



STATE OF NH
DEPT OF JUSTICE
2016 JUL 14 AM 11:36

July 11, 2016

VIA US MAIL

Joseph Foster
NH Department of Justice
33 Capitol Street
Concord, NH 03301

Re: Notice to the Attorney General's Office, Pursuant to New Hampshire Statutes Section 359-C:20(I)(b).

Dear Mr. Foster:

This law firm represents North Palm Motors, LLC d/b/a Napleton's Car Rental Center ("Napleton's"). This letter constitutes notice of a security breach to the Attorney General's Office, pursuant to New Hampshire Statutes Section 359-C:20(I)(b).

On February 10, 2016, several of Napleton's former employees quit their jobs without prior notice. Several days after the employees quit, Napleton's discovered evidence of a data privacy event caused by its former employees and involving the personal information of Napleton's customers. It appears that the information that was taken from Napleton's without authorization includes information such as customer names, addresses, e-mail addresses, telephone numbers, credit card numbers with expiration dates and authorization codes, driver's license numbers, prior rental history with Napleton's, upcoming vehicle reservations made with Napleton's, pricing information, customer vehicle preferences, and customer vehicle drop-off/pick up preferences.

After our original notification, we have been able to identify a number of additional affected parties who have also had their customer information taken from Napleton's Car Rental Center without authorization, which has prompted us to send this additional notification.

On February 16, 2016, Napleton's filed a civil lawsuit against those former employees, their new employer and the principals of that new employer, in a lawsuit pending in the Circuit Court of the 15th Judicial Circuit, in and for Palm Beach County, Florida (Case No. 502016CA001515XXXXMB(AF)). On March 9, 2016, an order granting Napleton's motion for temporary injunction was entered in that lawsuit. That lawsuit is continuing. Napleton's has also referred this matter to local law enforcement for possible criminal prosecution.

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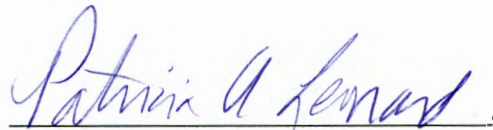
Through the initial course of discovery and the ongoing investigation, we have recently discovered a number of additional affected parties who have had their customer information taken from Napleton's Car Rental Center without authorization, and therefore are sending this notice. This customer information includes customer names, addresses, e-mail addresses, telephone numbers, date of birth, and driver's license numbers. The ongoing investigation suggests that 22,961 customers potentially have been affected by the breach. Of those customers, approximately 36 have New Hampshire Addresses.

In accordance with New Hampshire Statutes Section 359-C:20(I)(b), Napleton's is sending a notice to individuals of security breach, in the form attached hereto. As set forth in that notice, Napleton's has retained Lifelock, a leading identity theft monitoring firm, to offer potentially affected individuals its identity protection services for a period of one year, at no charge to the consumers. The potentially affected individuals may opt-in to such services using the information set forth in the attached notice.

Additional information about the breach may be obtained from me, as attorney for Napleton's: Patricia A. Leonard, Shutts & Bowen, LLP, 525 Okeechobee Blvd., Suite 1100, West Palm Beach, Florida 33401, (561) 671-5821, pleonard@shutts.com.

Sincerely,

SHUTTS & BOWEN LLP



Patricia A. Leonard
Partner

Attachment



July 6th, 2016

«First_Name» «Last_Name»

«Street_1»E

«City», «State» «Zip»

Re: *Information Regarding Security Breach Involving Personal Information of Customers of North Palm Motors, LLC d/b/a Napleton's Car Rental Center*

Dear «First_Name»:

We are writing to advise you about a security breach involving a database containing some of your personal information, as well as steps we are taking in response, and the resources we are making available to you.

Background

On February 10, 2016, various former employees of Napleton's Car Rental Center unexpectedly quit their jobs without notice. Based upon our preliminary investigation, it appears that the breach of security involved these and other former employees and may have begun during late June 2015 and may have continued to March 9, 2016.

On March 9, 2016, the Circuit Court in the 15th Judicial Circuit in and for Palm Beach County, Florida entered a temporary injunction at Napleton's Car Rental Center's request. This injunction requires these former employees, their new employer, and its principals, to return information that was taken without authorization. This lawsuit is ongoing. We have previously notified the customers that were initially identified as being affected.

Through the initial course of discovery and the ongoing investigation, we have recently discovered a number of additional affected parties who have had their customer information taken from Napleton's Car Rental Center without authorization, and therefore are sending this notice. This customer information includes customer names, addresses, e-mail addresses, telephone numbers, date of birth, and driver's license numbers.

Next Steps

Regardless of the intent of the former employees, under applicable state law, their actions resulted in this required notification. In addition, we have taken the following steps to insure your data remains secure:

1. We have referred this matter to local law enforcement for possible criminal prosecution and are providing them the necessary information to assist in their investigation.
2. Our investigation is continuing to determine if any other parties may be involved or have access to this information. Law enforcement may be running a parallel investigation as well.
3. We are continuing with our civil lawsuit against the former employees and their new employer and its principals. In that lawsuit, we are seeking a return of all of the information and property, including customer information, taken from Napleton's Car Rental Center, along with a permanent injunction



preventing the former employees or their new employer or its principals from using or disclosing the information to third parties.

4. As a precaution, we have also retained "Lifelock", a leading identity theft monitoring firm, to offer you, at no cost to you, its identity protection services for a period of one year to help you protect your personal identity. If you wish to take advantage of Lifelock's services, please e-mail us at Optin@napleton.com and state that you wish to be entered into Lifelock's program. If you choose to enroll, you may call Lifelock with any concerns regarding your personal data information.

What You Can Do

As always, we encourage you to regularly review your credit and other financial accounts and report any suspicious or unrecognized activity immediately. As recommended by federal regulatory agencies, you should be vigilant in the coming months and report any suspected incidents of fraud to the relevant financial institution.

We also encourage clients to be particularly vigilant against email schemes seeking to trick you into revealing personal information. Never confirm or provide personal information such as passwords or account information to anyone contacting you. Please know that Napleton's Car Rental Center will never send you any unsolicited correspondence asking you for your account number, password or other private information. Be cautious about opening attachments or links from emails, regardless of who appears to have sent them.

As our valued customer, we deeply regret the occurrence of this incident and apologize for any uncertainty or inconvenience this may have caused you. We know that incidents such as these are troublesome and frustrating. Napleton's Car Rental Center takes the security and privacy of your information very seriously and we are committed to continually strengthening and evolving our defenses based on these new and emerging threats. Should you have any questions or concerns, please contact Joanne Prescott at Napleton's at (561) 283-0582.

As a valued customer, we look forward to the opportunity to continue serving your rental car needs. Please feel free to visit our website at: www.napletonrental.com.

Very truly yours,

A handwritten signature in black ink, appearing to read "Bruce Etheridge", written in a cursive style.

Bruce Etheridge

Napleton's Car Rental Center