

Attn: Hawaii Office of Consumer Protection
235 South Beretania Street, Room 801
Honolulu, HI 66813

RECEIVED

MAR 15 2016

OFFICE OF CONSUMER PROTECTION
INVESTIGATIONS



Bailey's Inc.
baileysonline.com

NOTICE OF DATA BREACH

What Happened

In January 2016, we sent our customers a notification that their credit card information and other personal information may have been stolen due to a cyber attack on our website, BaileysOnline.com. In that notice, we informed our customers that the compromise event began on September 25, 2015.

Following an extensive eight week forensic examination, we have recently learned that the cyber attacks actually first occurred in December 2011. The forensic examination shows that beginning in December 2011, a person or persons without authorization accessed and possibly stole credit card information from our website belonging to our customers. The thief or thieves accessed our website remotely and overcame our firewall and security protections. Of these exposed cards, nearly 25% were MasterCard® cards, 64% were VISA® cards, and fewer than 5% and 6% were American Express® and Discover® cards, respectively.

The number of people in your state that are affected is 1,319.

We cannot be certain whether their data was stolen. However, because there is a possibility that their data was stolen, we are required by law to notify them that they made a purchase and/or opened an account with Bailey's during the affected range.

What Information Was Involved

The types of information stolen appears to include credit card numbers, cardholder names, CCV numbers, credit card expiration dates, addresses and phone numbers, email addresses, log- in and password to BaileysOnline.com, and other information typed into our website related to their order.

The following information is NOT included in what was taken: PINs (personal identification numbers), Social Security numbers, bank account numbers, and other personally identifiable information.

What We Are Doing

We have reported the theft to various law enforcement agencies, and are cooperating with them in their investigation. We also have notified Wells Fargo Bank, which handles our credit card

transactions, along with MasterCard®, VISA®, American Express® and Discover®. We have no indication that any PayPal accounts were impacted.

We have engaged a security consultant and have been implementing our consultant's recommendations to strengthen our firewall and take other security protections (described below). We have also replaced our server with new hardware. We are confident that there have been no further data breaches since January 27, 2016.

What We Advise Them to Do

We strongly encourage them to take preventive measures now to help prevent and detect any misuse of their information. Change their log-in and password for BaileysOnline.com. They may want to cancel the credit card(s), if any, that they think they may have used at BaileysOnline.com. They may also want to place a fraud alert or order a security freeze on their credit reports with the three major credit reporting agencies: (1) Equifax: 1-800-525-6285; www.equifax.com; P.O. Box 740241, Atlanta, GA 30374-0241; (2) Experian: 1-888-EXPERIAN (397-3742); www.experian.com; P.O. Box 2002, Allen, TX 75013; and (3) TransUnion: 1-800-680-7289; www.transunion.com; Fraud Victim Assistance Division, P.O. Box 6790, Fullerton, CA 92834-6790. They may want to ask for a free copy of their credit report from each agency, and ask that only the last four digits of their Social Security number appear on their credit reports.

There are several things that they may want to do to protect themselves against possible identity theft if the information does get into the wrong hands. These include: (1) watch for phishing attempts and malicious email; (2) watch for scam U.S. mail; and (3) stay alert to signs of identity theft.

The Federal Trade Commission has published some information about how to defend against identity theft at: <http://www.consumer.ftc.gov/features/feature-0014-identity-theft>. We suggest that they submit a complaint with the FTC by calling 1-877-ID-THEFT (1-877-438-4338) or going online at <https://www.ftccomplaintassistant.gov/>.

Bailey's Commitment

We apologize for the inconvenience resulting from the theft by unknown people of their information described above. Please note that we have taken immediate steps to prevent a reoccurrence. In this regard, we have (1) replaced our servers; (2) enhanced our firewalls; (3) integrated mandatory changes with respect to our passwords and (4) integrated new software into our website. Please know that Bailey's is PCI compliant, never sells, trades or otherwise knowingly releases any personal information of our customers, and is committed to offering the most secure user experience for our customers.

For questions relating to this event please call (888) 582-3816 between the hours of 8:00 a.m. and 5:00 p.m. P.S.T. Monday through Friday.

Sincerely, The Bailey's Team



Bailey's Inc.
baileysonline.com

NOTICE OF DATA BREACH

What Happened

In January 2016, we sent our customers a notification that their credit card information and other personal information may have been stolen due to a cyber attack on our website, BaileysOnline.com. In that notice, we informed our customers that the compromise event began on September 25, 2015.

Following an extensive eight week forensic examination, we have recently learned that the cyber attacks actually first occurred in December 2011. The forensic examination shows that beginning in December 2011, a person or persons without authorization accessed and possibly stole credit card information from our website belonging to our customers. The thief or thieves accessed our website remotely and overcame our firewall and security protections. Of these exposed cards, nearly 25% were MasterCard® cards, 64% were VISA® cards, and fewer than 5% and 6% were American Express® and Discover® cards, respectively.

If you are receiving this letter, then we have identified you as one of the people who placed an order or opened an account within the affected date range, December 1, 2011 to January 26, 2016, and you may have had certain protected information misappropriated.

We cannot be certain whether your data was stolen. However, because there is a possibility that your data was stolen, we are required by law to notify you that you made a purchase and/or opened an account with Bailey's during the affected range.

What Information Was Involved

The types of information stolen appears to include credit card numbers, cardholder names, CCV numbers, credit card expiration dates, addresses and phone numbers, email addresses, log-in and password to BaileysOnline.com, and other information typed into our website related to your order.

The following information is NOT included in what was taken: PINs (personal identification numbers), Social Security numbers, bank account numbers, and other personally identifiable information.

What We Are Doing

We have reported the theft to various law enforcement agencies, and are cooperating with them in their investigation. We also have notified Wells Fargo Bank, which handles our credit card transactions, along with MasterCard®, VISA®, American Express® and Discover®. We have no indication that any PayPal accounts were impacted.

We have engaged a security consultant and have been implementing our consultant's recommendations to strengthen our firewall and take other security protections (described below). We have also replaced our server with new hardware. We are confident that there have been no further data breaches since January 27, 2016.

In some states we are required to notify a state agency or Attorney General's Office, and Bailey's is complying with all of those legal requirements.

What You Can Do

We strongly encourage you to take preventive measures now to help prevent and detect any misuse of your information. Change your log-in and password for BaileysOnline.com. If you've forgotten your password, call (800) 322-4539 between the hours of 8:00 a.m. and 5:00 p.m. P.S.T. Monday through Friday, OR email us at Baileys@baileysonline.com, and we'll reset your password for you. You may want to cancel the credit card(s), if any, that you think you may have used at BaileysOnline.com. You may also want to place a fraud alert or order a security freeze on your credit reports with the three major credit reporting agencies: (1) Equifax: 1-800-525-6285; www.equifax.com; P.O. Box 740241, Atlanta, GA 30374-0241; (2) Experian: 1-888-EXPERIAN (397-3742); www.experian.com; P.O. Box 2002, Allen, TX 75013; and (3) TransUnion: 1-800-680-7289; www.transunion.com; Fraud Victim Assistance Division, P.O. Box 6790, Fullerton, CA 92834-6790. You may want to ask for a free copy of your credit report from each agency, and ask that only the last four digits of your Social Security number appear on your credit reports.

There are several things that you may want to do to protect yourself against possible identity theft if the information does get into the wrong hands. These include: (1) watch for phishing attempts and malicious email; (2) watch for scam U.S. mail; and (3) stay alert to signs of identity theft.

The Federal Trade Commission has published some information about how to defend against identity theft at: <http://www.consumer.ftc.gov/features/feature-0014-identity-theft>. We suggest that you submit a complaint with the FTC by calling 1-877-ID-THEFT (1-877-438-4338) or going online at <https://www.ftccomplaintassistant.gov/>.

Bailey's Commitment

We apologize for the inconvenience resulting from the theft by unknown people of your information described above. Please note that we have taken immediate steps to prevent a reoccurrence. In this regard, we have (1) replaced our servers; (2) enhanced our firewalls; (3) integrated mandatory changes with respect to our passwords and (4) integrated new software into our website. Please know that Bailey's is PCI compliant, never sells, trades or otherwise knowingly releases any personal information of our customers, and is committed to offering the most secure user experience for our customers.

For questions relating to this event please call (888) 582-3816 between the hours of 8:00 a.m. and 5:00 p.m. P.S.T. Monday through Friday.

Sincerely,
The Bailey's Team