

May 9, 2023

VIA ONLINE SUBMISSION

Attorney General Aaron Frey
SECURITY BREACH NOTIFICATION
6 State House Station
Augusta, ME 04333

RE: Data Incident Notification

Dear Attorney General Frey:

Our firm represents Wingra Direct, LLC (“Wingra”), a Wisconsin company that sells sharpening supplies. Wingra hereby formally submits notification of a recent data incident pursuant to Maine Rev. Stat. Tit. 10, Section 210-B-1346 et seq. Wingra reserves the right to supplement this notice with any significant details learned subsequent to this submission. By providing this notice, Wingra does not waive any rights or defenses regarding the applicability of Maine law, including the applicability of Maine Rev. Stat. Tit. 10, Section 210-B-1346 et seq., the applicability of any other laws of this or any other state, or the existence of personal jurisdiction over Wingra.

On April 21, 2023, Wingra became aware of a cybersecurity incident involving its website, SharpeningSupplies.com. Immediately upon learning of the incident, Wingra began an investigation and took steps to secure the website. The investigation determined that an unauthorized third party had gained unauthorized access to a part of its website on April 18, 2023 and inserted a malicious script onto the website. After the investigation, it was determined on April 24, 2023 that the personal information of some New Jersey residents may have been accessed and/or acquired by the third party during the incident. Such personal information included the resident’s name, billing address, and credit card information, including card number, CVV code, and expiration date.

In light of the foregoing and out of an abundance of caution, Wingra has decided to notify your office (via this letter) and the four (4) Maine residents potentially affected by this incident via U.S. Mail on or about May 9, 2023. A sample notification letter to the affected resident is attached hereto as Exhibit A.

Attorney General Aaron Frey

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Please do not hesitate to contact me if you have any questions regarding this matter.

Sincerely,

GODFREY & KAHN, S.C.

Sarah A. Sargent

A handwritten signature in black ink, appearing to read 'Sarah A. Sargent', written over the printed name.

Attachment

EXHIBIT A

Sample Notification Letter

Wingra Direct, LLC
4145 SW Watson Ave, Suite 400
Beaverton, OR 97005

To Enroll, Please Call: 1-800-939-4170 Or Visit: https://app.idx.us/account-creation/protect Enrollment Code: <<XXXXXXXXXX>>

<<FirstName>> <<LastName>>
<<Address1>>
<<Address2>>
<<City>>, <<State>> <<Zip Code>>

May 9, 2023

Notice of Data Breach

Dear <<FirstName>> <<LastName>>,

At Wingra Direct, LLC (“Wingra”), owner and operator of SharpeningSupplies.com, we take your privacy seriously. For that reason, we are writing to provide you with notice of a recent cybersecurity incident that may have involved your personal information. You are receiving this notice because you are a customer of Wingra or may have recently placed an order on our website, SharpeningSupplies.com. Consistent with our commitment to protect the information of our customers, we have investigated the incident and, as a precautionary measure, we are notifying you of the incident and the additional protections that are available to you listed below.

What Happened

On April 21st, 2023, Wingra became aware of a cybersecurity incident involving SharpeningSupplies.com. Immediately upon learning of the incident, Wingra began an investigation and took steps to secure the website. The investigation determined that the unauthorized third party had gained unauthorized access to a part of our website on April 18th, 2023. After the investigation, it was determined that your personal information may have been accessed and/or acquired by the third party during the incident. Although we have already updated the SharpeningSupplies.com website to remove the threat, we are nonetheless informing you of this incident because we value our customers and take this matter seriously. This notice was not delayed at the request of law enforcement.

What Information Was Involved

Your personal information that was impacted includes your name, billing address, and credit card information, including card number, CVV code, and expiration date.

What We Are Doing

Upon discovery of the incident, Wingra immediately took steps to update our website to mitigate the impact of the incident. In addition to fully investigating this incident and providing notice to you through this letter, we have taken additional actions to improve and monitor the security of our website.

Additionally, to help protect your identity, we are providing complimentary identify theft services through IDX, a ZeroFox Company, the data breach and recovery services expert. IDX identity protection services include: 12 months of credit and CyberScan 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 with any questions and to enroll in free identity protection services by calling 1-800-939-4170 or going to <https://app.idx.us/account-creation/protect> and using the Enrollment Code provided above. IDX

representatives are available Monday through Friday from 6 am - 6 pm Pacific Time. Please note the deadline to enroll is August 9, 2023.

What You Can Do

We encourage you to contact IDX with any questions and to enroll in the free identity protection services. In addition, please review the enclosed "Additional Resources" section included with this letter. This section describes additional steps you can take to help protect yourself, including recommendations by the Federal Trade Commission regarding identity theft protection and details on how to place a fraud alert or a security freeze on your credit file. We encourage you to take full advantage of this service offering.

For More Information

We sincerely apologize for this incident and regret any inconvenience it may cause you. Please call 1-800-939-4170 or go to <https://app.idx.us/account-creation/protect> for assistance or for any additional questions you may have.

Sincerely,

John Carmona
Founder
Wingra Direct, LLC
8376 Murphy Dr.
Middleton, WI 53562

ADDITIONAL RESOURCES

Website and Enrollment: Go to <https://app.idx.us/account-creation/protect> and follow the instructions for enrollment using your Enrollment Code provided at the top of the letter.

Activate the credit monitoring: provided as part of your IDX identity protection membership. The monitoring included in the membership must be activated to be effective. Note: You must have established credit and access to a computer and the internet to use this service. If you need assistance, IDX will be able to assist you.

Telephone: Contact IDX at 1-800-939-4170 to gain additional information about this event and speak with knowledgeable representatives about the appropriate steps to take to protect your credit identity.

Contact information for the three nationwide credit reporting agencies:

Equifax, PO Box 740241, Atlanta, GA 30374, www.equifax.com, 1-800-685-1111

Experian, PO Box 2104, Allen, TX 75013, www.experian.com, 1-888-397-3742

TransUnion, PO Box 2000, Chester, PA 19016, www.transunion.com, 1-800-888-4213

Free Credit Report: It is recommended that you remain vigilant by reviewing account statements and monitoring your credit report for unauthorized activity, especially activity that may indicate fraud and identity theft. You may obtain a copy of your credit report, free of charge, once every 12 months from each of the three nationwide credit reporting agencies.

To order your annual free credit report please visit 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 from the U.S. Federal Trade Commission's ("FTC") website at www.consumer.ftc.gov) to:
Annual Credit Report Request Service, P.O. Box 105281, Atlanta, GA 30348-5281.

For Colorado, Georgia, Maine, Maryland, Massachusetts, New Jersey, Puerto Rico, and Vermont residents: You may obtain one or more (depending on the state) additional copies of your credit report, free of charge. You must contact each of the credit reporting agencies directly to obtain such additional report(s).

Filing a Police Report: You should also know that you have the right to file a police report if you ever experience identity fraud. Please note that in order to file a crime report or incident report with law enforcement for identity theft, you will likely need to provide some kind of proof that you have been a victim. A police report is often required to dispute fraudulent items. You can report suspected incidents of identity theft to local law enforcement or to the Attorney General.

Fraud Alerts: There are two types of fraud alerts you can place on your credit report to put your creditors on notice that you may be a victim of fraud—an initial alert and an extended alert. You may ask that an initial fraud alert be placed on your credit report if you suspect you have been, or are about to be, a victim of identity theft. An initial fraud alert stays on your credit report for at least one year. You may have an extended alert placed on your credit report if you have already been a victim of identity theft and you have the appropriate documentary proof. An extended fraud alert stays on your credit report for seven years. You can place a fraud alert on your credit report by contacting any of the three national credit reporting agencies.

Security Freeze: You have the ability to place a security freeze, also known as a credit freeze, on your credit report free of charge. 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 may use an online process, an automated telephone line, or submit a written request to any of the three credit reporting agencies listed above. The following information must be included when requesting a security freeze (note that, if you are requesting a credit report for your spouse, this information must be provided for him/her as well): (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 5 years; and (5) any applicable incident report or complaint with a law enforcement agency or the Registry of Motor Vehicles. The request must also

include a copy of a government-issued identification card and a copy of a recent utility bill or bank or insurance statement. It is essential that each copy be legible, and display your name, current mailing address, and the date of issue.

Federal Trade Commission and State Attorneys General Offices: If you believe you are the victim of identity theft or have reason to believe your personal information has been misused, you should immediately contact the Federal Trade Commission, the Attorney General's office in your home state, or your local law enforcement.

You may contact the **Federal Trade Commission**, Consumer Response Center, 600 Pennsylvania Avenue, NW Washington, DC 20580, www.consumer.gov/idtheft, 1-877-IDTHEFT (438-4338), TTY: 1-866-653-4261.

Fair Credit Reporting Act: You have certain rights pursuant to the Fair Credit Reporting Act. If you would like additional information regarding your rights under the Fair Credit Reporting Act, you can review your rights by visiting www.consumerfinance.gov/f/201504_cfpb_summary_your-rights-under-fcra.pdf or by writing the Consumer Response Center, Room 130-A, Federal Trade Commission, 600 Pennsylvania Ave. N.W., Washington, D.C. 20580.

You can obtain additional information about the steps you can take to avoid identity theft from the following agencies. The Federal Trade Commission also encourages those who discover that their information has been misused to file a complaint with them.

California Residents: Visit the California Office of Privacy Protection (www.oag.ca.gov/privacy) for additional information on protection against identity theft. Office of the Attorney General of California, 1300 I Street, Sacramento, CA 95814, Telephone: 1-800-952-5225.

For Iowa Residents: You are advised to report any suspected identity theft to law enforcement or to the Iowa Attorney General at consumer@ag.iowa.gov, by calling (515) 281-5926, or writing to 1305 E. Walnut Street Des Moines, Iowa 50319-0106.

Kentucky Residents: 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: Office of the Attorney General of Maryland, Consumer Protection Division 200 St. Paul Place Baltimore, MD 21202, www.oag.state.md.us/Consumer, Telephone: 1-888-743-0023.

New York Residents: the Attorney General may be contacted at: Office of the Attorney General, The Capitol, Albany, NY 12224-0341; 1-800-771-7755; <https://ag.ny.gov/>. You can also contact the New York Department of State Division of Consumer Protection, One Commerce Plaza, 99 Washington Ave., Albany, NY 12231-0001, 518-474-8583 / 1-800-697-1220.

North Carolina Residents: Office of the Attorney General of North Carolina, 9001 Mail Service Center Raleigh, NC 27699-9001, www.ncdoj.gov, Telephone: 1-919-716-6400.

Oregon Residents: You are advised to report any suspected identity theft to law enforcement, the Federal Trade Commission, and the Oregon Attorney General. Oregon Attorney General, 1162 Court St. NE, Salem, OR 97301, <https://justice.oregon.gov>, Telephone 1-877-877-9392.

Rhode Island Residents: Office of the Attorney General, 150 South Main Street, Providence, Rhode Island 02903, www.riag.ri.gov, Telephone: 401-274-4400. Two Rhode Island residents were impacted by this incident.