



MULLEN
COUGHLIN^{LLC}
ATTORNEYS AT LAW

RECEIVED

MAY 26 2020

CONSUMER PROTECTION

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1275 Drummers Lane, Suite 302
Wayne, PA 19087

May 22, 2020

VIA U.S. MAIL

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

Re: Notice of Data Event

Dear Sir or Madam:

Our office represents Sceptre Hospitality Resources (“SHR”), located at 1900 W Loop South, Houston, TX 77027. We write to notify your office of an incident that may affect the security of some personal information relating to eleven (11) New Hampshire residents. SHR previously reported this incident on March 13, 2020, and is now reporting on behalf of different data owners. This notice may be supplemented with any new significant facts learned subsequent to its submission. By providing this notice, SHR 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 January 28, 2020, SHR discovered suspicious activity related to its central reservation system (“CRS”). SHR immediately launched an investigation, with the aid of forensic experts, to determine the nature and scope of this incident. SHR determined that, between January 22, 2020 and January 29, 2020, there was unauthorized access to guest reservation data maintained on its CRS. SHR undertook a lengthy and labor-intensive process to identify the personal information that may have been accessed. SHR provided notice to the hotels that own the data at issue and offered to provide notice on their behalf to the impacted individuals and the appropriate state regulators. The type of personal information related to the affected New Hampshire residents include the following: name and credit card information.

Notice to New Hampshire Residents

On or about May 22, 2020, after receiving permission from the hotels who own the data at issue, SHR provided written notice of this incident to individuals affected by this incident, which includes eleven (11) New Hampshire residents. A sample of the letter is attached hereto and labeled as *Exhibit A*.

Other Steps Taken and To Be Taken

Upon discovering the event, SHR moved quickly to investigate and respond to the incident, assess the security of SHR systems, and notify potentially affected individuals. SHR is also working to implement additional safeguards and training to its employees.

SHR 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. SHR 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.

Contact Information

Should you have any questions regarding this notification or other aspects of the data security event, please contact us at 267-930-4777.

Very truly yours,

A handwritten signature in blue ink, appearing to read "Brian Fox".

Brian Fox of
MULLEN COUGHLIN LLC

Enclosure

EXHIBIT A



<<Date>> (Format: Month Day, Year)

<<first_name>> <<middle_name>> <<last_name>> <<suffix>>
<<address_1>>
<<address_2>>
<<city>>, <<state_province>> <<postal_code>>
<<country >>

Re: Notice of Data Security Event

Dear <<first_name>> <<middle_name>> <<last_name>> <<suffix>>,

Sceptre Hospitality Resources ("SHR") provides Central Reservation System ("CRS") services to <<b2b_text_1 (Entity Name)>>. SHR is writing to inform you of a recent event that may impact the privacy of some of your personal information. We wanted to provide you with information about the event, our response, and steps you may take to better protect against potential misuse of your information, should you feel it necessary.

What Happened? On January 28, 2020, SHR discovered suspicious activity related to our CRS. We immediately launched an investigation, with the aid of forensic experts, to determine the nature and scope of this incident. SHR determined that there was unauthorized user access to our CRS between January 22, 2020 to January 29, 2020. SHR undertook a lengthy and labor-intensive process to identify the personal information that may have been accessed. SHR is providing notice to you because our investigation determined that the unauthorized individual accessed your information.

What Information Was Affected? Our investigation confirmed that the following information related to you was affected by this incident: <<b2b_text_2 (Affected Information)>>.

What We Are Doing. SHR takes the confidentiality, privacy, and security of information in our care seriously. We have security measures in place to safeguard the data on our systems and we continue to assess and update security measures and training to our employees and clients to safeguard the privacy and security of information in our care. We are also notifying regulatory authorities, as required by law.

What You Can Do. SHR encourages you to remain vigilant against incidents of identity theft and fraud, to review your account statements and to monitor your credit reports for suspicious activity. Please review the enclosed *Steps You Can Take to Help Protect Your Information*, which contains instructions on how to better protect against potential misuse of your information.

For More Information. We understand that you may have questions about this incident not addressed in this letter. If you have additional questions, please call our dedicated assistance line at 1-800-832-9167, which is available Monday through Friday, 8:00 am to 5:30 pm Central Time, excluding U.S. holidays.

We sincerely regret any inconvenience or concern this incident may cause you.

Sincerely,

Adam Roark
COO

Steps You Can Take to Help Protect Your Information

Monitor Your Accounts. To protect against the possibility of identity theft or other financial loss, we encourage you to remain vigilant, to review your account statements, and to monitor your credit reports for suspicious activity.

Credit Reports. 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.

Security Freeze. You have the right to place a "security freeze" on your credit report, which will prohibit a consumer reporting agency from releasing information in your credit report without your express authorization. The security 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 security 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 security freeze on your credit report. Should you wish to place a security freeze, please contact the major consumer reporting agencies listed below:

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|---|---|--|
| Experian P.O. Box 9554 Allen, TX 75013 1-888-397-3742 www.experian.com/freeze/center.html | TransUnion P.O. Box 2000 Chester, PA 19016 1-888-909-8872 www.transunion.com/credit-freeze | Equifax P.O. Box 105788 Atlanta, GA 30348 1-800-685-1111 www.equifax.com/personal/credit-report-services |
|---|---|--|

To remove the security freeze, you must send a written request to each of the three credit bureaus by mail and include proper identification (name, address, and Social Security number) and the PIN number or password provided to you when you placed the security freeze. The credit bureaus have three (3) business days after receiving your request to remove the security freeze.

As an alternative to a security freeze, you have the right to place an initial or extended "fraud alert" on your file at no cost. An initial fraud alert is a 1-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 agencies listed below:

| | | |
|---|---|--|
| Experian P.O. Box 2002 Allen, TX 75013 1-888-397-3742 www.experian.com/fraud/center.html | TransUnion P.O. Box 2000 Chester, PA 19016 1-800-680-7289 www.transunion.com/fraud-victim-resource/place-fraud-alert | Equifax P.O. Box 105069 Atlanta, GA 30348 1-888-766-0008 www.equifax.com/personal/credit-report-services |
|---|---|--|

Additional Information. You can further educate yourself regarding identity theft, and the steps you can take to protect yourself, by contacting your state Attorney General or the Federal Trade Commission. The Federal Trade Commission also encourages those who discover that their information has been misused to file a complaint with them. The Federal Trade Commission can be reached at: 600 Pennsylvania Avenue, NW, Washington, DC 20580; www.ftc.gov/idtheft; 1-877-ID-THEFT (1-877-438-4338); and TTY: 1-866-653-4261. Instances of known or suspected identity theft should be reported to law enforcement, your Attorney General, and the FTC. You can also further educate yourself about placing a fraud alert or security freeze on your credit file by contacting the FTC or your state's Attorney General. **For Maryland residents**, the Attorney General can be contacted by mail at 200 St. Paul Place, Baltimore, MD, 21202; toll-free at 1-888-743-0023; by phone at (410) 576-6300; consumer hotline (410) 528-8662; and online at www.marylandattorneygeneral.gov. **For New Mexico residents**, you have rights pursuant to the Fair Credit Reporting Act, such as the right to be told if information in your credit file has been used against you, the right to know what is in your credit file, the right to ask for your credit score, and the right to dispute incomplete or inaccurate information. Further, pursuant to the Fair Credit Reporting Act, the consumer reporting agencies must correct or delete inaccurate, incomplete, or unverifiable information; consumer reporting agencies may not report outdated negative information; access to your file is limited; you must give your consent for credit reports to be provided to employers; you may limit "prescreened" offers of credit and insurance you get based on information in your credit report; and you may seek damages from violators. You 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 you to review your 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 Attorney General may be contacted at: Office of the Attorney General, The Capitol, Albany, NY 12224-0341; 1-800-771-7755; <https://ag.ny.gov/>. **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 reached at: 150 South Main Street, Providence, Rhode Island 02903, www.riag.ri.gov, 1-401-247-4400. Under Rhode Island law, you have the right to obtain any police report filed in regard to this incident. There are approximately 7 Rhode Island residents impacted by this incident. This notice has not been delayed by a law enforcement investigation.