

Promenade, Suite 3100
1230 Peachtree Street, N.E.
Atlanta, Georgia 30309-3592
Main: 404 815-3500
www.sgrlaw.com

SMITH, GAMBRELL & RUSSELL, LLP
Attorneys at Law

Audria K. Crain
Direct Tel: 404-815-3646
Direct Fax: 404-685-6956
acrain@sgrlaw.com

November 14, 2019

VIA FEDERAL EXPRESS & EMAIL TO SECURITYBREACH@ATG.WA.GOV

Office of the Attorney General
1125 Washington St. S.E.
PO Box 40100
Olympia, WA 98504

Re: Notice of Data Security Incident on behalf of Green Roads of Florida,
LLC

Dear Attorney General Ferguson:

On behalf of our client, Green Roads of Florida, LLC, located at 601 Fairway Drive, Deerfield Beach, FL 33441 (“Green Roads”), we are writing to provide your office with notice of a data security incident involving the personally identifiable information, including names, credit card numbers, and credit card expiration dates, of approximately 540 residents of your state. We have detailed below a description of the incident and further steps Green Roads is taking to address this incident.

Description of the Data Security Incident:

On October 2, 2019, the Green Roads’ customer services team received calls from customers reporting suspicious purchases on credit cards they used to purchase merchandise from Green Roads’ website. Green Roads senior management team immediately launched an investigation. It was determined on or about October 16, 2019 that certain customer and credit card information from orders placed on the greenroadsworld.com website between July 9, 2019 and October 9, 2019 were potentially compromised due to a compromised administrator account in the web server of Green Roads’ outsourced website hosting provider.

Further Steps Being Taken by Green Roads:

Green Roads is taking additional steps to protect customer data from unauthorized access, including implementing additional safeguards to improve data security on the company’s website.

In addition, Green Roads is offering identity theft protection services through ID Experts®, a leading provider of data breach and recovery services, to provide affected Washington residents with MyIDCare™. MyIDCare services include: 12 months of credit and CyberScan monitoring, a \$1,000,000 insurance reimbursement policy, and fully managed ID theft recovery services.



November 14, 2019

Page 2

We have enclosed a sample copy of the notice being sent to the affected Washington residents. The notice contains information describing the data security incident, the personal information affected, the steps Greens Road is taking to address this incident, and an overview of the credit monitoring service being provided. This notice will be mailed to affected Washington residents on or about November 15, 2019. If you have any questions on this matter, please contact the undersigned at the above email address or by telephone at (404) 815-3646.

Sincerely,


Audria K. Crain
Attorney at Law

AKC/ac

Enclosure

cc: Green Roads of Florida, LLC



C/O ID Experts
 PO Box 4219
 Everett WA 98204

ENDORSE



NAME

ADDRESS1

ADDRESS2

CSZ

COUNTRY



SEQ
 CODE 2D
 Ver: G1

BREAK

To Enroll, Please Call:

1-833-953-1736

Or Visit:

<https://ide.myidcare.com/greenroads>

Enrollment Code: <<XXXXXXXXXX>>

November 15, 2019

Notice of Data Breach

Dear <<First Name>> <<Last Name>>,

What Happened

Green Roads of Florida, LLC has discovered that certain customer and credit card information from orders placed on the greenroadsworld.com website between July 9, 2019 and October 9, 2019 were potentially compromised. Upon learning of this incident, Green Roads immediately launched an investigation. It was determined that the root cause of the incident was a compromised Administrator account in the web server of our outsourced hosting provider.

Green Roads has taken several important actions: we have restricted website administrative access, changed all passwords and installed continuous monitoring of all activity from Administrators. Additionally, Green Roads has increased monitoring of all out-bound data transfers. Green Roads is confident that the breach has been secured.

What Information Was Involved

Account information that was compromised in this incident included name, credit card number and expiration date.

What We Are Doing

We are taking additional steps to protect customer data from theft or similar criminal activity in the future. Under our new Chief Technology Officer, we have implemented additional safeguards to improve data security on our web server. In addition, Green Roads has proactively engaged a third-party auditor to perform an updated PCI GAP analysis, remediation, network scans, penetration testing and conduct a PCI audit.

In addition, we are offering identity theft protection services through ID Experts®, the data breach and recovery services expert, to provide you with MyIDCare™. MyIDCare services include: 12 months of credit and CyberScan monitoring, a \$1,000,000 insurance reimbursement policy, and fully managed id theft recovery services. With this protection, MyIDCare will help you resolve issues if your identity is compromised.

What You Can Do

We advise you to remain vigilant and monitor your credit reports periodically. If you have reason to believe that any of your personal information is being misused, you should contact local law enforcement (including your State Attorney General's Office) and file a police report. Creditors may want a copy of the police report to excuse you from any fraudulent debts.

We also encourage you to contact ID Experts with any questions and to enroll in free MyIDCare services by calling 1-833-953-1736 or going to <https://ide.myidcare.com/greenroads> and using the Enrollment Code provided above. MyIDCare

experts are available Monday through Friday from 9 am - 9 pm Eastern Time. Please note the deadline to enroll is February 15, 2020.

Again, at this time, there is no evidence that your information has been misused. However, we encourage you to take full advantage of this service offering. MyIDCare representatives have been briefed on the incident and can answer questions or concerns you may have regarding protection of your personal information.

For More Information

You will find detailed instructions for MyIDCare enrollment and other steps that you can take to protect your personal information on the enclosed Recommended Steps document. Also, you will need to reference the Enrollment Code at the top of this letter when calling or enrolling online, so please do not discard this letter.

Please call 1-833-953-1736 or go to <https://ide.myidcare.com/greenroads> for assistance or for any additional questions you may have.

Please be assured that we take our responsibility to protect sensitive personal information seriously, and we apologize for any inconvenience this incident may cause you.

Sincerely,

A handwritten signature in black ink, appearing to read 'L. Fuentes', enclosed within a faint, circular, hand-drawn scribble.

Laura Fuentes
CEO
Green Roads of Florida, LLC

(Enclosure)



Recommended Steps to Help Protect Your Information

- 1. Website and Enrollment.** Go to <https://ide.myidcare.com/greenroads> and follow the instructions for enrollment using your Enrollment Code provided at the top of the letter.
- 2. Activate the credit monitoring** provided as part of your MyIDCare membership. The monitoring included in the membership must be activated to be effective. Note: You must have established credit and access to a computer and the internet to use this service. If you need assistance, MyIDCare will be able to assist you.
- 3. Telephone.** Contact MyIDCare at 1-833-953-1736 to gain additional information about this event and speak with knowledgeable representatives about the appropriate steps to take to protect your credit identity.
- 4. Review your credit reports.** We recommend that you remain vigilant by reviewing account statements and monitoring credit reports. Under federal law, you also are entitled every 12 months to one free copy of your credit report from each of the three major credit reporting companies. To obtain a free annual credit report, go to www.annualcreditreport.com or call 1-877-322-8228. You may wish to stagger your requests so that you receive a free report by one of the three credit bureaus every four months.

If you discover any suspicious items and have enrolled in MyIDCare, notify them immediately by calling or by logging into the MyIDCare website and filing a request for help.

If you file a request for help or report suspicious activity, you will be contacted by a member of our ID Care team who will help you determine the cause of the suspicious items. In the unlikely event that you fall victim to identity theft as a consequence of this incident, you will be assigned an ID Care Specialist who will work on your behalf to identify, stop and reverse the damage quickly.

You should also know that you have the right to file a police report if you ever experience identity fraud. Please note that in order to file a crime report or incident report with law enforcement for identity theft, you will likely need to provide some kind of proof that you have been a victim. A police report is often required to dispute fraudulent items. You can report suspected incidents of identity theft to local law enforcement or to the Attorney General.

5. Place Fraud Alerts with the three credit bureaus. If you choose to place a fraud alert, we recommend you do this after activating your credit monitoring. You can place a fraud alert at one of the three major credit bureaus by phone and also via Experian's or Equifax's website. 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. The contact information for all three bureaus is as follows:

Credit Bureaus

Equifax Fraud Reporting
1-866-349-5191
P.O. Box 105069
Atlanta, GA 30348-5069
www.equifax.com

Experian Fraud Reporting
1-888-397-3742
P.O. Box 9554
Allen, TX 75013
www.experian.com

TransUnion Fraud Reporting
1-800-680-7289
P.O. Box 2000
Chester, PA 19022-2000
www.transunion.com

It is necessary to contact only ONE of these bureaus and use only ONE of these methods. As soon as one of the three bureaus confirms your fraud alert, the others are notified to place alerts on their records as well. You will receive confirmation letters in the mail and will then be able to order all three credit reports, free of charge, for your review. An initial fraud alert will last for one year.

Please Note: No one is allowed to place a fraud alert on your credit report except you.

6. Security Freeze. By placing a security freeze, someone who fraudulently acquires your personal identifying information will not be able to use that information to open new accounts or borrow money in your name. You will need to contact the three national credit reporting bureaus listed above to place the freeze. Keep in mind that when you place the freeze, you will not be able to borrow money, obtain instant credit, or get a new credit card until you temporarily lift or permanently remove the freeze. There is no cost to freeze or unfreeze your credit files.

7. You can obtain additional information about the steps you can take to avoid identity theft from the following agencies. The Federal Trade Commission also encourages those who discover that their information has been misused to file a complaint with them.

California Residents: Visit the California Office of Privacy Protection (<http://www.ca.gov/Privacy>) for additional information on protection against identity theft.

Kentucky Residents: Office of the Attorney General of Kentucky, 700 Capitol Avenue, Suite 118 Frankfort, Kentucky 40601, www.ag.ky.gov, Telephone: 1-502-696-5300.

Maryland Residents: Office of the Attorney General of Maryland, Consumer Protection Division 200 St. Paul Place Baltimore, MD 21202, www.oag.state.md.us/Consumer, Telephone: 1-888-743-0023.

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 a 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. You can 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.

North Carolina Residents: Office of the Attorney General of North Carolina, 9001 Mail Service Center Raleigh, NC 27699-9001, www.ncdoj.gov, Telephone: 1-919-716-6400.

Oregon Residents: Oregon Department of Justice, 1162 Court Street NE, Salem, OR 97301-4096, www.doj.state.or.us/, Telephone: 877-877-9392

Rhode Island Residents: Office of the Attorney General, 150 South Main Street, Providence, Rhode Island 02903, www.riag.ri.gov, Telephone: 401-274-4400

All US Residents: Identity Theft Clearinghouse, Federal Trade Commission, 600 Pennsylvania Avenue, NW Washington, DC 20580, www.consumer.gov/idtheft, 1-877-IDTHEFT (438-4338), TTY: 1-866-653-4261.