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September 30, 2016

VIA OVERNIGHT MAIL

Joseph Foster
Office of the Attorney General
33 Capitol St
Concord, NH 03301

Re: Incident Notification

Dear Attorney General Foster:

Our client, Hutton Hotel, understands the importance of protecting payment card information. After Hutton Hotel received a report from their payment card processor of suspicious activity regarding payment cards that had been used legitimately at their onsite food and beverage outlets, the Company began an investigation of its payment card systems and engaged a leading cybersecurity firm to assist. On July 7, 2016, the investigation first found evidence of unauthorized access to its payment processing systems.

Findings from the investigation show that unknown individuals were able to install a program on the payment processing system at the Hutton Hotel designed to capture payment card data as it was routed through the system. The program could have affected payment card data—including cardholder name, payment card account number, card expiration date, and verification code—of guests who used a payment card to pay for or place hotel reservations during the period from September 19, 2012 to April 16, 2015, or who made purchases at the onsite food and beverage outlets from November 15, 2015 to June 10, 2016.

On September 2, 2016, the Company provided substitute notification to affected individuals by posting a statement on their websites and issuing a press release in substantially the same form as the documents enclosed herewith. Notification was not provided to your office at that time because the Hutton Hotel is located in Nashville, Tennessee.

Since then, the Company has been diligently working to identify those guests that used a payment card during at-risk window and for whom the Company can match the cardholder to a

Atlanta Chicago Cincinnati Cleveland Columbus Costa Mesa Denver
Houston Los Angeles New York Orlando Philadelphia Seattle Washington, DC

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physical address or email address. Now that the Company has completed the identification and matching process, beginning on September 29, 2016, letters will be sent by first-class mail to 35 New Hampshire residents in accordance with N.H. Rev. Stat. §359-C:20 in substantially the same form as the document enclosed herewith.¹ In addition, on October 4, 2016, emails will be sent those guests for whom the Company only had an email address. Notice is being provided as soon as possible.

Hutton Hotel has established a dedicated call center that potentially affected individuals can contact with questions. The Company is also recommending that potentially affected individuals remain vigilant to the possibility of fraud by reviewing their account statements and credit reports for unauthorized activity.

Hutton Hotel has implemented enhanced security measures, including the use of stand-alone payment processing devices, to prevent any further unauthorized access to payment card data. In addition, the Company notified law enforcement and will continue to support their investigation. The Company is also working closely with the payment card companies to identify potentially affected cards so that the card issuers can be made aware and initiate heightened monitoring on those accounts.

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

Best regards,



William R. Daugherty
Counsel

Enclosure

¹ As Hutton Hotel does not conduct business in New Hampshire, this letter is not, and does not constitute, a waiver of personal jurisdiction.

STATE OF NH
DEPT OF JUSTICE
2016 OCT -3 AM 9:55