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July 7, 2017

Office of Consumer Protection
235 South Beretania Street
Honolulu, Hawaii 96813

Re: Incident Notification

RECEIVED

JUL 10 2017

**OFFICE OF CONSUMER PROTECTION
INVESTIGATIONS**

Dear Sir/Madam:

This firm represents Aqua-Aston Hospitality, LLC ("Aqua-Aston"). We are writing to inform you of an incident involving the inadvertent disclosure of personal information related to Hawaii residents by a third-party vendor to Aqua-Aston, Sabre Hospitality Solutions, a division of Sabre GBLBL Inc. ("Sabre").

Aqua-Aston has an established business relationship with Sabre to provide hotel reservation services through the Sabre Hospitality Solutions SynXis Central Reservations system ("CRS"). On June 8, 2017, Sabre informed Aqua-Aston of an incident that involved unauthorized access to payment card information in certain hotel reservations made through CRS during the period between August 10, 2016 and March 9, 2017.

Sabre has advised Aqua-Aston that promptly after learning of the incident, Sabre engaged a leading cybersecurity firm to support its investigation. Sabre also notified federal law enforcement and the payment card brands about this incident. Sabre's investigation determined that an unauthorized party obtained access to account credentials that permitted access to a subset of hotel reservations processed through the CRS, and used the account credentials to view a credit card summary page on the CRS.

Based on the facts provided to Aqua-Aston by Sabre, 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. The unauthorized party was also able, in some cases, to access certain information such as guest name(s), email, phone number, address, and other information if provided to the CRS.

Holland & Hart LLP

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Information such as Social Security number, passport number, or driver's license number was not accessed.

Because Sabre purges payment card information 60 days after guest departure dates, Sabre no longer has the payment card data for approximately half of the affected reservations. In addition, for a large percentage of bookings, payment card security codes were never provided to the CRS as part of the reservation and would not have been accessible to the unauthorized party. To the extent the CRS was provided with a payment card security code, the code was purged from the CRS within 24 hours of the creation of the payment record. Sabre also notes that certain customers and partners use virtual cards or other payment methods such that the payment card information may not reflect a guest payment card.

Sabre has represented to Aqua-Aston that it is using a layered security approach and has enhanced its security around access credentials and the monitoring of system activity to further detect and prevent unauthorized access.

Pursuant to Haw. Rev. Stat. § 487N-2, Aqua-Aston will send written notification via U.S. Mail to approximately 1,056 Hawaii residents on or about July 7, 2017, in substantially the same form as the letter attached hereto. Notice is being provided as expeditiously as practicable and without unreasonable delay.

If you have any questions or need further information regarding this incident, please contact the undersigned at 303.473.4808 or rdspilde@hollandhart.com.

Sincerely,


Richard Spilde, Jr., P.C.
Holland & Hart LLP

RDS/
Enclosed

Aqua-Aston Hospitality, LLC

July 7, 2017

[CUSTOMER NAME AND ADDRESS]

NOTICE OF DATA BREACH

Dear Valued Customer:

We are writing to you because of an incident involving unauthorized access to customer information 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 suggestions on how you might protect yourself against potential misuse of your information.

What Happened?

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. Following an examination of forensic evidence, Sabre notified us on or about June 8, 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, including some reservations made by Aqua-Aston customers.

More specifically, the investigation conducted by Sabre and its consultants has 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?

The unauthorized party was able to access payment card information for your hotel reservation(s), including cardholder name; card number; card expiration date; and, potentially, 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. However, Social Security numbers, passport numbers, and driver's license numbers were not accessed.

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 credit reports for any unauthorized activity. For information on how to obtain free credit reports, see *Obtain Your Credit Report* below. 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 more 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.

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
www.equifax.com

Experian
P.O. Box 9554
Allen, TX 75013
(888) 397-3742
www.experian.com

TransUnion
P.O. Box 2000
Chester, PA 19016
(800) 680-7289
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 call toll-free 888-721-6305, Monday through Friday, 9:00 a.m. to 9:00 p.m., except holidays. For international callers outside of the United States, please call 503-520-4448 (some charges may apply).

Sincerely,

Aqua-Aston Hospitality, 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
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 MASSACHUSETTS RESIDENT:

Under Massachusetts law, you have the right to obtain a police report in regard to this incident. If you are the victim of identity theft, you also have the right to file a police report and obtain a copy of it.

Massachusetts law also allows consumers to place a security freeze on their credit reports. If you have been a victim of identity theft, and you provide the credit reporting agency with a valid police report, it cannot charge you to place, lift, or remove a security freeze. In all other cases, a credit reporting agency may charge you up to \$5.00 each to place, temporarily lift, or permanently remove a security freeze. To place a security freeze on your credit report, you must send a written request to **each** of the three major consumer reporting agencies: Equifax, Experian, and TransUnion by regular, certified, or overnight mail at the addresses below:

Equifax
P.O. Box 105788
Atlanta, GA 30348
(800) 525-6285
www.equifax.com

Experian
P.O. Box 9554
Allen, TX 75013
(888) 397-3742
www.experian.com

TransUnion
P.O. Box 2000
Chester, PA 19016
(800) 680-7289
www.transunion.com

IF YOU ARE A MASSACHUSETTS RESIDENT (CONTINUED):

In order to request a security freeze, you will need to provide the following information:

1. Your full name (including middle initial as well as Jr., Sr., II, III, etc.);
2. Social Security number;
3. Date of birth;
4. If you have moved in the past five (5) years, the addresses where you have lived over the prior five years;
5. Proof of current address such as a current utility bill or telephone bill;
6. A legible photocopy of a government issued identification card (state driver's license or ID card, military identification, etc.);
7. If you are a victim of identity theft, a copy of either the police report, investigative report, or complaint to a law enforcement agency concerning identity theft;
8. If you are not a victim of identity theft, payment by check, money order, or credit card (Visa, MasterCard, American Express, or Discover only). Do not send cash through the mail.

The credit reporting agencies have three (3) business days after receiving your request to place a security freeze on your credit report. The credit reporting agencies must also send written confirmation to you within five (5) business days and provide you with a unique personal identification number (PIN) or password, or both, that can be used by you to authorize the removal or lifting of the security freeze.

To lift the security freeze in order to allow a specific entity or individual access to your credit report, you must call or send a written request to the credit reporting agencies 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, as well as the identities of those entities or individuals you would like to receive your credit report or the specific period of time you want the credit report available. The credit reporting agencies have three (3) business days after receiving your request to lift the security freeze for those identified entities or for the specified period of time.

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.

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.

IF YOU ARE A NEW MEXICO RESIDENT (CONTINUED):

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/>

IF YOU ARE A RHODE ISLAND RESIDENT:

You may contact law enforcement, such as the Rhode Island Attorney General's Office, to report incidents of identity theft or to learn about steps you can take to protect yourself from identity theft. You can contact the Rhode Island Attorney General at:

RI Office of the Attorney General
150 South Main Street
Providence, RI 02903
(401) 274-4400
<http://www.riag.ri.gov/>

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 have a right to place a "security freeze" on your credit report pursuant to chapter 48 of title 6 of the Identity Theft Prevention Act of 2006.

IF YOU ARE A RHODE ISLAND RESIDENT (CONTINUED):

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, within five (5) business days you will be provided a personal identification number or password to use if you choose to remove the freeze on your credit report or to temporarily authorize the release of your credit report for a specific period of time after the freeze is in place. To provide that authorization, you must contact the consumer reporting agency and provide all of the following:

1. The unique personal identification number or password provided by the consumer reporting agency.
2. Proper identification to verify your identity.
3. The proper information regarding the period of time for which the report shall be available to users of the credit report.

A consumer reporting agency that receives a request from a consumer to temporarily lift a freeze on a credit report shall comply with the request no later than three (3) business days after receiving the request.

A security freeze does not apply to circumstances where you have an existing account relationship and a copy of your report is requested by your existing creditor or its agents or affiliates for certain types of an account review, collection, fraud control, or similar activities.

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.