



MULLEN
COUGHLIN^{LLC}
ATTORNEYS AT LAW

Alexandria N. Murphy
Office: (267) 930-1345
Fax: (267) 930-4771
Email: amurphy@mullen.law

40 Burton Hills Boulevard, Suite 200
Nashville, TN 37215

August 19, 2022

VIA E-MAIL

Office of the Attorney General
Attn: Security Breach Notification
200 St. Paul Place
Baltimore, MD 21202
E-mail: idtheft@oag.state.md.us

Re: Notice of Data Event

Dear Sir or Madam:

We represent Photo Paper Direct, Ltd. ("PPD"), located at Unit 8 Shakespeare Industrial Estate, Watford, UK, WD24 5RR, and are writing to notify your office of an incident that may affect the security of certain personal information relating to approximately three (3) Maryland residents. By providing this notice, PPD does not waive any rights or defenses regarding the applicability of Maryland law, the applicability of the Maryland data event notification statute, or personal jurisdiction.

Nature of the Data Event

On April 25, 2022, PPD was first alerted to potentially suspicious activity on the PPD's United Kingdom (UK) customer-facing website, www.photopaperdirect.com. PPD promptly began an investigation into the nature and scope of the activity. The investigation determined that information entered onto the checkout page between April 5, 2020 to April 25, 2022 may have been obtained by an unauthorized individual.

The information that could have been subject to unauthorized access includes name and payment card information.

Notice to Maryland Residents

On or about August 19, 2022, PPD provided written notice of this incident to approximately three (3) Maryland 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, PPD moved quickly to investigate and respond to the incident, assess the security of PPD systems, and identify potentially affected individuals. Further, PPD notified law enforcement agencies in the United Kingdom regarding the event. While the investigation was ongoing, PPD took the website offline and began building an updated website on a new platform. PPD is also migrating to a different provider for its online payment processing platform and services. PPD is providing access to credit monitoring services for twelve months, through Experian Identity Works, to individuals whose personal information was potentially affected by this incident, at no cost to these individuals.

Additionally, while no Social Security Numbers are at risk, PPD is providing potentially 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. PPD 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.

PPD is providing written notice of this incident to relevant state regulators, as necessary.

Contact Information

Should you have any questions regarding this notification or other aspects of the data security event, please contact us at (267) 930-1345.

Very truly yours,

Alexandria N. Murphy of
MULLEN COUGHLIN LLC

ANM/kml
Enclosure

EXHIBIT A



Return Mail Processing
PO Box 589
Claysburg, PA 16625-0589

August 19, 2022

i2234-L01-0000001 T00001 P001 *****SCH 5-DIGIT 12345



SAMPLE A SAMPLE - L01 INDIVIDUAL
APT ABC
123 ANY STREET
ANYTOWN, ST 12345-6789



Re: Notice of Data [Extra1]

Dear Sample A. Sample:

Photo Paper Direct Ltd. ("PPD") is writing to notify you of a recent incident that may impact the security of your information. This notice provides you with information about the event, our response, and resources available to you to help better protect your information, should you feel it is appropriate to do so.

What Happened? On April 25, 2022, PPD was first alerted to potentially suspicious activity on the PPD's United Kingdom (UK) customer-facing website, www.photopaperdirect.com. We promptly began an investigation into the nature and scope of the activity. While the investigation was ongoing, PPD took the website offline and began building an updated website on a new platform. The investigation determined that information entered onto the checkout page between April 5, 2020 to April 25, 2022 may have been obtained by an unauthorized individual. We reviewed our records of transactions during this time to determine what personal information, including payment information, may have been potentially exposed to the unauthorized actor, and we recently completed our review.

What Information Was Involved? We determined the following types of information relating to you may have been impacted: name and payment card information.

What We Are Doing. We take this incident and the security of personal information in our care seriously. Upon discovering the suspicious activity, we took the impacted PPD website offline and began building a new website. We also promptly took steps to investigate the activity and notify potentially affected individuals. As part of our ongoing commitment to the privacy of information in our care, we implemented additional technical security measures designed to better prevent this type of incident from recurring. We are also reviewing and enhancing existing policies and procedures.

As an added precaution, we are offering you complimentary access to twelve (12) months of credit monitoring services through Experian, as well as guidance on how to better protect your information, should you feel it is appropriate to do so. While we are covering the cost of these services, due to privacy restrictions, you will need to complete the activation process yourself.

What You Can Do. We encourage you to remain vigilant against incidents of identity theft and fraud by reviewing your account statements and monitoring your free credit reports for suspicious activity and to detect errors over the next 12 to 24 months. If you see any unauthorized or suspicious activity related to your accounts, promptly contact your credit card company. You may also review the information contained in the attached *Steps You Can Take to Protect Personal Information*. You can also enroll in the complimentary credit monitoring services using the instructions that are enclosed with this letter.

0000001



i2234-L01

For More Information. If you have further questions or concerns, please call (833) 420-2863 toll-free Monday through Friday from 9:00 am – 11:00 pm ET, or Saturday and Sunday from 11:00 am – 8:00 pm ET (excluding major U.S. holidays). Be prepared to provide your engagement number **B059193**.

Sincerely,

Photo Paper Direct, Ltd.

STEPS YOU CAN TAKE TO PROTECT PERSONAL INFORMATION

Enroll in Credit Monitoring Services

Although Social Security numbers were **not** impacted by this incident, to help protect your identity, we are offering complimentary access to Experian IdentityWorksSM for 12 months.

If you believe there was fraudulent use of your information as a result of this incident and would like to discuss how you may be able to resolve those issues, please reach out to an Experian agent. If, after discussing your situation with an agent, it is determined that identity restoration support is needed then an Experian Identity Restoration agent is available to work with you to investigate and resolve each incident of fraud that occurred from the date of the incident (including, as appropriate, helping you with contacting credit grantors to dispute charges and close accounts; assisting you in placing a freeze on your credit file with the three major credit bureaus; and assisting you with contacting government agencies to help restore your identity to its proper condition).

Please note that Identity Restoration is available to you for 12 months from the date of this letter and does not require any action on your part at this time. The Terms and Conditions for this offer are located at www.ExperianIDWorks.com/restoration.

While identity restoration assistance is immediately available to you, we also encourage you to activate the fraud detection tools available through Experian IdentityWorks as a complimentary 12-month membership. This product provides you with superior identity detection and resolution of identity theft. To start monitoring your personal information, please follow the steps below:

- Ensure that you **enroll by November 30, 2022** (Your code will not work after this date.)
- **Visit** the Experian IdentityWorks website to enroll: **www.experianidworks.com/credit**
- Provide your **activation code: ABCDEFGHI**

If you have questions about the product, need assistance with Identity Restoration that arose as a result of this incident, or would like an alternative to enrolling in Experian IdentityWorks online, please contact Experian's customer care team at **(833) 420-2863** by **November 30, 2022**. Be prepared to provide engagement number **B059193** as proof of eligibility for the Identity Restoration services by Experian.

ADDITIONAL DETAILS REGARDING YOUR EXPERIAN IDENTITYWORKS MEMBERSHIP

A credit card is not required for enrollment in Experian IdentityWorks. You can contact Experian immediately regarding any fraud issues, and have access to the following features once you enroll in Experian IdentityWorks:

- **Experian credit report at signup:** See what information is associated with your credit file. Daily credit reports are available for online members only.¹
- **Credit Monitoring:** Actively monitors Experian file for indicators of fraud.
- **Identity Restoration:** Identity Restoration specialists are immediately available to help you address credit and non-credit related fraud.
- **Experian IdentityWorks ExtendCARETM:** You receive the same high-level of Identity Restoration support even after your Experian IdentityWorks membership has expired.
- **\$1 Million Identity Theft Insurance²:** Provides coverage for certain costs and unauthorized electronic fund transfers.

¹ Offline members will be eligible to call for additional reports quarterly after enrolling.

² The Identity Theft Insurance is underwritten and administered by American Bankers Insurance Company of Florida, an Assurant company. Please refer to the actual policies for terms, conditions, and exclusions of coverage. Coverage may not be available in all jurisdictions.



Monitor Your Accounts

Under U.S. law, a consumer is entitled to one free credit report annually from each of the three major credit reporting bureaus, Equifax, Experian, and TransUnion. To order your free credit report, visit www.annualcreditreport.com or call, toll-free, 1-877-322-8228. You may also directly contact the three major credit reporting bureaus listed below to request a free copy of your credit report.

Consumers have the right to place an initial or extended “fraud alert” on a credit 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 three major credit reporting bureaus listed below.

As an alternative to a fraud alert, consumers have the right to place a “credit freeze” on a credit report, which will prohibit a credit bureau from releasing information in the credit report without the consumer’s express authorization. The credit 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 credit 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 credit freeze on your credit report. To request a credit freeze, you will need to provide the following information:

1. Full name (including middle initial as well as Jr., Sr., II, III, etc.);
2. Social Security number;
3. Date of birth;
4. Addresses for the prior two to 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, etc.); and
7. A copy of either the police report, investigative report, or complaint to a law enforcement agency concerning identity theft if you are a victim of identity theft.

Should you wish to place a credit freeze, please contact the three major credit reporting bureaus listed below:

Equifax	Experian	TransUnion
https://www.equifax.com/personal/credit-report-services/	https://www.experian.com/help/	https://www.transunion.com/credit-help
1-888-298-0045	1-888-397-3742	1-833-395-6938
Equifax Fraud Alert, P.O. Box 105069 Atlanta, GA 30348-5069	Experian Fraud Alert, P.O. Box 9554, Allen, TX 75013	TransUnion Fraud Alert, P.O. Box 2000, Chester, PA 19016
Equifax Credit Freeze, P.O. Box 105788 Atlanta, GA 30348-5788	Experian Credit Freeze, P.O. Box 9554, Allen, TX 75013	TransUnion Credit Freeze, P.O. Box 160, Woodlyn, PA 19094

Additional Information

You may further educate yourself regarding identity theft, fraud alerts, credit freezes, and the steps you can take to protect your personal information by contacting the consumer reporting bureaus, the Federal Trade Commission, or your state Attorney General. The Federal Trade Commission may be reached at: 600 Pennsylvania Avenue NW, Washington, D.C. 20580; www.identitytheft.gov; 1-877-ID-THEFT (1-877-438-4338); and 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 Maryland Attorney General may be contacted at: 200 St. Paul Place, 16th Floor, Baltimore, MD 21202; 1-410-528-8662 or 1-888-743-0023; and www.oag.state.md.us. You may obtain information from these sources and/or the Federal Trade Commission using the contact information noted above about steps you can take to avoid identity theft. You can write to PPD at the following address: Unit 8 Shakespeare Industrial Estate, Watford, WD24 5RR, United Kingdom.

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 bureaus 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 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. 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-fera.pdf, or by writing Consumer Response Center, Room 130-A, Federal Trade Commission, 600 Pennsylvania Avenue NW, Washington, D.C. 20580.

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

For North Carolina residents, the North Carolina Attorney General may be contacted at: 9001 Mail Service Center, Raleigh, NC 27699-9001; 1-877-566-7226 or 1-919-716-6000; and www.ncdoj.gov.

