



MULLEN  
COUGHLIN LLC  
ATTORNEYS AT LAW

RECEIVED

APR 08 2021

CONSUMER PROTECTION

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426 W. Lancaster Avenue, Suite 200  
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April 2, 2021

**VIA U.S. MAIL**

Consumer Protection Bureau  
Office of the New Hampshire Attorney General  
33 Capitol Street  
Concord, NH 03301

**Re: Notice of Data Event**

Dear Sir or Madam:

We represent Crestline Hotels & Resorts, LLC (“Crestline”) located at 3950 University Dr #301, Fairfax, VA 22030, and are writing to notify your office of an incident that may affect the security of some information relating to seven (7) New Hampshire residents. This notice may be supplemented with any new significant facts learned subsequent to its submission. By providing this notice, Crestline does not waive any rights or defenses regarding the applicability of New Hampshire law, the applicability of the New Hampshire data event notification statute, or personal jurisdiction.

**Nature of the Data Event**

On May 27, 2020, Crestline became aware of suspicious activity relating to its systems and immediately launched an investigation to determine the nature and scope of the activity. An unauthorized actor gained access to Crestline’s systems between May 25, 2020 and May 27, 2020, encrypted certain files, and removed certain files from Crestline’s network. The investigation was unable to determine which specific information was actually removed from Crestline’s network. The unauthorized actor threatened to release, and did release, an unknown number of files purportedly acquired from the Crestline network.

In an abundance of caution, Crestline overtook a comprehensive and time-intensive review of all files that could have been impacted. This review was completed on December 22, 2020, and determined that information relating to individuals was present in the potentially impacted files. Crestline then conducted a second review of its files to identify address information for the impacted individuals in order to mail notification letters. This review was completed on February 11, 2021. At this time we are unaware of any fraudulent misuse of information or whether files containing information relating to individuals were actually accessed or acquired by the unknown actor.

Though they may vary by individual, the information types potentially impacted for residents of your state are name and Social Security number.

### **Notice to New Hampshire Residents**

On April 2, 2021, Crestline began mailing written notice of this incident to affected individuals, which includes seven (7) New Hampshire residents. Written notice is being provided in substantially the same form as the letter attached here as *Exhibit A*.

### **Other Steps Taken and To Be Taken**

Upon discovering the event, Crestline moved quickly to investigate and respond to the incident, assess the security of Crestline systems, and notify potentially affected individuals. Crestline is also working to implement additional safeguards and training to its employees. Crestline is providing access to credit monitoring services for twelve (12) months, through Equifax, to individuals whose information was potentially affected by this incident, at no cost to these individuals.

Additionally, Crestline is providing impacted individuals with guidance on how to better protect against identity theft and fraud, including advising individuals to report any suspected incidents of identity theft or fraud to their credit card company and/or bank. Crestline is providing individuals with information on how to place a fraud alert and security freeze on one's credit file, the contact details for the national consumer reporting agencies, information on how to obtain a free credit report, a reminder to remain vigilant for incidents of fraud and identity theft by reviewing account statements and monitoring free credit reports, and encouragement to contact the Federal Trade Commission, their state Attorney General, and law enforcement to report attempted or actual identity theft and fraud.

### **Contact Information**

Should you have any questions regarding this notification or other aspects of the data security event, please contact us at (267) 930-4801.

Very truly yours,



Alexander T. Walker of  
MULLEN COUGHLIN LLC

ATW:zlg  
Enclosure

# **EXHIBIT A**



CRESTLINE  
HOTELS & RESORTS

Return Mail Processing Center  
P.O. Box 6336  
Portland, OR 97228-6336

<<Mail ID>>  
<<Name 1>>  
<<Name 2>>  
<<Address 1>>  
<<Address 2>>  
<<Address 3>>  
<<Address 4>> <<Date>>  
<<Address 5>>  
<<City>><<State>><<Zip>>  
<<Country>>

<<Variable Data 3 – CA Header>>

Dear <<Name 1>>:

Crestline Hotels & Resorts, LLC (“Crestline”) is writing to notify you of a recent data security incident that may have impacted the security of some of your information. Although at this time there is no indication that your information has been misused in relation to this incident, we are providing you with information about the incident, our response to it, and information related to what you may do to better protect your information, should you feel it appropriate to do so.

**What Happened?** On May 27, 2020, Crestline became aware of suspicious activity relating to its systems and immediately launched an investigation to determine the nature and scope of the activity. An unauthorized actor gained access to Crestline’s system between May 25, 2020 and May 27, 2020, encrypted certain files, and removed certain files from our network. The unauthorized actor threatened to release and did release an unknown number of files acquired from the Crestline network.

Although the investigation was unable to confirm which specific files were impacted, we could not rule out the possibility that some of your information may have been accessed. Therefore, in an abundance of caution, Crestline undertook a comprehensive and time-intensive review of all files that could have been impacted. This review was recently completed and determined that your information was present in potentially impacted files. At this time, we are unaware of any actual fraudulent misuse of your information or whether files containing your information were actually accessed or acquired by the unknown actor.

**What Information Was Involved?** Our investigation determined that at the time of the incident your name and <<data elements>> were stored within potentially impacted files.

**What We Are Doing.** We have strict security measures in place to protect information in our care. Upon learning of this incident, we quickly took steps to confirm the security of our systems and investigate the incident. Crestline worked quickly to secure its systems and implement additional network and endpoint monitoring. We also notified the FBI of this incident.

Although we are unaware of any fraudulent misuse of your information as a result of this incident, as an additional precaution, Crestline is offering you access to <<Variable Data 2 – twelve/twenty-four>> months of complimentary credit monitoring services through Equifax. Details of this offer and instructions on how to activate these services are enclosed with this letter.

**What You Can Do.** Please review the enclosed “Steps You Can Take to Help Protect Your Information,” which contains information on what you can do to better safeguard against possible misuse of your information.

***For More Information.*** We understand that you may have questions about this incident that are not addressed in this notice. If you have additional questions or concerns, please call our toll-free dedicated assistance line at 855-654-0894. This toll-free line is available Monday – Friday from 9:00 a.m. to 9:00 p.m. Eastern Time, except holidays.

We sincerely regret the inconvenience this event may cause you. We remain committed to safeguarding the information in our care and will continue to take steps to ensure the security of our systems.

Sincerely,

Crestline Hotels & Resorts, LLC

## Steps You Can Take to Help Protect Your Information

### Enroll in Credit Monitoring

As a safeguard, we have arranged for you to enroll, at no cost to you, in an online credit monitoring service for <<Variable Data 2 – twelve/twenty-four>> months provided by Equifax.

### Product Information:

Equifax® Credit Watch™ Gold provides you with the following key features:

\*Note: You must be over age 18 with a credit file to take advantage of the product

### Key Features

- Credit monitoring with email notifications of key changes to your Equifax credit report
- Daily access to your Equifax credit report
- WebScan notifications<sup>1</sup> when your personal information, such as Social Security Number, credit/debit card or bank account numbers are found on fraudulent Internet trading sites
- Automatic fraud alerts<sup>2</sup>, which encourages potential lenders to take extra steps to verify your identity before extending credit, plus blocked inquiry alerts and Equifax credit report lock<sup>3</sup>
- Identity Restoration to help restore your identity should you become a victim of identity theft, and a dedicated Identity Restoration Specialist to work on your behalf
- Up to \$1,000,000 of identity theft insurance coverage for certain out of pocket expenses resulting from identity theft<sup>4</sup>

### Enrollment Instructions

Go to [www.equifax.com/activate](http://www.equifax.com/activate)

Enter your unique Activation Code of <<ACTIVATION CODE>> then click “Submit” and follow these 4 steps:

#### **1. Register:**

Complete the form with your contact information and click “Continue”.

*If you already have a myEquifax account, click the ‘Sign in here’ link under the “Let’s get started” header.*

*Once you have successfully signed in, you will skip to the Checkout Page in Step 4*

#### **2. Create Account:**

Enter your email address, create a password, and accept the terms of use.

#### **3. Verify Identity:**

To enroll in your product, we will ask you to complete our identity verification process.

#### **4. Checkout:**

Upon successful verification of your identity, you will see the Checkout Page.

Click ‘Sign Me Up’ to finish enrolling.

#### **You’re done!**

The confirmation page shows your completed enrollment.

Click “View My Product” to access the product features.

**To sign up for US Mail delivery, dial 1-855-833-9162 for access to the Equifax Credit Watch automated enrollment process. Note that all credit reports and alerts will be sent to you via US Mail only.**

**1. Activation Code:** You will be asked to enter your enrollment code as provided at the top of this section.

**2. Customer Information:** You will be asked to enter your home telephone number, home address, name, date of birth and Social Security Number.

**3. Permissible Purpose:** You will be asked to provide Equifax with your permission to access your Equifax credit file and to monitor your file. Without your agreement, Equifax cannot process your enrollment.

**4. Order Confirmation:** Equifax will provide a confirmation number with an explanation that you will receive your Fulfillment Kit via the US Mail (when Equifax is able to verify your identity) or a Customer Care letter with further instructions (if your identity can not be verified using the information provided). Please allow up to 10 business days to receive this information.

## **Monitor Your Accounts**

Under U.S. law, a consumer is entitled to one free credit report annually from each of the three major credit reporting bureaus, Equifax, Experian, and TransUnion. To order your free credit report, visit [www.annualcreditreport.com](http://www.annualcreditreport.com) or call, toll-free, 1-877-322-8228. You may also directly contact the three major credit reporting bureaus listed below to request a free copy of your credit report.

Consumers have the right to place an initial or extended "fraud alert" on a credit file at no cost. An initial fraud alert is a 1-year alert that is placed on a consumer's credit file. Upon seeing a fraud alert display on a consumer's credit file, a business is required to take steps to verify the consumer's identity before extending new credit. If you are a victim of identity theft, you are entitled to an extended fraud alert, which is a fraud alert lasting seven years. Should you wish to place a fraud alert, please contact any one of the three major credit reporting bureaus listed below.

As an alternative to a fraud alert, consumers have the right to place a "credit freeze" on a credit report, which will prohibit a credit bureau from releasing information in the credit report without the consumer's express authorization. The credit freeze is designed to prevent credit, loans, and services from being approved in your name without your consent. However, you should be aware that using a credit freeze to take control over who gets access to the personal and financial information in your credit report may delay, interfere with, or prohibit the timely approval of any subsequent request or application you make regarding a new loan, credit, mortgage, or any other account involving the extension of credit. Pursuant to federal law, you cannot be charged to place or lift a credit freeze on your credit report. To request a security freeze, you will need to provide the following information:

1. Full name (including middle initial as well as Jr., Sr., II, III, etc.);
2. Social Security number;
3. Date of birth;
4. Addresses for the prior two to 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.); and
7. A copy of either the police report, investigative report, or complaint to a law enforcement agency concerning identity theft if you are a victim of identity theft.

Should you wish to place a fraud alert or credit freeze, please contact the three major credit reporting bureaus listed below:

<b>Equifax</b>	<b>Experian</b>	<b>TransUnion</b>
<a href="https://www.equifax.com/personal/credit-report-services/">https://www.equifax.com/personal/credit-report-services/</a>	<a href="https://www.experian.com/help/">https://www.experian.com/help/</a>	<a href="https://www.transunion.com/credit-help">https://www.transunion.com/credit-help</a>
888-298-0045	1-888-397-3742	833-395-6938
Equifax Fraud Alert, P.O. Box 105069 Atlanta, GA 30348-5069	Experian Fraud Alert, P.O. Box 9554, Allen, TX 75013	TransUnion Fraud Alert, P.O. Box 2000, Chester, PA 19016
Equifax Credit Freeze, P.O. Box 105788 Atlanta, GA 30348-5788	Experian Credit Freeze, P.O. Box 9554, Allen, TX 75013	TransUnion Credit Freeze, P.O. Box 160, Woodlyn, PA 19094

## **Additional Information**

You may further educate yourself regarding identity theft, fraud alerts, credit freezes, and the steps you can take to protect your personal information by contacting the consumer reporting bureaus, the Federal Trade Commission, or your state Attorney General. The Federal Trade Commission may be reached at: 600 Pennsylvania Avenue NW, Washington, DC 20580; [www.identitytheft.gov](http://www.identitytheft.gov); 1-877-ID-THEFT (1-877-438-4338); and TTY: 1-866-653-4261. The Federal Trade Commission also encourages those who discover that their information has been misused to file a complaint with them. You can obtain further information on how to file such a complaint by way of the contact information listed above. You have the right to file a police report if you ever experience identity theft or fraud. Please note that in order to file a report with law enforcement for identity theft, you will likely need to provide some proof that you have been a victim. Instances of known or suspected identity theft should also be reported to law enforcement and your state Attorney General. This notice has not been delayed by law enforcement.

*For District of Columbia residents*, the District of Columbia Attorney General may be contacted at: 400 6th St NW, Washington, DC 20001 202-727-3400; and [oag@dc.gov](mailto:oag@dc.gov).

*For Maryland residents*, the Maryland Attorney General may be contacted at: 200 St. Paul Place, 16th Floor, Baltimore, MD 21202; 1-410-528-8662 or 1-888-743-0023; and [www.oag.state.md.us](http://www.oag.state.md.us). Crestline is located at 3950 University Drive #301, Fairfax, VA 22030.

*For North Carolina residents*, the North Carolina Attorney General may be contacted at: 9001 Mail Service Center, Raleigh, NC 27699-9001; 1-877-566-7226 or 1-919-716-6000; and [www.ncdoj.gov](http://www.ncdoj.gov).

*For Rhode Island residents*, the Rhode Island Attorney General may be reached at: 150 South Main Street, Providence, RI 02903; [www.riag.ri.gov](http://www.riag.ri.gov); and 1-401-274-4400. Under Rhode Island law, you have the right to obtain any police report filed in regard to this incident. There are 1 Rhode Island residents impacted by this incident.

*For New Mexico residents*, you have rights pursuant to the Fair Credit Reporting Act, such as the right to be told if information in your credit file has been used against you, the right to know what is in your credit file, the right to ask for your credit score, and the right to dispute incomplete or inaccurate information. Further, pursuant to the Fair Credit Reporting Act, the consumer reporting bureaus must correct or delete inaccurate, incomplete, or unverifiable information; consumer reporting agencies may not report outdated negative information; access to your file is limited; you must give your consent for credit reports to be provided to employers; you may limit "prescreened" offers of credit and insurance you get based on information in your credit report; and you may seek damages from a violator. You may have additional rights under the Fair Credit Reporting Act not summarized here. Identity theft victims and active duty military personnel have specific additional rights pursuant to the Fair Credit Reporting Act. We encourage you to review your rights pursuant to the Fair Credit Reporting Act by visiting [www.consumerfinance.gov/f/201504\\_cfpb\\_summary\\_your-rights-under-fcra.pdf](http://www.consumerfinance.gov/f/201504_cfpb_summary_your-rights-under-fcra.pdf), or by writing Consumer Response Center, Room 130-A, Federal Trade Commission, 600 Pennsylvania Ave. N.W., Washington, D.C. 20580.

*For New York residents*, the New York Attorney General may be contacted at: Office of the Attorney General, The Capitol, Albany, NY 12224-0341; 1-800-771-7755; or <https://ag.ny.gov/>.