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August 9, 2023

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 CommerceV3 Data Event

To Whom It May Concern:

We represent Vermont Christmas Company (“VCC”) located at P.O. Box 1071, Burlington, VT 05402, and we are writing to notify your office of an event involving VCC’s third-party vendor, CommerceV3. As to VCC customers specifically, this data event may affect the security of certain information relating to three hundred thirty-five (335) Maryland residents. This notice will be supplemented with any new significant facts learned subsequent to its submission. By providing this notice, VCC 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

As noted above, CommerceV3 is a third-party vendor of VCC. VCC uses CommerceV3’s e-commerce platform to process payment card information when an order is placed on one of its websites. CommerceV3 recently notified VCC of an event involving unauthorized access to CommerceV3 systems between November 24, 2021 and December 14, 2022. Upon receiving notice, VCC commenced an investigation, which included requesting additional information about the event and CommerceV3’s investigation.

CommerceV3 reported that, on May 3, 2023, after a forensic investigation, it determined that cardholder information was potentially impacted as a result of its event. On June 8, 2023, CommerceV3 provided VCC with a list of the VCC customers whose information may be involved. This list identified customer information including name, email address, billing address, payment card number, CVV code, and expiration date.

Notice to Maryland Residents

To date, CommerceV3 has identified three hundred thirty-five (335) Maryland residents associated with VCC whose credit card information is potentially impacted by the CommerceV3 event. On August 9, 2023, VCC began providing written notice of this event to these individuals. Written notice is being provided in substantially the same form as the notice attached here as ***Exhibit A***.

Other Steps Taken and To Be Taken

Although the CommerceV3 event did not impact VCC systems, VCC is reviewing its policies and procedures including those involving third-party vendors. VCC is providing written notice of the CommerceV3 event to relevant regulators, as necessary.

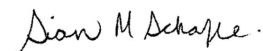
VCC is providing potentially impacted individuals with guidance on how to better protect against identity theft and fraud. VCC is providing individuals with information on how to place a fraud alert and security freeze a credit file, the contact details for the national consumer reporting agencies, information 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.

VCC understands that CommerceV3 has implemented a series of additional security measures to protect customer information. CommerceV3 also shared that law enforcement was notified and that CommerceV3 worked with the major card brands and merchant banks during their investigation.

Contact Information

Should you have any questions regarding this notification or other aspects of the data security event, please contact us at (267) 930-4799.

Very truly yours,



Sian M. Schafle of
MULLEN COUGHLIN LLC

SMS/bxn
Enclosure

EXHIBIT A



P.O. Box 989728
West Sacramento, CA 95798-9728

<<FIRST NAME>> <<LAST NAME>>
<<ADDRESS1>>
<<ADDRESS2>>
<<CITY>>, <<STATE>> <<ZIP>>
<<Country>>

August 9, 2023

<<Variable Text 1>>

Dear <<FIRST NAME>> <<LAST NAME>>:

Vermont Christmas Company ("VCC") is notifying you of an event involving our third-party vendor, CommerceV3. VCC uses CommerceV3's e-commerce platform to process payment card information when an order is placed on our www.vermontchristmasco.com or www.vccwholesale.com websites. Although this event did not affect our systems, we wanted to provide you with information on the CommerceV3 event and the resources available to you to help protect your information, should you feel it appropriate to do so.

What Happened? CommerceV3 recently notified us of an event involving unauthorized access to CommerceV3 systems between November 24, 2021 and December 14, 2022. Upon receiving notice, we commenced an investigation, which included requesting additional information about the event and CommerceV3's investigation.

What Information Was Involved? CommerceV3 reported that, on May 3, 2023, after a forensic investigation, it determined that cardholder information was potentially impacted as a result of the CommerceV3 event. On June 8, 2023, CommerceV3 provided us with a list of the VCC customers whose information may be involved, which is why we are notifying you now. CommerceV3 advised that the potentially impacted customer information may include: name, billing address, email address, payment card number, CVV code, and expiration date.

What We Are Doing. We take the confidentiality, privacy, and security of personal information very seriously. After receiving notice from CommerceV3, we took and are continuing to take steps to understand the impact of the CommerceV3 event on VCC and our customer information. As part of our ongoing commitment to data security, we are reviewing our processes and procedures regarding third-party vendors, and we are notifying relevant regulatory authorities.

We understand that CommerceV3 has implemented a series of additional security measures to protect customer information. CommerceV3 also shared that they notified law enforcement and worked with the major card brands and merchant banks during their investigation.

What You Can Do. We encourage you to remain vigilant against incidents of identity theft and fraud and to review your account statements and free credit reports for suspicious activity and to detect errors. We also recommend you review the "Steps You Can Take to Help Protect Your Personal Information" section of this letter.

For More Information. If you have additional questions, please contact 1-888-498-1633, Monday through Friday from 9 a.m. – 9 p.m. Eastern (excluding U.S. holidays). You may also write to us at: P.O. Box 1071, Burlington, VT 05402-1071.

Sincerely,

Vermont Christmas Company

Steps You Can Take to Help Protect Your Personal Information

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 a free credit report, visit www.annualcreditreport.com or call, toll-free, 1-877-322-8228. Consumers may also directly contact the three major credit reporting bureaus listed below to request a free copy of their 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 consumers are the victim of identity theft, they are entitled to an extended fraud alert, which is a fraud alert lasting seven years. Should consumers wish to place a fraud alert, please contact any 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 a consumer’s name without consent. However, consumers should be aware that using a credit freeze to take control over who gets access to the personal and financial information in their credit report may delay, interfere with, or prohibit the timely approval of any subsequent request or application they make regarding a new loan, credit, mortgage, or any other account involving the extension of credit. Pursuant to federal law, consumers cannot be charged to place or lift a credit freeze on their credit report. To request a credit freeze, individuals may need to provide some or all of 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 they are a victim of identity theft.

Should consumers wish to place a credit freeze or fraud alert, 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	1-800-916-8800
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

Consumers may further educate themselves regarding identity theft, fraud alerts, credit freezes, and the steps they can take to protect their personal information by contacting the consumer reporting bureaus, the Federal Trade Commission, or their 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. Consumers can obtain further information on how to file such a complaint by way of the contact information listed above. Consumers have the right to file a police report if they ever experience identity theft or fraud. Please note that in order to file a report with law enforcement for identity theft, consumers will likely need to provide

some proof that they have been a victim. Instances of known or suspected identity theft should also be reported to law enforcement and the relevant state Attorney General. This notice has not been delayed by law enforcement.

For District of Columbia residents, the District of Columbia Attorney General may be contacted at: 400 6th Street, NW, Washington, D.C. 20001; 1-202-727-3400; and oag.dc.gov.

For Maryland residents, the Maryland Attorney General may be contacted at: 200 St. Paul Place, 16th Floor, Baltimore, MD 21202; 1-410-576-6300 or 1-888-743-0023; and <https://www.marylandattorneygeneral.gov/>.

For New Mexico residents, consumers have rights pursuant to the Fair Credit Reporting Act, such as the right to be told if information in their credit file has been used against them, the right to know what is in their credit file, the right to ask for their 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 consumers' files is limited; consumers must give consent for credit reports to be provided to employers; consumers may limit "prescreened" offers of credit and insurance based on information in their credit report; and consumers may seek damages from violators. Consumers 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 consumers to review their 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. 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.

For Rhode Island residents, the Rhode Island Attorney General may be reached at: 150 South Main Street, Providence, RI 02903; www.riag.ri.gov; and 1-401-274-4400. Under Rhode Island law, individuals have the right to obtain any police report filed in regard to this event. There are approximately 86 Rhode Island residents that may be impacted by this event.