

Norton Rose Fulbright US LLP
Tabor Center
1200 17th Street, Suite 1000
Denver, Colorado 80202-5835
United States

Direct line +1 303 801 2758
kris.kleiner@nortonrosefulbright.com

Tel +1 303 801 2700
Fax +1 303 801 2777
nortonrosefulbright.com

RECEIVED

AUG 09 2017

CONCORD PROTECTION

July 28, 2017

**By Certified Mail
Return Receipt Requested**

**Office of the New Hampshire Attorney General
Consumer Protection & Antitrust Bureau
33 Capitol Street
Concord, NH 03301**

Re: Legal Notice of Information Security Incident

Dear Sirs or Madams:

I write on behalf of my client, Westgate Resorts Ltd (“Westgate”), to inform you of a potential security incident involving the personal information of certain Westgate guests from a vendor’s computer system – Sabre (“Sabre”) – including approximately 43 New Hampshire residents. Westgate is notifying these individuals and outlining some steps they may take to help protect themselves.

Westgate was recently notified of a potential security incident by Sabre/SynXis, a company that operates a widely-used Internet-accessible reservation platform for the hotel industry. According to the information we have received from this vendor in a letter dated June 6, 2017, an unauthorized individual was able to gain access to Sabre’s systems and view certain reservation information between August 10, 2016, and March 9, 2017. The information that was accessed may have included certain payment card information belonging to certain individuals who provided card information when making reservations at some Westgate properties.

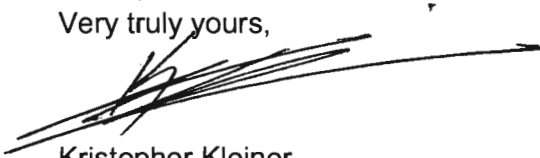
Westgate takes the privacy of personal information seriously, and was deeply disappointed to learn that this vendor’s incident could affect Westgate guests. Upon learning of the incident, Westgate promptly initiated an investigation into the incident and has communicated extensively with the vendor to learn more about what occurred. The vendor informed us that it engaged an outside forensic investigation firm to assist them in investigating and remediating the situation,

and has enhanced the security around its access credentials and the monitoring of system activity to further detect and prevent unauthorized access. In addition, the vendor has advised us that they notified law enforcement and the payment card brands of this incident.

Affected individuals are currently being notified via written letter. A form copy of the notice being sent to the affected New Hampshire residents is included for your reference.

If you have any questions or need further information regarding this incident, please contact me at (303) 801-2758 or kris.kleiner@nortonrosefulbright.com.

Very truly yours,

A handwritten signature in black ink, appearing to read 'Kristopher Kleiner', with a long horizontal flourish extending to the right.

Kristopher Kleiner

KCK
Enclosure



WESTGATE RESORTS
Return Mail Processing Center
PO Box 6336
Portland, OR 97228-6336

<<Mail ID>>
<<Name>>
<<Address1>>
<<Address2>>
<<City>>, <<ST>><<ZIP>>

<<Date>>

NOTICE OF DATA BREACH

Dear Valued Customer,

We are writing to you because of an incident involving unauthorized access to customer information at Sabre Corporation that may be associated with your hotel reservation(s). The privacy and protection of our customers' information is a matter we take very seriously, and we recommend that you closely review the information provided in this letter for some steps that you may take to protect yourself against potential misuse of your information.

What Happened?

We are writing on behalf of an incident of unauthorized access to system information at Sabre Corporation, a partner of Westgate Resorts who processes some hotel booking transactions on our behalf. Please note that no Westgate computer or network systems were affected by this incident. Following a forensic investigation, Sabre notified us on or about June 19th that an unauthorized party gained access to their systems and was able to view some reservation information for a subset of hotel reservations that Sabre processed on behalf of Westgate.

The investigation determined that the unauthorized party was able to access Sabre's system between August 10th 2016 and March 9, 2017.

What Information Was Involved?

The unauthorized party was able to access payment card information for your hotel reservation(s), including cardholder name; full card number ending in <<Last 4 CC #>>; card expiration date; and, potentially, your card verification code. The unauthorized party was also able, in some cases, to access other reservation information such as guest name, email, phone number, address, and other information. Sensitive information such as Social Security, passport, or driver's license number was not affected by this incident.

What We Are Doing

Sabre engaged a leading cybersecurity firm to support its investigation. Sabre also notified law enforcement and the payment card brands about this incident.

What You Can Do

You should remain vigilant for incidents of fraud and identity theft by regularly reviewing your account statements and monitoring free credit reports for any unauthorized activity. If you discover any suspicious or unusual activity on your accounts, be sure to report it immediately to your financial institutions, as major credit card companies have rules that restrict them from requiring you to pay for fraudulent charges that are timely reported.

In addition, you may contact the Federal Trade Commission (FTC) or law enforcement, such as your state attorney general, to report incidents of identity theft or to learn about steps you can take to protect yourself from identity theft. You can contact the FTC at:

Federal Trade Commission
600 Pennsylvania Avenue, NW
Washington, DC 20580
(877) IDTHEFT (438-4338)
<https://www.identitytheft.gov/>

If you find that your information has been misused, the FTC encourages you to file a complaint with the FTC and to take these additional steps: (1) close the accounts that you have confirmed or believe have been tampered with or opened fraudulently; and (2) file and keep a copy of a local police report as evidence of the identity theft crime.

Obtain Your Credit Report

You should also monitor your credit reports. You may periodically obtain credit reports from each nationwide credit reporting agency. If you discover inaccurate information or a fraudulent transaction on your credit report, you have the right to request that the credit reporting agency delete that information from your credit report file.

In addition, under federal law, you are entitled to one free copy of your credit report every 12 months from each of the three nationwide credit reporting agencies. You may obtain a free copy of your credit report by going to www.AnnualCreditReport.com or by calling (877) 322-8228. You also may complete the Annual Credit Report Request Form available from the FTC at <https://www.consumer.ftc.gov/articles/pdf-0093-annual-report-request-form.pdf>, and mail it to Annual Credit Report Request Service, P.O. Box 105281, Atlanta, GA 30348-5281. You may also contact any of the three major credit reporting agencies to request a copy of your credit report.

Place a Fraud Alert or Security Freeze on Your Credit Report File

In addition, you may obtain information from the FTC and the credit reporting agencies about fraud alerts and security freezes. A fraud alert can make it more difficult for someone to get credit in your name because it tells creditors to follow certain procedures to protect you, but it also may delay your ability to obtain credit. If you suspect you may be a victim of identity theft, you may place a fraud alert in your file by calling just one of the three nationwide credit reporting agencies listed below. As soon as that agency processes your fraud alert, it will notify the other two agencies, which then must also place fraud alerts in your file. An initial fraud alert will last 90 days. An extended alert stays on your file for seven years. To place either of these alerts, a consumer reporting agency will require you to provide appropriate proof of your identity, which may include your Social Security number. If you ask for an extended alert, you will have to provide an identity theft report.

Also, you can contact the nationwide credit reporting agencies regarding if and how you may place a security freeze on your credit report. A security freeze prohibits a credit reporting agency from releasing information from your credit report without your prior written authorization, which makes it more difficult for unauthorized parties to open new accounts in your name. However, please be aware 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. The credit reporting agencies have 3 business days after receiving a request to place a security freeze on a consumer's credit report. You may be charged to place or lift a security freeze. Unlike a fraud alert, you must separately place a credit freeze on your credit file at each credit reporting company.

You may contact the nationwide credit reporting agencies at:

Equifax
P.O. Box 105788
Atlanta, GA 30348
(800) 525-6285
<http://www.equifax.com/>

Experian
P.O. Box 9554
Allen, TX 75013
(888) 397-3742
<http://www.experian.com/>

TransUnion
P.O. Box 2000
Chester, PA 19016
(800) 680-7289
<http://www.transunion.com/>

Please see the following page for certain state-specific information.

For More Information

We apologize for any inconvenience caused by this incident. If you have any questions regarding this incident or if you desire further information or assistance, please do not hesitate to contact us at 888-721-6305, Monday through Friday, 24 hours a day, or Local (Intl) at +1-503-520-4448.

Sincerely,

Jared Saft
Senior Vice President
Westgate Marketing LLC

IF YOU ARE AN IOWA RESIDENT:

You may contact law enforcement or the Iowa Attorney General's Office to report suspected incidents of identity theft. This office can be reached at:

Office of the Attorney General of Iowa
Hoover State Office Building
1305 E. Walnut Street
Des Moines, IA 50319
(515) 281-5164
<http://www.iowaattorneygeneral.gov/>

IF YOU ARE A MARYLAND RESIDENT:

You may obtain information about avoiding identity theft from the Maryland Attorney General's Office. This office can be reached at:

Office of the Attorney General
Consumer Protection Division
200 St. Paul Place
Baltimore, MD 21202
(888) 743-0023
<http://www.marylandattorneygeneral.gov/>

IF YOU ARE A NEW MEXICO RESIDENT:

You have rights under the federal Fair Credit Reporting Act (FCRA). These include, among others, the right to know what is in your file; to dispute incomplete or inaccurate information; and to have consumer reporting agencies correct or delete inaccurate, incomplete, or unverifiable information. For more information about the FCRA, please visit <http://www.ftc.gov/> or <https://www.consumer.ftc.gov/articles/pdf-0096-fair-credit-reporting-act.pdf>.

In Addition, New Mexico Consumers Have the Right to Obtain a Security Freeze or Submit a Declaration of Removal

You may obtain a security freeze on your credit report to protect your privacy and ensure that credit is not granted in your name without your knowledge. You may submit a declaration of removal to remove information placed in your credit report as a result of being a victim of identity theft. You have a right to place a security freeze on your credit report or submit a declaration of removal pursuant to the Fair Credit Reporting and Identity Security Act.

The security freeze will prohibit a consumer reporting agency from releasing any information in your credit report without your express authorization or approval.

The security freeze is designed to prevent credit, loans, and services from being approved in your name without your consent. When you place a security freeze on your credit report, you will be provided with a personal identification number, password, or similar device to use if you choose to remove the freeze on your credit report or to temporarily authorize the release of your credit report to a specific party or parties or for a specific period of time after the freeze is in place. To remove the freeze or to provide authorization for the temporary release of your credit report, you must contact the consumer reporting agency and provide all of the following:

1. the unique personal identification number, password, or similar device provided by the consumer reporting agency;
2. proper identification to verify your identity;
3. information regarding the third party or parties who are to receive the credit report or the period of time for which the credit report may be released to users of the credit report; and
4. payment of a fee, if applicable.

A consumer reporting agency that receives a request from a consumer to lift temporarily a freeze on a credit report shall comply with the request no later than three business days after receiving the request. As of September 1, 2008, a consumer reporting agency shall comply with the request within fifteen minutes of receiving the request by a secure electronic method or by telephone.

A security freeze does not apply in all circumstances, such as where you have an existing account relationship and a copy of your credit report is requested by your existing creditor or its agents for certain types of account review, collection, fraud control, or similar activities; for use in setting or adjusting an insurance rate or claim or insurance underwriting; for certain governmental purposes; and for purposes of prescreening as defined in the federal Fair Credit Reporting Act.

If you are actively seeking a new credit, loan, utility, telephone, or insurance account, you should understand that the procedures involved in lifting a security freeze may slow your own applications for credit. You should plan ahead and lift a freeze, either completely if you are shopping around or specifically for a certain creditor, with enough advance notice before you apply for new credit for the lifting to take effect. You should contact a consumer reporting agency and request it to lift the freeze at least three business days before applying. As of September 1, 2008, if you contact a consumer reporting agency by a secure electronic method or by telephone, the consumer reporting agency should lift the freeze within fifteen minutes. You have a right to bring a civil action against a consumer reporting agency that violates your rights under the Fair Credit Reporting and Identity Security Act.

To place a security freeze on your credit report, you must send a request to each of the three major consumer reporting agencies: Equifax, Experian, and TransUnion. These agencies using the contact information provided in the enclosed letter.

IF YOU ARE A NORTH CAROLINA RESIDENT:

You may obtain information about preventing identity theft from the North Carolina Attorney General's Office. This office can be reached at:

North Carolina Department of Justice
Attorney General's Office
9001 Mail Service Center
Raleigh, NC 27699-9001
(877) 566-7226
<http://www.ncdoj.gov>

IF YOU ARE AN OREGON RESIDENT:

You may obtain information about preventing identity theft from the Oregon Attorney General's Office. This office can be reached at:

Oregon Department of Justice
1162 Court Street NE
10 Salem, OR 97301-4096
(503) 378-4400
<http://www.doj.state.or.us/>



Dear Westgate Resorts Customers:

Sabre is a leading technology provider to the global travel industry, and counts Westgate Resorts as one of our most important customers of our Sabre Hospitality Solutions (SHS) division.

SHS had a cybersecurity incident that affects you. We wanted to offer an explanation.

SHS provides reservations technology to a number of hotels. SHS had an incident in which an unauthorized party was able to obtain the credentials to an account within the SHS central reservations system and then view a subset of the hotel reservations. This was *not* an internal technology platform at a hotel that you stayed at, and the unauthorized use was contained to one system managed by SHS. As part of this incident, payment card information that may have been transmitted as part of the reservation booking process may have been viewed by this unauthorized user.

Sabre engaged premier cybersecurity experts to support our investigation and took successful measures to ensure this unauthorized access was stopped and is no longer possible. The investigation did not uncover evidence that the unauthorized party removed any information from the system, but it is a possibility. We have also notified law enforcement and the payment card brands.

The unauthorized party was able to access information for certain hotel reservations, including cardholder name; payment card number; card expiration date; and, for a subset of reservations, card security code (if it was provided). Social Security, passport, driver's license or other government identification numbers were *not* accessed.

On behalf of the Sabre team, we wish to express our sincere regret for this incident and assure you that we have taken measures to further strengthen our already-robust cybersecurity program. As a leading technology provider to the travel industry, Sabre is committed to a global, holistic security program focused on protecting its systems, their customers and consumers. As cyber threats have escalated, so too has Sabre's investment in state of the art security technology and highly qualified personnel to reassure its travel industry customers and the traveling public that Sabre addresses security with the utmost care and expertise.

Yours truly,
SABRE HOSPITALITY SOLUTIONS