HUNTON& WILLIAMS

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FILE NO: 85182.000002

November 20, 2015

Via Email (securitybreach@atg.wa.gov)

Office of the Attorney General
1125 Washington St. SE
PO Box 40100
Olympia, WA 98504-0100

To Whom It May Concern:

In accordance with R.C.W. 19.255.010, I am writing to notify you regarding the nature and circumstances of a recent data security incident.

Starwood Hotels & Resorts Worldwide, Inc. ("Starwood") recently learned that a malware intrusion affected some point of sale systems at a limited number of Starwood hotels in North America.

Promptly after discovering the issue, Starwood engaged third-party forensic experts to conduct an extensive investigation. Based on the investigation, the company discovered evidence indicating that the point of sale systems at certain Starwood hotels were infected with malware, enabling unauthorized parties to access payment card data of some of its customers. The malware was designed to collect certain payment card information, including cardholder name, payment card number, security code and expiration date. Attached is a list of locations and potential dates of exposure for each affected Starwood property. There is no evidence that other customer information, such as contact information, Social Security numbers or PINs, were affected by this issue. The malware affected certain restaurants, gift shops and other point of sale systems at the relevant Starwood properties. Starwood has no indication at this time that its guest reservation or Starwood Preferred Guest membership systems were impacted.

The affected hotels have taken steps to secure customer payment card information, and the malware no longer presents a threat to customers using payment cards at the hotels. Starwood is offering identity protection and credit monitoring services to affected Starwood customers for one year at no cost to them.

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Starwood is not able to determine the number of Washington residents who may be affected by this issue. Attached for your reference is a copy of the substitute notice Starwood posted on its website on November 20, 2015. Please do not hesitate to contact me if you have any questions.

Very truly yours,

Lisa Sotto BJB

Lisa J. Sotto

Enclosures

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Letter From Our President

November 20, 2015

Dear Starwood Customers:

We recently became aware of a malware intrusion that affected some point of sale systems at a limited number of Starwood hotels in North America. Promptly after discovering the issue, we engaged third-party forensic experts to conduct an extensive investigation. We have been working closely with law enforcement authorities and coordinating our efforts with the payment card organizations to determine the facts. We want to assure you that protecting the security of our customers' personal information is a top priority for Starwood.

Based on the investigation, we discovered that the point of sale systems at certain Starwood hotels were infected with malware, enabling unauthorized parties to access payment card data of some of our customers. We want you to know that the affected hotels have taken steps to secure customer payment card information, and the malware no longer presents a threat to customers using payment cards at our hotels.

We have determined the following:

- The attack targeted certain point of sale systems at a limited number of Starwood properties in North America. The locations and potential dates of exposure for each affected Starwood property are listed here.

- The malware affected certain restaurants, gift shops and other point of sale systems at the relevant Starwood properties. We have no indication at this time that our guest reservation or Starwood Preferred Guest membership systems were impacted.

- The malware was designed to collect certain payment card information, including cardholder name, payment card number, security code and expiration date. There is no evidence that other customer information, such as contact information, Social Security numbers or PINs, were affected by this issue.

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Stamford, CT 06902
United States

We sincerely regret any inconvenience this may cause. We take our obligation to safeguard personal information very seriously and are alerting affected customers about this incident so they can take steps to help protect their information. You are entitled under U.S. law to one free credit report annually from each of the three nationwide consumer reporting agencies. To order your free credit report, visit www.annualcreditreport.com or call toll-free at 1-877-322-8228. We encourage you to remain vigilant by reviewing your account statements and monitoring your free credit reports. If you believe your payment card may have been affected, please contact your bank or card issuer immediately.

In addition, we have arranged with AllClear ID to offer identity protection and credit monitoring services to affected Starwood customers for one year at no cost to them. The Reference Guide provides information on registration and recommendations by the U.S. Federal Trade Commission on the protection of personal information.

If you have any questions or would like more information, please call 1-855-270-9179 (U.S. and Canada) or 1-512-201-2201 (International), Monday through Saturday, 8:00 am to 8:00 pm CST.

Again, we sincerely apologize for any inconvenience this issue may cause.

Sincerely,

Sergio Rivera
President, The Americas

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Reference Guide

We encourage affected customers to take the following steps:

Order Your Free Credit Report. To order your free credit report, visit www.annualcreditreport.com, call toll-free at 1-877-322-8228, or complete the Annual Credit Report Request Form on the U.S. Federal Trade Commission's ("FTC") website at www.consumer.ftc.gov and mail it to Annual Credit Report Request Service, P.O. Box 105281, Atlanta, GA 30348-5281. The three consumer reporting agencies provide free annual credit reports only through the website, toll-free number or request form.

When you receive your credit report, review it carefully. Look for accounts you did not open. Look in the "inquiries" section for names of creditors from whom you haven't requested credit. Some companies bill under names other than their store or commercial names. The consumer reporting agency will be able to tell you when that is the case. Look in the "personal information" section for any inaccuracies in your information (such as home address and Social Security number). If you see anything you do not understand, call the consumer reporting agency at the telephone number on the report. Errors in this information may be a warning sign of possible identity theft. You should notify the consumer reporting agencies of any inaccuracies in your report, whether due to error or fraud, as soon as possible so the information can be investigated and, if found to be in error, corrected. If there are accounts or charges you did not authorize, immediately notify the appropriate consumer reporting agency by telephone and in writing. Consumer reporting agency staff will review your report with you. If the information can't be explained, then you will need to call the creditors involved. Information that can't be explained also should be reported to your local police or sheriff's office because it may signal criminal activity.

Identity Protection and Credit Monitoring Services. Starwood has arranged with AllClear ID to offer affected customers identity protection, credit monitoring and fraud assistance services for 12 months at no cost to them. These services start on November 20, 2015, and will be available at any time during the next 12 months. A customer is eligible for the services listed below if the customer used a payment card at one of the affected Starwood properties during a relevant time period. The locations and potential dates of exposure for each affected Starwood property are listed here.

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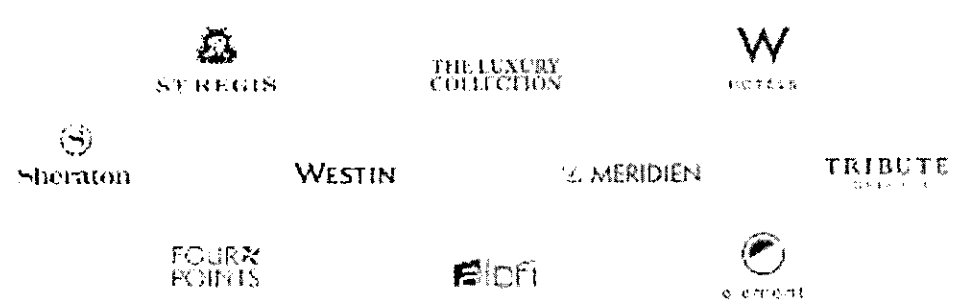

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AllClear SECURE: This service provides affected customers with a dedicated investigator to help them recover financial losses and restore their credit and identity. Affected Starwood customers are automatically eligible to use this service – there is no action required on their part to enroll. Affected customers may receive this fraud assistance service by calling 1-855-270-9179.

AllClear PRO: This service offers additional layers of protection to U.S. residents, including credit monitoring and a $1 million identity theft insurance policy. Please click here or call 1-855-270-9179 to learn more and sign up for this service.

AllClear PLUS Canada: For additional protections, Canadian residents may enroll in AllClear PLUS Canada, which includes identity theft monitoring. To use this service, you will need to provide certain information. Please click here or call 1-855-270-9179 to learn more and sign up for this service.

AllClear Global Identity Repair: Customers residing outside the U.S. and Canada may call 1-512-201-2201 or click here for information about AllClear SECURE and AllClear Global Identity Repair services.

Report Incidents. If you detect any unauthorized transactions in a financial account, promptly notify your payment card company or financial institution. If you detect any incident of identity theft or fraud, promptly report the incident to law enforcement, the FTC and your state Attorney General. If you believe your identity has been stolen, the FTC recommends that you take these steps:

- Place an initial fraud alert.
- Order your credit reports.
- Create an FTC Identity Theft Affidavit by submitting a report about the theft at http://www.ftc.gov/complaint or by calling the FTC.
- File a police report about the identity theft and get a copy of the police report or the report number. Bring your FTC Identity Theft Affidavit with you when you file the police report.
- Your Identity Theft Report is your FTC Identity Theft Affidavit plus your police report. You may be able to use your Identity Theft Report to remove fraudulent information from your credit report, prevent companies from refurnishing fraudulent information to a consumer reporting agency, stop a company from collecting a debt that resulted from identity theft, place an extended seven-year fraud alert with consumer reporting

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agencies, and obtain information from companies about accounts the identity thief opened or misused.

You can contact the FTC to learn more about how to protect yourself from becoming a victim of identity theft and how to repair identity theft:

Federal Trade Commission
Consumer Response Center
600 Pennsylvania Avenue, NW
Washington, DC 20580
1-877-IDTHEFT (438-4338)
www.ftc.gov/idtheft/

Consider Placing a Fraud Alert on Your Credit File. To protect yourself from possible identity theft, consider placing a fraud alert on your credit file. A fraud alert helps protect you against the possibility of an identity thief opening new credit accounts in your name. When a merchant checks the credit history of someone applying for credit, the merchant gets a notice that the applicant may be the victim of identity theft. The alert notifies the merchant to take steps to verify the identity of the applicant. You can place a fraud alert on your credit report by calling any one of the toll-free numbers provided below. You will reach an automated telephone system that allows you to flag your file with a fraud alert at all three consumer reporting agencies. For more information on fraud alerts, you also may contact the FTC as described above.

Equifax	Equifax Credit Information Services, Inc. P.O. Box 740241 Atlanta, GA 30374	1-800-525-6285	www.equifax.com
Experian	Experian Inc. P.O. Box 9554 Allen, TX 75013	1-888-397-3742	www.experian.com
TransUnion	TransUnion LLC P.O. Box 2000 Chester, PA 19022-2000	1-800-680-7289	www.transunion.com

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Consider Placing a Security Freeze on Your Credit File. You may wish to place a "security freeze" (also known as a "credit freeze") on your credit file. A security freeze is designed to prevent potential creditors from accessing your credit file at the consumer reporting agencies without your consent. There may be fees for placing, lifting, and/or removing a security freeze, which generally range from $5-$20 per action. *Unlike a fraud alert, you must place a security freeze on your credit file at each consumer reporting agency individually.* For more information on security freezes, you may contact the three nationwide consumer reporting agencies or the FTC as described above. As the instructions for establishing a security freeze differ from state to state, please contact the three nationwide consumer reporting agencies to find out more information.

The consumer reporting agencies may require proper identification prior to honoring your request. For example, you may be asked to provide:

- Your full name with middle initial and generation (such as Jr., Sr., II, III)
- Your Social Security number
- Your date of birth
- Addresses where you have lived over the past five years
- A legible copy of a government-issued identification card (such as a state driver's license or military ID card)
- Proof of your current residential address (such as a current utility bill or account statement)

For Maryland Residents. You can obtain information from the Maryland Office of the Attorney General about steps you can take to avoid identity theft. You may contact the Maryland Attorney General at:

Maryland Office of the Attorney General
Consumer Protection Division
200 St. Paul Place
Baltimore, MD 21202
(888) 743-0023 (toll-free in Maryland)
(410) 576-6300
www.oag.state.md.us

For Massachusetts Residents. You have the right to obtain a police report and request a security freeze as described above. The consumer reporting agencies may charge you a fee of up to $5 to place a security freeze on your account, and may require that you provide certain

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personal information (such as your name, Social Security number, date of birth, and address) and proper identification (such as a copy of a government-issued ID card and a bill or statement) prior to honoring your request for a security freeze. There is no charge, however, to place, lift or remove a security freeze if you have been a victim of identity theft and you provide the consumer reporting agencies with a valid police report.

For North Carolina Residents. You can obtain information from the North Carolina Attorney General's Office about preventing identity theft. You can contact the North Carolina Attorney General at:

North Carolina Attorney General's Office
9001 Mail Service Center
Raleigh, NC 27699-9001
(877) 566-7226 (toll-free in North Carolina)
(919) 716-6400
www.ncdoj.gov

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Stamford, CT 06902
United States

Frequently Asked Questions

1. What happened?

We recently became aware of a malware intrusion that affected some point of sale systems at a limited number of Starwood hotels in North America. Promptly after discovering the issue, we engaged third-party forensic experts to conduct an extensive investigation. Based on the investigation, we discovered that the malware affected certain restaurants, gift shops and other point of sale systems at the relevant Starwood properties. We have no indication at this time that our guest reservation or Starwood Preferred Guest membership systems were impacted.

2. What did Starwood do when it discovered the issue?

Promptly after discovering the issue, we engaged third-party forensic experts to conduct an extensive investigation. We also have been working closely with law enforcement authorities and coordinating our efforts with the payment card organizations to determine the facts.

3. What information may have been compromised?

The malware was designed to collect certain payment card information, including cardholder name, payment card number, security code and expiration date. There is no evidence that other customer information, such as contact information, Social Security numbers or PINs, were affected by this issue.

4. Which Starwood hotels in North America were impacted by this incident?

The locations and potential dates of exposure for each affected Starwood property are listed here.

5. Is it safe to use a payment card at Starwood hotels?

The malware no longer presents a threat to customers using payment cards at our hotels.

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6. Is my payment card information affected?

Starwood cannot identify individual affected customers based on the payment card data the company has available. This issue impacted a limited number of Starwood properties during specific periods of time. Please refer to your payment card statements to see if you used a card at one of the affected hotels during a relevant time period. If you believe your payment card was affected or you see any unusual activity on your account statement, you should immediately contact your bank or card issuer.

7. What should I do to help protect my information?

If you believe your payment card may have been affected, you should immediately contact your bank or card issuer. Under U.S. law, you are entitled to one free credit report annually from each of the three national credit bureaus. To order your free credit report, visit www.annualcreditreport.com or call toll free at 1-877-322-8228. We encourage you to review your account statements and monitor your free credit reports. For more information about steps you can take to protect your credit files, you can contact any one of the consumer reporting agencies at:

Equifax	1-800-525-6285	www.equifax.com
Experian	1-888-397-3742	www.experian.com
TransUnion	1-800-680-7289	www.transunion.com

In addition, we have arranged with AllClear ID to offer identity protection and credit monitoring services to affected Starwood customers for one year at no cost to them. The Reference Guide provides information on registration and recommendations by the U.S. Federal Trade Commission on the protection of personal information.

8. How do I find out more about the identity protection and credit monitoring services?

We have arranged with AllClear ID to offer identity protection and credit monitoring services to affected Starwood customers for one year at no cost to them. For more information about these services, please click here or call 1-855-270-9179 (U.S. and Canada) or 1-512-201-2201 (International), Monday through Saturday, 8:00 am to 8:00 pm CST.

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9. Where can I get more information?

If you have any questions or would like additional information regarding this issue, please call 1-855-270-9179 (U.S. and Canada) or 1-512-201-2201 (International), Monday through Saturday, 8:00 am to 8:00 pm CST.

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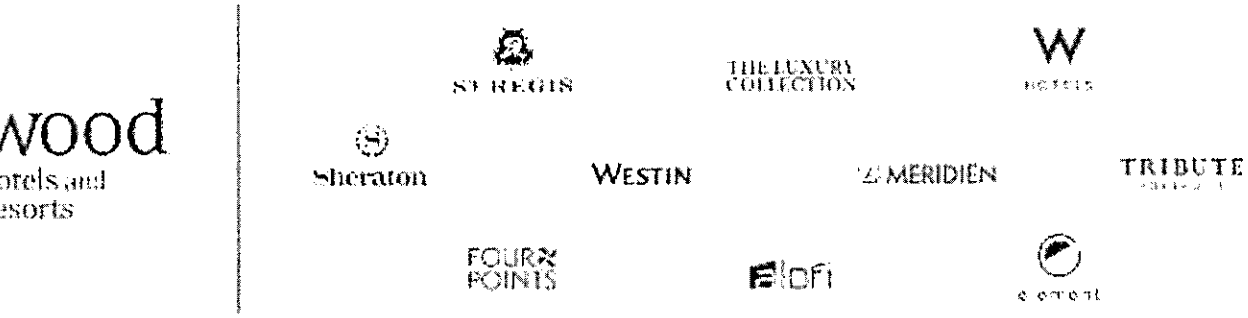

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Starwood Hotels & Resorts locations affected by payment card security issue:

Property	Location	Start	End
Le Centre Sheraton Montreal	Montreal, QC	03/02/2015	04/06/2015
Moana Surfrider, A Westin Resort	Honolulu, HI	02/02/2015	04/04/2015
Palace Hotel, San Francisco	San Francisco, CA	12/25/2014	04/04/2015
Sheraton Atlantic City Convention Center Hotel	Atlantic City, NJ	11/07/2014	05/06/2015
Sheraton Birmingham Hotel	Birmingham, AL	03/02/2015	04/14/2015
Sheraton Boston Hotel	Boston, MA	03/02/2015	04/09/2015
Sheraton Dallas Hotel	Dallas, TX	03/02/2015	04/16/2015
Sheraton Denver Hotel	Denver, CO	03/02/2015	05/02/2015
Sheraton Fairplex Hotel & Conference Center	Pomona, CA	03/02/2015	04/13/2015
Sheraton Grand Sacramento Hotel	Sacramento, CA	03/02/2015	04/19/2015
Sheraton Kansas City Hotel at Crown Center	Kansas City, MO	03/02/2015	04/16/2015
Sheraton Maui Resort & Spa	Maui, HI	11/07/2014	04/16/2015
Sheraton New Orleans Hotel	New Orleans, LA	11/07/2014	04/16/2015
Sheraton New York Times Square Hotel	New York, NY	03/02/2015	05/03/2015
Sheraton San Diego Hotel & Marina	San Diego, CA	01/03/2015	03/02/2015
Sheraton Seattle Hotel	Seattle, WA	03/02/2015	04/16/2015
Sheraton Stonebriar Hotel	Frisco, TX	03/02/2015	04/08/2015
Sheraton Waikiki	Honolulu, HI	11/07/2014	04/08/2015
Sheraton Wild Horse Pass Resort & Spa	Chandler, AZ	03/02/2015	05/06/2015
The Phoenician, a Luxury Collection Resort	Scottsdale, AZ	01/23/2015	04/17/2015
The St. Regis Bal Harbour Resort	Bal Harbour, FL	03/02/2015	04/16/2015
The Westin Birmingham	Birmingham, AL	03/02/2015	04/07/2015
The Westin Boston Waterfront	Boston, MA	03/02/2015	04/20/2015
The Westin Charlotte	Charlotte, NC	01/06/2015	04/13/2015
The Westin Chicago River North	Chicago, IL	03/02/2015	04/05/2015
The Westin Cincinnati	Cincinnati, OH	03/02/2015	06/30/2015

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Property	Location	Start	End
The Westin Detroit Metropolitan Airport	Detroit, MI	03/02/2015	04/09/2015
The Westin Ka`Anapali Ocean Resort Villas	Lahaina, HI	03/02/2015	03/26/2015
The Westin Kansas City at Crown Center	Kansas City, MO	11/07/2014	04/05/2015
The Westin Kierland Resort & Spa	Scottsdale, AZ	01/22/2015	04/05/2015
The Westin Kierland Villas, Scottsdale	Scottsdale, AZ	01/20/2015	01/21/2015
The Westin La Paloma Resort & Spa	Tucson, AZ	03/02/2015	04/16/2015
The Westin Lombard Yorktown Center	Lombard, IL	03/02/2015	04/04/2015
The Westin Los Angeles Airport	Los Angeles, CA	03/02/2015	04/04/2015
The Westin Maui Resort & Spa	Lahaina, HI	03/02/2015	04/08/2015
The Westin Michigan Avenue Chicago	Chicago, IL	03/02/2015	05/14/2015
The Westin Mission Hills Golf Resort & Spa	Rancho Mirage, CA	01/06/2015	02/10/2015
The Westin New York at Times Square	New York, NY	03/02/2015	04/25/2015
The Westin New York Grand Central	New York, NY	03/02/2015	04/10/2015
The Westin Phoenix Downtown	Phoenix, AZ	01/05/2015	04/16/2015
The Westin Princeville Ocean Resort Villas	Princeville, HI	03/02/2015	03/26/2015
The Westin Seattle	Seattle, WA	11/07/2014	04/07/2015
The Westin South Coast Plaza	Costa Mesa, CA	11/07/2014	12/03/2014
The Westin St. Francis	San Francisco, CA	03/02/2015	04/08/2015
The Westin Stonebriar Hotel & Golf Club	Frisco, TX	11/07/2014	04/15/2015
The Westin Waltham Boston	Waltham, MA	11/07/2014	04/20/2015
W Hoboken	Hoboken, NJ	03/02/2015	04/15/2015
W Hollywood	Los Angeles, CA	03/02/2015	04/06/2015
W Montreal	Montreal, QC	03/02/2015	04/06/2015
W New Orleans - French Quarter	New Orleans, LA	03/02/2015	10/23/2015
W New York - Times Square	New York, NY	03/02/2015	03/08/2015
W Retreat & Spa - Vieques Island	Vieques Island, PR	03/02/2015	04/13/2015
W South Beach	Miami Beach, FL	01/22/2015	04/09/2015
Walt Disney World Dolphin, A Sheraton Hotel	Orlando, FL	11/05/2014	04/13/2015

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FOR IMMEDIATE RELEASE

Starwood Notifies Customers of Malware Intrusion

Stamford, Conn. – November 20, 2015 – Starwood Hotels & Resorts Worldwide, Inc. (NYSE:HOT) announced today that the point of sale systems of a limited number of its hotels in North America were infected with malware, enabling unauthorized parties to access payment card data of some customers.

Promptly after discovering the issue, Starwood engaged third-party forensic experts to conduct an extensive investigation to determine the facts. Based on the investigation, malware was detected that affected certain restaurants, gift shops and other point of sale systems at the relevant Starwood properties. There is no indication at this time that the Company's guest reservation or Starwood Preferred Guest membership systems were impacted. The malware was designed to collect certain payment card information, including cardholder name, payment card number, security code and expiration date. There is no evidence that other customer information, such as contact information or PINs, were affected by this issue. The affected hotels have taken steps to secure customer payment card information and the malware no longer presents a threat to customers using payment cards at Starwood hotels.

"Protecting our customers' information is critically important to Starwood and we take this issue extremely seriously," said Sergio Rivera, Starwood President, The Americas. "Quickly after we became aware of the possible issue, we took prompt action to determine the facts. We have been working closely with law enforcement authorities and have been coordinating our efforts with the payment card organizations. We want to assure our customers that we have implemented additional security measures to help prevent this type of crime from reoccurring."

Starwood encourages customers to carefully review and monitor their payment card account statements. If a customer believes his or her payment card may have been affected, the customer should immediately contact their bank or card issuer.

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The locations and potential dates of exposure for each affected Starwood property is available at www.starwoodhotels.com/paymentcardsecuritynotice. Customers with questions may call 1-855-270-9179 (U.S. and Canada) or 1-512-201-2201 (International), Monday through Saturday, 8:00 am to 8:00 pm CST or visit www.starwoodhotels.com/paymentcardsecuritynotice for more information.

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Starwood Hotels & Resorts Worldwide, Inc. is a hotel and leisure company with nearly 1,275 properties under the brands of St. Regis®, The Luxury Collection®, W®, Westin®, Le Méridien®, Sheraton®, Four Points® by Sheraton, Aloft®, Element® and the Tribute Portfolio™.

Media Contact:
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Starwood Hotels & Resorts
(203) 964-4661
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