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June 29, 2017

# Via Certified Mail

Office of the New Hampshire Attorney General 33 Capitol Street Concord, NH 03301

To Whom It May Concern:

In accordance with N.H. Rev. Stat. Ann. § 359-C:20, I am writing on behalf of Google Inc. ("Google") to notify you regarding the nature and circumstances of a recent data security incident that occurred on the electronic reservation system of Sabre Hospitality Solutions ("Sabre"). Sabre is a third-party service provider used by Google's travel provider, Carlson Wagonlit Travel ("CWT"), to process Google's business-related hotel reservations. The security incident did not affect Google's systems.

Sabre operates the SynXis Central Reservations system ("CRS"), which facilitates the booking of hotel reservations made by individuals and companies, such as Google, through travel agencies. Sabre discovered unauthorized access to an internal account in the SynXis CRS. Following an investigation, Sabre notified CWT, which uses the SynXis CRS, that an unauthorized party gained access to personal information associated with certain hotel reservations made through CWT. CWT subsequently notified Google about the issue on June 16, 2017.

The unauthorized party was able to access the name, contact information and payment card data associated with certain hotel reservations maintained in the SynXis CRS between August 10, 2016 and March 9, 2017. Sabre's investigation discovered no evidence that information such as Social Security, passport, and driver's license numbers were accessed.

Google has identified approximately 5 New Hampshire residents affected by this issue. Enclosed for your reference is a copy of the notice that Google sent to affected individuals on June 29, 2017.

# HUNTON& WILLIAMS

Office of the New Hampshire Attorney General June 29, 2017 Page 2

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

Very truly yours,

Lisa J. Sotto

Enclosure



Google Inc. 1600 Amphitheatre Parkway Mountain View CA 94043 650 253-0000 main google.com

June 29, 2017

Addressee's Name Title Company Name Number and Street City, State and Zip Country

#### NOTICE OF DATA BREACH

# Dear [preferred name]:

We recently learned that certain hotel reservations made for Google business travel were among the many reservations affected by a security incident impacting a third-party provider's electronic reservation system that serves thousands of travel agencies and hotels. This did not affect Google's systems. However, this incident impacted one of the travel providers used by Googlers, Carlson Wagonlit Travel (CWT).

CWT has confirmed that one or more of your hotel reservations and the name, contact information, and payment card information associated with the reservation(s) may have been compromised. The protection of your personal information is a matter we take very seriously, and we recommend that you review the information in this letter for some steps you can take to protect yourself against potential misuse of your information.

## What Happened?

A company named Sabre Hospitality Solutions operates the SynXis Central Reservations system (CRS), which facilitates the booking of hotel reservations made by individuals and companies, such as Google, through travel agencies. Sabre discovered unauthorized access to an internal account in the SynXis CRS. Following an investigation, Sabre notified CWT, which uses the SynXis CRS, that an unauthorized party gained access to personal information associated with certain hotel reservations made through CWT. CWT subsequently notified Google about the issue on June 16, 2017, and we have been working with CWT and Sabre to confirm which Google travelers were affected.

#### What Information Was Involved?

The unauthorized party was able to access the name, contact information and payment card data associated with certain hotel reservations maintained in the SynXis CRS between August 10, 2016 and March 9, 2017. Sabre's investigation discovered no evidence that information such as Social Security, passport, and driver's license numbers were accessed. However, because the SynXis CRS deletes reservation details 60 days after the hotel stay, we are not able to confirm the specific information associated with every affected reservation.

Google

# What We Are Doing

We are working with CWT and Sabre to address this issue. Sabre engaged a leading cybersecurity firm to support its investigation. Sabre indicated that they also notified law enforcement and the payment card brands about this incident.

We are offering you 24 months of complimentary identity protection and credit monitoring services. These services, described below, will be provided by AllClear ID and are available as of the date of this notice. You can use them at any time during the next 24 months:

<u>AllClear Identity Repair:</u> This service is automatically available to you with no enrollment required. If a problem arises, call 1-866-979-2595 and an investigator will help recover financial losses and restore your credit.

AllClear Credit Monitoring: This service offers additional layers of protection including credit monitoring and a \$1 million identity theft insurance policy. To use this service, you will need to provide certain information to AllClear ID. You may sign up online at enroll.allclearid.com or by phone by calling 1-866-979-2595 using the following redemption code: [insert unique redemption code].

## What You Can Do

We recommend that you remain vigilant for incidents of fraud and identity theft by regularly reviewing your account statements and monitoring free credit reports for any unauthorized activity. If you discover any suspicious or unusual activity on your accounts, be sure to report it immediately to your financial institutions, as the major credit card companies have rules that restrict them from requiring you to pay for fraudulent charges that are reported timely.

In addition, you may contact the Federal Trade Commission (FTC) or law enforcement authorities, such as your state attorney general, to report incidents of identity theft or to learn about steps you can take to protect yourself from identity theft. You can contact the FTC at:

Federal Trade Commission 600 Pennsylvania Avenue, NW Washington, DC 20580 (877) IDTHEFT (438-4338) https://www.identitytheft.gov/

If you find that your information has been misused, the FTC encourages you to file a complaint with the FTC and to take these additional steps: (1) close the accounts that you have confirmed or believe have been tampered with or opened fraudulently, and (2) file and keep a copy of a local police report as evidence of the identity theft crime.

Google

# Obtain Your Credit Report

You should also monitor your credit reports. You may periodically obtain credit reports from each nationwide consumer reporting agency. If you discover inaccurate information or a fraudulent transaction on your credit report, you have the right to request that the consumer reporting agency delete that information from your credit report file.

In addition, under federal law, you are entitled to one free copy of your credit report every 12 months from each of the three nationwide consumer reporting agencies. You may obtain a free copy of your credit report by going to www.AnnualCreditReport.com or by calling (877) 322-8228. You also may complete the Annual Credit Report Request Form available from the FTC at https://www.consumer.ftc.gov/articles/pdf-0093-annual-report-request-form.pdf, and mail it to Annual Credit Report Request Service, P.O. Box 105281, Atlanta, GA 30348-5281. You may also contact any of the three major consumer reporting agencies to request a copy of your credit report.

Place a Fraud Alert or Security Freeze on Your Credit Report File

In addition, you can obtain information from the FTC and the consumer reporting agencies about fraud alerts and security freezes. A fraud alert can make it more difficult for someone to get credit in your name because it tells creditors to follow certain procedures to protect you, but it also may delay your ability to obtain credit. If you suspect you may be a victim of identity theft, you may place a fraud alert in your file by calling just one of the three nationwide consumer reporting agencies listed below. As soon as that agency processes your fraud alert, it will notify the other two agencies, which then must also place fraud alerts in your file. An initial fraud alert will last 90 days. An extended alert stays in your file for seven years. To place either of these alerts, a consumer reporting agency will require you to provide appropriate proof of your identity, which may include your Social Security number. If you ask for an extended alert, you will have to provide an identity theft report.

Also, you can contact the nationwide consumer reporting agencies regarding if and how you may place a security freeze on your credit report. A security freeze prohibits a consumer reporting agency from releasing information from your credit report without your prior written authorization, which makes it more difficult for unauthorized parties to open new accounts in your name. Please be aware, however, that placing a security freeze on your credit report may delay, interfere with, or prevent the timely approval of any requests you make for new loans, credit mortgages, employment, housing, or other services. The consumer reporting agencies have 3 business days after receiving a request to place a security freeze on a consumer's credit report. You may be charged to place or lift a security freeze. Unlike a fraud alert, you must separately place a credit freeze on your credit file at each consumer reporting company.

You may contact the nationwide consumer reporting agencies at:

Equifax
P.O. Box 105788
Atlanta, GA 30348
(800) 525-6285
www.equifax.com

Experian P.O. Box 9554 Allen, TX 75013 (888) 397-3742 www.experian.com

TransUnion P.O. Box 2000 Chester, PA 19016 (800) 680-7289 www.transunion.com



Please see the following pages for certain state-specific information.

# For More Information

If you have any questions regarding this issue or you would like further information or assistance, please do not hesitate to contact the Travel Team at p2phelp@google.com.

Sincerely, [SIGNATURE]



## State-Specific Information

#### IF YOU ARE AN IOWA RESIDENT:

You may contact law enforcement or the Iowa Attorney General's Office to report suspected incidents of identity theft. This office can be reached at:

Office of the Attorney General of Iowa Hoover State Office Building 1305 E. Walnut Street Des Moines, IA 50319 (515) 281-5164 www.iowaattorneygeneral.gov

#### IF YOU ARE A MARYLAND RESIDENT:

You may obtain information about avoiding identity theft from the Maryland Attorney General's Office. This office can be reached at:

Office of the Attorney General Consumer Protection Division 200 St. Paul Place Baltimore, MD 21202 (888) 743-0023 www.marylandattorneygeneral.gov

## IF YOU ARE A MASSACHUSETTS RESIDENT:

Under Massachusetts law, you have the right to obtain a police report in regard to this incident. If you are the victim of identity theft, you also have the right to file a police report and obtain a copy of it.

Massachusetts law allows consumers to place a security freeze on their credit reports. If you have been a victim of identity theft, and you provide the consumer reporting agency with a valid police report, it cannot charge you to place, lift, or remove a security freeze. In all other cases, a consumer reporting agency may charge you up to \$5.00 each to place, temporarily lift, or permanently remove a security freeze. To place a security freeze on your credit report, you must send a written request to each of the three major consumer reporting agencies, Equifax, Experian, and TransUnion, by regular, certified, or overnight mail at the addresses below:

Equifax	Experian	TransUnion
P.O. Box 105788	P.O. Box 9554	P.O. Box 2000
Atlanta, GA 30348	Allen, TX 75013	Chester, PA 19016
www.equifax.com	www.experian.com	www.transunion.com
(800) 525-6285	(888) 397-3742	(800) 680-7289

To request a security freeze, you will need to provide the following information:

- 1. your full name (including middle initial as well as Jr., Sr., II, III, etc.);
- 2. Social Security number;
- 3. date of birth;
- 4. if you have moved in the past five years, the addresses where you have lived over the prior five years;



5. proof of current address such as a current utility bill or telephone bill;

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

7. if you are a victim of identity theft, a copy of either the police report, investigative report, or complaint to a law enforcement agency concerning identity theft;

8. if you are not a victim of identity theft, payment by check, money order, or credit card (Visa, Mastercard, American Express, or Discover only). Do not send cash through the mail.

The consumer reporting agencies have three business days after receiving your request to place a security freeze on your credit report. The consumer reporting agencies must also send written confirmation to you within five business days and provide you with a unique personal identification number (PIN) or password, or both, that can be used by you to authorize the removal or lifting of the security freeze.

To lift the security freeze to allow a specific entity or individual access to your credit report, you must call or send a written request to the consumer reporting agencies by mail and include proper identification (name, address, and Social Security number) and the PIN number or password provided to you when you placed the security freeze, as well as the identities of those entities or individuals you would like to receive your credit report or the specific period of time you want the credit report available. The consumer reporting agencies have three business days after receiving your request to lift the security freeze for those identified entities or for the specified period of time.

To remove the security freeze, you must send a written request to each of the three nationwide consumer reporting agencies by mail and include proper identification (name, address, and social security number) and the PIN number or password provided to you when you placed the security freeze. The consumer reporting agencies have three business days after receiving your request to remove the security freeze.

#### IF YOU ARE A NEW MEXICO RESIDENT:

You have rights under the federal Fair Credit Reporting Act (FCRA). These include, among others, the right to know what is in your file; to dispute incomplete or inaccurate information; and to have consumer reporting agencies correct or delete inaccurate, incomplete, or unverifiable information. For more information about the FCRA, please visit <a href="https://www.consumer.ftc.gov/articles/pdf-0096-fair-credit-reporting-act.pdf">https://www.consumer.ftc.gov/articles/pdf-0096-fair-credit-reporting-act.pdf</a> or <a href="https://www.trc.gov">www.ftc.gov</a>.

In Addition, New Mexico Consumers Have the Right to Obtain a Security Freeze or Submit a Declaration of Removal

You may obtain a security freeze on your credit report to protect your privacy and ensure that credit is not granted in your name without your knowledge. You may submit a declaration of removal to remove information placed in your credit report as a result of being a victim of identity theft. You have a right to place a security freeze on your credit report or submit a declaration of removal pursuant to the Fair Credit Reporting and Identity Security Act.

The security freeze will prohibit a consumer reporting agency from releasing any information in your credit report without your express authorization or approval. The security freeze is designed to prevent credit, loans, and services from being approved in your name without your consent. When you place a security freeze on your credit report, you will be provided with a

Google

personal identification number, password, or similar device to use if you choose to remove the freeze on your credit report or to temporarily authorize the release of your credit report to a specific party or parties or for a specific period of time after the freeze is in place. To remove the freeze or to provide authorization for the temporary release of your credit report, you must contact the consumer reporting agency and provide all of the following:

- 1. the unique personal identification number, password, or similar device provided by the consumer reporting agency;
- 2. proper identification to verify your identity;
- 3. information regarding the third party or parties who are to receive the credit report or the period of time for which the credit report may be released to users of the credit report; and
- 4. payment of a fee, if applicable.

A consumer reporting agency that receives a request from a consumer to lift temporarily a freeze on a credit report shall comply with the request no later than three business days after receiving the request. A consumer reporting agency shall comply with the request within 15 minutes of receiving the request by a secure electronic method or by telephone.

A security freeze does not apply in all circumstances, such as where you have an existing account relationship and a copy of your credit report is requested by your existing creditor or its agents for certain types of account review, collection, fraud control, or similar activities; for use in setting or adjusting an insurance rate or claim or insurance underwriting; for certain governmental purposes; and for purposes of prescreening as defined in the FCRA.

If you are actively seeking a new credit, loan, utility, telephone, or insurance account, you should understand that the procedures involved in lifting a security freeze may slow your own applications for credit. You should plan ahead and lift a freeze, either completely if you are shopping around or specifically for a certain creditor, with enough advance notice before you apply for new credit for the lifting to take effect. You should contact a consumer reporting agency and request it to lift the freeze at least three business days before applying. If you contact a consumer reporting agency by a secure electronic method or by telephone, the consumer reporting agency should lift the freeze within 15 minutes. You have a right to bring a civil action against a consumer reporting agency that violates your rights under the Fair Credit Reporting and Identity Security Act.

To place a security freeze on your credit report, you must send a request to each of the three major consumer reporting agencies: Equifax, Experian, and TransUnion. Contact these agencies using the contact information provided in the enclosed letter.

## IF YOU ARE A NORTH CAROLINA RESIDENT:

You may obtain information about preventing identity theft from the North Carolina Attorney General's Office. This office can be reached at:

North Carolina Department of Justice Attorney General's Office 9001 Mail Service Center Raleigh, NC 27699-9001 (877) 566-7226



## http://www.ncdoi.gov

#### IF YOU ARE AN OREGON RESIDENT:

You may obtain information about preventing identity theft from the Oregon Attorney General's Office. This office can be reached at:

Oregon Department of Justice 1162 Court Street NE Salem, OR 97301-4096 (503) 378-4400 http://www.doj.state.or.us/

#### IF YOU ARE A RHODE ISLAND RESIDENT:

You may contact law enforcement, such as the Rhode Island Attorney General's Office, to report incidents of identity theft or to learn about steps you can take to protect yourself from identity theft. You can contact the Rhode Island Attorney General at:

RI Office of the Attorney General 150 South Main Street Providence, RI 02903 (401) 274-4400 www.riag.ri.gov/

You may obtain a security freeze on your credit report to protect your privacy and ensure that credit is not granted in your name without your knowledge. You have a right to place a security freeze on your credit report pursuant to the Identity Theft Prevention Act of 2006.

The security freeze will prohibit a consumer reporting agency from releasing any information in your credit report without your express authorization or approval. The security freeze is designed to prevent credit, loans, and services from being approved in your name without your consent. When you place a security freeze on your credit report, within five business days you will be provided a personal identification number or password to use if you choose to remove the freeze on your credit report or to temporarily authorize the release of your credit report for a specific period of time after the freeze is in place. To provide that authorization, you must contact the consumer reporting agency and provide all of the following:

- 1. the unique personal identification number or password provided by the consumer reporting agency;
- 2. proper identification to verify your identity; and
- 3. the proper information regarding the period of time for which the report shall be available to users of the credit report.

A consumer reporting agency that receives a request from a consumer to temporarily lift a freeze on a credit report shall comply with the request no later than three business days after receiving the request. A security freeze does not apply to circumstances where you have an existing account relationship and a copy of your report is requested by your existing creditor or its agents or affiliates for certain types of an account review, collection, fraud control, or similar activities.



If you are actively seeking a new credit, loan, utility, telephone, or insurance account, you should understand that the procedures involved in lifting a security freeze may slow your own applications for credit. You should plan ahead and lift a freeze -- either completely, if you are shopping around, or specifically for a certain creditor -- with enough advance notice before you apply for new credit for the lifting to take effect.

You have a right to bring a civil action against someone who violates your rights under the credit reporting laws. The action can be brought against a consumer reporting agency or a user of your credit report.

Unless you are 65 years of age or older, or you are a victim of identity theft with an incident report or complaint from a law enforcement agency, a consumer reporting agency has the right to charge you up to \$10.00 to place a freeze on your credit report; up to \$10.00 to temporarily lift a freeze on your credit report, depending on the circumstances; and up to \$10.00 to remove a freeze from your credit report. If you are 65 years of age or older or are a victim of identity theft with a valid incident report or complaint, you may not be charged a fee by a consumer reporting agency for placing, temporarily lifting, or removing a freeze.

To place a security freeze on your credit report, you must send a request to each of the three major consumer reporting agencies: Equifax, Experian, and TransUnion. These agencies can be contacted using the contact information provided above.

To request a security freeze, you may need to provide the following information:

- 1. your full name (including middle initial as well as Jr., Sr., II, III, etc.);
- 2. Social Security number;
- 3. date of birth;
- 4. complete address;
- 5. prior addresses;
- 6. proof(s) of identification (state driver's license or ID card, military identification, birth certificate etc.);
- 7. if you are a victim of identity theft, a copy of either the police report, investigative report, or complaint to a law enforcement agency concerning identity theft; and
- 8. if you are not a victim of identity theft, payment. Do not send cash through the mail.