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STATE OF NH  
DEPT OF JUSTICE

2016 APR 18 AM 9:35

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April 14, 2016

**VIA OVERNIGHT FEDERAL EXPRESS**

Attorney General Joseph Foster  
Office of the Attorney General  
33 Capitol St.  
Concord, NH 03301

Dear Attorney General Foster:

We are writing to notify you of a breach of security involving one (1) New Hampshire resident. In October and November of 2015, TTI Floor Care North America ("TTI") received notification from six (6) customers informing us that shortly after placing an order with our customer service center, the credit cards they used for payment was used to make unauthorized purchases from various locations. TTI promptly launched an investigation into this matter and discovered that a single employee had taken the orders from these customers whose credit cards were compromised. The employee was questioned, and although denied any wrongdoing, was terminated for the mishandling of customer information. TTI continued its investigation to determine which other customers had recently placed orders with the employee who was terminated, and law enforcement was notified of this incident.

Although TTI cannot be sure of the cause of the compromise of the six aforementioned credit cards, TTI wants to take precautions and notify those of its customers whose credit card information TTI believes may have potentially been placed at risk. One (1) resident of New Hampshire may have been affected by the breach of security. The New Hampshire resident will shortly receive notice by mail. We will send the enclosed letter to the affected individual the week of April 18, 2016.

In TTI's notice letters to affected customers, TTI suggested they take certain steps to monitor their personal information, including supplying information with respect to credit reporting agencies and providing them the contact information for the Federal Trade Commission and other parties that should be notified upon their discovery of suspicious activity related to their personal information. In an effort to demonstrate TTI's commitment to its customers, TTI has also provided 12 months free identity monitoring services provided by Kroll, at TTI's cost. TTI also provided affected residents with a toll-free number to call with questions.

If you have any questions, please feel free to contact me.

Very truly yours,

**WOMBLE CARLYLE SANDRIDGE & RICE**  
*A Limited Liability Partnership*

*Theodore F. Claypoole (omo)*

Theodore F. Claypoole  
Partner



TTI Floor Care North America

<<MemberFirstName>> <<MemberLastName>>  
<<Address1>>  
<<Address2>>  
<<City>>, <<State>> <<Zip Code>>

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

## Notice of Data Breach

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

We are writing to tell you about a data security incident 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?

In October and November of 2015, TTI Floor Care North America ("TTI") received notification from six customers informing us that shortly after placing an order with our customer service center, the credit cards they used for payment was used to make unauthorized purchases from various locations. TTI promptly launched an investigation into this matter and discovered that a single employee had taken the orders from these customers whose credit cards were compromised. The employee was questioned, and although the employee denied any wrongdoing, was terminated for the mishandling of customer information. TTI continued its investigation to determine which other customers had recently placed orders with the employee who was terminated, and law enforcement was notified of this incident.

### What information was involved?

Although we cannot be sure of the cause of the compromise of the aforementioned credit cards, we are taking precautions by notifying those of our customers whose credit card information we believe may have potentially been placed at risk. Our investigation indicated that your credit card number ending in <<ClientDef1(Card Number)>> was among those credit card numbers possibly affected, along with the security code, name, and billing address associated with that card. Accordingly, please see recommendations for next steps in the "What you can do" section below.

### What we are doing.

TTI values its customers' privacy and security. In addition to terminating the employee who was involved in the handling of the credit card information from the affected customers, TTI ensures that its customer service representatives cannot access customer credit card information after it is entered into the system. We train all of our employees to handle our customers' personal and payment information with care and make every effort to ensure it is properly safeguarded. Following the termination of the employee, remedial training was provided to all employees reemphasizing the importance of following proper protocol.

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, Identity Consultation, and Identity Restoration.

Visit <<IDMonitoringURL>> to enroll and take advantage of your identity monitoring services.

Membership Number: <<Member ID>>

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-???-???-???, 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,

Heidi Giovanelli  
Vice President of Human Resources

## 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 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.com](http://www.ncdoj.com), 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:

### **Credit Monitoring through TransUnion**

You'll 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 investigator, who can help you determine if it's an indicator of identity theft.

### **Identity Consultation**

You have unlimited access to consultation with a dedicated licensed investigator at Kroll. 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 Restoration**

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