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July 14, 2017

Via E-Mail (SecurityBreach@atg.wa.gov)

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

Re: Legal Notice of Information Security Incident

Dear Sirs or Madams:

I write on behalf of my client, Two Roads Hospitality LLC (“Two Roads”), to inform you of a potential security incident involving the personal information of certain Two Roads guests, which may have affected approximately 5401 Washington residents. Two Roads is notifying these individuals and outlining some steps they may take to help protect themselves.

Two Roads was recently notified of a potential security incident by Sabre, a company that operates an Internet-accessible reservation platform (SynXis) for the hotel industry. According to the information we have received from this vendor in a letter dated June 6, 2017, an unauthorized individual was able to gain access to Sabre’s systems and view certain reservation information between August 10, 2016, and March 9, 2017. Based on the notice that was provided to us, the information viewed by the individual may have included certain cardholder data belonging to certain individuals who provided payment card information in order to make reservations at some properties managed by Two Roads’ subsidiaries.

Two Roads takes the privacy of personal information seriously, and was deeply disappointed to learn that this vendor’s incident could affect Two Roads guests. Upon learning of the incident, Two Roads promptly initiated an investigation into the incident and has communicated extensively with the vendor to learn more about what occurred. The vendor informed us that it engaged an outside forensic investigation firm to assist them in investigating and remediating the situation, and has enhanced the security around its access credentials and the monitoring of system activity to further detect and prevent unauthorized access. In addition, the vendor has advised us that they notified law enforcement and the payment card brands of this incident.

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Affected individuals are being notified via written letter, which will begin mailing on or around July 14, 2017. A form copy of the notice being sent to the affected Washington residents is included for your reference.

If you have any questions or need further information regarding this incident, please contact me at (303) 801-2758 or kris.kleiner@nortonrosefulbright.com.

Very truly yours,

A handwritten signature in black ink, appearing to read 'Kristopher Kleiner', written over a horizontal line.

Kristopher Kleiner

KCK
Enclosure

Two Roads Hospitality LLC
10333 E. Dry Creek Rd.
Suite 450
Englewood, CO 80112

[DATE]

[CUSTOMER NAME]

[CUSTOMER ADDRESS LINE 1]

[CUSTOMER ADDRESS LINE 2]

[CUSTOMER CITY, ST ZIP]

NOTICE OF DATA BREACH

Dear Guest:

We are writing to you to inform you of an incident involving an unauthorized party gaining access to information associated with your hotel reservation(s) at <HOTEL NAME>. The safety and security of our guests is a matter we take very seriously at Two Roads Hospitality, and we recommend that you closely review the information provided in this letter for steps to take to protect yourself against any potential misuses of your information.

What Happened?

The data incident occurred at Sabre Hospitality Solutions, a technology company that offers reservation systems and other services to thousands of hotels, online travel agencies, and similar booking services, including properties across the Two Roads Hospitality portfolio. Sabre's SynXis Central Reservations system (CRS) is the reservations system that guests interact with when making reservations at properties managed by Two Roads Hospitality companies, including Joie de Vivre Hotels, Thompson Hotels, and Destination Hotels. Please note that none of these hotel properties' computer or network systems were affected by this incident.

Following a forensic investigation, Sabre notified us on approximately June 6, 2017 that an unauthorized party gained access to their systems and was able to view certain reservation information for a subset of hotel reservations Sabre processed on behalf of certain properties.

The investigation determined that the unauthorized party first accessed payment card and other reservation information on Sabre's system on August 10, 2016 and last accessed payment card information 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 verification code. To the extent that your payment card's verification code was captured in the booking process, the code was purged from the system within 24 hours of the creation of the payment record. The unauthorized party was also able, in some cases, to access other reservation information such as guest name, email, phone number, address, and other information. Sensitive information such as Social Security, passport, or driver's license numbers was not affected by this incident. To date, the payment card brands have not notified Two Roads of any patterns of fraud related to this data breach.

What We Are Doing

Sabre engaged a leading cybersecurity firm to support its investigation, and also notified law enforcement and the payment card brands about this incident.

At Two Roads Hospitality, our hotels are continuing to evaluate and enhance their environments to provide guests with the level of security they deserve.

Every team member – from the person who greets you when you walk into our hotels to our executives – shares our commitment to information security best practices and understands the importance of protecting our guests' information.

Additionally, we are evaluating the third-party partners who assist us in managing guest information on our behalf. It is paramount they treat our guests' personal information with this same level of importance.

What You Can Do

We recommend you remain vigilant for incidents of fraud and identity theft by immediately and 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, please be sure to report it immediately to your card-issuing banks. Most financial institutions and major credit card companies have policies in place protecting cardholders from fraudulent activity and any related charges if they are reported in a timely manner.

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 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.

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 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

You may also 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 deeply regret this incident occurred and apologize for any inconveniences or hardship it may cause you. At Two Roads Hospitality, information security is a top priority, and we remain committed to continuing to work to protect your privacy. Our hotels will continue to focus on enhancing their applications, suppliers and technology infrastructure to help safeguard guests' information in the face of heightened cyber-security concerns.

If you have any questions regarding this incident or if you would like further information or assistance, please do not hesitate to contact us at [TELEPHONE NUMBER (toll-free, if available) OF PERSON OR BUSINESS REPORTING THE BREACH]. Further information can be found at <http://www.sabreconsumernotice.com/>.

Sincerely,
Andrew Arthurs
Chief Information Officer, Two Roads Hospitality LLC

STATE-SPECIFIC INFORMATION

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/>

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.

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.

You have a right to bring a civil action against someone who violates your rights under the credit reporting laws. The action can be brought against a consumer reporting agency or a user of your credit report.

Unless you are sixty-five (65) years of age or older, or you are a victim of identity theft with an incident report or complaint from a law enforcement agency, a consumer reporting agency has the right to charge you up to ten dollars (\$10.00) to place a freeze on your credit report; up to ten dollars (\$10.00) to temporarily lift a freeze on your credit report, depending on the circumstances; and up to ten dollars (\$10.00) to remove a freeze from your credit report. If you are sixty-five (65) years of age or older or are a victim of identity theft with a valid incident report or complaint, you may not be charged a fee by a consumer reporting agency for placing, temporarily lifting, or removing a freeze.

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 can be contacted using the contact information provided above.

In order to request a security freeze, you may 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. Complete address;
5. Prior addresses;
6. Proof(s) of identification (state driver's license or ID card, military identification, birth certificate 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. Do not send cash through the mail.