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December 31, 2020

**VIA FIRST-CLASS 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 Thomas D. Mangelsen, Inc. ("TDMI") located at 10152 L Street, Omaha, NE 68127, and are writing to notify your office of an incident that may affect the security of some personal information relating to three (3) New Hampshire residents. The investigation into this matter is ongoing, and this notice may be supplemented with any new significant facts learned subsequent to its submission. By providing this notice, TDMI 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**

TDMI was recently notified of a data security event by its third-party website developer, Forix Commerce, concerning its e-commerce website, www.mangelsen.com. TDMI immediately responded and launched an investigation to confirm the nature and scope of the event. TDMI worked with its third-party website developer to investigate and remediate the event. The third-party website developer performed an investigation and determined that an unauthorized actor may have accessed and/or acquired a limited amount of customer card payment information entered into its e-commerce website between October 29, 2020 and November 19, 2020. Based on the investigation, on November 25, 2020, TDMI determined that information related to New Hampshire residents was included in the potentially impacted data set. TDMI has undertaken efforts to identify potentially impacted individuals and put resources in place to assist them as quickly as possible. TDMI cannot confirm specifically what information, if any, was viewed or acquired by the unauthorized actor. However, TDMI confirmed that customer card payment

information on www.mangelsen.com between October 29, 2020 and November 19, 2020 was at risk as a result of this incident, including names, addresses, payment card numbers, expiration dates, and CVV numbers.

**Notice to New Hampshire Residents**

On or about December 31, 2020, TDMI began providing written notice of this incident to affected individuals, which includes three (3) 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**

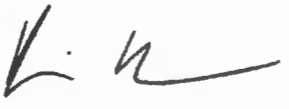
TDMI treats its responsibility to safeguard personal information as an utmost priority. As such, TDMI responded immediately to this event and has been working diligently to provide affected individuals with an accurate and complete notice of the incident as soon as possible. TDMI is reviewing its existing policies and procedures relating to data protection and security. TDMI and its third-party website developer have also implemented enhanced security controls on its e-commerce website, changed system passwords, and have scheduled additional routine scans for malicious code. TDMI is further investigating additional security measures to mitigate any risk associated with this incident and to better prevent future incidents. TDMI is providing individuals with twelve (12) months of complimentary access to credit monitoring and identity restoration services through TransUnion.

Additionally, TDMI 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. TDMI is also providing individuals with information on how to place a fraud alert and security freeze on one's credit file, 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) 930-2190.

Very truly yours,



Kevin M. Mekler of
MULLEN COUGHLIN LLC

KMK/laf

# Exhibit A

MANGELSEN
IMAGES OF NATURE GALLERY

[C/O Epiq
Return Address]

<<First Name>> <<Last Name>>
<<Address>>
<<City>>, <<State>> <<ZIP>>

<<Date>>

Dear <<First Name>>:

Thomas D. Mangelsen, Inc. ("TDMI") is writing to inform you of an incident that may affect the security of some of your personal information. This notice provides information about the incident, TDMI's response, and resources available to you to help protect your information from possible misuse, should you feel it necessary to do so.

**What Happened?** On or about November 25, 2020, TDMI received noticed from its third-party website developer, Forix Commerce ("Forix"), regarding a potential data security incident that may have resulted in the compromise of payment cards used at www.mangelsen.com between October 29, 2020 and November 19, 2020. The notice provided that malicious code in Forix's platform could permit the unauthorized acquisition of payment card information used on TDMI's website. Upon receiving this notice, TDMI immediately secured its website and worked with Forix to remove the malicious code, perform scans for any other malicious code or activities, and perform a global password reset to ensure only authorized users are able to access the website platform. TDMI is continuing to work with Forix to ensure the security of TDMI's website.

**What Information Was Involved?** Forix's investigation determined that malicious code capable of capturing customer payment information, such as name, billing and shipping address, payment card number, expiration date, and CVV, for payment cards used at www.mangelsen.com was found between October 29, 2020 and November 19, 2020.

**What We Are Doing.** TDMI treats its responsibility to safeguard customer information as an utmost priority. TDMI has strict security measures in place to protect its customers' information. Upon confirmation of this incident, TDMI worked with Forix to ensure the security of its website moving forward. TDMI continues to review its security policies and procedures as part of its ongoing commitment to information privacy and security.

Although TDMI is unaware of any actual or attempted misuse of your personal information, TDMI is offering you access to 12 months of credit monitoring and identity theft protection services through TransUnion at no cost to you as an added precaution. If you wish to activate these services, you may follow the instructions included in the attached *Steps You Can Take to Protect Personal Information*. We encourage you to enroll in these services as we are unable to act on your behalf to do so.

**What You Can Do.** TDMI encourages you to remain vigilant against incidents of identity theft and fraud, to review your account statements, and credit reports for suspicious activity. You may also review the information contained in the attached *Steps You Can Take to Protect Personal Information.*

***For More Information.*** *If* you have questions about this incident that are not addressed in this letter, please call [call center phone number], Monday through Friday from [business hours]. You may also write to TDMI directly at: 10152 L Street, Omaha, NE 68127 in care of Mike Campisi.

We apologize for any inconvenience this incident may cause you. We remain committed to the privacy and security of information in our possession.

Sincerely,

Mike Campisi
Executive Director of Operations

## Steps You Can Take to Protect Personal Information

### Enroll in Complimentary Credit Monitoring

As a safeguard, we have arranged for you to enroll, at no cost to you, in an online credit monitoring service (*my*TrueIdentity) for one year provided by TransUnion Interactive, a subsidiary of TransUnion,® one of the three nationwide credit reporting companies.

### How to Enroll: You can sign up online or via U.S. mail delivery

- To enroll in this service, go to the *my*TrueIdentity website at **www.MyTrueIdentity.com** and, in the space referenced as "Enter Activation Code," enter the 12-letter Activation Code **<<Insert Unique 12-letter Activation Code>>** and follow the three steps to receive your credit monitoring service online within minutes.
- If you do not have access to the Internet and wish to enroll in a similar offline, paper-based credit monitoring service, via U.S. mail delivery, please call the TransUnion Fraud Response Services toll-free hotline at **1-855-288-5422**. When prompted, enter the six-digit telephone passcode **<<Insert static 6-digit Telephone Pass Code>>** and follow the steps to enroll in the offline credit monitoring service, add an initial fraud alert to your credit file, or to speak to a TransUnion representative if you believe you may be a victim of identity theft.

  You can sign up for the online or offline credit monitoring service anytime between now and **<<Enrollment Deadline>>**. Due to privacy laws, we cannot register you directly. Please note that credit monitoring services might not be available for individuals who do not have a credit file with TransUnion or an address in the United States (or its territories) and a valid Social Security number. Enrolling in this service will not affect your credit score.

**ADDITIONAL DETAILS REGARDING YOUR 12-MONTH COMPLIMENTARY CREDIT MONITORING SERVICE:**

- Once you are enrolled, you will be able to obtain one year of unlimited access to your TransUnion credit report and credit score.
- The daily credit monitoring service will notify you if there are any critical changes to your credit file at TransUnion, including fraud alerts, new inquiries, new accounts, new public records, late payments, changes of address, and more.
- The service also includes access to an identity restoration program that provides assistance in the event that your identity is compromised and up to $1,000,000 in identity theft insurance with no deductible. (Policy limitations and exclusions may apply.)

### Monitor Accounts

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 | TransUnion | Equifax |
|---|---|---|

| | | |
|---|---|---|
| PO Box 9554<br>Allen, TX 75013<br>1-888-397-3742<br>www.experian.com/freeze/center.html | P.O. Box 160<br>Woodlyn, PA 19094<br>1-888-909-8872<br>www.transunion.com/credit-freeze | PO Box 105788<br>Atlanta, GA 30348-5788<br>1-800-685-1111<br>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.

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** | **TransUnion** | **Equifax** |
|---|---|---|
| P.O. Box 9554<br>Allen, TX 75013<br>1-888-397-3742<br>www.experian.com/fraud/center.html | P.O. Box 2000<br>Chester, PA 19016<br>1-800-680-7289<br>www.transunion.com/fraud-victim-resource/place-fraud-alert | P.O. Box 105069<br>Atlanta, GA 30348<br>1-888-766-0008<br>www.equifax.com/personal/credit-report-services |

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. Instances of known or suspected identity theft should also be reported to law enforcement and your state Attorney General. 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 21202,1-410-528-8662, www.oag.state.md.us. You can obtain information from the Attorney General or the Federal Trade Commission about preventing identity theft.

**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 violator. 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 New York Attorney General provides resources regarding identity theft protection and security breach response at www.ag.ny.gov/internet/privacy-and-identity-theft. The New York Attorney General can be contacted by phone at 1-800-771-7755; toll-free at 1-800-788-9898; and online at www.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 1-919-716-6000, www.ncdoj.gov. You can obtain information from the Attorney General or the Federal Trade Commission about preventing identity theft.