



MULLEN
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October 27, 2020

VIA E-MAIL

Office of the Attorney General
1125 Washington Street SE
PO Box 40100
Olympia, WA 98504-0100
E-mail: securitybreach@atg.wa.gov

Re: Notice of Data Event

Dear Sir or Madam:

We represent TrueFire LLC (“TrueFire”) located at 2500 Emerson Ave. South, St. Petersburg, FL 33712, and are writing to notify your office of an incident that may affect the security of some personal information relating to two thousand six hundred thirty-three (2,633) Washington residents. The investigation into this matter is ongoing, and this notice will be supplemented with any new significant facts learned subsequent to its submission. By providing this notice, TrueFire does not waive any rights or defenses regarding the applicability of Washington law, the applicability of the Washington data event notification statute, or personal jurisdiction.

Nature of the Data Event

On July 28, 2020, TrueFire discovered certain information in its network may have been subject to unauthorized access. TrueFire immediately began an investigation, with the assistance of third-party forensic specialists, to assess the nature and scope of the incident. The investigation determined that an unauthorized actor accessed TrueFire’s network and further accessed certain information stored on the network on or about February 21, 2020. TrueFire conducted a comprehensive review of information potentially impacted by this incident to determine the type of information at issue and to whom the information related. Although TrueFire is unaware of any actual or attempted misuse of information as a result of this incident, they are notifying any individuals that were potentially impacted. The information that could have been subject to unauthorized access includes name, address, date of birth and username and hashed password.

Notice to Washington Residents

On October 27, 2020, TrueFire provided written notice of this incident to affected individuals, which includes two thousand six hundred thirty-three (2,633) Washington residents. Written notice is being provided in substantially the same form as the letter attached here as *Exhibit A*.

Other Steps Taken and To Be Taken

Upon discovering the event, TrueFire moved quickly to investigate and respond to the incident, assess the security of its systems, identify potentially affected individuals, and provide them with notice. TrueFire is also working to implement additional safeguards. TrueFire is providing individuals whose personal information was potentially affected by this incident with access to credit monitoring services for 1 year through TransUnion at no cost to the individuals.

Additionally, TrueFire is providing impacted individuals with guidance on how to better protect against identity theft and fraud, including advising individuals to report any suspected incidents of identity theft or fraud to their credit card company and/or bank. TrueFire is providing individuals with information on how to place a fraud alert and security freeze on one's credit file, the contact details for the national consumer reporting agencies, information on how to obtain a free credit report, a reminder to remain vigilant for incidents of fraud and identity theft by reviewing account statements and monitoring free credit reports, and encouragement to contact the Federal Trade Commission, their state Attorney General, and law enforcement to report attempted or actual identity theft and fraud. TrueFire is also reporting this matter to regulators as required.

Contact Information

Should you have any questions regarding this notification or other aspects of the data security event, please contact us at (267) 930-4775.

Very truly yours,



Christopher J. DiIenno of
MULLEN COUGHLIN LLC

CJD/pls
Enclosure

EXHIBIT A



Return Mail Processing Center
PO Box 6336
Portland, OR 97228-6336

<<Mail ID>>
<<Name 1>>
<<Name 2>>
<<Address 1>>
<<Address 2>>
<<Address 3>>
<<Address 4>>
<<Address 5>>
<<City>><<State>><<Zip>>
<<Country>>

<<Date>>

Re: Notice of Data Breach

Dear <<Name 1>>:

TrueFire LLC (“TrueFire”) is writing to inform you of an incident that may affect the privacy of some of your personal information. Although we have no evidence of actual or attempted misuse of information potentially affected by this incident, this letter provides details of the incident, our investigation, and steps you can take to help protect your information should you feel it is appropriate to do so.

What happened? On July 28, 2020, TrueFire discovered certain information in its network may have been subject to unauthorized access. We immediately began an investigation, with the assistance of third-party forensic specialists, to assess the nature and scope of the incident. Our investigation determined that an unauthorized actor accessed our network and further accessed certain information stored on the network on or about February 21, 2020. We conducted a comprehensive review of information potentially impacted by this incident to determine the type of information at issue and to whom the information related. Although we are unaware of any actual or attempted misuse of information as a result of this incident, we are notifying you because your information was potentially impacted.

What Information Was Involved? We determined that the type of information potentially impacted by this incident includes your: <<breached elements>>.

What are we doing? TrueFire takes the security of personal information in our care very seriously. Upon discovering this incident, we moved quickly to ensure our systems were secure, and notify potentially impacted individuals. As part of our ongoing commitment to the security of the information in our care, we are reviewing our existing policies and procedures related to network security.

What can you do? Please review the enclosed *Steps You Can Take to Help Protect Your Information*. Although we have no evidence of actual or attempted misuse of information as a result of this incident, we arranged to have TransUnion provide credit monitoring and identity protection services to you for one (1) year at no cost to you as an added precaution. Please review the enclosed *Steps You Can Take to Help Protect Your Information* for instructions on how to enroll in these services.

For More Information. We understand that you may have questions about this incident that are not addressed in this letter. If you have additional questions, please call our dedicated assistance line at 1-888-905-0715, Monday through Friday from 9:00 a.m. to 9:00 p.m. Eastern Time.

We regret any inconvenience this incident may cause you. TrueFire remains committed to safeguarding information in our care, and we will continue to take proactive steps to enhance the security of our systems.

Sincerely,

A handwritten signature in black ink, appearing to read "Ren Wright". The signature is fluid and cursive, with a large loop at the beginning and a long horizontal stroke extending to the right.

Ren Wright
Chief Customer Officer
TrueFire LLC

Steps You Can Take to Help Protect Your Information

Activate Identity Monitoring

How to Enroll: You can sign up online or via U.S. Mail delivery

To enroll in this service, go to the *myTrueIdentity* website at www.MyTrueIdentity.com and, in the space referenced as “Enter Activation Code,” enter the 12-letter Activation Code <<**12-letter Activation Code**>> and follow the three steps to receive your credit monitoring service online within minutes.

If you do not have access to the Internet and wish to enroll in a similar offline, paper-based credit monitoring service, via U.S. Mail delivery, please call the TransUnion Fraud Response Services toll-free hotline at **1-855-288-5422**. When prompted, enter the six-digit telephone passcode <<**6-digit Telephone Pass Code**>> and follow the steps to enroll in the offline credit monitoring service, add an initial fraud alert to your credit file, or to speak to a TransUnion representative if you believe you may be a victim of identity theft.

You can sign up for the online or offline credit monitoring service anytime between now and <<**Enrollment Deadline**>>. Due to privacy laws, we cannot register you directly. Please note that credit monitoring services might not be available for individuals who do not have a credit file with TransUnion or an address in the United States (or its territories) and a valid Social Security number. Enrolling in this service will not affect your credit score.

Monitor Your Accounts

We encourage you to remain vigilant against incidents of identity theft and fraud, to review your account statements, and to monitor your credit reports for suspicious activity. Under U.S. Law you are entitled to one free credit report annually from each of the three major credit reporting bureaus. To order your free credit report, visit www.annualcreditreport.com or call, toll-free, 1-877-322-8228. You may also contact the three major credit bureaus directly to request a free copy of your credit report.

You have the right to place a “security freeze” on your credit report, which will prohibit a consumer reporting agency from releasing information in your credit report without your express authorization. The security freeze is designed to prevent credit, loans, and services from being approved in your name without your consent. However, you should be aware that using a security freeze to take control over who gets access to the personal and financial information in your credit report may delay, interfere with, or prohibit the timely approval of any subsequent request or application you make regarding a new loan, credit, mortgage, or any other account involving the extension of credit. Pursuant to federal law, you cannot be charged to place or lift a security freeze on your credit report. Should you wish to place a security freeze, please contact the major consumer reporting agencies listed below:

Experian

P.O. Box 9554
Allen, TX 75013
1-888-397-3742

www.experian.com/freeze/center.html

TransUnion

P.O. Box 160
Woodlyn, PA 19016
1-888-909-8872

www.transunion.com/credit-freeze

Equifax

P.O. Box 105788
Atlanta, GA 30348-5788
1-800-685-1111

www.equifax.com/personal/credit-report-services

In order to request a security freeze, you will need to provide the following information:

1. Your full name (including middle initial as well as Jr., Sr., II, III, etc.);
2. Social Security number;
3. Date of birth;
4. If you have moved in the past five (5) years, provide the addresses where you have lived over the prior five years;
5. Proof of current address, such as a current utility bill or telephone bill;
6. A legible photocopy of a government-issued identification card (state driver’s license or ID card, military identification, etc.);
7. If you are a victim of identity theft, include a copy of either the police report, investigative report, or complaint to a law enforcement agency concerning identity theft.

As an alternative to a security freeze, you have the right to place an initial or extended “fraud alert” on your file at no cost. An initial fraud alert is a 1-year alert that is placed on a consumer’s credit file. Upon seeing a fraud alert display on a consumer’s credit file, a business is required to take steps to verify the consumer’s identity before extending new credit. If you are a victim of identity theft, you are entitled to an extended fraud alert, which is a fraud alert lasting seven years. Should you wish to place a fraud alert, please contact any one of the agencies listed below:

Experian

P.O. Box 2002
Allen, TX 75013
1-888-397-3742
www.experian.com/fraud/center.html

TransUnion

P.O. Box 2000
Chester, PA 19106
1-800-680-7289
[www.transunion.com/
fraud-victim-resource/
place-fraud-alert](http://www.transunion.com/fraud-victim-resource/place-fraud-alert)

Equifax

P.O. Box 105069
Atlanta, GA 30348
1-888-766-0008
[www.equifax.com/personal/
credit-report-services](http://www.equifax.com/personal/credit-report-services)

You can further educate yourself regarding identity theft, fraud alerts, security freezes, and the steps you can take to protect yourself, by contacting the consumer reporting agencies, the Federal Trade Commission, or your state Attorney General. The Federal Trade Commission can be reached at: 600 Pennsylvania Ave. NW, Washington, DC 20580, www.identitytheft.gov, 1-877-ID-THEFT (1-877-438-4338); TTY: 1-866-653-4261. The Federal Trade Commission also encourages those who discover that their information has been misused to file a complaint with them. You can obtain further information on how to file such a complaint by way of the contact information listed above. You have the right to file a police report if you ever experience identity theft or fraud. Please note that in order to file a report with law enforcement for identity theft, you will likely need to provide some proof that you have been a victim. Instances of known or suspected identity theft should also be reported to law enforcement and your state Attorney General. This notice has not been delayed by law enforcement.

For Maryland residents, the Attorney General can be contacted at 200 St. Paul Place, 16th Floor, Baltimore, MD 21202, 1-410-528-8662, www.oag.state.md.us.

For North Carolina residents, the Attorney General can be contacted at 9001 Mail Service Center, Raleigh, NC 27699-9001, 1-877-566-7226 or 1-919-716-6000, www.ncdoj.gov. You can obtain information from the Attorney General or the Federal Trade Commission about preventing identity theft.

For Rhode Island residents, the Rhode Island Attorney General can be reached at 150 South Main Street, Providence, Rhode Island 02903; www.riag.ri.gov, 1-401-274-4400. Under Rhode Island law, you have the right to obtain any police report filed in regard to this incident. There are 317 Rhode Island residents impacted by this incident.

For 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 violators. 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. We encourage you to 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.

For New York residents, the Attorney General may be contacted at Office of the Attorney General, The Capitol, Albany, NY 12224-0341; 1-800-771-7755; <https://ag.ny.gov/>.

For Washington, D.C. residents, the Office of Attorney General for the District of Columbia can be reached at 441 4th Street NW, Suite 1100 South, Washington, D.C. 20001; 1-202-442-9828; <https://oag.dc.gov>.