

BakerHostetler

Baker & Hostetler LLP

312 Walnut Street
Suite 3200
Cincinnati, OH 45202-4074

T 513.929.3400
F 513.929.0303
www.bakerlaw.com

Patrick H. Haggerty
direct dial: 513.929.3412
phaggerty@bakerlaw.com

July 8, 2016

VIA OVERNIGHT MAIL AND E-MAIL
(IDTHEFT@OAG.STATE.MD.US)

Brian E. Frosh
Attorney General
Office of the Attorney General
Attn: Security Breach Notification
200 St. Paul Place
Baltimore, MD 21202

Re: Incident Notification

Dear Mr. Frosh:

Our client, Vacation Express USA Corp. (“Vacation Express”), on June 14, 2016, learned that a former Vacation Express employee had been arrested. At the time of the arrest, the former employee had in his possession customers’ payment card information, including their name, address, payment card number, card expiration date, and CVV code. Vacation Express been actively cooperating with law enforcement in their investigation and will continue to do so. Vacation Express began mailing notification letters to the home addresses of the affected customers on June 29, 2016. Vacation Express is providing call center support for those affected.

Vacation Express is notifying one Maryland resident via U.S. mail in substantially the same form as the letter attached hereto.¹ Notification is being provided in the most expedient time possible and without unreasonable delay pursuant to the investigation described above, which was necessary to determine the scope of the incident and identify the individuals potentially affected. *See* MD. CODE, COM. LAW § 14-3504(d)(1)(ii).

¹ This report is not, and does not constitute, a waiver of personal jurisdiction.

Vacation Express is continually evaluating ways to further strengthen its privacy and information security program, including identifying additional measures and enhancements to existing safeguards to protect personal information.

Please do not hesitate to contact me if you any have questions regarding this matter.

Sincerely,



Patrick H. Haggerty
Partner

Enclosure

[Vacation Express Letterhead]

June 29, 2016

[Name]

[Address 1]

[Address 2]

Dear [Name]:

Vacation Express USA Corp. (Vacation Express) values the relationship with our customers and understands the importance of protecting customer information. We are writing to inform you about an incident that involves some of your information.

On 6/14/16, we learned that a former Vacation Express employee had been arrested. At the time of the arrest, the former employee had in his possession a small number of customers' payment card information, including your name, address, payment card number ending in XXXX, card expiration date and CVV code. We have been actively cooperating with law enforcement in their investigation and will continue to do so.

We encourage that you remain vigilant to the possibility of fraud and identity theft by reviewing your financial statements for any unauthorized activity. You should immediately report any unauthorized charges to your financial institution because the major credit card companies have rules that restrict them from requiring payment for fraudulent charges that are timely reported. You should also review the information on the following page regarding additional ways to protect yourself.

We deeply regret this incident and any inconvenience it may have caused you. Vacation Express is continually evaluating ways to further strengthen its privacy and information security program, including identifying additional measures and enhancements to existing safeguards to protect personal information. If you have any questions, please call us at 800-486-9777 Monday through Friday between 9am and 5pm Eastern Time.

Sincerely,

Ann Memmer
Director – Human Resources

MORE INFORMATION ON WAYS TO PROTECT YOURSELF

We recommend that you remain vigilant for incidents of fraud or identity theft by reviewing your account statements and credit reports for any unauthorized activity. You may obtain a copy of your credit report, free of charge, once every 12 months from each of the three nationwide credit reporting companies. To order your annual free credit report, please visit www.annualcreditreport.com or call toll free at 1-877-322-8228. Contact information for the three nationwide credit reporting companies is as follows:

Equifax, PO Box 740256, Atlanta, GA 30348, www.equifax.com, 1-800-685-1111
Experian, PO Box 4500, Allen, TX 75013, www.experian.com, 1-888-397-3742
TransUnion, PO Box 2000, Chester, PA 19016, www.transunion.com, 1-800-888-4213

If you believe you are the victim of identity theft or have reason to believe your personal information has been misused, you should immediately contact the Federal Trade Commission and/or the Office of the Attorney General in Maryland. Contact information for the Federal Trade Commission and the Maryland Attorney General's Office is as follows:

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

Maryland Attorney General's Office, 200 St. Paul Place, Baltimore, MD 21202, www.oag.state.md.us, (888) 743-0023 (toll free when calling within Maryland), (410) 576-6300 (for calls originating outside Maryland)

You can obtain information from these sources about steps an individual can take to avoid identity theft as well as information about fraud alerts and security freezes. You should also contact your local law enforcement authorities and file a police report. Obtain a copy of the police report in case you are asked to provide copies to creditors to correct your records. This notification was not delayed as a result of a law enforcement investigation.