ATG MI ADM Security Breach

From: Giftos, Melinda MG (6076) <MGiftos@whdlaw.com>
Sent: Monday, April 11, 2016 2:45 PM
To: ATG MI ADM Security Breach
Cc: Hughes, Julie A. JAH (6039)
Subject: Data Security Incident Notification
Attachments: Schwaab Notification Letter.pdf

To the Washington Office of the Attorney General:

The purpose of this letter is to notify your office that my client, Schwaab, Inc., recently experienced a data security incident that may have affected consumers in the state of Washington. Schwaab is a small, Wisconsin-based company that operates e-commerce web sites and sells rubber stamp products. Schwaab recently learned that an unauthorized individual uploaded malicious code to Schwaab's web server. This code allowed the individual to access Schwaab's system. Upon learning of the security incident, Schwaab retained highly credentialed PCI forensic experts to investigate and analyze the incident. The investigation has been ongoing.

On March 4, 2016, the investigators released their Final Incident Response Report, which indicated that there was evidence that Schwaab's system had been accessed and malicious code had been uploaded. However, they were unable to find evidence that any specific data was accessed or stolen. Due to the nature of the incident, they do not think they will ever be able to determine what, if any, data was accessed or compromised.

During the period of time that unauthorized access may have occurred, Schwaab was doing business as usual and was processing customer credit card information. Out of the abundance of caution and in the interest of protecting its customers, Schwaab has elected to report the incident to consumers, state attorney generals and the consumer reporting agencies. Schwaab is also working proactively with the credit card brands, law enforcement and others to ensure its customers' information is protected. In fact, Schwaab delayed notification to customers and state governments upon the request of the Federal Bureau of Investigation, who is investigating the incident.

The total number of consumers in Washington affected, if any, is unknown as again, Schwaab has no evidence that any specific information was accessed or stolen. However, approximately 2162 individuals in Washington transacted business with Schwaab using a credit card during the period of time a potential intrusion may have occurred. Those individuals will be notified of the incident today or sometime early this week via electronic mail. Schwaab's customer notification letter form is attached.

If your office has any questions or would like to discuss this incident further, please do not hesitate to contact me directly.

Best regards,
Mindi Giftos

Mindi Giftos
Attorney / Technology Team Leader
Madison Office Managing Shareholder
(608) 234-6076
(608) 220-7406
mgiftos@whdlaw.com

Whyte Hirschboeck Dudek S.C.
33 East Main Street, Suite 300
Madison, WI 53701-1369
www.whdlaw.com

WHD in the News: Whyte Hirschboeck Dudek S.C. Practice Areas Named to the U.S. News - Best Lawyers 2016 "Best Law Firms" Rankings Read more.

schwaab, inc
• ESTABLISHED 1881 •

HIGH QUALITY MARKING PRODUCTS SINCE 1881

[INDIVIDUAL NAME]
[STREET ADDRESS]
[CITY, STATE AND POSTAL CODE]
[DATE]

Dear [INDIVIDUAL NAME]:

Thank you for shopping at Discount Rubber Stamps.Com. You are a valued customer and we appreciate your business. We respect the privacy of your information, which is why, as a precautionary measure, we are writing to let you know about a data security incident that appears to have taken place on our system.

We recently learned that sometime between January 22, 2014 and January 26, 2016, our computer system was accessed without our authorization. During this time, it is possible that our customer credit card information may have been compromised. We have no evidence that any specific information was accessed or stolen. Out of an abundance of caution, we are letting you know about the incident so you can take steps to protect yourself.

During the time period that someone may have accessed our system, all credit card information processed on our systems was stored on an encrypted server and was protected by security protocols. Schwaab maintains industry standard security protocols, and, since learning of attempted activity on our site, has implemented additional security measures designed to prevent a recurrence of such an attack, to quickly identify unusual activity, and to further protect the privacy of your information. We are also actively working with forensic investigators and law enforcement. In fact, we delayed our notification to you under the direction of the Federal Bureau of Investigation so they could take steps to identify the individuals who appeared to have accessed our system.

We value your privacy and deeply regret that this incident occurred. We are taking this incident very seriously and are actively continuing our investigation of the situation. We will notify you if there are any significant developments. Please review the attachment to this letter for more information on how you can take steps to actively protect your personal information. For further information and assistance, please contact us at 1-844-608-3819 or customers@discountrubberstamps.com.

Sincerely,

Jeremiah McNeal
President & CEO

WHD/12600195.1

12855 W. Lisbon Rd.,Suite 100 Brookfield, Wisconsin 53005
P.O. Box 26069 Milwaukee Wisconsin 53226-0069

STEPS YOU CAN TAKE TO FURTHER PROTECT YOUR INFORMATION

Review Your Account Statements and Notify Law Enforcement of Suspicious Activity. As a precautionary measure, we recommend that you remain vigilant by reviewing your account statements and credit reports closely. If you detect any suspicious activity on an account, you should promptly notify the financial institution or company with which the account is maintained. You also should promptly report any fraudulent activity or any suspected incidence of identity theft to proper law enforcement authorities, your state attorney general, and/or the Federal Trade Commission. To file a complaint with the FTC, go to www.ftc.gov/idtheft or call 1-877-ID-THEFT (877-438-4338). Complaints filed with the FTC will be added to the FTC's Identity Theft Data Clearinghouse, which is a database made available to law enforcement agencies.

Copy of Credit Report. You may obtain a free copy of your credit report from each of the three major credit reporting agencies once every 12 months by visiting http://www.annualcreditreport.com, calling toll-free 877-322-8228, or by completing an Annual Credit Report Request Form and mailing it to Annual Credit Report Request Service, P.O. Box 105281, Atlanta, GA 30348. You can print a copy of the request form athttps://www.annualcreditreport.com/cra/requestformfinal.pdf. Or you can elect to purchase a copy of your credit report by contacting one of the three national credit reporting agencies. Contact information for the three national credit reporting agencies for the purpose of requesting a copy of your credit report or for general inquiries is provided below:

Equifax	Experian	TransUnion
(800) 685-1111	(888) 397-3742	(800) 916-8800
www.equifax.com	www.experian.com	www.transunion.com
P.O. Box 740241	535 Anton Blvd., Suite 100	P.O. Box 6790
Atlanta, GA 30374	Costa Mesa, CA 92626	Fullerton, CA 92834

Fraud Alert. You may want to consider placing a fraud alert on your credit report. An initial fraud alert is free and will stay on your credit file for at least 90 days. The alert informs creditors of possible fraudulent activity within your report and requests that the creditor contact you prior to establishing any accounts in your name. To place a fraud alert on your credit report, contact any of the three credit reporting agencies identified above. Additional information is available at http://www.annualcreditreport.com.

Security Freeze. In some US states, you have the right to put a security freeze on your credit file. This will prevent new credit from being opened in your name without the use of a PIN number that is issued to you when you initiate the freeze. A security freeze is

12855 W. Lisbon Rd.,Suite 100 Brookfield, Wisconsin 53005
P.O. Box 26069 Milwaukee Wisconsin 53226-0069

designed to prevent potential creditors from accessing your credit report without your consent. As a result, using a security freeze may interfere with or delay your ability to obtain credit. You must separately place a security freeze on your credit file with each credit reporting agency. To place a security freeze, you may be required to provide the consumer reporting agency with information that identifies you including your full name, Social Security number, date of birth, current and previous addresses, a copy of your state-issued identification card, and a recent utility bill, bank statement or insurance statement.

Additional Free Resources on Identity Theft. You may wish to review the tips provided by the Federal Trade Commission on how to avoid identity theft. For more information, please visit http://www.ftc.gov/idtheft or call 1-877-ID-THEFT (877-438-4338). Taking Charge: What to Do if Your Identity is Stolen, a comprehensive guide from the FTC to help you guard against and deal with identity theft, can be found on the FTC's website at http://www.ftc.gov/bcp/edu/pubs/consumer/idtheft/idt04.shtm.

12855 W. Lisbon Rd.,Suite 100 Brookfield, Wisconsin 53005
P.O. Box 26069 Milwaukee Wisconsin 53226-0069

ATG MI ADM Security Breach

From: Giftos, Melinda MG (6076) <MGiftos@whdlaw.com>
Sent: Thursday, April 14, 2016 12:46 PM
To: ATG MI ADM Security Breach
Cc: Hughes, Julie A. JAH (6039)
Subject: RE: Data Security Incident Notification
Attachments: FINAL Schwaab Customer Reporting Letter.pdf

To the Washington Office of the Attorney General:

On Monday, April 11, 2016, I sent your office notice of a data security incident that occurred on the system of my client, Schwaab, Inc. After sending the notice to your office, we made some minor amendments to the customer reporting letter to ensure compliance with various state laws. A form of the attached was the actual notification used to provide notice to consumers who may have potentially been affected by the incident in Washington. The notice was sent to consumers today.

If you have any questions, please do not hesitate to contact me.

Best regards,
Mindi

Mindi Giftos
Attorney / Technology Team Leader
Madison Office Managing Shareholder
(608) 234-6076
(608) 220-7406
mgiftos@whdlaw.com

Whyte Hirschboeck Dudek S.C.
33 East Main Street, Suite 300
Madison, WI 53701-1369
www.whdlaw.com

From: Giftos, Melinda MG (6076)
Sent: Monday, April 11, 2016 4:45 PM
To: 'SecurityBreach@atg.wa.gov'
Cc: Hughes, Julie A. JAH (6039)
Subject: Data Security Incident Notification

To the Washington Office of the Attorney General:

The purpose of this letter is to notify your office that my client, Schwaab, Inc., recently experienced a data security incident that may have affected consumers in the state of Washington. Schwaab is a small, Wisconsin-based company that operates e-commerce web sites and sells rubber stamp products. Schwaab recently learned that an unauthorized individual uploaded malicious code to Schwaab's web server. This code allowed the individual to access Schwaab's system. Upon learning of

the security incident, Schwaab retained highly credentialed PCI forensic experts to investigate and analyze the incident. The investigation has been ongoing.

On March 4, 2016, the investigators released their Final Incident Response Report, which indicated that there was evidence that Schwaab's system had been accessed and malicious code had been uploaded. However, they were unable to find evidence that any specific data was accessed or stolen. Due to the nature of the incident, they do not think they will ever be able to determine what, if any, data was accessed or compromised.

During the period of time that unauthorized access may have occurred, Schwaab was doing business as usual and was processing customer credit card information. Out of the abundance of caution and in the interest of protecting its customers, Schwaab has elected to report the incident to consumers, state attorney generals and the consumer reporting agencies. Schwaab is also working proactively with the credit card brands, law enforcement and others to ensure its customers' information is protected. In fact, Schwaab delayed notification to customers and state governments upon the request of the Federal Bureau of Investigation, who is investigating the incident.

The total number of consumers in Washington affected, if any, is unknown as again, Schwaab has no evidence that any specific information was accessed or stolen. However, approximately 2162 individuals in Washington transacted business with Schwaab using a credit card during the period of time a potential intrusion may have occurred. Those individuals will be notified of the incident today or sometime early this week via electronic mail. Schwaab's customer notification letter form is attached.

If your office has any questions or would like to discuss this incident further, please do not hesitate to contact me directly.

Best regards,
Mindi Giftos

Mindi Giftos
Attorney / Technology Team Leader
Madison Office Managing Shareholder
(608) 234-6076
(608) 220-7406
mgiftos@whdlaw.com

Whyte Hirschboeck Dudek S.C.
33 East Main Street, Suite 300
Madison, WI 53701-1369
www.whdlaw.com

schwaab, inc
• ESTABLISHED 1881 •
HIGH QUALITY MARKING PRODUCTS SINCE 1881

April 13, 2016 – Notice of Data Breach / Data Security Incident

[INDIVIDUAL NAME]
[STREET ADDRESS]
[CITY, STATE AND POSTAL CODE]
[DATE]

Dear [INDIVIDUAL NAME]:

Thank you for shopping at Discount Rubber Stamps.Com. You are a valued customer and we appreciate your business. We respect the privacy of your information, which is why, as a precautionary measure, we are writing to let you know about a data security incident that recently took place on our system.

What Happened:
We learned that our computer system was accessed without our authorization during the time period of January 22, 2014 and February 8, 2016.

What Information Was Involved:
It is possible that customer credit card information may have been compromised during the incident. After a comprehensive analysis, our forensic investigators were unable to find evidence that any credit card information was accessed or stolen. Out of an abundance of caution, we are letting you know about the incident so you can take steps to protect yourself.

During the time period that someone may have accessed our system, all credit card information processed on our system was maintained on en encrypted server and was protected by security protocols.

What We Are Doing:
Upon learning about the incident, we immediately took steps to resolve the incident and prevent the unauthorized access to our system. We also implemented additional security measures designed to prevent a recurrence of such an attack, to quickly identify unusual activity, and to further protect the privacy of your information. We are actively working with forensic investigators, state attorney generals and law enforcement. In fact, we were required to delay our notification to you under the direction of the Federal Bureau of Investigation, so that steps could be taken to identify the individual who tampered with our system.

We value your privacy and deeply regret that this incident occurred. We are taking this incident very seriously and are actively continuing our investigation of the situation. We will notify you if there are any significant developments.

12855 W. Lisbon Rd.,Suite 100 Brookfield, Wisconsin 53005
P.O. Box 26069 Milwaukee Wisconsin 53226-0069

More Information:
Please review the information provided below on how you can actively protect your personal information. For further information and assistance, please contact us at 1-844-608-3819 or customers@discountrubberstamps.com.

Sincerely,

Jeremiah McNeal
President & CEO

STEPS YOU CAN TAKE TO PROTECT YOUR PERSONAL INFORMATION

Review Your Account Statements and Notify Law Enforcement of Suspicious Activity. As a precautionary measure, we recommend that you remain vigilant by reviewing your account statements and credit reports closely. If you detect any suspicious activity on an account, you should promptly notify the financial institution or company with which the account is maintained. You also should promptly report any fraudulent activity or any suspected incidence of identity theft to proper law enforcement authorities, your state attorney general, and/or the Federal Trade Commission. To file a complaint with the FTC, go to www.ftc.gov/idtheft or call 1-877-ID-THEFT (877-438-4338). Complaints filed with the FTC will be added to the FTC's Identity Theft Data Clearinghouse, which is a database made available to law enforcement agencies.

Copy of Credit Report. You may obtain a free copy of your credit report from each of the three major credit reporting agencies once every 12 months by visiting http://www.annualcreditreport.com, calling toll-free 877-322-8228, or by completing an Annual Credit Report Request Form and mailing it to Annual Credit Report Request Service, P.O. Box 105281, Atlanta, GA 30348. You can print a copy of the request form at https://www.annualcreditreport.com/cra/requestformfinal.pdf. Or you can elect to purchase a copy of your credit report by contacting one of the three national credit reporting agencies. Contact information for the three national credit reporting agencies for the purpose of requesting a copy of your credit report or for general inquiries is provided below:

Equifax	Experian	TransUnion
(800) 685-1111	(888) 397-3742	(800) 916-8800
www.equifax.com	www.experian.com	www.transunion.com
P.O. Box 740241	535 Anton Blvd., Suite 100	P.O. Box 6790
Atlanta, GA 30374	Costa Mesa, CA 92626	Fullerton, CA 92834

Police Report. At this time, there is no police report relating to the incident. However, if a

12855 W. Lisbon Rd.,Suite 100 Brookfield, Wisconsin 53005
P.O. Box 26069 Milwaukee Wisconsin 53226-0069

report is issued at some time relating to this incident, you will have the right to obtain a copy of the police report.

Fraud Alert. You may want to consider placing a fraud alert on your credit report. An initial fraud alert is free and will stay on your credit file for at least 90 days. The alert informs creditors of possible fraudulent activity within your report and requests that the creditor contact you prior to establishing any accounts in your name. To place a fraud alert on your credit report, contact any of the three credit reporting agencies identified above. Additional information is available at http://www.annualcreditreport.com.

Security Freeze. In some US states, you have the right to put a security freeze on your credit file. This will prevent new credit from being opened in your name without the use of a PIN number that is issued to you when you initiate the freeze. A security freeze is designed to prevent potential creditors from accessing your credit report without your consent. As a result, using a security freeze may interfere with or delay your ability to obtain credit. You must separately place a security freeze on your credit file with each credit reporting agency. To place a security freeze, you may be required to provide the consumer reporting agency with information that identifies you including your full name, Social Security number, date of birth, current and previous addresses, a copy of your state-issued identification card, and a recent utility bill, bank statement or insurance statement.

Additional Free Resources on Identity Theft. You may obtain more information from your state Attorney General, as well as the Federal Trade Commission, about how to prevent/avoid identity theft. Taking Charge: What to Do if Your Identity is Stolen, a comprehensive guide from the FTC to help you guard against and deal with identity theft, can be found at http://www.ftc.gov/bcp/edu/pubs/consumer/idtheft/idt04.shtm.

You may contact the FTC at:
Federal Trade Commission
600 Pennsylvania Avenue, NW
Washington, DC 20580
(877) 438-4338
http://www.ftc.gov/idtheft

If you are a Maryland resident, you may obtain information from Attorney General of Maryland at:
Attorney General of Maryland
200 St. Paul Place
Baltimore, MD 21202
(410) 576-6300 / 1 (888) 743-0023 toll-free / TDD: (410) 576-6372
https://www.oag.state.md.us/

12855 W. Lisbon Rd.,Suite 100 Brookfield, Wisconsin 53005
P.O. Box 26069 Milwaukee Wisconsin 53226-0069

If you are a North Carolina resident, you may obtain information from the North Carolina Department of Justice at:
NC Dept. of Justice
Consumer Protection Division
P.O. Box 629
Raleigh, NC 27602
919-716-6000
www.ncdoj.gov

12855 W. Lisbon Rd.,Suite 100 Brookfield, Wisconsin 53005
P.O. Box 26069 Milwaukee Wisconsin 53226-0069