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February 6, 2019

VIA OVERNIGHT MAIL

Gordon MacDonald
Office of the Attorney General
33 Capitol St
Concord, NH 03301

Re: Incident Notification

Dear Attorney General Foster:

We are writing on behalf of our client, Akwa Vista LLC ("Akwa Vista"), to notify you of a security incident.

On January 10, 2019, after completing its investigation and analysis of an email phishing attack, Akwa Vista determined that unauthorized parties may have been able to access email and attachments in one of its employees' email accounts. Upon learning of the incident, Akwa Vista took immediate action to secure the employee's email account, contacted law enforcement, and launched the investigation, with the assistance of a leading forensics firm. The investigation determined that the employee's email account had been accessed by an unauthorized party between May 11, 2018 and August 31, 2018. Akwa Vista undertook a comprehensive review of the emails that may have been accessed by the unauthorized party and determined that emails or attachments contained personal information pertaining to employees, customers, and vendors. The personal information involved varied but included names along with Social Security numbers, driver's license numbers, U.S. passport numbers, payment card information, and/or bank account information. To date, Akwa Vista is not aware of any misuse of the information.

On February 6, 2019, Akwa Vista began mailing notification letters via United States Postal Service First-Class mail to sixty-five (65) New Hampshire residents in accordance with N.H. Rev. Stat. Ann. § 359-C:20. A copy of the notification letter is enclosed. Akwa Vista is offering the New Hampshire residents complimentary one-year memberships in credit monitoring and identity theft protection services from Experian®.

To help prevent a similar incident from occurring in the future, Akwa Vista has provided additional training to its employees regarding phishing emails and other cybersecurity issues, and has enhanced existing security measures.

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

2019 FEB - 7 A 10: 33

JUSTICE
: NH

New Hampshire Office of the Attorney General
February 6, 2019

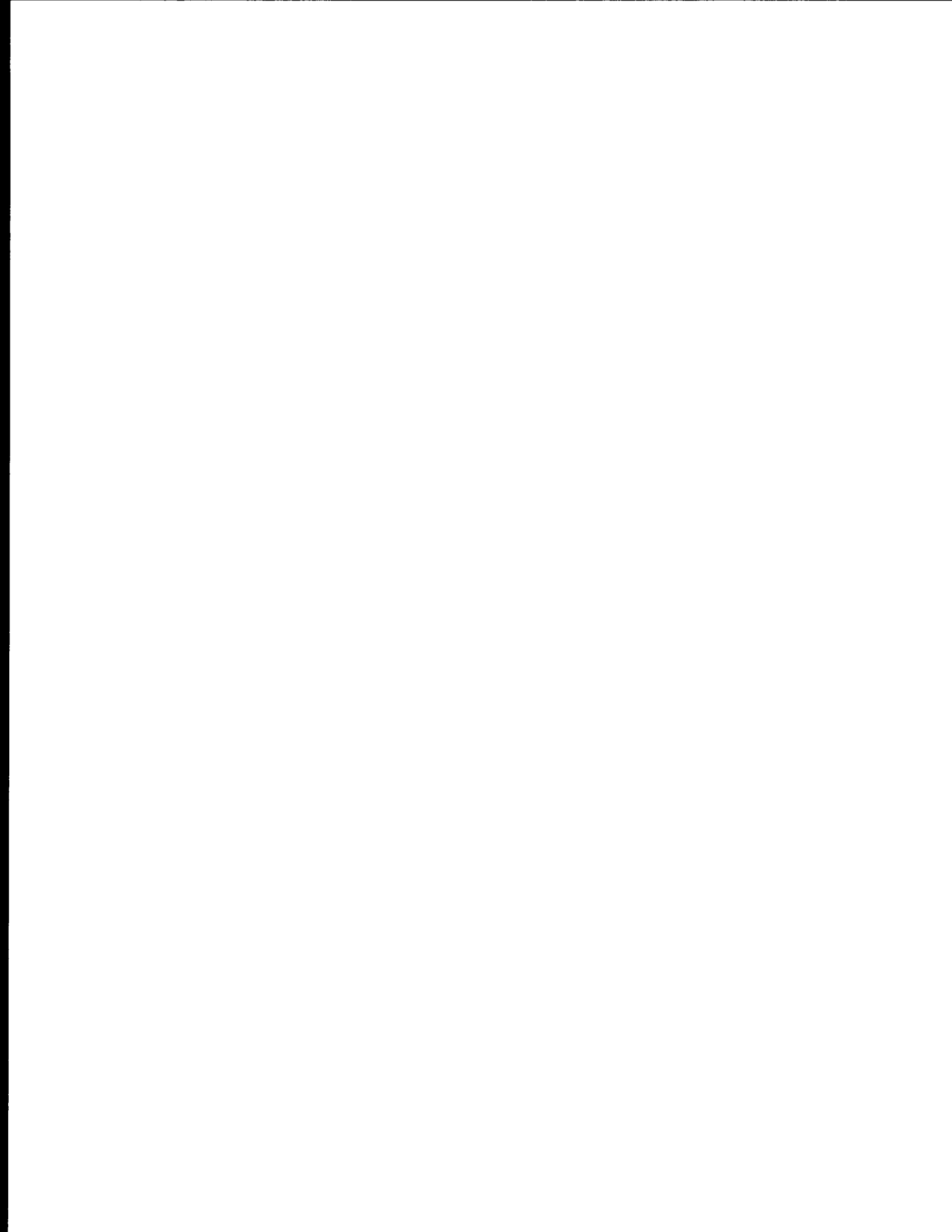
Please do not hesitate to contact me if you have any questions regarding this matter.

Sincerely,

M. Scott Koller

M. Scott Koller
Partner

Enclosure





MEREDITH BAY

LAKE WINNIPESAUKEE

<<First Name>><<Last Name>>

<<Address 1>>

<<Address 2>>

<<City>><<State>><<Zip>>

<<Date>>

Dear <<Name 1>>:

Akwa Vista LLC ("Akwa Vista") is committed to protecting the confidentiality and security of the personal information of our customers. We are writing to inform you about an incident that may involve some of your information. This notice explains the incident, measures that have been taken, and some steps you can take in response.

On January 10, 2019, after our investigation and analysis of an email phishing attack, we determined that unauthorized parties may have been able to access emails and attachments in one of our employees' email accounts. Upon learning of the incident, we took immediate action to secure the employee's email account, contacted law enforcement, and launched the investigation, with the assistance of a leading forensics firm. The investigation determined that the employee's email account had been accessed by an unauthorized party between May 11, 2018 and August 31, 2018. We undertook a comprehensive review of the contents of the account and determined that emails or attachments may have contained your name and some or all of the following: Social Security number, driver's license number, U.S. passport number, and bank account information.

Although, to date, we have no indication that any of your information was misused, we are nonetheless informing you of this incident, and we want to assure you that we take it very seriously. As a precaution, we have arranged for you to receive a complimentary one-year membership of Experian's® IdentityWorksSM Credit 3B. This product helps detect possible misuse of your personal information and provides you with identity protection services focused on identification and resolution of identity theft. IdentityWorks Credit 3B is completely free to you, and enrolling in this program will not hurt your credit score. **For more information on IdentityWorks Credit 3B, including instructions on how to activate your complimentary one-year membership, as well as information on additional steps you can take, please see the information provided in the pages that follow this letter.** Identity Restoration assistance is immediately available to you.

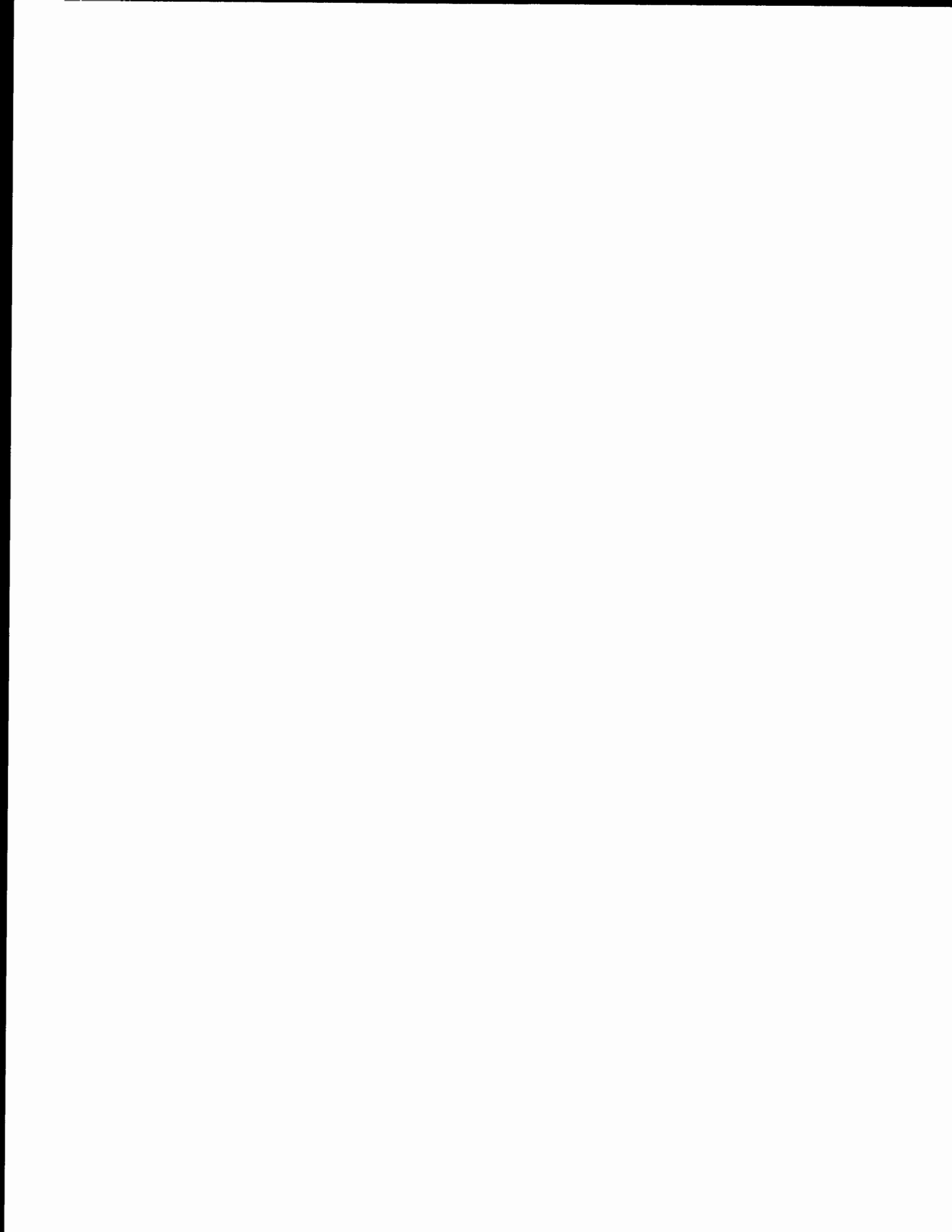
We regret any inconvenience caused by this incident. To help prevent a similar occurrence in the future, we have implemented additional safeguards and technical security measures. In addition, Akwa Vista will support any resulting law enforcement investigation related to this incident. If you have questions about this matter or the recommended next steps, please contact Pamela Zorn Adams at 617-630-4915 or pzornadams@southworthdevelopment.com

Sincerely,

Christopher Duprey

Christopher Duprey

Project Executive



To help protect your identity, we are offering a **complimentary** one-year membership of Experian® IdentityWorksSM Credit 3B. This product helps detect possible misuse of your personal information and provides you with identity protection support focused on immediate identification and resolution of identity theft.

Activate IdentityWorks Credit 3B Now in Three Easy Steps

1. ENROLL by: **April 30, 2019** (Your code will not work after this date.)
2. VISIT the **Experian IdentityWorks website** to enroll: www.experianidworks.com/3bcredit
3. PROVIDE the **Activation Code**: [Code]

If you have questions about the product, need assistance with identity restoration or would like an alternative to enrolling in Experian IdentityWorks online, please contact Experian's customer care team at **877-890-9332**. Be prepared to provide engagement number **DB10567** as proof of eligibility for the identity restoration services by Experian.

ADDITIONAL DETAILS REGARDING YOUR 12-MONTH EXPERIAN IDENTITYWORKS CREDIT 3B MEMBERSHIP:

A credit card is **not** required for enrollment in Experian IdentityWorks Credit 3B.

You can contact Experian **immediately without needing to enroll in the product** regarding any fraud issues. Identity Restoration specialists are available to help you address credit and non-credit related fraud.

Once you enroll in Experian IdentityWorks, you will have access to the following additional features:

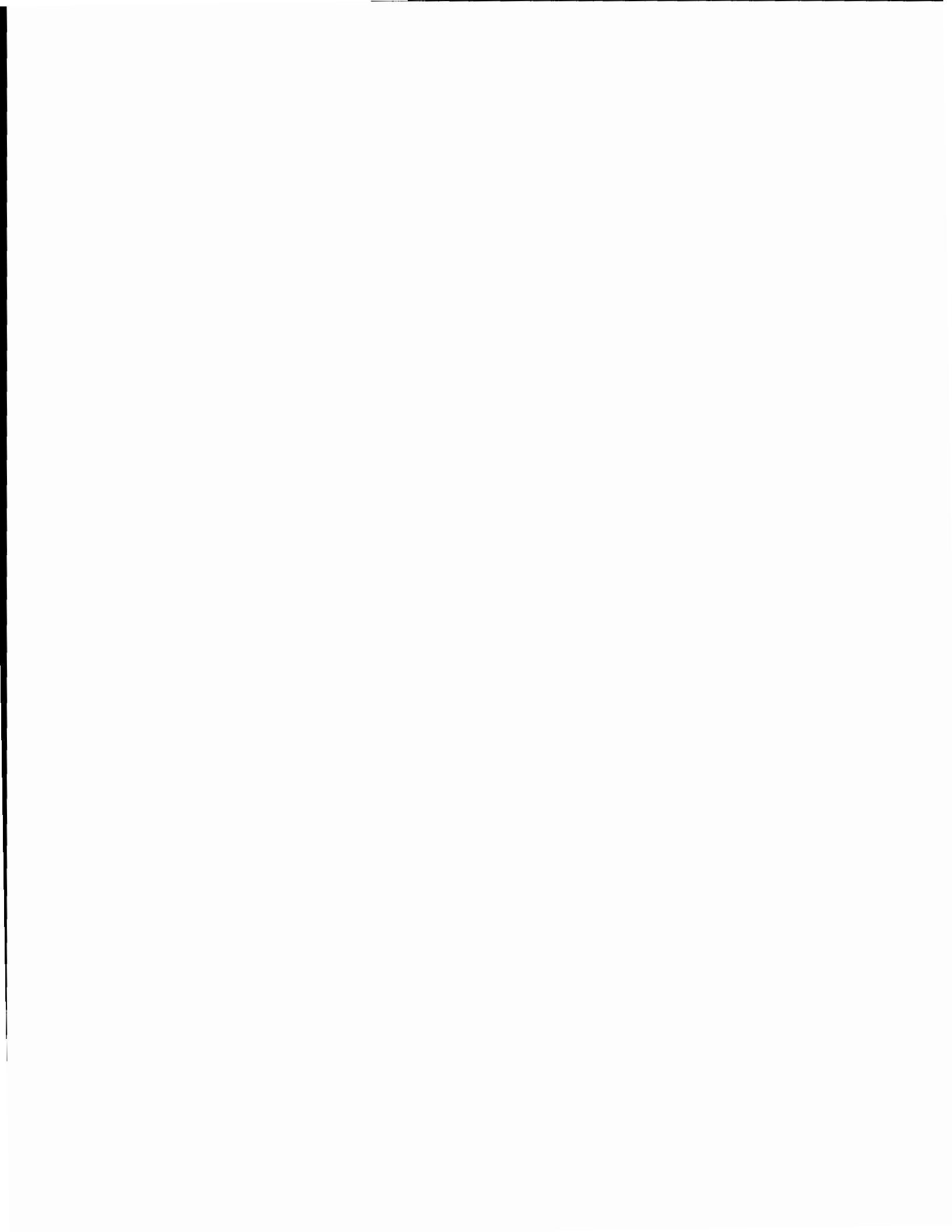
- **Experian credit report at signup:** See what information is associated with your credit file. Daily credit reports are available for online members only.*
- **Credit Monitoring:** Actively monitors Experian, Equifax and Transunion files for indicators of fraud.
- **Experian IdentityWorks ExtendCARETM:** You receive the same high-level of Identity Restoration support even after your Experian IdentityWorks membership has expired.
- **\$1 Million Identity Theft Insurance^{**}:** Provides coverage for certain costs and unauthorized electronic fund transfers.

Activate your membership today at www.experianidworks.com/3bcredit or call 877-890-9332 to register with the activation code above.

What you can do to protect your information: There are additional actions you can consider taking to reduce the chances of identity theft or fraud on your account(s). Please refer to www.ExperianIDWorks.com/restoration for this information. If you have any questions about IdentityWorks, need help understanding something on your credit report or suspect that an item on your credit report may be fraudulent, please contact Experian's customer care team at **877-890-9332**.

* Offline members will be eligible to call for additional reports quarterly after enrolling.

** Identity theft insurance is underwritten by insurance company subsidiaries or affiliates of American International Group, Inc. (AIG). The description herein is a summary and intended for informational purposes only and does not include all terms, conditions and exclusions of the policies described. Please refer to the actual policies for terms, conditions, and exclusions of coverage. Coverage may not be available in all jurisdictions.



ADDITIONAL STEPS YOU CAN TAKE

Regardless of whether you choose to take advantage of the complimentary credit monitoring, we recommend that you remain vigilant for incidents of fraud or identity theft by reviewing your account statements and free credit reports for any unauthorized activity. You may obtain a copy of your credit report, free of charge, once every 12 months from each of the three nationwide credit reporting companies. To order your annual free credit report, please visit www.annualcreditreport.com or call toll free at 1-877-322-8228. Contact information for the three nationwide credit reporting companies is as follows:

Equifax, PO Box 740241, Atlanta, GA 30374, www.equifax.com, 1-800-685-1111

Experian, PO Box 2002, Allen, TX 75013, www.experian.com, 1-888-397-3742

TransUnion, PO Box 2000, Chester, PA 19016, www.transunion.com, 1-800-916-8800

If you believe you are the victim of identity theft or have reason to believe your personal information has been misused, you should immediately contact the Federal Trade Commission and/or the Attorney General's office in your state. You can obtain information from these sources about steps an individual can take to avoid identity theft as well as information about fraud alerts and security freezes. You should also contact your local law enforcement authorities and file a police report. Obtain a copy of the police report in case you are asked to provide copies to creditors to correct your records. Contact information for the Federal Trade Commission is as follows:

Federal Trade Commission, Consumer Response Center, 600 Pennsylvania Avenue, NW
Washington, DC 20580, www.ftc.gov/idtheft, 1-877-IDTHEFT (438-4338)

Fraud Alerts: There are two types of fraud alerts you can place on your credit report to put your creditors on notice that you may be a victim of fraud—an initial alert and an extended alert. You may ask that an initial fraud alert be placed on your credit report if you suspect you have been, or are about to be, a victim of identity theft. An initial fraud alert stays on your credit report for at least 90 days. You may have an extended alert placed on your credit report if you have already been a victim of identity theft with the appropriate documentary proof. An extended fraud alert stays on your credit report for seven years. You can place a fraud alert on your credit report by contacting any of the three national credit reporting agencies.

Credit Freezes: You have the right to put a credit freeze, also known as a security freeze, on your credit file, free of charge, 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. There is no fee to place or lift a security freeze. Unlike a fraud alert, you must separately place a security freeze on your credit file at each credit reporting company. For information and instructions to place a security freeze, contact each of the credit reporting agencies at the addresses below:

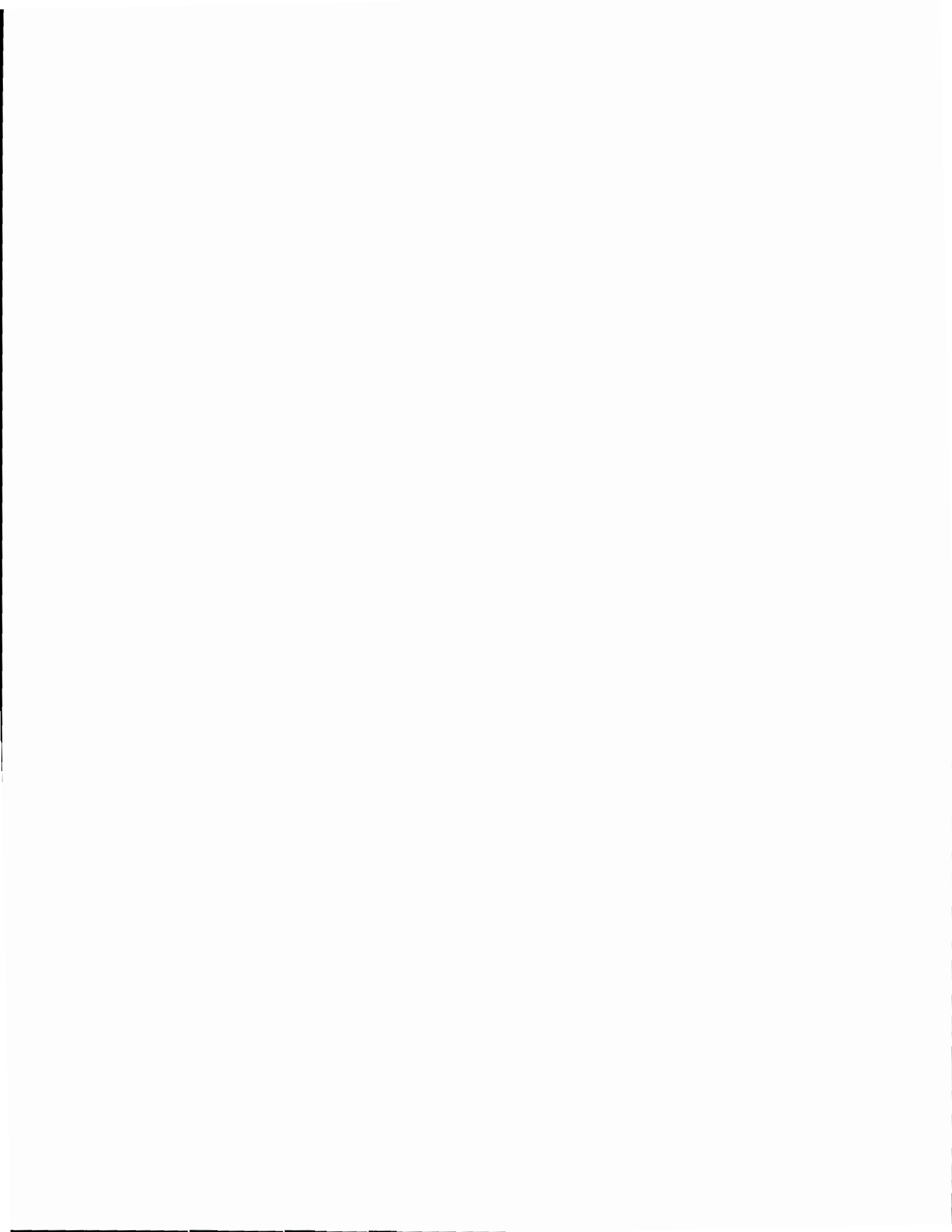
Equifax Security Freeze, PO Box 105788, Atlanta, GA 30348, www.equifax.com

Experian Security Freeze, PO Box 9554, Allen, TX 75013, www.experian.com

TransUnion Security Freeze, PO Box 2000, Chester, PA 19016, www.transunion.com

In order 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, provide 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, include a copy of the police report, investigative report, or complaint to a law enforcement agency concerning identity theft

The credit reporting agencies have one business day after receiving your request by toll-free telephone or secure electronic means, or three business days after receiving your request by mail, to place a security freeze on your credit report. The credit bureaus 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 in order to allow a specific entity or individual access to your credit report, or to lift a security freeze for a specified period of time, you must submit a request through a toll-free telephone number, a secure electronic means maintained by a credit reporting agency, or by sending a written request via regular, certified, or overnight mail to the credit reporting agencies 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 identity 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 credit reporting agencies have one business day after receiving your request by toll-free telephone or secure electronic means, or three business days after receiving your request by mail, to lift the security freeze for those identified entities or for the specified period of time.

To remove the security freeze, you must submit a request through a toll-free telephone number, a secure electronic means maintained by a credit reporting agency, or by sending a written request via regular, certified, or overnight mail to each of the three credit bureaus 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 credit bureaus have one business day after receiving your request by toll-free telephone or secure electronic means, or three business days after receiving your request by mail, to remove the security freeze.

