

**BakerHostetler**

STATE OF NH  
DEPT OF JUSTICE

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August 24, 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, Noble House Hotels & Resorts (Noble House), understands the importance of the privacy and confidentiality of personal information provided by its guests. Noble House was notified by the Secret Service on July 13, 2016, about possible fraudulent activity on the payment card system for one of its properties, Ocean Key Resort & Spa. It promptly began an investigation and engaged a computer security firm to examine its payment system for any signs of an issue. On July 26, 2016, the computer security firm confirmed that Ocean Key's system may have been compromised between April 26, 2016 and June 8, 2016. The incident may have affected guests who used payment cards during this time frame at Ocean Key, or at one of its onsite dining establishments, including Hot Tin Roof Restaurant, Sunset Pier bar, and LIQUID Pool Bar.

The information potentially compromised by the attack involved Track 1 and Track 2 data found in the magnetic stripe on payment cards. Because Noble House does not retain this information, it is unable to determine whether Track 1 or Track 2 data was exposed for individual guests. For each cardholder guest, the affected information included the cardholder's payment card number, payment card expiration date, CVV number, and may have included the cardholder's name.

Beginning on August 24, 2016, Noble House is notifying thirteen New Hampshire residents pursuant to New Hampshire law in substantially the same form enclosed with this

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

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letter.<sup>1</sup> Noble House has also established a dedicated call center to assist individuals with any questions they may have regarding the incident. In addition, Noble House is providing substitute notification to New Hampshire residents by posting a statement on the home page its website and on a page of the website of Ocean Key Resort and by issuing a press release.

To help prevent this from happening again, Noble House is working with the computer security firm to ensure that this issue has been fully remediated, as well as reviewing and enhancing its security measures.

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

Sincerely,

A handwritten signature in blue ink, appearing to read "R. L. Gainer".

Randal L. Gainer  
Partner

Enclosures

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<sup>1</sup> As Noble House does not conduct business in New Hampshire, this letter is not, and does not constitute, a waiver of personal jurisdiction.