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JUL 30 2018

CONSUMER PROTECTION

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1275 Drummers Lane, Suite 302  
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July 25, 2018

**VIA U.S. 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 Event

Dear Attorney General MacDonald:

We represent Welk Resort Group, Inc. ("Welk"), located at 300 Rancheros Drive, Suite 450, San Marcos, CA 92069, and write to notify your office of an incident that may affect the security of personal information relating to approximately two (2) 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, Welk does not waive any rights or defenses regarding the applicability of New Hampshire law or personal jurisdiction.

**Nature of the Data Event**

On or around December 4, 2017, Welk learned of unusual activity in certain employee email accounts and immediately began an investigation to confirm the security of its network and determine the nature and scope of this event. With the assistance of third-party forensic investigators, Welk learned that unauthorized actor(s) were able to gain access to certain employee email accounts. While the investigation found no evidence of actual or attempted misuse of personal information, it did reveal some personal information was present in the impacted email accounts at the time of the incident.

While the potentially impacted data varies by individuals, the investigation determined that the following types of information may have been present in the impacted email accounts: name; driver's license or state identification number; Social Security number; financial account information; credit or debit card information; username or email and password; mother's maiden name; electronic signature; birth certificate; marriage certificate; employer or individual tax identification number; date of birth; medical history; medical or physical condition; treatment information; diagnosis or diagnosis code; doctor's name; or treatment location.

[Mullen.law](http://Mullen.law)

### **Notice to New Hampshire Residents**

Beginning on or around July 25, 2018, Welk will begin mailing written notice of this incident to potentially affected individuals, which includes approximately two (2) New Hampshire residents. Written notice is being provided in substantially the same form as the letter attached here as *Exhibit A*.

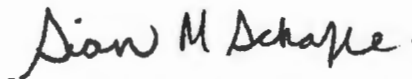
### **Other Steps Taken and To Be Taken**

Upon discovering unusual activity affiliated with certain employee email accounts, Welk immediately took steps to investigate. Welk worked to determine the nature and scope of this incident, as well as determine what data may potentially be affected. The investigation included working with third-party forensic experts. Welk is mailing written notice to those individuals whose data was present in the impacted emails. This notice will include an offer of access to one year of credit and identity monitoring services, including identity restoration services, through AllClear ID, and the contact information for a dedicated call center for potentially affected individuals to contact with questions or concerns regarding this incident. Additionally, Welk 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. Welk will also be providing notice of this event to other state regulators as required by law.

### **Contact Information**

Should you have any questions regarding this notification or other aspects of the data security event, please contact us at 267-930-4799.

Very truly yours,



Sian M. Schafle of  
MULLEN COUGHLIN LLC

# EXHIBIT A



Processing Center • P.O. BOX 141578 • Austin, TX 78714



00001  
JOHN Q. SAMPLE  
1234 MAIN STREET  
ANYTOWN US 12345-6789

July 25, 2018

**Re: Notice of Data Breach**

Dear John Sample,

Welk Resort Group, Inc. (“Welk”) writes to notify you of an incident that may affect the security of some of your personal information. We take this incident seriously and are providing you with information and access to resources so you may better protect your personal information, should you feel it is appropriate to do so.

**What Happened?** On or around December 4, 2017, Welk learned of unusual activity in certain employee email accounts. We immediately began an investigation, to confirm the security of our network, and to determine the nature and scope of this event. With the assistance of third-party forensic investigators, we learned that unauthorized actor(s) were able to gain access to certain employee email accounts. Based upon available forensic evidence, it appears these email accounts were subject to unauthorized access between November 29 and December 4, 2017. While we have no evidence of actual or attempted misuse of personal information, the investigation revealed some personal information was present in the impacted email accounts at the time of the incident. Our investigation indicates only a small percentage of Welk’s Owners were potentially affected by the incident.

**What Information Was Involved?** Our investigation determined the following information related to you was present in the emails affected by this incident: name. We have no evidence of actual or attempted misuse of this information by any third party.

**What We Are Doing.** We take the security of personal information in our care seriously. We are working to enhance our existing security measures and to confirm the ongoing security of our networks. We are providing you with notice of this incident and will be notifying state regulators as required by law.

As an added precaution, we are offering you access to twelve (12) months of credit monitoring and identity theft restoration services through AllClear ID at no cost to you. The cost of this service will be paid by Welk. We encourage you to enroll in these services, as we are not able to act on your behalf to enroll you in the credit monitoring service.

**What You Can Do.** Please review the enclosed “Steps You Can Take to Protect Your Information.” You can also enroll to receive the free credit monitoring and identity theft protection services we are offering.



01-02-1-00

***For More Information.*** We understand you may have questions about this incident that are not addressed in this letter. If you have additional questions, please call our dedicated assistance line at 1-855-326-5225, Monday through Saturday between 9 a.m. and 9 p.m. Eastern Time.

Again, Welk takes the privacy and security of the personal information in our care seriously. We sincerely regret any inconvenience or concern this incident has caused you.

Sincerely,

Welk Resort Group, Inc.

## STEPS YOU CAN TAKE TO PROTECT YOUR INFORMATION

### Enroll in Credit Monitoring

As an added precaution, we have arranged to have AllClear ID protect your identity for 12 months at no cost to you. The following identity protection services start on the date of this notice and you can use them at any time during the next 12 months.

**AllClear Identity Repair:** This service is automatically available to you with no enrollment required. If a problem arises, simply call 1-855-326-5225 and a dedicated investigator will help recover financial losses, restore your credit and make sure your identity is returned to its proper condition.

**AllClear Fraud Alerts with Credit Monitoring:** This service offers the ability to set, renew, and remove 90-day fraud alerts on your credit file to help protect you from credit fraud. In addition, it provides credit monitoring services, a once annual credit score and credit report, and a \$1 million identity theft insurance policy. To enroll in this service, you will need to provide your personal information to AllClear ID. You may sign up online at [enroll.allclearid.com](http://enroll.allclearid.com) or by phone by calling 1-855-326-5225 using the following redemption code: Redemption Code.

Please note: Following enrollment, additional steps are required by you in order to activate your phone alerts and fraud alerts, and to pull your credit score and credit file. Additional steps may also be required in order to activate your monitoring options.

### 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 and to detect errors. 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](http://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  
1-800-525-6285  
[www.equifax.com](http://www.equifax.com)

Experian  
P.O. Box 2002  
Allen, TX 75013  
1-888-397-3742  
[www.experian.com](http://www.experian.com)

TransUnion  
P.O. Box 2000  
Chester, PA 19106  
1-800-680-7289  
[www.transunion.com](http://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  
freeze.transunion.com

**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](http://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 promptly 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](http://www.oag.state.md.us). The Welk is located at 300 Ranceros Drive, Suite 450, San Marco, CA 92069.

**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](http://www.ncdoj.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 a violator. 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](http://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.