ALSTON & BIRD

One Atlantic Center
1201 West Peachtree Street
Atlanta, GA 30309-3424
404-881-7000 | Fax: 404-881-7777

James A. Harvey Direct Dial: 404-881-7328 Email: jim.harvey@alston.com

February 23, 2018

CONFIDENTIAL
VIA OVERNIGHT DELIVERY

Office of the Attorney General
Consumer Protection and Antitrust Bureau
Attn: Security Breach Notification
33 Capitol Street
Concord, NH 03301

Re: Notice of Security Incident

To the Office of the Attorney General:

We are writing on behalf of our client, ACTIVE Network ("Active"), to inform you of a security incident that may have involved unauthorized access to the personal information of 3 New Hampshire residents.

Active recently identified suspicious activity on one of its systems. An investigation by Active and leading cybersecurity firms determined that this activity related to transactions manually keyed in by users while checking out on the Active website, and that unauthorized third parties may have accessed personal information provided by users as part of the checkout process between December of 2016 and September of 2017. The information may have included name, address, email address, credit or debit card number, expiration date, and cardholder verification code (the three- or four-digit value included on the front or back of payment cards and used for verification of certain transactions).

Active engaged leading cybersecurity firms to investigate the suspicious activity as soon as it was identified, took steps to enhance its monitoring tools and security controls, and is offering the affected individuals, at no cost, one year of fraud consultation and identity restoration services.

A copy of the notification being sent to 3 New Hampshire residents on February 23, 2018 by first class mail is attached to this letter.

If you have any questions regarding this incident or if you desire further information or assistance, please email me at Jim.Harvey@alston.com or call my direct line at (404) 881-7328.

Sincerely,

James A. Harvey

<<Date>> (Format: Month Day, Year)

<<MemberFirstName>> <<MemberMiddleName>> <<MemberLastName>> <<NameSuffix>>
<<Address1>>
<<Address2>>
<<City>>, <<State>> <<ZipCode>>

NOTICE OF DATA BREACH

Dear <<MemberFirstName>> <<MemberLastName>>,

We are writing to inform you that we recently became aware of a security incident involving the ACTIVE Network, including ACTIVE Works and ACTIVE Endurance ("Active") which may have impacted your personal information.

What Happened

Active recently identified suspicious activity on one of its systems. We worked with leading cybersecurity firms to determine that the activity related to transactions manually keyed in by users while checking out on the Active website between December of 2016 and September of 2017. During this time period, personal information that you provided as part of the checkout process may have been accessed by unauthorized third parties.

What Information Was Involved

The information may have included your name, address, email address, credit or debit card number, expiration date, and cardholder verification code (the three- or four-digit value included on the front or back of payment cards and used for verification of certain transactions).

What We Are Doing

As soon as Active identified the suspicious activity, it engaged leading cybersecurity firms to investigate the incident and took steps to enhance its monitoring tools and security controls. Active is offering you free fraud consultation and identity restoration services. More information on how to access these services can be found below and in the enclosed Reference Guide.

What You Can Do

We encourage you to be diligent in watching for unauthorized activity associated with your payment card accounts and to quickly report suspicious activity to your bank or credit card company. The phone number to call is usually on the back of the credit or debit card. The Reference Guide contains additional information on steps you can take to monitor and protect your personal information. We have also arranged for Kroll to provide you one year of fraud consultation and identity restoration services at no cost to you. For instructions on how to access your complimentary year of fraud consultation and identity restoration services call a toll-free number, 1-800-844-8169. The Reference Guide contains additional information about these services.

Your Kroll Membership Number is: **<<Member ID>>**

For More Information

We apologize for any inconvenience this incident may cause. You may contact us at 1-800-844-8169, between 9 a.m. through 6 p.m. ET, Monday through Friday, excluding major holidays. If you have any questions or would like additional information about this incident.

Sincerely,

Phil Petescia
Vice President of Customer Care

Reference Guide

Order Your Free Credit Report

To order your free annual credit report, visit www.annualcreditreport.com, call toll-free at (877) 322-8228, or complete the Annual Credit Report Request Form on the U.S. Federal Trade Commission's ("FTC") website at www.ftc.gov and mail it to Annual Credit Report Request Service, P.O. Box 105281, Atlanta, GA 30348-5281. The three credit bureaus provide free annual credit reports only through the website, toll-free number or request form.

Upon receiving your credit report, review it carefully. Look for accounts you did not open. Look in the "inquiries" section for names of creditors from whom you have not requested credit. Some companies bill under names other than their store or commercial names; the credit bureau will be able to tell if this is the case. Look in the "personal information" section for any inaccuracies in information (such as home address and Social Security Number).

If you see anything you do not understand, call the credit bureau at the telephone number on the report. Errors may be a warning sign of possible identity theft. You should notify the credit bureaus of any inaccuracies in your report, whether due to error or fraud, as soon as possible so the information can be investigated and, if found to be in error, corrected. If there are accounts or charges you did not authorize, immediately notify the appropriate credit bureau by telephone and in writing. Information that cannot be explained should also be reported to your local police or sheriff's office because it may signal criminal activity.

Additional Information on Fraud Consultation and Identity Restoration Services

You will receive one year of complimentary fraud consultation and identity restoration services through Kroll:

- Fraud Consultation - You have access to consultation with a dedicated licensed investigator at Kroll. Support includes showing you the most effective ways to protect your identity, explaining your rights and protections under the law, assistance with fraud alerts, and interpreting how personal information is accessed and used, including investigating suspicious activity that could be tied to an identity theft event. You do not need to sign up for these services in order to access them.
- Identity Restoration - If you become a victim of identity theft, an experienced licensed investigator will work on your behalf to resolve related issues. You will have access to a dedicated investigator who understands your issues and will do most of the work for you. Your investigator can dig deep to uncover all aspects of the identity theft, and then work to resolve it. You do not need to sign up for these services in order to access them.

Contact the U.S. Federal Trade Commission

If you detect any unauthorized transactions in any of your financial accounts, promptly notify the appropriate payment card company or financial institution. If you detect any incidence of identity theft or fraud, promptly report the matter to your local law enforcement authorities, state Attorney General and the FTC.

You can contact the FTC to learn more about how to protect yourself from becoming a victim of identity theft by using the contact information below:

Federal Trade Commission
Consumer Response Center
600 Pennsylvania Avenue, NW
Washington, DC 20580
1-877-IDTHEFT (438-4338)

Place a Fraud Alert on Your Credit File

To protect yourself from possible identity theft, consider placing a fraud alert on your credit file. A fraud alert helps protect against the possibility of an identity thief opening new credit accounts in your name. When a credit grantor checks the credit history of someone applying for credit, the credit grantor gets a notice that the applicant may be the victim of identity theft. The alert notifies the credit grantor to take steps to verify the identity of the applicant. You can place a fraud alert on your credit report by calling any one of the toll-free fraud numbers provided below. You will reach an automated telephone system that allows flagging of your file with a fraud alert at all three credit bureaus.

Equifax	P.O. Box 740241 Atlanta, Georgia 30348	800 -525-6285	www.equifax.com
Experian	P.O. Box 2002 Allen, Texas 75013	888-397-3742	www.experian.com
TransUnion	P.O. Box 2000 Chester, PA 19016	800-916-8800	www.transunion.com

Security Freezes

You may have the right to put a security freeze, also known as a credit freeze, on your credit file, so that no new credit can be opened in your name without the use of a PIN number that is issued to you when you initiate a freeze. A security freeze is designed to prevent potential credit grantors from accessing your credit report without your consent. If you place a security freeze, potential creditors and other third parties will not be able to get access to your credit report unless you temporarily lift the freeze. Therefore, using a security freeze may delay your ability to obtain credit. In addition, you may incur fees to place, lift and/or remove a security freeze.

Security freeze laws vary from state to state. The cost of placing, temporarily lifting, and removing a security freeze also varies by state, generally $5 to $20 per action at each credit reporting company. Unlike a fraud alert, you must separately place a security freeze on your credit file at each credit bureau. To place a security freeze on your credit report you need to send a request to a consumer reporting agency by certified mail, overnight mail, or regular stamped mail. The following information must be included when requesting a security freeze (note that if you are requesting a credit report for your spouse, this information must be provided for him/her as well): (1) full name, with middle initial and any suffixes; (2) Social Security number; (3) date of birth; (4) current address and any previous addresses for the past five years; and (5) any applicable incident report or complaint with a law enforcement agency or the Registry of Motor Vehicles. The request must also include a copy of a government-issued identification card and a copy of a recent utility bill or bank or insurance statement. It is essential that each copy be legible, display your name and current mailing address, and the date of issue.

Below, please find relevant contact information for the three consumer reporting agencies:

Equifax Security Freeze	P.O. Box 105788 Atlanta, Georgia 30348	800-685-1111	www.equifax.com
Experian Security Freeze	P.O. Box 9554 Allen, Texas 75013	888-397-3742	www.experian.com
TransUnion	P.O. Box 2000 Chester, PA 19016	800-909-8872	www.transunion.com

For Residents of Maryland

You may also obtain information about preventing and avoiding identity theft from the Maryland Office of the Attorney General:

Maryland Office of the Attorney General, Consumer Protection Division
200 St. Paul Place, Baltimore, MD 21202, 1-888-743-0023, www.oag.state.md.us

For Residents of Massachusetts

You have the right to obtain a police report with respect 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.

For Residents of New Mexico

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 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. As of September 1, 2008, a consumer reporting agency shall comply with the request within fifteen 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 federal Fair Credit Reporting Act.

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. As of September 1, 2008, if you contact a consumer reporting agency by a secure electronic method or by telephone, the consumer reporting agency should lift the freeze within fifteen 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".

For Residents of North Carolina

You may also obtain information about preventing and avoiding identity theft from the North Carolina Attorney General's Office:

North Carolina Attorney General's Office, Consumer Protection Division
9001 Mail Service Center, Raleigh, NC 27699-9001, 1-877-5-NO-SCAM, www.ncdoj.gov

For Residents of Oregon

State laws advise you to report any suspected identity theft to law enforcement, as well as the Federal Trade Commission. Contact information for the Oregon Department of Justice is as follows:

Oregon Department of Justice, 1162 Court Street NE, Salem, OR 97301, 1-503-378-4320, www.doj.state.or.us