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Birmingham, AL 35205-2972

PO Box 55727
Birmingham, AL 35255-5727

June 23, 2015

VIA US MAIL

Office of New Hampshire Attorney General
Attn: Security Breach Notification
33 Capitol Street
Concord, NH 03301

Re: Notification of Data Security Incident

Dear Sir or Madam:

This firm represents Manchester Hotel Hospitality, LLC (the "Company"). In accordance with N.H. Rev. Stat. Ann. § 359-C:19, please accept this letter as notice of the compromise of certain computerized data of the Company that may have led to the unauthorized acquisition of certain personal information, including some combination of names, addresses and payment card account numbers and expiration dates.

An explanation of the events giving rise to this notice is as follows:

On February 11, 2015, the Company was contacted by Six Continents Hotels ("IHG"), who was previously notified by the United States Secret Service, that certain hotels affiliated with IHG had been identified as potential victims of a data security incident. It was suggested that the Company conduct a formal investigation into a potential data breach at its hotel location in Manchester, Tennessee. IHG engaged Dell SecureWorks to conduct a forensic investigation, and the report of such investigation was provided to the Company on April 29th, 2015.

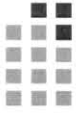
Dell SecureWorks' investigation determined that, based on available evidence, starting on October 13, 2014, the Company's payment processing environment was compromised by a malicious attachment sent in an email. The compromise was contained on February 13, 2015 when the Company ceased using the compromised workstation to process customer credit cards. Based on information provided by Dell SecureWorks, a total of 999 U.S. citizens were affected, of which only 1 was a resident of the state of New Hampshire.

The affected workstation was removed from the network and reimaged. The Company is updating its firewalls, security software and employee procedures in line with recommendations from Dell SecureWorks and Payment Card Industry (PCI) data security standards.

STATE OF NH
DEPT OF JUSTICE

2015 JUN 26 AM 11:51

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Attached please find a copy of the notice that will be provided to all affected individuals on or around June 23, 2015. The Company is providing the affected individuals with fraud assistance services, which will be provided by IDT911, a company specializing in identity theft education and resolution.

The delay by the Company in notifying the potentially affected individuals is the result of several factors outside of the Company's control. First, IHG withheld the forensic report of Dell SecureWorks until April 29th, 2015 and was uncooperative with the Company in obtaining details of the breach. Until the receipt of the report, the Company was only aware of a potential breach, and had no confirmation that its computer systems were actually affected. Second, the original data received by the Company from Dell Secureworks was incomplete, and the card numbers that were reported as compromised appeared to be potentially invalid. After further investigation, the Company received a revised set of data from Dell Secureworks on June 8th, 2015. Third, for each affected individual, in order to obtain a contact address, the Company was forced to conduct an individual search through the Company's customer records. This labor intensive process was completed by the hotel's staff in addition to their customary job duties.

The Company is relatively small, with few employees located at the affected location. Further, this is the Company's first experience in dealing with a data breach. Upon receiving notice of the potential breach, the Company promptly undertook reasonable efforts to determine its obligations and comply with applicable law.

For more information on the incident, please contact the undersigned by telephone at (205) 930-5166 or by email at mmurphy@sirote.com.

Sincerely,

R. Michael Murphy
FOR THE FIRM

cc: Robert Webster, Manchester Hotel Hospitality

Date

Name

Address

Address

Address

Dear <name>:

Please read this letter in its entirety.

We were recently made aware that our payment processing environment was compromised by malware. Based on our review of the situation and an examination of the impacted data, our forensics specialists have indicated that some personal data belonging to you was potentially exposed. This information includes names, addresses and payment card account numbers and expiration dates. The data accessed did not include any social security numbers. The period of potential exposure was October 2014 through February 2015, for your payment card ending ****1234.

While we have no evidence that any of your personal information has been misused in any manner, we are taking appropriate precautionary measures to ensure your financial security and help alleviate concerns you may have.

What is <our company> doing to address this situation?

We have taken the necessary steps to remove the malware and prevent it from being reinstalled. We have reported the incident to and are cooperating with law enforcement. We are providing you with access to a fraud specialist to help with answering your questions and providing guidance with this situation. These services will be provided by IDT911, a company that specializes in identity theft education and resolution. This proactive service will last for a full year from the date of this letter.

To take advantage of the **IDT911** services, or to obtain additional information about these services, **please call the IDT911 help line 1-800-405-6108** and supply the fraud specialist with the following unique code: <code>.

What can I do on my own to address this situation?

If you choose not to use these services, **we are strongly urging all customers** to notify their payment card institution of this incident to inform them that your account may be at an increased risk for fraud and so that they can flag your account. We also encourage you to monitor your account closely for any suspicious activity and to notify your financial institution immediately if you notice any unauthorized transactions.

If you choose to place a fraud alert on your own, you will need to contact one of the three major credit agencies directly at:

- **Experian (1-888-397-3742)**
- **Equifax (1-800-525-6285)**
- **Transunion (1-800-680-7289)**

Also, should you wish to obtain a credit report and monitor it on your own:

- **IMMEDIATELY** obtain free copies of your credit report and monitor them upon receipt for any suspicious activity. You can obtain your free copies by going to the following website: www.annualcreditreport.com or by calling them toll-free at 1-877-322-8228. (Hearing impaired consumers can access their TDD service at 1-877-730-4204).
- **Upon receipt of your credit report**, we recommend that you monitor it carefully for any suspicious activity.
- Be sure to promptly report any suspicious activity to IDT911

If you are very concerned about becoming a victim of fraud or identity theft, a security freeze might be right for you. Placing a freeze on your credit report will prevent lenders and others from accessing your credit report entirely, which will prevent them from extending credit. With a Security Freeze in place, you will be required to take special steps when you wish to apply for any type of credit. To initiate a Security Freeze, you should contact each of the credit reporting companies, Experian, Equifax and Transunion.

You can also obtain more information about identity theft and ways to protect yourself from the Federal Trade Commission (FTC). The FTC has an identity theft hotline: 877-438-4338; TTY: 1-866-653-4261. They also provide information on-line at www.ftc.gov/idtheft.

What if I want to speak with Manchester Hotel Hospitality, LLC regarding this incident?

If you have any questions, please call 865-539-0588 ext 304 from 9:00am-4:30pm Eastern Daylight Time, Monday through Friday.

We regret any inconvenience this may cause you.

Sincerely,

Robert L. Webster II
PRESIDENT, CHIEF OPERATING OFFICER
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