

RECEIVED

JUL 13 2017

CONSUMER PROTECTION

VIA UPS OVERNIGHT MAIL

July 12, 2017

Office of the Attorney General
33 Capitol Street
Concord, NH 03301

Dear Attorney General Foster:

I am writing on behalf of Willis Towers Watson to inform the Office of the Attorney General of a security incident involving the electronic reservation system of Sabre Hospitality Solutions ("Sabre"), one of our third-party service providers. Sabre utilizes the SynXis Central Reservations System ("SynXis CRS"), which facilitates the booking of hotel reservations made by individuals and companies such as ours. Sabre discovered unauthorized access to an internal account in the SynXis CRS. Willis Towers Watson was made aware of the breach on June 23rd, 2017.

Based on the information reported to us by Sabre, it appears that the unauthorized party may have accessed the names, contact information, and payment card information associated with certain hotel reservations maintained in the SynXis CRS between August 10, 2016 and March 9, 2017. Sabre's investigation, however, revealed no evidence that information such as Social Security, passport, or driver's license numbers were accessed.

We have been working to investigate the incident, and to confirm the information provided by Sabre regarding the incident. We are also currently working with American Express, our travel services provider, and Sabre to address this issue. Sabre has already engaged a leading cybersecurity firm to support its investigation and has notified law enforcement, as well as payment card brands, about the incident.

We will offer our employees 12 months of complimentary identity protection and credit monitoring services. These services will be provided by AllClear ID Alert Network.

Joe Sensenbrenner
Assistant General Counsel

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Towers Watson Delaware Inc.

Please find attached a sample copy of the notice that will be sent to the 2 affected individuals who reside in the state of New Hampshire on Friday, July 14th, 2017.

Sincerely,



Joe Sensenbrenner
Assistant General Counsel

Enclosures

Subject: Notice of Data Breach
Delivered via email

Dear [Colleague Name] –

We have recently learned that certain hotel reservations made for Willis Towers Watson travel were among the many reservations affected by a security incident impacting Sabre Hospitality Solutions (“Sabre”), a third-party provider, electronic reservation system. SynXis Central Reservations System (“SynXis CRS”) facilitates the booking of hotel reservations made by individuals and companies such as ours.

What happened?

Our Information Security Incident team has confirmed that one or more of your hotel reservations and the name, contact information and payment card information associated with the reservation(s) may have been compromised. Unfortunately, your information was exposed before the security breach was discovered and stopped. In discussions with Sabre, they have advised us that they had discovered unauthorized access to an internal account in the SynXis CRS and launched an investigation into the unauthorized activity that included support from Mandiant, a leading forensic and cybersecurity firm. As a result of the investigation, it was determined that an unauthorized party gained access to information in the SynXis CRS. With such access, the unauthorized person used the account credentials to view a credit card summary page on the SynXis CRS and access payment card information.

We take the security of your personal information very seriously, and are providing the following information to help protect you against potential misuse of your information.

What information was involved?

The unauthorized party was able to access the name, contact information and payment card data associated with certain hotel reservations maintained in the SynXis CRS between August 10, 2016 and March 9, 2017. Social Security, passport, and driver’s license numbers were not accessed. However, because the SynXis CRS deletes reservation details 60 days after the hotel stay, we are not able to confirm the specific information associated with every affected reservation.

What we are doing

We are currently working with American Express, our travel services provider, and Sabre, who operates SynXis CRS, to address this issue. We are continuing to monitor the investigation being conducted by Sabre and its cybersecurity firm to fully understand the nature of this breach. Also, be aware that Sabre has notified law enforcement and the payment card brands about the incident.

We are offering you 12 months of complimentary identity protection and credit monitoring services. This service offers additional layers of protection including credit monitoring and a \$1 million identity theft insurance policy. To use this service, you will need to provide your personal information to AllClear ID. You may sign up online at enroll.allclearid.com or by phone by calling «DID_Phone» using the following redemption code: [RedemptionCode]

What you can do

You should check your recent credit card account statements for suspicious activity and report any such activity to the issuer of the credit card you used in making reservations with Sabre. You should also confirm that the issuer has cancelled the card you used with Sabre and ordered a replacement card. 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. We also recommend that you change your password for your American Express account, as doing so regularly is a good security practice.

We have included below a Resource Guide that contains detailed information about additional steps you can take to protect yourself against identity theft. This information includes instructions for contacting the three major credit bureaus to place a 90-day fraud alert on your account, inquire about any unusual activity on your accounts, request a free credit report and/or place a more extensive credit freeze on your credit reports. If you think that your personal information is being improperly used in any manner, you can also contact local law enforcement to file a police report and contact the Federal Trade Commission at 1-877-ID THEFT (877-438-4338) or at www.identitytheft.gov.

For more information

While we have tried to provide all of the information you may need in this letter and accompanying Resource Guide, please contact at WTWTravelServices@WillisTowersWatson.com or **[provide phone number]** if you have any other questions.

Sincerely,

[Management Team Member]

The Willis Towers Watson Team

Resource Guide for Impacted Colleagues in the United States

We encourage you to consider taking the following steps to protect yourself against misuse of your personal information:

Contacting the FTC

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 believe 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 at no cost from each of the three nationwide credit reporting agencies. 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 visiting 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 directly to request a copy of your credit report using the contact information provided below.

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 any 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. In most cases, the alert will be placed on your credit file with all three agencies within 48 hours. 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 to 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. The cost for placing a security freeze varies by state, so please call or visit the credit reporting agencies' websites to find that information for your state. Unlike a fraud alert, you must separately place a credit freeze on your credit file at each credit reporting company.

To place a security freeze on your credit report, you must send a written request with the following information to each of the three major consumer reporting agencies by regular, certified or overnight mail at the addresses listed below.

- Your full name (including middle initial as well as Jr., Sr., II, III, etc.);
- Social Security number;
- Date of birth;
- If you have moved in the past five (5) years, the addresses where you lived over the prior five years;
- Proof of current address such as a current utility bill or telephone bill;
- A legible photocopy of a government-issued ID card (state driver's license or ID card, military ID, etc.);
- If you are a victim of identity theft, include a copy of the police report, investigative report, or complaint to a law enforcement agency concerning identity theft.

We have included instructions below on how you can contact the three major credit reporting agencies to place a 90-day fraud alert on your account, inquire about any unusual activity on your accounts, and request a free credit report.

Equifax	Experian	Trans Union
<p>P.O. Box 740241 Atlanta, GA 30374-0241 www.equifax.com For general info or to request a credit report, call 1-800-685-1111.</p>	<p>P.O. Box 2002 Allen, TX 75013 www.experian.com For general info, to request a credit report, or to place a fraud alert, call 1-888-397-3742.</p>	<p>P.O. Box 1000 Chester, PA 19022 www.transunion.com For general info or to request a credit report, call 1-800-888-4213.</p>
<p>To place a fraud alert, call 1-800-525-6285 or go to the Equifax Fraud Alert website</p>	<p>You can also place a fraud alert through the Experian Fraud Center website.</p>	<p>To place a fraud alert, call 1-800-680-7289, or visit the Trans Union Fraud Alert website</p>
<p>To place a security freeze, send a written request by regular, certified, or overnight mail to:</p>	<p>To place a security freeze, send a written request by regular, certified, or overnight mail to:</p>	<p>To place a security freeze, send a written request by regular, certified, or overnight mail to:</p>
<p>Equifax Security Freeze P.O. Box 105788 Atlanta, GA 30348</p>	<p>Experian Security Freeze P.O. Box 9554 Allen, TX 75013</p>	<p>Trans Union Security Freeze Fraud Victim Assistance Dept. P.O. Box 6790 Fullerton, CA 92834</p>

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
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
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 <https://www.consumer.ftc.gov/articles/pdf-0096-fair-credit-reporting-act.pdf> or www.ftc.gov.

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
Salem, OR 97301-4096
(503) 378-4400 <http://www.doj.state.or.us/>