



MULLEN  
COUGHLIN<sup>LLC</sup>  
ATTORNEYS AT LAW

426 W. Lancaster Avenue, Suite 200  
Devon, PA 19333

April 24, 2024

**VIA E-MAIL**

Office of the New Hampshire Attorney General  
Consumer Protection & Antitrust Bureau  
33 Capitol Street  
Concord, NH 03301  
E-mail: [DOJ-CPB@doj.nh.gov](mailto:DOJ-CPB@doj.nh.gov)

**Re: Notice of Data Event**

To Whom It May Concern:

We represent Synergy Hotel Inc. (“Synergy”) located at 1709 Dryden Rd, Houston, Texas 77030, and are writing to notify your office of an event that may affect the security of certain personal information relating to one (1) New Hampshire resident. This notice will be supplemented with any new significant facts learned subsequent to its submission. By providing this notice, Synergy 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 or about July 1, 2023, Synergy identified unusual activity within a limited portion of its network. In response, Synergy initiated an investigation to understand the nature and scope of the activity while taking steps to ensure the security of its environment. Through this investigation, Synergy learned that certain files were copied from a portion of its systems without authorization on or around July 1, 2023.

Subsequently, Synergy undertook a time-intensive and detailed review of the files potentially affected by this event to understand what information was present in the files and to whom it related. The personal information identified in these files varied by individual but included

. From there Synergy had to undertake an additional review to identify contact information for purposes of providing required notifications with some assistance from third party resources. The review effort was completed on April 15, 2024.

### **Notice to New Hampshire Resident**

On or about April 24, 2024, Synergy will begin providing written notice of this event to one (1) New Hampshire resident. 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**

Once it identified the event, Synergy moved quickly to investigate and respond to the event, which involved assessing the security of its systems, completing a comprehensive investigation, notifying federal law enforcement, identifying potentially affected individuals, and identifying the contact information for individuals to issue notice accordingly.

Synergy is providing access to complimentary credit monitoring services for \_\_\_\_\_ through Kroll to individuals whose personal information was potentially affected by this event.

Additionally, Synergy is providing individuals with guidance on how to better protect against identity theft and fraud, information on how to place a fraud alert and security freeze on one's credit file, guidance related to password security, 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.

Synergy is providing written notice of this event to relevant state regulators, as necessary, and to the three major credit reporting agencies, Equifax, Experian, and TransUnion.

### **Contact Information**

Should you have any questions regarding this notification or other aspects of the data security event, please contact us at \_\_\_\_\_.

Very truly yours,

Sian M. Schafle of  
MULLEN COUGHLIN LLC

SMS/jlt  
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>>

<<b2b\_text\_1 (NOTICE OF DATA BREACH)>>

Dear <<first\_name>> <<middle\_name>> <<last\_name>> <<suffix>>:

Synergy Hotels, Inc. (“Synergy”) writes to inform you of an event that may involve some of your information. This notice provides you with information about the event, our response, and the resources available to you, should you feel it is necessary and appropriate to take additional action.

**What Happened?** On or about July 1, 2023, Synergy identified suspicious activity with systems in our network. In response, we shut down a portion of our network to review the security of the environment and conducted a thorough investigation of the activity. Through this investigation, we identified that certain files were copied from a portion of our systems without authorization on or around July 1, 2023. We in turn engaged in a detailed review of these files to determine what information was present and to whom it related, and on April 15, 2024, the review was completed. You are receiving this letter because the review indicated that your information was present in the relevant files.

**What Information Was Involved?** The information identified in the involved files, as it relates to you, included <<b2b\_text\_2 (Name, Data Elements)>><<b2b\_text\_3 (Data Elements cont.)>>.

**What We Are Doing.** Synergy takes this event along with the privacy and security of information in our care seriously. As such, we took steps to conduct a diligent investigation into the event and to ensure the security of our network. We also reported this event to federal law enforcement.

Synergy has an ongoing commitment to safeguarding the privacy and security of information provided to us. As part of that commitment, we implemented additional security measures within our network and completed a review of our policies and procedures to mitigate reoccurrence of this type of event.

As an added precaution, we are providing you with access to identity monitoring services for \_\_\_\_\_ at no cost to you. Your identity monitoring services include Credit Monitoring, Fraud Consultation, and Identity Theft Restoration. Information on these services and instructions on how to activate them may be found in the *Steps You Can Take to Help Protect Personal Information* section of this letter.

**What You Can Do.** We encourage you to remain vigilant against incidents of identity theft and fraud by reviewing your account statements along with monitoring your free credit reports for suspicious activity and to detect errors. In an abundance of caution, we also recommend that individuals change the passwords, security question, and answer to their email accounts or accounts where your email is your username. As a best practice, individuals should change all passwords to their personal accounts on a regular basis, use strong passwords, and refrain from using the same password for multiple accounts.

We also recommend you review the *Steps You Can Take To Help Protect Personal Information* section of this letter and activate the offered complimentary identity monitoring services. Please note, due to privacy restrictions, we are unable to automatically activate your complimentary identity monitoring services.

**For More Information.** If you have questions about this matter, please call our dedicated assistance line at (866) 528-0724, Monday through Friday 8 am – 5:30 pm Central Time (excluding major U.S. holidays).

Sincerely,

Synergy Hotels, Inc.

## STEPS YOU CAN TAKE TO HELP PROTECT PERSONAL INFORMATION

### **Activate Identity Monitoring Services**

Visit <https://enroll.krollmonitoring.com> to activate and take advantage of your identity monitoring services.

You have until <<b2b\_text\_6 (activation date)>> to activate your identity monitoring services.

Membership Number: <<Membership Number s\_n>>

For more information about Kroll and your Identity Monitoring services, you can visit [info.krollmonitoring.com](http://info.krollmonitoring.com).

Additional information describing your services is included with this letter.



### **TAKE ADVANTAGE OF YOUR IDENTITY MONITORING SERVICES**

You have been provided with access to the following services from Kroll:

#### **Single Bureau Credit Monitoring**

You will receive alerts when there are changes to your credit data—for instance, when a new line of credit is applied for in your name. If you do not recognize the activity, you'll have the option to call a Kroll fraud specialist, who will be able to help you determine if it is an indicator of identity theft.

#### **Fraud Consultation**

You have unlimited access to consultation with a Kroll fraud specialist. Support includes showing you the most effective ways to protect your identity, explaining your rights and protections under the law, assistance with fraud alerts, and interpreting how personal information is accessed and used, including investigating suspicious activity that could be tied to an identity theft event.

#### **Identity Theft Restoration**

If you become a victim of identity theft, an experienced Kroll licensed investigator will work on your behalf to resolve related issues. You will have access to a dedicated investigator who understands your issues and can do most of the work for you. Your investigator will be able to dig deep to uncover the scope of the identity theft, and then work to resolve it.

Kroll's activation website is only compatible with the current version or one version earlier of Chrome, Firefox, Safari and Edge.

To receive credit services, you must be over the age of 18 and have established credit in the U.S., have a Social Security number in your name, and have a U.S. residential address associated with your credit file.

### **Monitor Your Accounts**

Under U.S. law, a consumer is entitled to one free credit report annually from each of the three major credit reporting bureaus, Equifax, Experian, and TransUnion. To order a free credit report, visit [www.annualcreditreport.com](http://www.annualcreditreport.com) or call, toll-free, 1-877-322-8228. Consumers may also directly contact the three major credit reporting bureaus listed below to request a free copy of their credit report.

Consumers have the right to place an initial or extended "fraud alert" on a credit 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 consumers are the victim of identity theft, they are entitled to an extended fraud alert, which is a fraud alert lasting seven years. Should consumers wish to place a fraud alert, please contact any of the three major credit reporting bureaus listed below.

As an alternative to a fraud alert, consumers have the right to place a "credit freeze" on a credit report, which will prohibit a credit bureau from releasing information in the credit report without the consumer's express authorization. The credit freeze is designed to prevent credit, loans, and services from being approved in a consumer's name without consent. However, consumers should be aware that using a credit freeze to take control over who gets access to the personal and financial information in their credit report may delay, interfere with, or prohibit the timely approval of any subsequent request or application they make regarding a new loan, credit, mortgage, or any other account involving the extension of credit. Pursuant to federal law, consumers cannot be charged to place or lift a credit freeze on their credit report. To request a credit freeze, individuals may need to provide some or all of the following information:

1. Full name (including middle initial as well as Jr., Sr., II, III, etc.);
2. Social Security number;
3. Date of birth;
4. Addresses for the prior two to 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, etc.); and
7. A copy of either the police report, investigative report, or complaint to a law enforcement agency concerning identity theft if they are a victim of identity theft.

Should consumers wish to place a credit freeze or fraud alert, please contact the three major credit reporting bureaus listed below:

| <b>Equifax</b>  | <b>Experian</b>   | <b>TransUnion</b>   |
|---|---|---|
| <a href="https://www.equifax.com/personal/credit-report-services/">https://www.equifax.com/personal/credit-report-services/</a> | <a href="https://www.experian.com/help/">https://www.experian.com/help/</a> | <a href="https://www.transunion.com/credit-help">https://www.transunion.com/credit-help</a> |
| 1-888-298-0045  | 1-888-397-3742  | 1-800-916-8800  |
| Equifax Fraud Alert, P.O. Box 105069 Atlanta, GA 30348-5069   | Experian Fraud Alert, P.O. Box 9554, Allen, TX 75013                        | TransUnion Fraud Alert, P.O. Box 2000, Chester, PA 19016                                    |
| Equifax Credit Freeze, P.O. Box 105788 Atlanta, GA 30348-5788   | Experian Credit Freeze, P.O. Box 9554, Allen, TX 75013                      | TransUnion Credit Freeze, P.O. Box 160, Woodlyn, PA 19094                                   |

#### **Additional Information**

Consumers may further educate themselves regarding identity theft, fraud alerts, credit freezes, and the steps they can take to protect your personal information by contacting the consumer reporting bureaus, the Federal Trade Commission, or their state Attorney General. The Federal Trade Commission may be reached at: 600 Pennsylvania Avenue NW, Washington, D.C. 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 also encourages those who discover that their information has been misused to file a complaint with them. Consumers can obtain further information on how to file such a complaint by way of the contact information listed above. Consumers have the right to file a police report if they ever experience identity theft or fraud. Please note that in order to file a report with law enforcement for identity theft, consumers will likely need to provide some proof that they have been a victim. Instances of known or suspected identity theft should also be reported to law enforcement and the relevant state Attorney General. This notice has not been delayed by law enforcement.

*For District of Columbia residents*, the District of Columbia Attorney General may be contacted at: 400 6th Street, NW, Washington, D.C. 20001; (202) 442-9828; and [www.oag.dc.gov](http://www.oag.dc.gov).

*For Maryland residents*, the Maryland Attorney General may be contacted at: 200 St. Paul Place, 16th Floor, Baltimore, MD 21202; 1-410-576-6300 or 1-888-743-0023; and <https://www.marylandattorneygeneral.gov/>.

*For New Mexico residents*, consumers have rights pursuant to the Fair Credit Reporting Act, such as the right to be told if information in their credit file has been used against them, the right to know what is in their credit file, the right to ask for their credit score, and the right to dispute incomplete or inaccurate information. Further, pursuant to the Fair Credit Reporting Act, the consumer reporting bureaus must correct or delete inaccurate, incomplete, or unverifiable information; consumer reporting agencies may not report outdated negative information; access to consumers' files is limited; consumers must give consent for credit reports to be provided to employers; consumers may limit "prescreened" offers of credit and insurance based on information in their credit report; and consumers may seek damages from violators. Consumers 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 consumers to review their 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.

*For New York residents*, the New York Attorney General may be contacted at: Office of the Attorney General, The Capitol, Albany, NY 12224-0341; 1-800-771-7755; or <https://ag.ny.gov>.

*For North Carolina residents*, the North Carolina Attorney General may be contacted at: 9001 Mail Service Center, Raleigh, NC 27699-9001; 1-877-566-7226 or 1-919-716-6000; and [www.ncdoj.gov](http://www.ncdoj.gov).