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RECEIVED

JUL 31 2017

CONSUMER PROTECTION

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1275 Drummers Lane, Suite 302
Wayne, PA 19087

July 24, 2017

VIA U.S. 1st CLASS MAIL

Attorney General Gordon J. MacDonald
Office of the New Hampshire Attorney General
Attn: Security Breach Notification
33 Capitol Street
Concord, NH 03301

Re: Notice of Data Security Event

Dear Attorney General MacDonald:

We represent Hartz Hotel Services, Inc. ("Hartz"), 400 Plaza Drive, Secaucus, NJ 07094, and write to notify your office of an incident occurring at Sabre Holdings that may affect the security of personal information relating to six (6) New Hampshire residents. The investigation into this event is ongoing, and this notice will be supplemented with any new significant facts learned subsequent to its submission. By providing this notice, Hartz does not waive any rights or defenses regarding the applicability of New Hampshire law or personal jurisdiction.

Nature of the Data Event

Hartz operates The Roxy Hotel and The Soho Grande Hotel, both located in New York City. Sabre Holdings ("Sabre") provides reservation management services to Hartz for these hotels. The Sabre Hospitality Solutions SynXis Central Reservations system (CRS) facilitates the booking of hotel reservations made by consumers through hotels, online travel agencies, and similar booking services. Sabre notified Hartz on or about June 6, 2017 that an unauthorized party gained access to account credentials that permitted unauthorized access to unencrypted payment card information, as well as certain reservation information, related to Hartz hotel guests for a subset of hotel reservations processed through the CRS. Sabre provided additional information on dates subsequent to the initial notice that Hartz utilized to determine its legal obligations. The investigation determined that the unauthorized party first obtained access to payment card and other reservation information on August 10, 2016. The last access to payment card information was on March 9, 2017.

According to Sabre, the unauthorized party was able to access payment card information for hotel reservations. This potentially included: (1) name; (2) card number; (3) card expiration date; and,

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(4) card security code. The unauthorized party was also able, in some cases, to access certain information, such as guest name, email, phone number, address, and other information. Information such as Social Security, passport, or driver's license number was not impacted by this incident.

Notice to New Hampshire Residents

On July 24, 2017, Hartz will publish notice of this incident on the website homepages of The Roxy Hotel and The Soho Grande Hotel. This notice will be provided in substantially the same form as the notice attached hereto as *Exhibit A*. In the coming weeks, Hartz will issue a nationwide press release regarding this incident. Hartz will also begin mailing notice letters to the approximately six (6) known, potentially impacted New Hampshire residents for whom Hartz has address information. Hartz will be sending emails on this same date to those individuals for whom address information is unknown, but for whom email addresses are available. This notice will be provided in the substantially the same form as the letter attached hereto as *Exhibit B*.

Other Steps Taken and to Be Taken

Since being informed of this incident, Hartz has been working diligently to determine the full nature and scope of this event and to identify those customers who may be impacted. Hartz has also verified that Sabre worked with third party forensic investigators in its investigation into this incident and has provided notice of this event to law enforcement and the payment card brands about this incident.

Hartz is providing potentially impacted individuals with guidance on how to better protect against identity theft and fraud, including 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. Hartz has provided notice of this incident to the credit reporting agencies, as well as to other state officials as required by law.

Attorney General Gordon J. MacDonald
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Contact Information

Should you have any questions regarding this notification or other aspects of the data security event, please contact us at 267-930-4776.

Very truly yours,

A handwritten signature in black ink, appearing to read "E. Finn". The signature is stylized with a large initial "E" and a cursive "Finn".

Edward J. Finn of
MULLEN COUGHLIN LLC

EJF:ncf
Enclosures

EXHIBIT A

July 2017

Sabre Data Security Incident

To Our Valued Guests:

Sabre Holdings (“Sabre”) provides reservation management services for The Roxy Hotel. Sabre notified us on or about June 6, 2017 that an unauthorized party gained unauthorized access to unencrypted payment card information, as well as certain reservation information, for certain hotel reservations processed through their system between August 10, 2016 and March 9, 2017. While our hotel systems were not breached, certain hotel guest information may have been exposed on Sabre’s systems during this incident.

Upon learning of this incident, we immediately launched an investigation to determine what happened and which hotel guests may be affected. We are working to provide potentially affected hotel guests with accurate and complete information regarding the nature and scope of this event. ***Please note, however, that to date we are unaware of any of our hotel guests who have been impacted by fraudulent credit card charges resulting from the Sabre data security incident.***

We take the privacy and protection of our hotel guests very seriously. If you made a reservation at The Roxy Hotel between August 10, 2016 and March 9, 2017 we strongly encourage you to review the information provided by Sabre about this incident and to call the Sabre Hotline if you have any questions.

Sabre established a hotline and a website specifically to assist any potentially affected hotel guests in responding to this data security incident. The Hotline and the Sabre website are best equipped to answer any questions you may have regarding this incident.

Hotline: 1-888-721-6305 (toll-free)

Website: www.sabreconsumernotice.com.

July 2017

Sabre Data Security Incident

To Our Valued Guests:

Sabre Holdings (“Sabre”) provides reservation management services for The Soho Grand Hotel. Sabre notified us on or about June 6, 2017 that an unauthorized party gained unauthorized access to unencrypted payment card information, as well as certain reservation information, for certain hotel reservations processed through their system between August 10, 2016 and March 9, 2017. While our hotel systems were not breached, certain hotel guest information may have been exposed on Sabre’s systems during this incident.

Upon learning of this incident, we immediately launched an investigation to determine what happened and which hotel guests may be affected. We are working to provide potentially affected hotel guests with accurate and complete information regarding the nature and scope of this event. ***Please note, however, that to date we are unaware of any of our hotel guests who have been impacted by fraudulent credit card charges resulting from the Sabre data security incident.***

We take the privacy and protection of our hotel guests very seriously. If you made a reservation at The Soho Grand Hotel between August 10, 2016 and March 9, 2017 we strongly encourage you to review the information provided by Sabre about this incident and to call the Sabre Hotline if you have any questions.

Sabre established a hotline and a website specifically to assist any potentially affected hotel guests in responding to this data security incident. The Hotline and the Sabre website are best equipped to answer any questions you may have regarding this incident.

Hotline: 1-888-721-6305 (toll-free)

Website: www.sabreconsumernotice.com.

EXHIBIT B

GRANDLIFE

HOTELS

[Name]

[Address]

[City, State, Zip]

Date

Re: Notice of Data Breach

Dear [Name]:

We write to make you aware of an incident that occurred at a 3rd party vendor – Sabre Holdings – involving unauthorized access to information associated with your hotel reservation(s) made at The Roxy Hotel or The Soho Grand Hotel between August 10, 2016 and March 9, 2017. The privacy and protection of our customers' information is a matter we take very seriously, and we encourage you to review the information provided in this letter for steps that you may take to protect yourself against potential misuse of your information, should you feel it appropriate to do so.

What Happened? Hartz Hotel Services, Inc. ("Hartz") operates The Roxy Hotel and The Soho Grand Hotel both located in New York City. Sabre Holdings ("Sabre") provides reservation management services to Hartz for these hotels. The Sabre Hospitality Solutions SynXis Central Reservations system (CRS) facilitates the booking of hotel reservations made by consumers through hotels, online travel agencies, and similar booking services. Sabre notified us on or about June 6, 2017 that an unauthorized party gained access to account credentials that permitted unauthorized access to unencrypted payment card information, as well as certain reservation information, for a subset of hotel reservations processed through the CRS. The investigation determined that the unauthorized party first obtained access to payment card and other reservation information on August 10, 2016. The last access to payment card information was on March 9, 2017.

What Information Was Involved? According to Sabre, the unauthorized party was able to access payment card information for your hotel reservation(s). This potentially included your: (1) name; (2) card number; (3) card expiration date; and, (4) your card security code. The unauthorized party was also able, in some cases, to access certain information such as guest name, email, phone number, address, and other information. Some of this information may not have been stored in Sabre's systems at the time of the incident and may not be affected, but Sabre is unable to confirm whether your information was included and, out of an abundance of caution, we are providing notice to you. Information such as Social Security, passport, or driver's license number was ***not*** impacted by this incident.

What We Are Doing. Since being informed of this incident, Hartz has been working diligently to determine the full nature and scope of this event and to identify those customers who may be impacted. We have also verified that Sabre worked with third party forensic investigators in its investigation into this incident and has provided notice of this event to law enforcement and the payment card brands about this incident. The confidentiality, privacy, and security of information in our systems is one of our highest priorities. We have safeguards in place to protect the security of data in our systems and will be taking additional steps going forward, including working with our third party vendors, to ensure the protection of data in our care.

What You Can Do. Please review the enclosed "Steps You Can Take to Protect Your Information" for additional steps you can take to better protect against the potential misuse of your personal information.

For More Information. We understand that you may have questions about this incident that are not addressed in this letter. If you have additional questions, please contact Sabre's dedicated assistance line at 1-888-721-6305 (toll-free) (Monday through Friday, 9:00am – 9:00pm EST) or visit the Sabre website established specifically to help our customers in responding to this incident at www.sabreconsumernotice.com. We sincerely regret any inconvenience or concern this incident has caused you.

Sincerely,

A handwritten signature in black ink, appearing to read "Ellis K. Yee". The signature is fluid and cursive, with a long horizontal stroke at the end.

Ellis K. Yee
Vice President Administration
Hartz Hotel Services, Inc.

STEPS YOU CAN TAKE TO PROTECT YOUR INFORMATION

Monitor Your Accounts.

Credit Reports. 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. Under U.S. law, you are entitled to one free credit report annually from each of the three major credit reporting bureaus. To order your free credit report, visit www.annualcreditreport.com or call, toll-free, 1-877-322-8228. You may also contact the three major credit bureaus directly to request a free copy of your credit report.

Fraud Alerts. At no charge, you can also have these credit bureaus place a "fraud alert" on your file that alerts creditors to take additional steps to verify your identity prior to granting credit in your name. Note, however, that because it tells creditors to follow certain procedures to protect you, it may also delay your ability to obtain credit while the agency verifies your identity. As soon as one credit bureau confirms your fraud alert, the others are notified to place fraud alerts on your file. Should you wish to place a fraud alert, or should you have any questions regarding your credit report, please contact any one of the agencies listed below:

Equifax
P.O. Box 105069
Atlanta, GA 30348
800-525-6285
www.equifax.com

Experian
P.O. Box 2002
Allen, TX 75013
888-397-3742
www.experian.com

TransUnion
P.O. Box 2000
Chester, PA 19106
800-680-7289
www.transunion.com

Security Freeze. You may also place a security freeze on your credit reports. A security freeze prohibits a credit bureau from releasing any information from a consumer's credit report without the consumer's written authorization. However, please be advised that placing a security freeze on your credit report may delay, interfere with, or prevent the timely approval of any requests you make for new loans, credit mortgages, employment, housing, or other services. If you have been a victim of identity theft and you provide the credit bureau with a valid police report, it cannot charge you to place, lift, or remove a security freeze. In all other cases, a credit bureau may charge you a fee to place, temporarily lift, or permanently remove a security freeze. Fees vary based on where you live, but commonly range from \$3 to \$15. You will need to place a security freeze separately with each of the three major credit bureaus listed above if you wish to place a freeze on all of your credit files. In order to request a security freeze, you will need to supply your full name, address, date of birth, Social Security number, current address, all addresses for up to five previous years, email address, a copy of your state identification card or driver's license, and a copy of a utility bill, bank or insurance statement, or other statement proving residence. To find out more on how to place a security freeze, you can use the following contact information:

Equifax Security Freeze
P.O. Box 105788
Atlanta, GA 30348
1-800-685-1111
www.freeze.equifax.com

Experian Security Freeze
P.O. Box 9554
Allen, TX 75013
1-888-397-3742
www.experian.com/freeze/

TransUnion
P.O. Box 2000
Chester, PA 19016
1-888-909-8872
[www.transunion.com/
credit-freeze/place-credit-freeze](http://www.transunion.com/credit-freeze/place-credit-freeze)

Additional Information. You can further educate yourself regarding identity theft, security freezes, fraud alerts, and the steps you can take to protect yourself against identity theft and fraud by contacting the Federal Trade Commission or your state Attorney General. The Federal Trade Commission can 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. Instances of known or suspected identity theft should be reported to law

enforcement, the Federal Trade Commission, and your state Attorney General. This notice has not been delayed as the result of a law enforcement investigation.

For Maryland residents, the Maryland Attorney General can be reached at: 200 St. Paul Place, 16th Floor, Baltimore, MD 21202; 1-888-743-0023; and www.oag.state.md.us. Hartz Hotel Services, Inc. is located at 667 Madison Avenue 24th floor, New York, New York 10065 and can be reached at 212-965-3030.

For North Carolina residents, the North Carolina Attorney General can be contacted by mail at 9001 Mail Service Center, Raleigh, NC 27699-9001; toll-free at 1-877-566-7226; by phone at 1-919-716-6400; and online at www.ncdoj.gov.

For Rhode Island residents, the Rhode Island Attorney General can be contacted by mail at 150 South Main Street, Providence, RI 02903; by phone at (401) 274-4400; and online at www.riag.ri.gov. A total of **NUMBER** Rhode Island residents may be impacted by this incident. You have the right to file and obtain a police report if you ever experience identity theft or fraud. Please note that, in order to file a crime report or incident report with law enforcement for identity theft, you will likely need to provide some kind of proof that you have been a victim.