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MAR 11 2021

CONSUMER PROTECTION

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March 8, 2021

VIA U.S. MAIL:

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

Re: Data Security Incident Notification

Dear Attorney General MacDonald:

I am writing on behalf of Island Hotel Company Limited doing business as Atlantis Paradise Island ("Atlantis Paradise Island") located at One Casino Drive, Executive Offices, The Coral, Paradise Island, New Providence, The Bahamas, to inform you of a data security incident that affects 83 New Hampshire residents.

On October 18, 2020, we became aware of an IT security incident, and immediately commenced an investigation aided by a leading cybersecurity forensic investigation firm. The cybersecurity firm's investigation concluded on December 28, 2020. Based on the investigation's findings, we determined that an unauthorized party may have obtained access to a US-based, corporate computer server containing company information. We performed a full audit of the compromised company information located on the server to determine whether it included any personal information. Based on our review and analysis of the results, we can confirm that between the dates of October 17 and 19, 2020, the unauthorized party may have accessed or acquired New Hampshire resident personal information such as social security numbers, credit card or debit card numbers, financial account information, passport numbers and health insurance policy ID and numbers.

We have taken steps to further strengthen and harden the security of systems in our network, including enhancing administrative and technical safeguards. These administrative and technical safeguards include but are not limited to the following: expanding the use of multi-factor authentication, more frequent and rigorous training of employees on avoiding phishing attempts, additional filtering of malicious links and impersonation protection policies, and enhancing network monitoring.

Buckhead Office | 1600 Atlanta Financial Center
(404) 233-7000 | 3343 Peachtree Road, N. E.
Atlanta, Georgia 30326
Fax: (404) 365-9532

With offices in | Washington, DC
Raleigh-Durham, N.C.

MORRIS, MANNING & MARTIN, LLP

On March 8, 2021, we mailed the notification letter to the affected residents. Atlantis Paradise Island has established a dedicated call center service to assist affected residents with questions and is offering complimentary access to 12 months of identity theft protection services through Kroll Essential Monitoring Services.

Please let me know if you have questions regarding the notification.

Sincerely,

MORRIS, MANNING & MARTIN, LLP

By:



Elizabeth "Bess" Hinson
Partner

Enclosure

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

<<first_name>> <<middle_name>> <<last_name>> <<suffix>>
<<address_1>>
<<address_2>>
<<city>>, <<state_province>> <<postal_code>>
<<country >>

Notice of Data Breach

Dear <<first_name>> <<middle_name>> <<last_name>> <<suffix>>,

On behalf of Atlantis Paradise Island, I am writing to notify you of an issue that may have affected some of your personal information. We value our relationship and the trust that you have placed in us. We take the protection of your data very seriously, and want to provide you with as much information as we can.

What Happened?

<<b2b_text_1(DateInformation)>> discovered information that led us to believe that an unauthorized party may have obtained access to a computer server containing company information. We immediately engaged leading cyber security experts to assist us in a forensic investigation of this incident.

What Information Was Involved?

The unauthorized party may have accessed or acquired some of your personal information, including your <<b2b_text_2(DataElements)>><<b2b_text_3(AdditionalDateInformation)>>.

What We Are Doing

We have taken steps to further strengthen and enhance systems' security in our network, including updating administrative and technical safeguards. We also notified law enforcement authorities.

To help protect your personal information, we are offering complimentary identity monitoring services through Kroll for one year. Kroll is a global leader in risk mitigation and response, and their team has extensive experience helping people who have sustained an unintentional exposure of confidential data. Your identity monitoring services include Credit Monitoring, Web Watcher, Public Persona, Quick Cash Scan, \$1 Million Identity Fraud Loss Reimbursement, Fraud Consultation, and Identity Theft Restoration.

Visit <https://enroll.idheadquarters.com> to activate and take advantage of your identity monitoring services.

You have until **May 31, 2021** to activate your identity monitoring services.

Membership Number: <<Member ID>>

Additional information describing your services is included with this letter.

What You Can Do

While we have no indication that your information was misused in any way, we encourage you to remain vigilant with respect to your personal information and that you use the identity monitoring services we are offering. Additional steps to consider include:

- Contact your credit card and other financial companies you have relationships with to alert them that your identity was compromised and to establish additional security on your personal accounts.
- Closely monitor your financial accounts and promptly contact your financial institution if you see any unauthorized activity.
- Monitor your credit report at all three of the national credit reporting agencies. Even if you do not find any suspicious activity on your credit reports, we recommend that you check your credit report periodically.
- You can order a free copy of your credit report by visiting www.annualcreditreport.com, calling 877-322-8228, or completing the Annual Credit Report Form on the Federal Trade Commission website at <http://www.consumer.ftc.gov/articles/pdf-0093-annual-report-request-form.pdf>. The contact information for all three national credit reporting agencies is listed below.

Equifax	Experian	TransUnion
Phone: 800-685-1111 P.O. Box 740256 Atlanta, GA 30374 www.equifax.com	Phone: 888-397-3742 P.O. Box 9532 Allen, TX 75013 www.experian.com	Phone: 888-909-8872 P.O. Box 6790 Fullerton, CA 92834 www.transunion.com

- Consider placing a fraud alert message on your credit file. By placing this alert on your credit file, any company that requests your credit file will receive a message warning them that you may have been a victim of fraud. Companies that receive this alert may request that you provide proof of your identity. This step helps to protect you from accounts being opened or used by anyone other than yourself. If you would like to place a fraud alert on your credit file, call TransUnion at 1-800-680-7289 or request a fraud alert at <https://www.transunion.com/fraud-victim-resource/place-fraud-alert>.
- 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 the Attorney General's office in your state. You can also obtain information from these sources about additional methods to prevent identity theft, and you can obtain information from the Federal Trade Commission and the consumer reporting agencies for more information regarding fraud alerts and security freezes. Contact information for the Federal Trade Commission is as follows:

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

For More Information

Please know that we take the protection of your personal information very seriously and sincerely regret any concerns this issue may cause. If you have any questions regarding this notification, please contact << [Call Center Toll-Free Number]>>, Monday through Friday from 8:00 a.m. to 5:30 p.m. Central Time. Please have your membership number ready. If you are located outside of the United States or Canada, please call <<toll-number>>. Note that toll charges may apply.

Sincerely,



Audrey Oswell
President and Managing Director
Island Hotel Company Limited doing business as Atlantis Paradise Island

ADDITIONAL RESOURCES

Contact information for the three nationwide credit reporting agencies:

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

Experian, PO Box 2104, Allen, TX 75013, www.experian.com, 1-888-397-3742

TransUnion, PO Box 2000, Chester, PA 119016, www.transunion.com, 1-800-888-4213

Free Credit Report. It is recommended that you remain vigilant by reviewing account statements and monitoring your credit report for unauthorized activity, especially activity that may indicate fraud and identity theft. You may obtain a copy of your credit report, free of charge, once every 12 months from each of the three nationwide credit reporting agencies.

To order your annual free credit report please visit www.annualcreditreport.com or call toll free at **1-877-322-8228**.

You can also order your annual free credit report by mailing a completed Annual Credit Report Request Form (available from the U.S. Federal Trade Commission's ("FTC") website at www.consumer.ftc.gov) to:

Annual Credit Report Request Service, P.O. Box 105281, Atlanta, GA 30348-5281.

For Colorado, Georgia, Maine, Maryland, Massachusetts, New Jersey, Puerto Rico, and Vermont residents: You may obtain one or more (depending on the state) additional copies of your credit report, free of charge. You must contact each of the credit reporting agencies directly to obtain such additional report(s).

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 one year. You may have an extended alert placed on your credit report if you have already been a victim of identity theft and you have 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.

Security Freeze. You have the ability to place a security freeze, also known as a credit freeze, on your credit report free of charge.

A security freeze is intended to prevent credit, loans and services from being approved in your name without your consent. To place a security freeze on your credit report, you may use an online process, an automated telephone line, or submit a written request to any of the three credit reporting agencies listed above. 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 5 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, and display your name, current mailing address, and the date of issue.

Federal Trade Commission and State Attorneys General Offices. 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 home state. You may also contact these agencies for information on how to prevent or minimize the risks of identity theft.

You may contact the **Federal Trade Commission**, Consumer Response Center, 600 Pennsylvania Avenue, NW, Washington, DC 20580, www.ftc.gov/bcp/edu/microsites/idtheft/, 1-877-IDTHEFT (438-4338).

For District of Columbia residents: You may contact the Office of Attorney General for the District of Columbia, 400 6th Street, NW, Washington, DC 20001, 202-442-9828, <https://oag.dc.gov/>.

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

For North Carolina residents: You may contact the North Carolina Office of the Attorney General, Consumer Protection Division, 9001 Mail Service Center, Raleigh, NC 27699-9001, www.ncdoj.gov, 1-877-566-7226.

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

For Connecticut residents: You may contact the Connecticut Office of the Attorney General, 165 Capitol Avenue, Hartford, CT 06106, 1-860-808-5318, www.ct.gov/ag.

For Massachusetts residents: You may contact the Office of the Massachusetts Attorney General, 1 Ashburton Place, Boston, MA 02108, 1-617-727-8400, www.mass.gov/ago/contact-us.html

For Rhode Island residents: You may contact the Rhode Island Office of Attorney General, 150 South Main Street Providence, RI 02903, 1-401-274-4400, <http://www.riag.ri.gov/home/ContactUs.php>

Reporting of identity theft and obtaining a police report.

For Iowa residents: You are advised to report any suspected identity theft to law enforcement or to the Iowa Attorney General.

For Massachusetts residents: You have the right to obtain a police report if you are a victim of identity theft.

For Oregon residents: You are advised to report any suspected identity theft to law enforcement, the Federal Trade Commission, and the Oregon Attorney General.

TAKE ADVANTAGE OF YOUR IDENTITY MONITORING SERVICES

You have been provided with access to the following services from Kroll:

Single Bureau Credit Monitoring

You will receive alerts when there are changes to your credit data—for instance, when a new line of credit is applied for in your name. If you do not recognize the activity, you will have the option to call a Kroll fraud specialist, who will be able to help you determine if it is an indicator of identity theft.

Web Watcher

Web Watcher monitors internet sites where criminals may buy, sell, and trade personal identity information. An alert will be generated if evidence of your personal identity information is found.

Public Persona

Public Persona monitors and notifies when names, aliases, and addresses become associated with your Social Security number. If information is found, you will receive an alert.

Quick Cash Scan

Quick Cash Scan monitors short-term and cash-advance loan sources. You will receive an alert when a loan is reported, and you can call a Kroll fraud specialist for more information.

\$1 Million Identity Fraud Loss Reimbursement

Reimburses you for out-of-pocket expenses totaling up to \$1 million in covered legal costs and expenses for any one stolen identity event. All coverage is subject to the conditions and exclusions in the policy.

Fraud Consultation

You have unlimited access to consultation with a Kroll fraud specialist. 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.

Identity Theft Restoration

If you become a victim of identity theft, an experienced Kroll licensed investigator will work on your behalf to resolve related issues. You will have access to a dedicated investigator who understands your issues and can do most of the work for you. Your investigator will be able to dig deep to uncover the scope of the identity theft, and then work to resolve it.