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CONSUMER PROTECTION

February 16, 2015

Stephen Levins, Esq. Executive Director State Office of Consumer Protection State of Hawaii 235 South Beretania Street, Suite 801 Honolulu, Hawaii 96813

Re: Notification of Data Breach Pursuant to Hawaii Revised Statutes § 477N-2(f)

Dear Mr. Levins,

As first discussed with former Executive Director Bruce Kim on June 5, 2014, as a result of an unauthorized entry at a secure offsite Oahu Publications, Inc. storage unit in April, 2014, the personal information of 3,543 Oahu Publications, Inc.'s customers who paid for advertisements (including classified advertisements) using a credit card between May 1, 2012 and August 31, 2012 may have been accessed by unauthorized third parties. The personal information potentially exposed includes customer names, mailing addresses and credit card numbers. No information regarding Oahu Publications, Inc.'s subscribers or payments made by those subscribers were among the records potentially exposed.

As previously discussed with Mr. Kim, the potential data breach arose from the theft of two boxes containing original paper records stored by Oahu Publications, Inc. for record retention purposes, and there were no electronic or paper duplicates of the stolen records. The Honolulu Police Department arrested two suspects in the case on June 4, 2014 and recovered one of the boxes of the stolen records. Although the Honolulu Police Department provided Oahu Publications, Inc. with a description of the recovered box (which was the first instance that Oahu Publications, Inc. could confirm what had been stolen in the theft), HPD did not permit Oahu Publications, Inc. to review or otherwise access the original records in the box, as the box and records are considered evidence in the ongoing criminal investigation. Based on the description of the recovered box (and an inventory, which indicated the type of records in the second box), Oahu Publications, Inc. was able to determine the approximate time period documented by the records; however, since Oahu Publications, Inc. could not access the original documents, it could not readily determine the specific transactions were involved in the potential data breach.

After Oahu Publications, Inc. determined the time period covered by the records, it began to work with its credit card processing bank to reconstruct the credit card transactions for the applicable time period in order to determine the scope of the potential breach and



determine sufficient information to contact potentially affected customers. Given the lack of duplicate records relating to the potential data breach, some aspects of this process involved the manual cross referencing of records from various sources, which required significant time and resources. Oahu Publications, Inc. also made arrangements with a credit reporting bureau for credit monitoring services for affected customers.

After obtaining sufficient contact information, Oahu Publications, Inc. retained a vendor to mail notices to the affected customers. A copy of the notice, which was mailed to the 3,543 affected customers on February 10, 2015 pursuant to HRS § 487N-2 (a) and (d), is enclosed for your reference and records. Pursuant to HRS § 487N-2(f), Oahu Publications, Inc. will also be providing Equifax, TransUnion and Experian with information on the timing, distribution and content of the notice.

Thank you for your attention to this matter, and please contact me should you have any questions regarding the foregoing.

Sincerely,

Dennis Francis President & Publisher

Enclosure



February 10, 2015

Re: An Important Notice Regarding Unauthorized Access to Oahu Publications, Inc. Customer Personal Information

Dear JOHN SAMPLE,

This is to inform you of recent unauthorized access to Oahu Publications, Inc. customer personal information that may affect you. The unauthorized access may affect Oahu Publications, Inc. customers who paid for advertisements (including classified advertisements) using a credit card between May 1, 2012 and Aug. 31, 2012. The personal information that has potentially been exposed, as a result of unauthorized entry at an offsite Oahu Publications, Inc. storage unit in April 2014, includes customer names, mailing addresses and credit card numbers.

In light of this incident, we highly recommend that you remain vigilant by carefully and regularly reviewing your account statements and monitoring credit reports. If you discover any unusual activity or transactions on your accounts or you suspect any fraud, you should immediately report your concerns to your financial institution. You may also find helpful the information and advice from State of Hawaii Office of Consumer Protection regarding data breaches and identity theft. You can visit its website (http://cca.hawaii.gov/ocp/) or call (808) 586-2630.

We sincerely regret any inconvenience or concern this incident may cause you. Oahu Publications, Inc. takes this incident very seriously, and as soon as we learned of the unauthorized access, we began investigating the matter, communicating with law enforcement and consumer protection authorities, and working to determine sufficient customer contact information and the scope of the breach. We have implemented various measures, including enhanced security protections to safeguard our customers' personal information from further unauthorized access.

We have arranged for you to enroll, <u>at no cost to you</u>, in an online three-bureau credit monitoring service (*My TransUnion Monitoring*) for one year provided by TransUnion Interactive, a subsidiary of TransUnion, one of the three nationwide credit reporting companies. To enroll in this service, go to the TransUnion Monitoring website at **www.transunionmonitoring.com** and in the space referenced as "Activation Code", enter the following unique 12-letter Activation Code **ABCDEFGHIJKL** and follow the simple three steps to receive your credit monitoring service online within minutes.

OAHU PUBLICATIONS, INC. 500 ALA MOANA BOULEVARD • SUITE 7-500 • HONOLULU, HAWAII 96813 PHONE 808.529.4700 • FAX 808.529.4898 If you do not have access to the Internet, as an alternative, you may enroll in a similar offline paper based three-bureau credit monitoring service, via U.S. Mail delivery, by calling the TransUnion Fraud Response Services toll-free hotline at 1-855-288-5422 and when prompted, enter the following 6-digit telephone pass code: 296968.

You can sign up for the online or offline credit monitoring service anytime between now and May 31, 2015. Due to privacy laws, we cannot register you directly. Please note that credit monitoring services might not be available for individuals who do not have a credit file with TransUnion, or an address in the United States (or its territories) and a valid Social Security number.

Once you are enrolled, you will be able to obtain one year of unlimited access to your Trans-Union credit report and credit score. The daily three-bureau credit monitoring service will notify you if there are any critical changes to your credit files at TransUnion, Experian and Equifax, including fraud alerts, new inquiries, new accounts, new public records, late payments, change of address and more. The service also includes up to \$1,000,000 in identity theft insurance with no deductible. (Policy limitations and exclusions may apply.)

Other Options:

Fraud Alert Information

Whether or not you enroll in credit monitoring, we recommend that you place a "Fraud Alert" on your credit file. Fraud Alert messages notify potential credit grantors to verify your identification before extending credit in your name in case someone is using your information without your consent. A Fraud Alert can make it more difficult for someone to get credit in your name; however, please be aware that it also may delay your ability to obtain credit. Call only one of the following three nationwide credit reporting companies to place your Fraud Alert: TransUnion, Equifax, or Experian. As soon as the credit reporting company confirms your Fraud Alert, they will also forward your alert request to the other two nationwide credit reporting companies so you do not need to contact each of them separately. The contact information for the three nationwide credit reporting companies is:

Equifax PO Box 740256 Atlanta, GA 30374 www.equifax.com 1-800-525-6285 TransUnion PO Box 2000 Chester, PA 19022 www.transunion.com/fraud 1-800-680-7289

Experian PO Box 9554 Allen, TX 75013 www.experian.com 1-888-397-3742

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Free Credit Report Information

Under federal law, you are also entitled to one free credit report once every 12 months from each of the above three major nationwide credit reporting companies. Call 1-877-322-8228 or make a request online at www.annualcreditreport.com.

Even if you do not find any suspicious activity on your initial credit reports, the Federal Trade Commission (FTC) recommends that you check your credit reports periodically. Victim information sometimes is held for use or shared among a group of thieves at different times. Checking your credit reports periodically can help you spot problems and address them quickly.

If you find suspicious activity on your credit reports or have reason to believe your information is being misused, call your local law enforcement agency and file a police report. Get a copy of the report; many creditors want the information it contains to absolve you of the fraudulent debts. You also should file a complaint with the Federal Trade Commission (FTC) at www.ftc.gov/idtheft or at 1-877-ID-THEFT (1-877- 438-4338). Your complaint will be added to the FTC's Identity Theft Data Clearinghouse, where it will be accessible to law enforcers for their investigations. Also visit the FTC's website at www. ftc.gov/idtheft to review the comprehensive information available in the *"Taking Charge: What to Do if Your Identity is Stolen"* step-by-step guide. You may also call 1-877-438-4338 to request a free copy.

Security Freeze Information

You can request a "Security Freeze" on your credit file by sending a request in writing, by mail, to each of the three nationwide credit-reporting companies. When a Security Freeze is added to your credit report, all third parties, such as credit lenders or other companies, whose use is not exempt under law will not be able to access your credit report without your consent. The Security Freeze may delay, interfere with or prohibit the timely approval of any subsequent request or application you make that involves access to your credit report. This may include, but is not limited to, new loans, credit, mortgages, insurance, rental housing, employment, investments, licenses, cellular phone service, utility service, digital signature service, Internet credit card transactions and extension of credit at point of sale. There may be a fee for placing, temporarily lifting, or removing a Security Freeze with each of the nationwide consumer reporting companies, although that fee is waived if you send the credit reporting company proof of eligibility by mailing a copy of a valid identity theft report, or other valid report from a law enforcement agency to show you are a victim of identity theft and are eligible for free Security Freeze services. To place a Security Freeze on your credit files at all three nationwide credit reporting companies, write to the addresses below and include the following information:

Equifax Security Freeze PO Box 105788 Atlanta, GA 30348 https://www.freeze.equifax.com 1-800-685-1111 TransUnion Security Freeze PO Box 2000 Chester, PA 19022 http://transunion.com/securityfreeze 1-888-909-8872 Experian Security Freeze PO Box 9554 Allen, TX 75013 http://experian.com/freeze 1-888-397-3742

• Your full name (first, middle, last including applicable generation, such as Jr., Sr., II, III, etc.)

• Your Social Security Number

• Your date of birth (month, day and year)

• Your complete address including proof of current address, such as a current utility bill, bank or insurance statement or telephone bill

• If you have moved in the past two years, give your previous addresses where you have lived for the past two years

• A legible photocopy of a government issued identification card (state driver's license or ID card, military identification, etc.)

• Include applicable fee. Call or visit each of the credit reporting company websites listed above for information on fees for Security Freeze services. Forms of payment are check, money order, or credit card (American Express, Discover, MasterCard and Visa), or a copy of a valid identity theft report, or other valid report from a law enforcement agency to show you are a victim of identity theft and are eligible for free Security Freeze services.

Within five business days of receiving your request for a security freeze, the consumer credit reporting company will provide you with a personal identification number (PIN) or password to use if you choose to remove the freeze on your consumer credit report or to authorize the release of your consumer credit report to a specific party or for a specified period of time after the freeze is in place.

Your business is important to us, and we regret that this incident has occurred. Please be assured that Oahu Publications is taking steps to protect our customers' information. Should you need further information or assistance with respect to this matter, please contact our Customer Service Center at (808) 538-6397. Thank you for your attention to this important matter and for your continued support of Oahu Publications, Inc.

Sincerely,

Dennis Francis President & Publisher

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February 16, 2015

Equifax P.O. Box 740256 Atlanta, GA 30374

Re: Notification of Data Breach Pursuant to Hawaii Revised Statutes § 477N-2(f)

To Whom it May Concern,

Pursuant to Hawaii Revised Statutes § 487N-2(f), this is to inform you that Oahu Publications, Inc. has notified 3,543 of its customers who paid for advertisements (including classified advertisements) using a credit card between May 1, 2012 and August 31, 2012 that their personal information may have been exposed to unauthorized third parties as a result of the theft of paper records. The personal information potentially exposed includes customer names, mailing addresses and credit card numbers.

A copy of the notice sent to the affected customers on February 10, 2015 informing them of the potential security breach is enclosed for your reference and files.

Please contact the undersigned should you have any questions or need further information. Thank you for your attention to this matter.

Sincerely.

Dennis Francis President & Publisher

Enclosures



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Experian P.O. Box 9554 Allen, TX 75013

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Dennis Francis President & Publisher

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TransUnion P.O. Box 2000 Chester, PA 19022

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