

STATE OF NH
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September 2, 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 began an investigation after it was notified by the Secret Service about possible fraudulent activity on the payment card system at one of its properties. It engaged a computer security firm to examine the payment systems at all of the properties it manages for any signs of an issue. Through its investigation, it learned that malware may have been installed on payment processing systems that potentially affected cards swiped at the following hotels, restaurants, and bars during the periods identified:

- Kona Kai Resort & Spa, San Diego, CA, including the Vessel restaurant and the Tiki Bar, from April 25, 2016 - August 3, 2016;
- Little Palm Island Resort & Spa, Florida Keys, FL, including the Little Palm Island Dining Room, from April 25, 2016 - June 8, 2016;
- The Portofino Hotel & Marina, Redondo Beach, CA, including the Baleen Kitchen & Lounge restaurant and the Living Room Bar, from April 26, 2016 - June 8, 2016;
- The Edgewater, Seattle, WA, including the Six Seven restaurant, from April 26, 2016 - August 3, 2016;
- River Terrace Inn, Napa, CA, including the Terrace Café & Wine Bar, from April 25, 2016 - June 8, 2016;
- LaPlaya Beach & Golf Resort, Naples, FL, including the Baleen restaurant and the Tiki Bar, from April 26, 2016 - August 3, 2016;

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

- Mountain Lodge at Telluride, Telluride, CO, including The View restaurant, from April 26, 2016 - August 5, 2016;
- Hotel Deca, Seattle, WA, from April 25, 2016 - June 8, 2016;
- Blue Mermaid restaurant, San Francisco, CA from April 26, 2016 – August 3, 2016;
- Pescatore restaurant, San Francisco, CA from April 26, 2016 – August 3, 2016.

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 September 2, 2016, Noble House is notifying thirty-four New Hampshire residents pursuant to New Hampshire law in substantially the same form enclosed with this letter.¹ 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 of its website 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,



Randal L. Gainer
Partner

Enclosure

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