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## LATHAM & WATKINS LLP

October 18, 2013

Office of Attorney General  
Consumer Protection and Antitrust Division  
Attn: Security Breach Notification  
33 Capitol Street  
Concord, NH 03301

### FIRM / AFFILIATE OFFICES

Abu Dhabi	Milan
Barcelona	Moscow
Beijing	Munich
Boston	New Jersey
Brussels	New York
Chicago	Orange County
Doha	Paris
Dubai	Riyadh
Düsseldorf	Rome
Frankfurt	San Diego
Hamburg	San Francisco
Hong Kong	Shanghai
Houston	Silicon Valley
London	Singapore
Los Angeles	Tokyo
Madrid	Washington, D.C.

Dear Ladies and Gentlemen:

I am writing on behalf of our client, Ouidad, to notify you that Ouidad recently discovered that they were the target of a data security intrusion.

While Ouidad continues to investigate the incident, it has been determined that between June 30 and July 4, 2013, attackers illegally gained access to a Ouidad administrative reporting system that contains customer order information. At this time, it is believed that the information the attackers were able to acquire includes customers' first and last name, credit card number, credit card security code and expiration date, billing address, email address, phone number, and for some individuals, user name and password. It appears that approximately 559 New Hampshire residents are affected.

Ouidad first observed evidence of the unauthorized access on or about September 20, 2013. They promptly implemented measures designed to prevent a recurrence of the breach and began a review designed to identify any additional unauthorized access. This review as well as an overall review of the company's information security posture are ongoing. In addition, Ouidad has engaged an outside security firm to investigate the full extent of the breach and review the company's security. Their investigation is ongoing as well.

Ouidad is preparing to notify all residents in New Hampshire affected by the unauthorized access. In addition to information about the breach, the notice will provide contact information should users have questions about the incident as well as resources and guidance for dealing with fraudulent use of credit cards and identity theft. A copy of the planned notice is attached.

Please contact me at (202) 637-2245 or kevin.boyle@lw.com in the event that you have any questions regarding this matter.

LATHAM & WATKINS LLP

Sincerely,

A handwritten signature in black ink, appearing to read "Kevin Boyle", written in a cursive style.

Kevin Boyle  
LATHAM & WATKINS LLP

Enclosure

October \_\_, 2013

**VIA FIRST CLASS MAIL**  
[ADDRESS]

Dear [FIRST NAME],

Ouidad is committed to protecting the personal information provided to us by our customers. Regrettably, we are writing to inform you of an incident involving some of that information. We only recently were alerted that our Company was the victim of an illegal data security attack by sophisticated criminals between the dates of June 30 and July 4, 2013. Based on our ongoing review, we believe that the attackers gained access to the Ouidad customer database, compromising your Ouidad account information. We are notifying you so that you can take action along with our efforts to minimize or eliminate any potential harm.

It appears the attackers obtained or viewed information about one or more transactions you completed at Ouidad.com including your first and last name, credit card number, credit card security code and expiration date, billing address, email address, [user name, password,]\* and phone number. We recommend that you carefully review your credit card statements, account activity, and credit reports to identify any unauthorized charges and otherwise help protect the security of those accounts. [We have reset your Ouidad password so you will need to follow our password recovery process to establish a new password the next time you log on to our site. Additionally, if you use your Ouidad password at other sites, we recommend you change your password on those sites.]

Upon learning of this incident, we immediately engaged leading security experts and have already implemented changes designed to protect your information from any further unauthorized access. Ouidad deeply values our relationship and the trust you place in us. We sincerely apologize for any inconvenience this attack on our systems may cause you.

To help monitor any unauthorized activity, we recommend that you obtain a copy of your credit report, free of charge once every 12 months from the three nationwide credit reporting companies listed below. To order your annual free credit report, please visit [www.annualcreditreport.com](http://www.annualcreditreport.com) or call toll free at 1-877-322-8228. Contact information for the three nationwide credit reporting companies is as follows:

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

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

Trans Union Security  
P.O. Box 2000  
Chester, PA 19022  
1-888-909-8872

Additionally, as a service to our customers, we have arranged for a credit monitoring company to provide you a free one year membership in the Equifax Credit Watch Gold with Web Detect identity theft protection monitoring program. This program helps detect possible misuse of your personal information and provides you with identity protection services focused on identification and resolution of identity theft. You may sign up for this service by following the instructions in Attachment A. You will be able to access this offer at no cost to you up until January 15, 2014.

Again, we would like to stress that Ouidad deeply regrets any inconvenience this attack on our systems has caused you. We value our relationship with you and your trust in us. We are committed to providing exceptional service to our customers and are dedicated to delivering the highest quality

products. We are working extremely hard now to implement changes designed to protect your information from future attacks.

If you have further questions, additional information is available at [www.oidad.com/securityalert](http://www.oidad.com/securityalert). We can also be reached toll-free at 888-406-4353.

Sincerely,

The Ouidad Customer Service Team

\* Bracketed language is included in letters to those customers whose user name and password were compromised.

**Attachment A:**

**Equifax Credit Watch Gold with WebDetect**

Consumer Name

Consumer Address

Consumer City, State, Zip Code

Promotion Code: #####

We have arranged with Equifax Personal Solutions to help you protect your identity and your credit information at no cost to you. The steps to follow are:

1. Enroll in Equifax Credit Watch™ Gold with WebDetect identity theft protection product. This product is being provided to you at no cost for one year.
2. Additionally, you may choose to adopt an increased level of protection by placing a fraud alert on your credit file at Equifax and the other two credit reporting agencies

**Enroll in Equifax Credit Watch™ Gold with WebDetect**

Equifax Credit Watch will provide you with an “early warning system” to changes to your credit file and help you to understand the content of your Equifax credit file. The key features and benefits are listed below.

Equifax Credit Watch provides you with the following benefits:

- Comprehensive credit file monitoring of your Equifax credit report with daily notification of key changes to your credit file
- Wireless alerts
- Access to your Equifax Credit Report™
- Ability to receive alerts if your Social Security Number or credit card numbers are found on Internet trading sites
- \$25,000 in identity theft insurance† with \$0 deductible, at no additional cost to you †
- 24 by 7 live agent Customer Service to assist you in understanding the content of your Equifax credit information, to provide personalize identity theft victim assistance and in initiating an investigation of inaccurate information
- 90 day Fraud Alert placement with automatic renewal functionality

**How to Enroll**

To sign up online for **online delivery** go to [www.myservices.equifax.com/goldscan](http://www.myservices.equifax.com/goldscan)

1. **Register:** Complete the form with your contact information (name, gender, address, date of birth, Social Security Number and telephone number) and click “Continue” button. Complete the form with your email address, create a User Name and Password, enter Promotion Code provided at the top of your letter in the “Promotion Code” box and agree to the Terms of Use. Then click “Accept Terms & Continue” button. This code eliminates the need to provide a credit card number for payment. The information is provided in a secured environment.
2. **Verify ID:** The system will then ask you up to four security questions. Please answer the questions and click the “Submit Order” button. This is the Equifax Identity Verification Process.

3. Order Confirmation: This page shows you your order. Please click the “View my Product” button to access the product features.

#### Directions for placing a Fraud Alert

A fraud alert is a consumer statement added to your credit report. This statement alerts creditors of possible fraudulent activity within your report as well as requests that they contact you prior to establishing any accounts in your name. Once the fraud alert is added to your credit report, all creditors should contact you prior to establishing any account in your name. To place a 90 day fraud alert on your credit file, log into the Equifax Member Center and click on the fraud alert tab, visit [www.fraudalerts.equifax.com](http://www.fraudalerts.equifax.com) or call our auto fraud line at 1-877-478-7625, and follow the simple prompts. Once the fraud alert has been placed with Equifax, a notification will be sent to the other two credit reporting agencies, Experian and Trans Union, on your behalf. Fraud alerts last 90 days unless you manually renew it or use the Automatic Fraud Alert\* feature within your Credit Watch subscription.

† Identity theft insurance is underwritten by subsidiaries or affiliates of Chartis Inc. The description herein is a summary and intended for informational purposes only and does not include all terms, conditions and exclusions of the policies described. Please refer to the actual policies for terms, conditions, and exclusions of coverage. Coverage may not be available in all jurisdictions. This product is not intended for minors (under 18 years of age).

\* The Automatic Fraud Alert feature made available to consumers by Equifax Information Services LLC and fulfilled on its behalf by Equifax Consumer Services LLC