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426 W. Lancaster Avenue, Suite 200
Devon, PA 19333

October 16, 2024

VIA E-MAIL

Office of the Attorney General of Iowa
Consumer Protection Division
Security Breach Notifications
1305 E. Walnut Street
Des Moines, IA 50319-0106
E-mail: consumer@ag.iowa.gov

Re: Notice of Data Event

To Whom It May Concern:

We represent Totally Promotional located at 450 South 2nd Street, Coldwater, OH 45828, and are writing to notify your office of an incident that may involve certain personal information relating to seven hundred twenty-one (721) Iowa residents. This notice may be supplemented with any new significant facts learned subsequent to its submission. By providing this notice, Totally Promotional does not waive any rights or defenses regarding the applicability of Iowa law, the applicability of the Iowa data event notification statute, or personal jurisdiction.

Nature of the Data Event

On or about July 10, 2024, Totally Promotional identified suspicious activity on its website's payment platform. Totally Promotional promptly commenced an investigation to better understand the nature and scope of this activity. Through this investigation, it was determined that an unauthorized actor placed code on the website that allowed it to capture certain customer payment card information entered during particular time frames between November 20, 2023 and July 11, 2024, and for a brief period of time on July 18, 2024. Upon becoming aware of this, Totally Promotional undertook a review of the affected data to determine what information was impacted and to whom it related. On September 13, 2024, this process was completed, and it was determined that certain Iowa residents may have had payment card involved in this event.

The information that could have been involved includes name and payment card information.

Notice to Iowa Residents

On or about October 16, 2024, Totally Promotional provided written notice of this incident to seven hundred twenty-one (721) Iowa 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 becoming aware of the incident, Totally Promotional moved quickly to investigate and respond to the incident, assess the security of Totally Promotional systems, and identify potentially affected individuals. Totally Promotional is also working to implement additional safeguards and training to its employees.

Additionally, Totally Promotional 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. Totally Promotional 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.

Totally Promotional is providing written notice of this incident to relevant state regulators, as necessary, and to the three major credit reporting agencies, Equifax, Experian, and TransUnion.

Contact Information

Should you have any questions regarding this notification or other aspects of the data security event, please contact us at (267) 930-4786.

Very truly yours,

Ryan C. Loughlin of
MULLEN COUGHLIN LLC

RCL/klh
Enclosure

EXHIBIT A

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

<<First Name>> <<Last Name>>
<<Address1>>
<<Address2>>
<<City>>, <<State>> <<Zip>>
<<Country>>

October 16, 2024

NOTICE OF <<SECURITY INCIDENT/DATA BREACH>>

Dear <<First Name>> <<Last Name>>:

Totally Promotional is writing to notify you of an incident that may involve some of your payment card information. This notice provides information about the incident, our response, and resources available to you to help protect your information from possible misuse, should you feel it necessary to do so.

What Happened? On or about July 10, 2024, Totally Promotional identified suspicious activity on its website's payment platform. Totally Promotional promptly commenced an investigation to better understand the nature and scope of this activity. Through this investigation, it was determined that an unauthorized actor placed code on the website that allowed it to capture certain customer payment card information entered during particular time frames between November 20, 2023 and July 11, 2024, and for a brief period of time on July 18, 2024. Upon becoming aware of this, Totally Promotional undertook a review of the affected data to determine what information was impacted and to whom it related. This process was completed on September 13, 2024. We are notifying you because the investigation determined that certain payment card information related to you could have been captured by the unauthorized code.

What Information Was Involved? The data involved included your name and payment card information.

What We Are Doing. Upon identifying this incident, we quickly took steps to investigate and respond, including removing the code at issue and reviewing and adjusting our existing policies and procedures to reduce the likelihood of a similar future event. Totally Promotional is notifying individuals and relevant regulators as required.

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. If you see a suspicious charge on your account statement, we recommend contacting the bank that issued the payment card involved. You may also review the information contained in the attached *Steps You Can Take to Help Protect Your Information.*

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 call center at (866) 253-1773 between 8:00am – 8:00pm Central Time. You may write to Totally Promotional at 450 South 2nd Street, Coldwater, OH 45828.

Sincerely,

Totally Promotional

STEPS YOU CAN TAKE TO PROTECT 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 your 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; (202) 442-9828; 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. N.W., 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 89 Rhode Island residents that may be impacted by this event.