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STATE OF NH
DEPT OF JUSTICE
2018 MAY 25 AM 9:11

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May 24, 2018

VIA OVERNIGHT MAIL

Joseph Foster
Office of the Attorney General
33 Capitol St
Concord, NH 03301

Re: Incident Notification

Dear Attorney General Foster:

On behalf of our client, Luxury Retreats, we are writing to notify you of a security incident involving New Hampshire residents.

On May 10, 2018, Luxury Retreats concluded its investigation into the nature and extent of a security incident, including the identification of potentially affected individuals, after learning on March 22, 2018, that an unknown individual had gained access to an employee's corporate email account. Upon first learning of this, Luxury Retreats immediately re-secured the account, initiated an investigation, and engaged a leading data forensics firm to assist. The investigation determined that the unauthorized person used the employee's account to create and send spam emails. Although the investigation did not identify any evidence that emails stored in the employee's account were viewed, the investigation could not eliminate that possibility. The investigation identified certain customer personal information in the email account that was provided in connection with booking a villa – which varied by customer but may have included name, address, date of birth, payment card account number, external verification code (CVV), financial account number, driver's license number, and passport number.

Although the company has no evidence that any of its customers' personal information was accessed, acquired, or misused in any way, beginning today, Luxury Retreats is mailing a notification letter to two New Hampshire residents in accordance with N.H. Rev. Stat. Ann. § 359-C:20 in substantially the same form as the attached letter. Luxury Retreats is offering affected individuals one year of complimentary credit monitoring and identity theft protection

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

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services. Luxury Retreats has also provided a phone number that potentially affected individuals can contact with questions.

Luxury Retreats takes the protection of personal information extremely seriously, and it is taking additional measures to help prevent a similar occurrence from happening again.

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

Sincerely,

A handwritten signature in blue ink, appearing to read "Craig A. Hoffman". The signature is stylized and includes a long horizontal flourish extending to the right.

Craig A. Hoffman

Enclosure

LUXURY RETREATS

PRIVATE VILLAS
Processing Center • P.O. BOX 141578 • Austin, TX 78714



00078
JOHN Q. SAMPLE
1234 MAIN STREET
ANYTOWN US 12345-6789

May 24, 2018

Dear John Sample:

Luxury Retreats greatly values your business, and the privacy and security of your personal information is of utmost importance. Unfortunately, we are writing to inform you of a recent incident involving some of your information. This notice explains the incident, the measures we have taken to address it, and information on free support being provided for your protection.

We learned on March 22, 2018, that an individual had unauthorized access to an employee's corporate email account. Upon first learning of this, we immediately re-secured the account, initiated an investigation, and engaged a leading data forensics firm to assist in this effort.

The investigation determined that the unauthorized person used the employee's account to create and send spam emails. Although the investigation did not identify any evidence that emails stored in the employee's account were viewed, the investigation has not eliminated that possibility. As a result, we are notifying you of this incident because information you provided in connection with booking a villa – including your [REDACTED] – was contained in an email in that employee's account.

To be clear, we have no evidence that any of your personal information was taken or misused, but, out of an abundance of caution, we wanted to make you aware of this and provide you with information and support to help guard against misuse of your information.

We have arranged for you to receive free identity protection services from AllClear ID for the next 12 months. The following services start on the date of this notice and you can use them at any time during the next year.

AllClear Identity Repair: This service is automatically available to you with no enrollment required. If a problem arises, simply call 1-866-979-2595, and a dedicated investigator will help recover financial losses, restore your credit, and make sure your identity is returned to its proper condition.

AllClear Fraud Alerts with Credit Monitoring: This service offers the ability to set, renew, and remove 90-day fraud alerts on your credit file to help protect you from credit fraud. In addition, it provides credit monitoring services, a once annual credit score and credit report, and a \$1 million identity theft insurance policy. To enroll in this service, you will need to provide your personal information to AllClear ID. You may sign up online at enroll.allclearid.com using the following redemption code: Redemption Code.

Please note: Following enrollment, additional steps are required by you in order to activate your phone alerts and fraud alerts, and to pull your credit score and credit file. Additional steps may be required in order to activate your monitoring options. For some additional steps you can take to protect yourself, please see the pages that follow this letter.



We sincerely regret any inconvenience or concern caused by this incident. Luxury Retreats takes the protection of your personal information extremely seriously, and we are taking additional measures to help prevent a similar occurrence from happening again.

If you have any further questions about this incident, please do not hesitate to call +1 438.387.2604, Monday through Saturday, 9:00 a.m. to 6:00 p.m. Eastern Time.

Sincerely,

A handwritten signature in black ink, appearing to read 'T. Mendonca', with a period at the end.

Tomas Mendonca
Senior Manager, Guest Experience

Additional Steps You Can Take

We remind you to 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, 1-877-IDTHEFT (438-4338), www.ftc.gov/idtheft

If you are a resident of Connecticut, Maryland, or North Carolina, you may contact and obtain information from your state attorney general at:

Connecticut Attorney General's Office, 55 Elm Street, Hartford, CT 06106, 1-860-808-5318, www.ct.gov/ag

Maryland Attorney General's Office, 200 St. Paul Place, Baltimore, MD 21202, www.oag.state.md.us,
1-888-743-0023 (toll free when calling within Maryland)
(410) 576-6300 (for calls originating outside Maryland)

North Carolina Attorney General's Office, 9001 Mail Service Center, Raleigh, NC 27699, www.ncdoj.gov,
1-919-716-6400

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 may have the right to put a credit freeze, also known as a security 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 credit freeze is designed to prevent potential credit grantors from accessing your credit report without your consent. If you place a credit 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 credit freeze may delay your ability to obtain credit. In addition, you may incur fees to place, lift and/or remove a credit freeze. Credit freeze laws vary from state to state. The cost of placing, temporarily lifting, and removing a credit 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 credit freeze on your credit file at each credit reporting company. Since the instructions for how to establish a credit freeze differ from state to state, please contact the three major credit reporting companies as specified below to find out more information.

To place a security freeze on your credit report, you must send a written request to each of the three (3) major reporting agencies by regular, certified, or overnight mail at the addresses below:

Experian Security Freeze, PO Box 9554, Allen, TX 75013, www.experian.com
TransUnion Security Freeze, PO Box 2000, Chester, PA 19016, www.transunion.com
Equifax Security Freeze, PO Box 105788, Atlanta, GA 30348, www.equifax.com



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 (5) 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 three (3) business days after receiving your request to place a security freeze on your credit report. The credit bureaus must also send written confirmation to you within five (5) 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, you must call or send a written request to the credit reporting agencies by mail 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 three (3) business days after receiving your request to lift the security freeze for those identified entities or for the specified period of time.

To remove the security freeze, you must send a written request to each of the three credit bureaus by mail 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 three (3) business days after receiving your request to remove the security freeze.

Fair Credit Reporting Act: You also have rights under the federal Fair Credit Reporting Act, which promotes the accuracy, fairness, and privacy of information in the files of consumer reporting agencies. The FTC has published a list of the primary rights created by the FCRA (<https://www.consumer.ftc.gov/articles/pdf-0096-fair-credit-reporting-act.pdf>), and that article refers individuals seeking more information to visit www.ftc.gov/credit. The FTC's list of FCRA rights includes:

- You have the right to receive a copy of your credit report. The copy of your report must contain all the information in your file at the time of your request.
- Each of the nationwide credit reporting companies – Equifax, Experian, and TransUnion – is required to provide you with a free copy of your credit report, at your request, once every 12 months.
- You are also entitled to a free report if a company takes adverse action against you, like denying your application for credit, insurance, or employment, and you ask for your report within 60 days of receiving notice of the action. The notice will give you the name, address, and phone number of the credit reporting company. You are also entitled to one free report a year if you're unemployed and plan to look for a job within 60 days; if you are on welfare; or if your report is inaccurate because of fraud, including identity theft.
- You have the right to ask for a credit score.
- You have the right to dispute incomplete or inaccurate information.
- Consumer reporting agencies 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 reports to be provided to employers.
- You may limit "prescreened" offers of credit and insurance you receive based on information in your credit report.
- You may seek damages from violators.
- Identity theft victims and active duty military personnel have additional rights.