



MULLEN
COUGHLIN^{LLC}
ATTORNEYS AT LAW

426 W. Lancaster Avenue, Suite 200
Devon, PA 19333

February 22, 2024

VIA E-MAIL:

Office of the New Hampshire Attorney General
Consumer Protection & Antitrust Bureau
33 Capitol Street
Concord, NH 03301
E-mail: DOJ-CPB@doj.nh.gov

Re: Notice of Data Event

To Whom It May Concern:

We represent Paradise Point Resort & Spa (“Paradise Point”), a resort managed by Davidson Hotel Company LLC, located at 1404 Vacation Rd, San Diego, CA 92109, and are writing to notify your office of an incident that may affect the security of certain personal information relating to two (2) New Hampshire residents. This notice may be supplemented with new significant facts learned subsequent to its submission. By providing this notice, Paradise Point 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 or about June 1, 2023, Paradise Point became aware of suspicious activity related to a Paradise Point email account. Paradise Point immediately initiated an investigation into the nature and scope of the activity with the assistance of third-party computer forensic specialists. The investigation determined that an unauthorized individual accessed a number of employee email accounts between April 3, 2023, and May 19, 2023. Paradise Point then undertook a comprehensive review of the contents of the affected email accounts to determine the full universe of information present that could have been subject to unauthorized access. On December 27, 2023, Paradise Point completed this comprehensive review and determined that the accounts contained personal information. The information that could have been subject to unauthorized access includes

Notice to New Hampshire Residents

On February 22, 2024, Paradise Point provided written notice of this incident to two (2) 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, Paradise Point moved quickly to investigate and respond to the incident, assess the security of its systems, and identify potentially affected individuals. Paradise Point is also working to implement additional safeguards and training to its employees. Paradise Point is providing individuals whose personal information was potentially affected by this incident access to credit monitoring services for _____ through TransUnion at no cost to the individuals.

Additionally, Paradise Point 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. Paradise Point 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. Paradise Point is also notifying regulators as necessary.

Contact Information

Should you have any questions regarding this notification or other aspects of the data security event, please contact us at _____ .

Very truly yours,

Colin D. Scanlon of
MULLEN COUGHLIN LLC

CDS/mf1
Enclosure

EXHIBIT A

Davidson Hotel Company, LLC.
c/o Cyberscout
1 Keystone Ave, Unit 700
Cherry Hill, NJ 08003
DB-08499

Paradise  Point
San Diego's Island Resort

[REDACTED]
[REDACTED]
[REDACTED]

February 22, 2024

Notice of Security Incident

Dear [REDACTED]:

Paradise Point Resort & Spa ("Paradise Point") is writing to notify you of an incident that may affect the privacy of some of your information. This letter provides details of the incident and the resources available to you to help protect your information should you feel it is appropriate to do so.

What Happened? On June 1, 2023, Paradise Point became aware of suspicious activity involving a Paradise Point employee's email account. We immediately launched an investigation, which was conducted with the assistance of third-party forensic specialists, to determine what may have happened. Through this investigation, we determined that a number of employee email accounts were subject to unauthorized access between April 3, 2023 and May 19, 2023. In response, we conducted a comprehensive review of the data determined to be at risk to assess what personal information was accessible to the unauthorized actor and to whom it related. On December 27, 2023, Paradise Point completed the review and determined information related to you could be impacted.

What Information Was Involved? The following information related to you could be affected:

. While we have no evidence to indicate that your information has been misused, we are notifying you out of an abundance of caution.

What We Are Doing. Paradise Point has strict security measures in place to protect the information in our care. Upon learning of this incident, we immediately took steps to secure the impacted accounts and implemented additional controls to mitigate the risk, or likelihood, of future incidents.

We also arranged to provide you with access to complimentary credit monitoring and identity protection services for 12 months through TransUnion as an added precaution. The instructions regarding how to enroll in these services are contained in the enclosed "Steps You Can Take to Protect Your Information". Although these services are being offered to you free of cost, you will need to enroll yourself in the services.

What You Can Do. We encourage you to remain vigilant against incidents of identity theft and fraud by reviewing your account statements and monitoring your free credit reports for suspicious activity, and to detect errors, over the next .

For More Information. We understand you may have questions about the incident that are not addressed in this letter. If you have questions, representatives are available for ninety (90) days from the date of this letter between the hours of 8:00 a.m. to 8:00 p.m. Eastern time, Monday through Friday, excluding holidays. Please call the help line at 1-800-405-6108. You may also write to Paradise Point at 1404 Vacation Rd, San Diego, CA 92109.

Sincerely,

Paradise Point Resort

STEPS YOU CAN TAKE TO PROTECT YOUR INFORMATION

Enroll in Credit Monitoring and Identity Protection

How do I enroll for the free services?

To enroll in Credit Monitoring services at no charge, please log on to <https://secure.identityforce.com/benefit/paradisepoint> and follow the instructions provided. When prompted please provide the following unique code to receive services: [REDACTED]

In order for you to receive the monitoring services described above, you must enroll within 90 days from the date of this letter. The enrollment requires an internet connection and e-mail account and may not be available to minors under the age of 18 years of age. Please note that when signing up for monitoring services, you may be asked to verify personal information for your own protection to confirm your identity.

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 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 one-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 may need to provide the following information, depending on whether the request is made online, by phone, or by mail:

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, 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 credit freeze, please contact the three major credit reporting bureaus listed below:

Equifax	Experian	TransUnion
https://www.equifax.com/personal/credit-report-services/	https://www.experian.com/help/	https://www.transunion.com/credit-help
1-888-298-0045	1-888-397-3742	1-800-916-8800
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; 1-877-ID-THEFT (1-877-438-4338); and TTY: 1-866-653-4261. The Federal Trade Commission 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.

For District of Columbia residents, the District of Columbia Attorney General may be contacted at: 400 6th Street, NW, Washington, D.C. 20001; 202-727-3400; and oag.dc.gov.

For Maryland residents, the Maryland Attorney General may be contacted at: 200 St. Paul Place, 16th Floor, Baltimore, MD 21202; 1-410-576-6300 or 1-888-743-0023; and <https://www.marylandattorneygeneral.gov/>.

For New Mexico residents, consumers have rights pursuant to the Fair Credit Reporting Act, such as the right to be told if information in their credit file has been used against them, the right to know what is in their credit file, the right to ask for their 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 consumers' files is limited; consumers must give consent for credit reports to be provided to employers; consumers may limit "prescreened" offers of credit and insurance based on information in their credit report; and consumers may seek damages from violators. Consumers 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 consumers to review their rights pursuant to the Fair Credit Reporting Act by visiting 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>.

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.

For Rhode Island residents, the Rhode Island Attorney General may be reached at: 150 South Main Street, Providence, RI 02903; www.riag.ri.gov; and 1-401-274-4400. Under Rhode Island law, individuals have the right to obtain any police report filed in regard to this event. There are approximately 0 Rhode Island residents that may be impacted by this event.