

**LEWIS
BRISBOIS
BISGAARD
& SMITH LLP**
ATTORNEYS AT LAW

STATE OF NH
DEPT OF JUSTICE
2014 DEC 18 AM 11:32

December 15, 2014

Via First Class US Mail

Office of the New Hampshire Attorney General
Attn: Security Breach Notification
33 Capitol Street
Concord, NH 03301

Re: Apple Leisure Group — Notice of Data Security Event

Dear Sir or Madam:

We represent Apple Leisure Group® and AMResorts (“ALG”), 7 Campus Blvd., Suite 100, Newtown Square, Pennsylvania 19073, and are writing to notify you of a data event that may have compromised the security of one (1) New Hampshire resident’s personal information. ALG’s investigation into this event is ongoing, and this notice may be supplemented should ALG learn of any new significant facts subsequent to its submission. By providing this notice, ALG does not waive any rights or defenses under New Hampshire law.

Nature of the Data Security Event

On May 6, 2014, ALG received calls from customers regarding suspicious activity on credit cards used to book reservations through the AMResorts websites. ALG launched an internal investigation to determine whether the reported incidents were related to the AMResorts websites. ALG notified its online booking vendor, and worked closely with them to determine whether customer personal information could have been accessed through their system. ALG retained third-party forensic experts to assist with the investigation of this matter and determine whether customer data would have been accessed without a legitimate business purpose. Although no malware, computer virus, or network intrusion has been identified, the investigation did identify activity in the system that may indicate unauthorized access to the data.

ALG takes the security of its customers’ personal information very seriously. There is a possibility that certain customers’ personal information was subject to unauthorized access. This information may have included some combination of the name, address, credit card information, telephone

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number, email address and date of birth of one (1) New Hampshire resident. ALG has changed its processes so that access to credit card information is no longer possible.

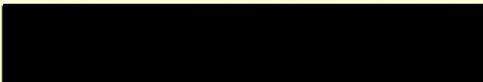
Notice to New Hampshire Resident

ALG is sending written notice of this incident to the one (1) New Hampshire resident whose information was contained in the file on or about December 15, 2014, in substantially the same form as the letter attached hereto as Exhibit A.

Other Steps Taken and To Be Taken

In addition to providing written notice of this incident to all affected individuals as described above, each affected individual is being offered access to one (1) free year of credit monitoring services and identity restoration services. ALG is also providing each individual with additional information on how to protect against identity theft and fraud, including how to place a fraud alert on one's credit file, the contact information for national consumer reporting agencies, how to obtain a free copy of one's credit report, and a reminder to remain vigilant for incidents of fraud and identity theft by reviewing account statements and monitoring free credit reports. ALG is also providing written notice of this incident to other state regulators, international regulators, and national consumer reporting agencies. To help prevent something like this from happening in the future, ALG changed its processes so that access to credit card information is no longer possible and is also reviewing its processes and enhancing its policies and procedures.

Contact Information

ding this notification or other aspects of the data security event,

Very truly yours,



Laura A. Rieben for

LEWIS BRISBOIS BISGAARD & SMITH LLP

LAR:sn

Enclosure

cc: Apple Leisure Group

EXHIBIT A



December 15, 2014

##A6686-L01-000001 T- 0001 *****3-DIGIT 159

SAMPLE A SAMPLE



APT ABC

123 ANY STREET

ANYTOWN, US 12345-6789



Dear Sample A Sample,

Apple Leisure Group® and AMResorts (“ALG”) are writing to inform you of a recent incident that may affect the security of your personal information. We are providing this notice to ensure that you are aware of the incident, so that you may take steps to protect your information should you feel it is appropriate to do so.

On May 6, 2014, we received calls from customers regarding suspicious activity on credit cards used to book reservations through the AMResorts websites. ALG launched an internal investigation to determine whether the reported incidents were related to the AMResorts websites. We notified our online booking vendor, and worked closely with them to determine whether customer personal information could have been accessed through their system. ALG retained third-party forensic experts to assist with the investigation of this matter and determine whether customer data would have been accessed without a legitimate business purpose. Although no malware, computer virus, or network intrusion has been identified, the investigation did identify activity in the system that may indicate unauthorized access to the data.

ALG takes the security of our customers’ personal information very seriously. There is a possibility that your personal information was accessed in an unauthorized way. This information may have included your name, address, credit card information, telephone number, email address and possibly your date of birth. We changed our processes so that access to credit card information is no longer possible. Our investigation is ongoing, and should we learn more information that you should know, we will inform you.

In an abundance of caution, we are providing written notice of this incident to you as well as to certain state regulators and national consumer reporting agencies. As an added precaution, we have arranged to have AllClear ID protect your identity for 12 months. 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 at no cost to you.

- **AllClear SECURE:** The team at AllClear ID is ready and standing by if you need identity repair assistance. This service is automatically available to you with no enrollment required. If a problem arises, simply call 866-979-2595 and a dedicated investigator will do the work to recover financial losses, restore your credit and make sure your identity is returned to its proper condition. AllClear ID maintains an A+ rating at the Better Business Bureau.
- **AllClear PRO:** This service offers additional layers of protection including credit monitoring and a \$1 million identity theft insurance policy. To use the PRO 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 866-979-2595 using the following redemption code: ABCDEFGHIJKL.

000001



We encourage you to remain vigilant, to review your account statements, and to monitor your credit reports and explanation of benefits forms for suspicious activity. 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.

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
800-525-6285
www.equifax.com

Experian
P.O. Box 2002
Allen, TX 75013
888-397-3742
www.experian.com

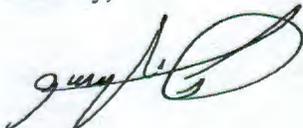
TransUnion
P.O. Box 2000
Chester, PA 19022-2000
800-680-7289
www.transunion.com

You can also 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/bcp/edu/microsites/idtheft/, 1-877-ID-THEFT (1-877-438-4338); 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 North Carolina residents, the Attorney General can be contacted at 9001 Mail Service Center, Raleigh, NC 27699-9001, (919) 716-6400, www.ncdoj.gov. For Maryland residents, the Attorney General can be contacted at 200 St. Paul Place, 16th Floor, Baltimore, MD 21202, (888) 743-0023, www.oag.state.md.us.

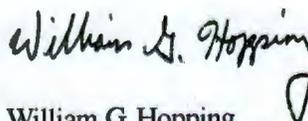
Apple Leisure Group is not experiencing any customer data security concerns in our other businesses, including Apple Vacations, CheapCaribbean.com and Travel Impressions. However, we would like to take this opportunity to encourage customers to be generally cautious about unsolicited phone or email contacts from third parties regarding travel services or time shares. Unfortunately, it has been and still is fairly common in the travel business that unscrupulous parties randomly contact persons (i) purporting to have authority to sell legitimate travel products and services when in fact they do not have such authority (known as "spoofing") to fraudulently collect payment for services they cannot fulfill purchases, or (ii) to induce customers to provide payment card information by phone or email for non-existent products and services and then misuse the cards ("phishing"). ALG does not generally authorize third parties to make completely unsolicited sales contacts on our behalf. If you are being so contacted in the name of any ALG company and doubt the authenticity of the offer or offeror, we encourage you to bring it to the attention of our customer service personnel at AMResorts via email to customer-care@amresorts.com or by phone at 610-359-8130.

In closing, our customers are our utmost priority and we are very sorry for any inconvenience or concern this may cause. We've established a confidential inquiry line, staffed with professionals trained in identity and credit protection and restoration, and familiar with this incident and the contents of this letter. This confidential inquiry line is available Monday through Friday, 9:00 a.m. to 7:00 p.m. E.S.T. at (877) 216-4074. The reference number for this incident is #2827120814.

Sincerely,



Gonzalo del Peon
President, AMResorts



William G. Hopping
General Counsel, Apple Leisure Group®