fraud alert stays on your credit report for one year. 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. To place a fraud alert on your credit reports, contact one of the nationwide credit bureaus. A fraud alert is free. The credit bureau you contact must tell the other two, and all three will place an alert on their versions of your report. You may obtain additional information from the credit reporting agencies and the FTC about fraud alerts.

**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 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 Connecticut Residents:** 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)

**For District of Columbia Residents:** You may contact the Office of the Attorney General for the District of Columbia, 441 4th Street NW, Suite 1100 South, Washington, D.C. 20001, <https://oag.dc.gov>, 202-442-9828.

**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. Revision Skincare is located at 5930 West Campus Circle Drive, Irving, TX 75063.

**For New York Residents:** You may contact the New York Department of State Division of Consumer Protection, One Commerce Plaza, 99 Washington Ave., Albany, NY 12231-0001, 518-474-8583 / 1-800-697-1220, <http://www.dos.ny.gov/consumerprotection>; and New York State Office of the Attorney General, The Capitol, Albany, NY 12224-0341, 1-800-771-7755, <https://ag.ny.gov>

**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.

**For Rhode Island Residents:** You may contact the Rhode Island Office of the Attorney General, 150 South Main Street, Providence, RI 02903, <http://www.riag.ri.gov>, 401-274-4400.

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

You have the right to obtain any police report filed in the United States in regard to this incident. If you are the victim of fraud or identity theft, you also have the right to file a police report.

#### **If you know or suspect you are a victim of tax-related identity theft, the IRS recommends these steps:**

- Respond immediately to any IRS notice; call the number provided or, if instructed, go to [IDVerify.irs.gov](http://IDVerify.irs.gov).
- Complete IRS Form 14039, Identity Theft Affidavit, if your e-filed return rejects because of a duplicate filing under your SSN or you are instructed to do so. Use a fillable form at [IRS.gov](http://IRS.gov), print, then attach the form to your return and mail according to instructions.
- Continue to pay your taxes and file your tax return, even if you must do so by paper.

If you previously contacted the IRS and did not have a resolution, contact the IRS for specialized assistance at 1-800-908-4490.