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October 4, 2024

ONLINE SUBMISSION

Attorney General Andrea Joy Campbell
Office of the Attorney General
Consumer Protection Division
ATTN: Data Breach Notification
One Ashburton Place
Boston, MA 02108

Undersecretary Layla R. D'Emilia
Office of Consumer Affairs and Business Regulation
501 Boylston St. Suite 5100
Boston, MA 02116

RE: NOTICE OF DATA SECURITY INCIDENT

Attorney General Campbell and Undersecretary D'Emilia:

Constangy, Brooks, Smith & Prophete, LLP, represents 5.11, Inc. ("5.11") in connection with a recent data security incident described in greater detail below. 5.11 takes the protection of all information within its possession very seriously and has taken measures to reduce the likelihood of a similar incident reoccurring. This notice is being sent on behalf of 5.11 because personal information for Massachusetts residents may have been involved in the incident.

I. NATURE OF THE SECURITY INCIDENT

On August 5, 2024, 5.11 was alerted of unusual activity involving our online store. Upon discovering this activity, 5.11 took immediate steps to further secure its website and customer information. 5.11 also engaged a nationally-recognized digital forensics firm to conduct an independent investigation into the activity and determine whether any customer payment card information had been accessed or acquired without authorization.

After a thorough forensic investigation, on September 12, 2024, 5.11 determined that this incident may have involved payment card information for customers who purchased products through 5.11's online store between July 12, 2024 and August 22, 2024. 5.11 thereafter worked diligently to identify all potentially affected customers and provide them with appropriate notification.

Alabama Arkansas California Colorado District of Columbia Florida Georgia Illinois
Indiana Maryland Massachusetts Minnesota Missouri New Jersey New York
North Carolina Oregon Pennsylvania South Carolina Tennessee Texas Virginia Washington

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11844601v1

II. NUMBER OF MASSACHUSETTS RESIDENTS INVOLVED

On September 27, 2024, 5.11 determined that the notification population included 488 Massachusetts residents. On October 4, 2024, 5.11 provided notification by first-class U.S. mail to these individuals via the attached notification letter template or a substantially similar version thereof.

The potentially affected personal information included names, email addresses, payment card numbers, expiration dates, and security codes.

III. STEPS TAKEN TO ADDRESS THE INCIDENT

As soon as 5.11 became aware of the incident, it took steps to further secure its website and conducted a comprehensive investigation. 5.11 also worked with the payment card brands and law enforcement to provide information related to the incident and has implemented additional measures to further enhance the security of its e-commerce platform and reduce the likelihood of a similar incident reoccurring.

5.11 has established a toll-free call center through IDX to answer questions about the incident and address related concerns. 5.11 has also arranged to provide all potentially affected customers with complimentary restoration assistance through IDX, which will work with individuals to help resolve issues with unrecognized payment card transactions.

IV. CONTACT INFORMATION

5.11 remains dedicated to protecting the information in its control. If you have any questions or need additional information, please do not hesitate to contact me at aweaver@constangy.com.

Sincerely,



Aubrey Weaver
Partner

Constangy, Brooks, Smith & Prophete, LLP

Encl. Sample Notification Letter