

DLA Piper LLP (US)

One Liberty Place 1650 Market Street Philadelphia, PA 19103-7300 www.dlapiper.com

Ron Plesco Ron.plesco@us.dlapiper.com T 215.656.2453

VIA EMAIL: consumer@ag.iowa.gov

Consumer Protection Division Security Breach Notifications Office of the Attorney General of Iowa 1305 E. Walnut Street Des Moines, Iowa 50319-0106

September 5, 2023

RE: Notice of Data Event

Dear Sir or Madam:

We represent Vivendi Ticketing US LLC d/b/a See Tickets ("See Tickets") and are writing to notify your Office of a compromise that may affect the security of certain personal information relating to 1,396 Iowa residents. The investigation into this matter is ongoing, and this notice will be supplemented with any new significant facts learned subsequent to its submission. By providing this notice, See Tickets does not waive any rights or defenses regarding the applicability of Iowa law, the applicability of Iowa data event notification statute, or personal jurisdiction.

Notice of Data Event

In May 2023, See Tickets became aware of unusual activity on certain of its e-commerce websites. In response, See Tickets began working with third-party cyber forensic specialists to determine the nature and extent of the compromise, secure its websites, and identify what information may have been affected and to whom it relates.

In May and June of 2023, See Tickets' third-party cyber forensic specialists determined that an unauthorized party(ies) inserted multiple instances of malicious code into a number of its ecommerce checkout pages resulting in unauthorized access to, and acquisition of, certain customer payment card information used to make purchases on the websites between February 28, 2023 and July 2, 2023. Once the forensic specialists determined the dates of compromise, See Tickets took steps to identify potentially impacted customers who made purchases during this time period. This process completed on July 21, 2023, See Tickets moved quickly to notify impacted individuals.

Please also note that as part of its response to this compromise, See Tickets took steps to implement additional safeguards to further protect the security of payment card information on its websites. Additionally, See Tickets notified law enforcement.

The information impacted includes the cardholder's name, address, and payment card information.

Notice to Iowa Residents

On September 5, 2023, See Tickets began providing written notice of the compromise to potentially affected individuals, which includes 1,400 Iowa residents. Written notice is being provided in substantially the same form as the letter attached hereto as *Exhibit A*.

Other Steps Taken and to be Taken

Upon discovery of the compromise, See Tickets moved quickly to investigate and respond to the compromise, assess the security of its systems, and notify potentially affected individuals. See Tickets also reviewed its existing policies and procedures and implemented additional safeguards to further secure its systems and the information contained therein.

Additionally, See Tickets is providing individuals with guidance on how to protect against identity theft and fraud, including advising individuals to report any suspected incidents of identity theft or fraud to their cred card company and/or bank. conducted a diligent investigation to confirm the nature and scope of the compromise. See Tickets is providing individuals with information on how to place a fraud alert and security freeze on one's credit file, information on protecting against tax fraud, the contact details for the national credit 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 credit reports, and encouragement to contact the Federal Trade Commission, their Attorney General, and law enforcement to report attempted or actual identity theft and fraud.

Although there is no evidence to suggest the personal information involved in this compromise has been fraudulently used, See Tickets is nevertheless providing individuals with access to twelve months of complementary credit monitoring and identity restoration services through Kroll.

Contact Information

Should you have any questions regarding this notification or other aspects of the compromise, please contact me at (215) 656-2453.

Sincerely,

Ron Plesco

RACPLe



See TICKETS

<< Date>> (Format: Month Day, Year)

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<<address_1>>
<<address_2>>
<<city>>, <<state_province>> <<postal_code>>
<<country>>
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RE: Notice of Security Compromise

Dear <<first name>> <<middle name>> <<last name>> <<suffix>>:

Vivendi Ticketing US LLC d/b/a See Tickets ("See Tickets") is writing to advise you of a recent security compromise that may impact the security of certain personal information related to you. We write to provide you with information about the security compromise, the steps we have taken since discovering the compromise, and the steps you can take to better help protect your information should you feel it appropriate to do so. See Tickets takes the security of your personal information very seriously and we sincerely regret any inconvenience this event may cause.

WHAT HAPPENED? In May 2023, See Tickets became aware of unusual activity on certain of its e-commerce websites. In response, See Tickets began working with third-party cyber forensic specialists to determine the nature and extent of the compromise, secure its websites, and identify what information may have been affected and to whom it relates.

In May and June of 2023, See Tickets' third-party cyber forensic specialists determined that an unauthorized party(ies) inserted multiple instances of malicious code into a number of its e-commerce checkout pages resulting in unauthorized access to, and acquisition of, certain customer payment card information used to make purchases on the websites between February 28, 2023 and July 2, 2023. Once the forensic specialists determined the dates of compromise, See Tickets took steps to identify potentially impacted customers who made purchases during this time period. This process completed on July 21, 2023, and See Tickets moved quickly to notify you.

Please also note that as part of its response to this compromise, See Tickets took steps to implement additional safeguards to further help protect the security of payment card information on its websites. Additionally, See Tickets notified applicable regulatory bodies as required.

WHAT INFORMATION WAS INVOLVED? Our investigation determined that the following types of your personal information were accessed and/or taken without authorization: your name, address, and payment card information.

WHAT WE ARE DOING. Please know that protecting your personal information is something we take very seriously. We conducted a diligent investigation to confirm the nature and scope of the compromise. We also took steps to reduce the likelihood of a similar incident occurring in the future, and we continue to make additional improvements that strengthen our cybersecurity protections. Although we have no evidence to suggest your personal information has been fraudulently used, we are nevertheless providing you with access to twelve (12) months of complementary identity monitoring and identity restoration services through Kroll. Individuals who wish to receive these services must activate by following the attached activation instructions.

WHAT YOU CAN DO. We encourage you to remain vigilant against incidents of identity theft and fraud by reviewing your financial account statements and credit reports for any anomalies. We also encourage you to review the enclosed *Steps You Can Take to Help Protect Your Information* for additional guidance, which includes instructions on how to activate the complimentary identity monitoring services being offered to you.

FOR MORE INFORMATION. We understand that you may have additional questions that are not addressed in this letter. Please call the dedicated assistance line that we have established regarding this event by dialing (866) 731-2485, Monday through Friday 8:00 a.m. to 5:30 p.m. Central Time, excluding major U.S. holidays.

Sincerely,

Vivendi Ticketing US LLC (See Tickets)

Steps You Can Take to Help Protect Your Personal Information

Activate Complimentary Identity Monitoring Services.

Visit https://enroll.krollmonitoring.com to activate and take advantage of your identity monitoring services.

You have until <<bb/>be text 6(activation deadline)>> to activate your identity monitoring services.

Membership Number: << Membership Number s_n>>

For more information about Kroll and your Identity Monitoring services, you can visit info.krollmonitoring.com.

Additional information describing your services is included with this letter.

Monitor Your Accounts. We recommend that you regularly review statements from your accounts and periodically obtain your credit report from one or more of the national credit reporting companies. You may obtain a free copy of your credit report online at www.annualcreditreport.com, by calling toll-free 1-877-322-8228, or by mailing an Annual Credit Report Request Form (available at www.annualcreditreport.com) to Annual Credit Report Request Service, P.O. Box 105281, Atlanta, GA, 30348-5281. You may also purchase a copy of your credit report by contacting one or more of the three national credit reporting agencies listed below.

Equifax ®	Experian	TransUnion ®
P.O. Box 740241	P.O. Box 9701	P.O. Box 1000
Atlanta, GA 30374-0241	Allen, TX 75013-9701	Chester, PA 19016-1000
1-800-685-1111	1-888-397-3742	1-800-888-4213
www.equifax.com	www.experian.com	www.transunion.com

When you receive your credit reports, review them carefully. Look for accounts or creditor inquiries that you did not initiate or do not recognize. Look for information, such as home address and Social Security number that is not accurate. If you see anything you do not understand, call the credit reporting agency at the telephone number on the report.

Place a Credit Freeze. You have the right to put a security freeze, also known as a credit freeze, on your credit file, so that no new credit can be opened in your name without the use of a Personal Identification Number (PIN) that is issued to you when you initiate a freeze. A credit freeze is designed to prevent potential credit grantors from accessing your credit report without your consent. If you place a credit freeze, potential creditors and other third parties will not be able to access your credit report unless you temporarily lift the freeze. Therefore, using a credit freeze may delay your ability to obtain credit. Pursuant to federal law, you cannot be charged to place or lift a credit freeze on your credit report. Should you wish to place a credit freeze, please contact all three major consumer reporting agencies listed below.

Equifax	Experian	TransUnion
P.O. Box 105788	P.O. Box 9554	P.O. Box 160
Atlanta, GA 30348-5788	Allen, TX 75013-9554	Woodlyn, PA 19094
1-800-685-1111	1-888-397-3742	1-888-909-8872
www.equifax.com/personal/	www.experian.com/	www.transunion.com/
credit-report-services	freeze/center.html	credit-freeze

You must separately place a credit freeze on your credit file at each credit reporting agency. The following information should be included when requesting a credit freeze:

- 1) Full name, with middle initial and any suffixes;
- 2) Social Security number;
- 3) Date of birth (month, day, and year);
- 4) Current address and previous addresses for the past five (5) years;
- 5) Proof of current address, such as a current utility bill or telephone bill;
- 6) Other personal information as required by the applicable credit reporting agency;

If you request a credit freeze online or by phone, then the credit reporting agencies have one (1) business day after receiving your request to place a credit freeze on your credit file report. If you request a lift of the credit freeze online or by phone, then the credit reporting agency must lift the freeze within one (1) hour. If you request a credit freeze or lift of a credit freeze by mail, then the credit agency must place or lift the credit freeze no later than three (3) business days after getting your request.

Place a Fraud Alert. You also have the right to place an initial or extended fraud alert on your file at no cost. An initial fraud alert lasts 1-year and 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 7 years. Should you wish to place a fraud alert, please contact any one of the agencies listed below. The agency you contact will then contact the other two credit agencies.

Equifax

P.O. Box 105788 Atlanta, GA 30348-5788 1-888-766-0008 www.equifax.com/personal/ credit-report-services

Experian

P.O. Box 9554 Allen, TX 75013-9554 1-888-397-3742 www.experian.com/ fraud/center.html

TransUnion

P.O. Box 2000 Chester, PA 19016-2000 1-800-680-7289 www.transunion.com/fraudvictim-resource/place-fraud-alert

<u>Additional Information</u>. You can further educate yourself regarding identity theft and the steps you can take to protect yourself, by contacting your state Attorney General or the Federal Trade Commission. Instances of known or suspected identity theft should be reported to law enforcement, your Attorney General, and the FTC.

The Federal Trade Commission

600 Pennsylvania Avenue, NW Washington, DC 20580 1-877-ID-THEFT (1-877-438-4338) TTY: 1-866-653-4261 www.ftc.gov/idtheft

STATE-SPECIFIC INFORMATION

Your state attorney general may also have advice on preventing identity theft, and you should report instances of known or suspected identity theft to law enforcement, your state attorney general, or the FTC. If you are a resident of the following states, the following information applies to you.

All US Residents: Identity Theft Clearinghouse, Federal Trade Commission, 600 Pennsylvania Avenue, NW Washington, DC 20580, www.consumer.gov/idtheft, 1-877-IDTHEFT (438-4338), TTY: 1-866-653-4261. California Residents: Visit the California Office of Privacy Protection (https://oag.ca.gov/privacy) for additional information on protection against identity theft. District of Columbia: The Attorney General may be contacted at 400 6th Street NW, Washington, DC 20001; Telephone: + (202) 727 3400; or aog@dc.gov. **Iowa Residents**: The Attorney General may be contacted at Office of Attorney General of Iowa, Hoover State Office Building, 1305 E. Walnut Street, Des Moines, Iowa 50319, +1 (515) 281-5164, www.iowaattorneygeneral.gov. Kentucky Residents: The Attorney General may be contacted at Office of the Attorney General of Kentucky, 700 Capitol Avenue, Suite 118 Frankfort, Kentucky 40601, www.ag.ky.gov, Telephone: +1 (502) 696-5300. Maryland Residents: The Attorney General may be contacted at Office of Attorney General, 200 St. Paul Place, Baltimore, Maryland 21202; +1 (888) 743-0023; or www.marylandattorneygeneral.gov. 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 agencies 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 a 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. You can review your 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. New York Residents: The Attorney General may be contacted at the Office of the Attorney General, The Capitol, Albany, NY 12224-0341, +1 (800) 771-7755; or www.ag.ny.gov. North Carolina Residents: The Attorney General may be contacted at 9001 Mail Service Center, Raleigh, NC 27699-9001; +1 (919) 716-6400; or www.ncdoj.gov.

Oregon Residents: Oregon Department of Justice, 1162 Court Street NE, Salem, OR 97301-4096, www.doj.state.or.us/, Telephone: 877-877-9392. **Rhode Island Residents**: The Attorney General may be contacted at 150 South Main Street, Providence, Rhode Island 02903; +1 (401) 274-4400; or www.riag.ri.gov. You may also file a police report by contacting local or state law enforcement agencies.

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TAKE ADVANTAGE OF YOUR IDENTITY MONITORING SERVICES

You have been provided with access to the following services from Kroll:

Single Bureau Credit Monitoring

You will receive alerts when there are changes to your credit data—for instance, when a new line of credit is applied for in your name. If you do not recognize the activity, you'll have the option to call a Kroll fraud specialist, who will be able to help you determine if it is an indicator of identity theft.

Fraud Consultation

You have unlimited access to consultation with a Kroll fraud specialist. Support includes showing you the most effective ways to protect your identity, explaining your rights and protections under the law, assistance with fraud alerts, and interpreting how personal information is accessed and used, including investigating suspicious activity that could be tied to an identity theft event.

Identity Theft Restoration

If you become a victim of identity theft, an experienced Kroll licensed investigator will work on your behalf to resolve related issues. You will have access to a dedicated investigator who understands your issues and can do most of the work for you. Your investigator will be able to dig deep to uncover the scope of the identity theft, and then work to resolve it.

Kroll's activation website is only compatible with the current version or one version earlier of Chrome, Firefox, Safari and Edge.

To receive credit services, you must be over the age of 18 and have established credit in the U.S., have a Social Security number in your name, and have a U.S. residential address associated with your credit file.