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July 30, 2018

VIA ELECTRONIC SUBMISSION

Xavier Becerra, Attorney General
Attorney General's Office
California Department of Justice
Attn: Public Inquiry Unit
P.O. Box 944255
Sacramento, CA 94244-2550

Re: Notification of Data Breach

Dear Attorney General Becerra:

I represent Plant Therapy, located in Twin Falls, ID. This letter is being sent pursuant to California Civil Code § 1798.82, because on May 11, 2018, Plant Therapy learned of a potential data breach involving the unauthorized installation of malware on the-commerce web platform of its third-party provider. We believe approximately 1,074 residents of California may have been affected. The incident may have involved unauthorized access to payment card information belonging to customers who utilized our web platform to purchase products from March 29, 2018 to May 11, 2018. The affected payment card information may have included names, card numbers, expiration dates, and security codes.

Upon discovering the incident, Plant Therapy and its third-party ecommerce platform provider took immediate steps to secure this information, launched an investigation with a leading forensics firm to determine what happened and whether customer payment card information had been accessed or acquired without authorization, and informed the Federal Bureau of Investigation.

Plant Therapy notified the affected California residents via the attached letter, and is providing twenty-four months of complimentary credit and identity monitoring services to affected residents through AllClear ID. Plant Therapy has also submitted the California Data Breach Reporting Form. Please contact me should you have any questions.

Very truly yours,

A handwritten signature in black ink, appearing to read 'C. Ballod'.

Christopher E. Ballod of
LEWIS BRISBOIS BISGAARD & SMITH LLP

Enclosure: Consumer Notification Letter



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JOHN Q. SAMPLE
1234 MAIN STREET
ANYTOWN US 12345-6789

July 13, 2018

Subject: Notice of Data Breach

Dear John Sample:

I am writing to inform you of a data security incident that may have affected your payment card information. At Plant Therapy, we take the privacy and security of your information very seriously and regret any concern that this incident may cause you. That is why we are contacting you and informing you about steps that can be taken to protect your information.

What Happened? On May 11, 2018, Plant Therapy learned of a potential data security incident involving the unauthorized installation of malware on our e-commerce web platform. Upon discovering the incident, we took immediate steps to secure this information. We also launched an investigation and worked with a leading forensics firm to determine what happened and whether customer payment card information had been accessed or acquired without authorization. This letter serves to inform you of the incident and to share with you steps that you can take to help protect your information.

What Information Was Involved? We believe that the malware could have compromised payment card information belonging to customers who utilized our web platform to purchase products from March 29, 2018 to May 11, 2018. The affected payment card information may have included names, card numbers, expiration dates, and security codes. Your payment with the brand American Express may have been affected.

What Are We Doing? As soon as Plant Therapy discovered the incident, we took the steps described above. We also reported the incident to the Federal Bureau of Investigation ("FBI") and are working with them to hold the perpetrators accountable. In addition, we reported the matter to the payment card brands to protect your payment card information and prevent fraudulent activity. We are also providing you with information about steps that you can take to help protect your personal information. We take the security of all personal information very seriously and have taken steps to enhance the security of Plant Therapy customer information and our e-commerce web platform in order to prevent similar incidents from occurring in the future.

As an added precaution, we have arranged to have AllClear ID protect your identity for 24 months at no cost to you. The following identity protection services start on the date of this notice and you can use them at any time during the next 24 months.



AllClear Identity Repair: This service is automatically available to you with no enrollment required. If a problem arises, simply call 1-855-682-4181 and a dedicated investigator will help recover financial losses, restore your credit and make sure your identity is returned to its proper condition.

AllClear Identity Theft Monitoring: This service offers additional layers of protection including identity theft monitoring that delivers secure, actionable alerts to you by phone and \$1,000,000.00 Identity Theft Insurance Coverage. For a child under 18 years old, AllClear ID ChildScan identifies acts of credit, criminal, medical or employment fraud against children by searching thousands of public databases for use of your child's information. To use this service, you will need to provide your personal information to AllClear ID. You may sign up online at enroll.allclearid.com or by phone by calling 1-855-682-4181 using the following redemption code: Redemption Code.

Please note: Additional steps may be required by you in order to activate your phone alerts and monitoring options.

What You Can Do: You can follow the recommendations on the following page to protect your personal information. We recommend that you review your current and past credit and debit card account statements for discrepancies or unusual activity. If you see anything that you do not understand or that looks suspicious, or if you suspect that any fraudulent transactions have taken place, you should call the bank that issued the credit or debit card immediately and call AllClear ID at 1-855-682-4181.

For More Information: Further information about how to protect your personal information appears on the following page. If you have questions or need assistance, please call AllClear ID at 1-855-682-4181, 8:00 a.m. to 8:00 p.m. Central Time, Monday through Saturday.

Thank you for your loyalty to Plant Therapy and your patience through this incident. We take your trust in us and this matter very seriously. Please accept our sincere apologies and know that we deeply regret any worry or inconvenience that this may cause you.

Sincerely,

Chris Jones

Chris Jones
President
Plant Therapy

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 and review 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 should also 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 (the “FTC”).

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 also contact one of the following three national credit reporting agencies:

Equifax P.O. Box 105851 Atlanta, GA 30348 1-800-525-6285 www.equifax.com	Experian P.O. Box 9532 Allen, TX 75013 1-888-397-3742 www.experian.com	TransUnion P.O. Box 1000 Chester, PA 19016 1-877-322-8228 www.transunion.com	Free Annual Report P.O. Box 105281 Atlanta, GA 30348 1-877-322-8228 www.annualcreditreport.com
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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 U.S. 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. If you request a security freeze from a consumer reporting agency there may be a fee up to \$10 to place, lift or remove the security freeze. In order 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: You can obtain information from the consumer reporting agencies, the FTC or from your respective state Attorney General about steps you can take toward preventing identity theft. You may report suspected identity theft to local law enforcement, including to the FTC or to the Attorney General in your state. Residents of Maryland, North Carolina, and Rhode Island can obtain more information from their Attorneys General using the contact information below.

Federal Trade Commission 600 Pennsylvania Ave, NW Washington, DC 20580 consumer.ftc.gov , and www.ftc.gov/idtheft 1-877-438-4338	Maryland Attorney General 200 St. Paul Place Baltimore, MD 21202 oag.state.md.us 1-888-743-0023	North Carolina Attorney General 9001 Mail Service Center Raleigh, NC 27699 ncdoj.gov 1-877-566-7226	Rhode Island Attorney General 150 South Main Street Providence, RI 02903 http://www.riag.ri.gov 401-274-4400
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You also have certain rights under the Fair Credit Reporting Act (FCRA): These rights include knowing what is in your file; disputing incomplete or inaccurate information; and requiring consumer reporting agencies correct or delete inaccurate, incomplete, or unverifiable information. For more information about the FCRA, please visit <https://www.consumer.ftc.gov/articles/pdf-0096-fair-credit-reporting-act.pdf>.



