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March 13, 2019

Via Overnight Mail

Gordon MacDonald
Office of the Attorney General
33 Capitol Street
Concord, New Hampshire 03301

Re: *Incident Notification*

Dear Attorney General MacDonald:

On behalf of our client, Zenfolio, Inc. (“Zenfolio”), we are writing to notify you of a security incident involving one New Hampshire resident.¹

On February 14, 2019, Zenfolio discovered that an unauthorized party was attempting to log into certain of Zenfolio’s user accounts. Zenfolio immediately commenced an investigation and engaged a leading data security firm to assist. On February 20, 2019, Zenfolio emailed the potentially affected users about the suspicious activity and instructed them to reset their Zenfolio passwords immediately. Zenfolio’s investigation determined that these unauthorized parties were using passwords and user names stolen or obtained primarily from other web sites that Zenfolio’s customers may use. The investigation also determined there was no evidence that passwords or user names had been acquired from Zenfolio’s systems.

On February 26, 2019, Zenfolio learned that the unauthorized party may have gained access to certain of Zenfolio’s customer accounts between February 3, 2019 and February 17, 2019. By accessing these customer accounts, the unauthorized party may have been able to view the personal information of one New Hampshire resident, including the individual’s name, address, email address, phone number(s), and the account and routing numbers associated with the ACH payments Zenfolio makes to their bank account.

Commencing today, Zenfolio is mailing a notification letter to the one New Hampshire resident in accordance with N.H. Rev. Stat. Ann. § 359-C:20 in substantially the same form as the attached letter. Zenfolio has also provided a phone number for the individual to contact with questions.

¹ This report does not waive Zenfolio’s objection that New Hampshire lacks personal jurisdiction related to this matter.

March 13, 2019

Page 2

To further protect personal information, Zenfolio is implementing additional measures to make it more difficult for unauthorized persons to attempt this type of access including additional requirements for account passwords.

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 "David E. Kitchen", with a long horizontal flourish extending to the right.

David E. Kitchen
Partner

Enclosure



March 13, 2019

Notice of Data Breach

Dear [REDACTED]:

At Zenfolio, Inc., we are committed to protecting the privacy and security of our customer's information. We are writing to let you know that we recently addressed a security incident that may have involved your account information. This notice explains the incident, measures we have taken, and some steps you can take in response.

What Happened

On February 14, 2019, Zenfolio discovered that some unknown and unauthorized parties were attempting to log into Zenfolio's user accounts. We immediately retained a leading forensics firm to assist us. Our investigation determined that these unauthorized parties were using passwords and user names stolen or obtained primarily from other (outside) web sites that our customers may use. Our investigation found no evidence that passwords or user names had been acquired from Zenfolio's systems.

What Information Was Involved

Our investigation found evidence that your account may have been accessed between February 3, 2019 and February 17, 2019, and it is possible that these unauthorized parties may have viewed your name, address, email address, phone number(s), and the account and routing numbers associated with the ACH payments Zenfolio makes to your bank account.

What We Are Doing

While we do not believe these attempts involve a compromise of Zenfolio's systems, we are working to implement additional measures to make it more difficult for unauthorized persons to attempt this type of access.

What You Can Do

We encourage you to remain vigilant by reviewing your account statements for any unauthorized activity and report any suspected fraud to your bank and to Zenfolio immediately. If you have not already done so, we also encourage you to immediately change your account password using the instructions we provided in our email communication of February 20, 2019. These instructions can also be found by emailing Support@Zenfolio.com. We strongly recommend that you do not reuse usernames and passwords for your Zenfolio account that you have used for other unrelated online accounts. We have included additional information on the following page on ways to protect yourself.

For More Information

The privacy and protection of our community's personal information is a priority and we take this matter very seriously. If you have questions, please call 1-866-207-3980, Monday through Friday between 9:00 AM and 6:00 PM Pacific.

Sincerely,

John P. Loughlin
Chief Executive Officer

MORE INFORMATION ON WAYS TO PROTECT YOURSELF

We remind you to 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 or call toll free at 1-877-322-8228. Contact information for the three nationwide credit reporting companies is as follows:

Experian, PO Box 2002, Allen, TX 75013, www.experian.com, 1-888-397-3742

TransUnion, PO Box 2000, Chester, PA 19016, www.transunion.com, 1-800-916-8800

Equifax, PO Box 740241, Atlanta, GA 30374, www.equifax.com, 1-800-685-1111

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, 1-877-IDTHEFT (438-4338), www.ftc.gov/idtheft