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December 30, 2020

Attorney General Wayne Stenehjem  
Office of the Attorney General  
Consumer Protection and Antitrust Division  
1050 E Interstate Avenue, Suite 200  
Bismarck, ND 58503

Re: Notification of Security Incident

Dear Attorney General Stenehjem:

We are writing to inform you that our client, Zoetop Business Co. Ltd., which operates the ecommerce website [www.romwe.com](http://www.romwe.com) (“ROMWE”), is notifying approximately 14,150 individuals who reside in North Dakota of a data security incident that may have impacted some of their personal information.

On September 7, 2020, ROMWE discovered that some customer usernames and passwords found on the dark web may have been stolen from its computer network in July 2018, as determined by internal and external forensic investigations. These usernames and passwords, if used, could have provided access to customer account information, including name, email, and phone number, or other optional information the customers may have stored. **Credit card information was redacted and not at risk.**

Over the past several years, ROMWE has continued to improve its security protections as part of its regular security program activities, including by increasing password encryption and using more advanced intrusion detection technologies. For the present matter, we have also forced password resets for all potentially affected customers.

ROMWE is providing notice on December 30, 2020. An example of the notification is attached. The three Credit Reporting Agencies are also being notified.

For potentially affected customers, ROMWE is offering, at no cost, identity theft protection services through IDX, the data breach and recovery services expert. Information regarding these services, as well as additional information to assist those individuals, is included in the notification sent to the individuals.

Office of the Attorney General

December 30, 2020

Page 2

Please contact me for any additional information. Thank you.

Best Regards,

A handwritten signature in blue ink, appearing to read "Kevin M. Scott", with a long horizontal flourish extending to the right.

Kevin M. Scott  
Shareholder

KMS:

Dear ROMWE Customer,

We're writing to notify you about an incident that may involve your ROMWE account information. We take your privacy and online security very seriously, and we sincerely apologize for any concern this incident may cause. This letter contains information about what happened, actions we have taken to prevent a recurrence, and steps you can take to protect your information.

### **What Happened?**

Recently, ROMWE became aware of customer information posted on the "dark web." Immediately, we retained a cyber security company and conducted an investigation to determine what happened.

### **What Information Was Involved?**

On September 7, 2020, we discovered that some ROMWE customers' usernames and passwords found on the dark web may have been stolen from our computer network in July 2018, as determined by internal and external forensic investigations. These usernames and passwords, if used, could have provided access to your ROMWE account information, including name, email, and phone number, or other optional information you may have stored. **If you stored your credit card information in your account, it remains secure since we do not keep your full credit card information.**

### **What Are We Doing**

Over the past several years, ROMWE has continued to improve its security protections as part of its regular security program activities, including by increasing password encryption and using more advanced intrusion detection technologies. For the present matter, we have also forced password resets for all potentially affected customers. In an abundance of caution, we are offering to potentially affected customers identity theft protection services through IDX, the data breach and recovery services expert. IDX identity protection services include 12 months of CyberScan (dark web) monitoring, a \$1,000,000 insurance reimbursement policy, and fully managed ID theft recovery services. With this protection, IDX will help you resolve issues if your identity is compromised. We encourage you to contact IDX to enroll in free identity protection services by going to <https://app.idx.us/account-creation/protect> and using the Enrollment Code provided below. For enrollment assistance by phone, please contact IDX at 1-833-754-1803. IDX representatives are available Monday through Friday from 6am - 6pm Pacific Time.

Enrollment Code: P4RML7U5LN.

### **What You Can Do**

You may also reset your password by logging onto your account on [www.romwe.com](http://www.romwe.com) and clicking on "Edit Password" on the "Account Setting" page. Also, please review the enclosed "Additional Important Information" section included with this email. This section describes additional steps you can take to help protect yourself, including recommendations by the Federal Trade Commission (FTC) regarding identity theft protection and details on how to place a fraud alert or a security freeze on your credit file, should you choose to do so. You can also contact the FTC for more information.

### **For More Information**

For more information regarding actions ROMWE is taking to protect customer information, please visit [www.romwe.com/datasecurity](http://www.romwe.com/datasecurity), email [datasecurity@romwe.com](mailto:datasecurity@romwe.com), or contact ROMWE at 1-877-218-7105 on Monday through Friday, between 7am to 7pm Pacific Time. Protecting your information is a top priority for us. We appreciate your patience and understanding, and we sincerely apologize for any inconvenience or concern this incident may cause you. We will remain vigilant as we implement new safeguards to help prevent any future incidents.

Thank you for your continued business,

Romwe.com

### **Additional Important Information**

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**For residents of Iowa:** You are advised to report any suspected identity theft to law enforcement or to the Attorney General.

**For residents of Oregon:** You are advised to report any suspected identity theft to law enforcement, including the Attorney General, and the Federal Trade Commission.

**For residents of New Mexico:** You are advised to review personal account statements and credit reports, as applicable, to detect errors resulting from the security incident, and that you have rights pursuant to the federal Fair Credit Reporting Act. Please see the contact information for the Federal Trade Commission listed below.

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**For residents of District of Columbia, Illinois, Maryland, New York, North Carolina, and Rhode Island:**

You can obtain information from the District of Columbia, Maryland, North Carolina, New York, and Rhode Island Offices of the Attorney General and the Federal Trade Commission about fraud alerts, security freezes, and steps you can take toward preventing identity theft.

<b>District of Columbia Attorney General</b>	<b>Maryland Attorney General</b>	<b>Rhode Island Attorney General</b>	<b>North Carolina Attorney General</b>	<b>New York Attorney General</b>
400 6th Street NW Washington, D.C. 20001 1-202-727-3400 <a href="http://www.oag.dc.gov">www.oag.dc.gov</a>	200 St. Paul Place Baltimore, MD 21202 1-888-743-0023 <a href="http://www.oag.state.md.us">www.oag.state.md.us</a>	150 South Main Street Providence RI 02903 1-401-274-4400 <a href="http://www.riag.ri.gov">www.riag.ri.gov</a>	9001 Mail Service Ctr Raleigh, NC 27699 1-877-566-7226 <a href="http://www.ncdoj.com">www.ncdoj.com</a>	120 Broadway 3rd Floor New York, NY 10271 <a href="http://www.ag.ny.gov">www.ag.ny.gov</a>

**Federal Trade Commission, Consumer Response Center**  
600 Pennsylvania Ave, NW Washington, DC 20580  
1-877-IDTHEFT (438-4338) [www.identitytheft.gov](http://www.identitytheft.gov)

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**For residents of Massachusetts and Rhode Island:** You have the right to obtain a police report if you are a victim of identity theft.

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**For residents of all states:**

It is recommended that you remain vigilant for incidents of fraud and identity theft by reviewing payment card account statements and monitoring your credit reports for unauthorized activity. You may obtain a copy of your credit report, free of charge, whether or not you suspect any unauthorized activity on your account. You may obtain a free copy of your credit report from each of the three nationwide credit reporting agencies. To order your free credit report, please visit [www.annualcreditreport.com](http://www.annualcreditreport.com), or call toll-free at 1-877-322-8228. You can also order your annual free credit report by mailing a completed Annual Credit Report Request Form (available at <https://www.consumer.ftc.gov/articles/0155-free-credit-reports>) to: Annual Credit Report Request Service, P.O. Box 105281, Atlanta, GA, 30348-5281.

**Fraud Alerts:** You can place fraud alerts with the three credit bureaus by phone and online with Equifax ([https://assets.equifax.com/assets/personal/Fraud\\_Alert\\_Request\\_Form.pdf](https://assets.equifax.com/assets/personal/Fraud_Alert_Request_Form.pdf)), Experian (<https://www.experian.com/fraud/center.html>), or Transunion (<https://www.transunion.com/fraud-victim-resource/place-fraud-alert>). A fraud alert tells creditors to follow certain procedures, including contacting you, before they open any new accounts or change your existing accounts. For that reason, placing a fraud alert can protect you, but also may delay you when you seek to obtain credit. Initial fraud alerts last for one year. Victims of identity theft can also get an extended fraud alert for seven years. The phone numbers for all three credit bureaus are at the bottom of this page.

**Monitoring:** You should always remain vigilant and monitor your accounts for suspicious or unusual activity.

**Security Freeze:** You also have the right to place a security freeze on your credit report. A security freeze is intended to prevent credit, loans, and services from being approved in your name without your consent. To place a security freeze on your credit report, you need to make a request to each consumer reporting agency by certified mail, overnight mail, regular stamped mail, or by following the instructions found at the websites listed below. The following information must be included when requesting a security freeze for yourself or your spouse or a minor under 16: (1) full name, with middle initial and any suffixes; (2) Social Security number; (3) date of birth; (4) current address and any previous addresses for the past five years; (5) Proof of current address, such as current utility or telephone bill, bank or insurance statement; (6) legible photocopy of government-issued identification card (state driver's license or ID card, military identification, etc.); and (7) if you are a victim of identity theft, include a copy of either the police report, investigative report, or complaint to a law enforcement agency concerning identity theft. It is essential that each copy be legible, display your name and current mailing address, and the date of issue. It is free to place, lift, or remove a security freeze.

**Equifax Security Freeze**  
P.O. Box 105788  
Atlanta, GA 30348-5788  
[www.equifax.com](http://www.equifax.com)  
800-525-6285

**Experian Security Freeze**  
P.O. Box 9554  
Allen, TX 75013-9544  
[www.experian.com](http://www.experian.com)  
888-397-3742

**TransUnion Security Freeze**  
P.O. Box 2000  
Chester, PA 19014-0200  
[www.transunion.com](http://www.transunion.com)  
800-680-7289