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November 27, 2017

Via Email (securitybreach@atg.wa.gov) and Overnight Mail

Attorney General Bob Ferguson
Office of the Attorney General
Consumer Protection Division
800 5th Ave., Suite 2000
Seattle, WA 98104-3188

Re: Incident Notification

Dear Attorney General Ferguson:

We are writing on behalf of our client, Bulletproof 360, Inc. (“Bulletproof”), to notify you of a security incident involving Washington residents. In 2017, Bulletproof mailed letters to customers notifying them that an unknown third party compromised Bulletproof’s e-commerce website and may have been able to access customer payment card information during the period from October 26, 2016 to May 30, 2017 and August 28, 2017 through September 5, 2017. The previous notifications were based on findings from security firms and a report from a Payment Card Forensic Investigator (“PFI”) engaged by Bulletproof.

In mid-October 2017, there was additional findings from Bulletproof’s investigation, which indicated that payment card information used on Bulletproof’s e-commerce website may have been compromised during a longer period of time than initially determined and reported; specifically, during the period from October 26, 2016 through October 13, 2017 and October 15-19, 2017. The information on the checkout page that the code may have accessed includes customers’ names, addresses, email addresses, payment card numbers, expiration dates, and card security codes (CVV).

Beginning today, November 27, 2017, Bulletproof is sending written notification via U.S. Mail to the potentially affected individuals, including to 1,437 Washington residents in accordance with Wash. Rev. Code § 19.255.010. Copies of the notices are attached. Notice is being provided in the most expeditious time possible and without unreasonable delay. Bulletproof has also

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established a dedicated call center to answer any questions that individuals may have regarding the incident.

To help prevent a similar incident from occurring in the future, Bulletproof continues to work with three security firms and has implemented enhanced security measures, including installing a new website security platform, implementing a security information and event management system (SIEM), and implementing enhanced logging.

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

Sincerely,

A handwritten signature in blue ink that reads "Randal L. Gainer". The signature is written in a cursive style with a blue highlight effect.

Randal L. Gainer
Partner

Enclosures



BULLETPROOF™

c/o GCG

P.O. Box 10522

Dublin, OH 43017-0196

SMP1000002



Sample Customer

123 Sample St

Apt 2

Dublin OH 43017-1234

US

November 27, 2017

Dear Sample Customer:

At Bulletproof 360, Inc. (“Bulletproof”), we understand the importance of protecting the security of your payment card information and have continually worked to improve the security of our system. Regrettably, this notice is to inform you about an incident that may have involved your payment card information. This notice explains the incident, measures we have taken, and some steps you can take in response.

In mid-October 2017, Bulletproof identified unauthorized computer code that had been added to the software that operates the checkout page at www.bulletproof.com. When we discovered the unauthorized code, we immediately removed it and began an investigation. We have been working with leading computer security firms to examine our systems. We have also been working with law enforcement. Based on our investigation, we determined that the unauthorized code may have been capable of capturing information entered during the checkout process during the period from May 20, 2017 through October 13, 2017 and October 15-19, 2017. The information on the checkout page that the code may have accessed includes customers’ names, addresses, email addresses, payment card numbers, expiration dates, and card security codes (CVV). You are receiving this notice because your payment card may have been entered on the checkout page during this time period.

We take the security of our customers’ personal information very seriously, which is why we have been working with leading computer security firms and reporting to law enforcement. We are working diligently to strengthen the security of our website in order to prevent this type of incident from happening again.

We remind you to remain vigilant to the possibility of fraud by reviewing your payment card account statements for any unauthorized activity. You should immediately report any unauthorized charges to your financial institution because payment card network rules generally state that cardholders are not responsible for fraudulent charges that are timely reported.

If you incurred costs that your financial institution declined to reimburse related to fraudulent charges on a payment card you used for an online transaction with Bulletproof during the relevant time period, please contact us at the number below. We will reimburse you for any such reasonable, documented costs that your financial institution declined to pay.

We regret that this incident occurred and apologize for any inconvenience. If you have any questions, please call (844) 534-0816, Monday through Friday between the hours of 9 a.m. and 5 p.m. Eastern time.

Thank you for your support and loyalty to Bulletproof.

Sincerely,

Dave Asprey
Founder & CEO

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 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



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c/o GCG

P.O. Box 10522

Dublin, OH 43017-0196

SMP1000002



Sample Customer

123 Sample St

Apt 2

Dublin OH 43017-1234

US

November 27, 2017

Dear Sample Customer:

We are writing to provide you additional information about a security incident that we described in an earlier letter. As we reported to you earlier, we identified unauthorized computer code that had been added to the software that operates the checkout page at www.bulletproof.com. When we discovered the unauthorized code, we immediately removed it and continued our investigation.

We initially reported that the code may have been capable of capturing payment card information entered during the checkout process for a period that ended in early 2017. Additional findings from our investigation in mid-October 2017 indicate that unauthorized code may have also been added to the software that operates the checkout page and was capable of capturing information entered during the checkout process from May 20, 2017 through October 13, 2017 and October 15-19, 2017. The information on the checkout page that the code may have accessed includes customers' names, addresses, email addresses, payment card numbers, expiration dates, and card security codes (CVV). You are receiving this notice because your payment card may have been entered on the checkout page during this time period.

We take the security of our customers' personal information very seriously, which is why we have been working with leading computer security firms and reporting to law enforcement. We are working diligently to strengthen the security of our website to prevent this type of incident from happening again.

We remind you to remain vigilant to the possibility of fraud by reviewing your account statements for any unauthorized activity. You should immediately report any unauthorized charges to your financial institution because the payment card network rules generally state that cardholders are not responsible for fraudulent charges that are timely reported.

If you incurred costs that your financial institution declined to reimburse related to fraudulent charges on a payment card you used for an online transaction with Bulletproof during the relevant time period, please contact us at the number below. We will reimburse you for any such reasonable, documented costs that your financial institution declined to pay.

We regret that this incident occurred and apologize for any inconvenience. If you have any questions, please call (844) 534-0816, Monday through Friday between the hours of 9 a.m. and 5 p.m. Eastern time.

Thank you for your support and loyalty to Bulletproof.

Sincerely,

Dave Asprey

Founder & CEO

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 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:

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