

VIA EXPRESS DELIVERY

February 15, 2010



InterContinental Hotels Group

The Honourable Janet T. Mills  
Attorney General of the State of Maine  
6 State House Station  
Augusta, ME 04333

Three Ravinia Drive  
Suite 100  
Atlanta, GA 30346-2149  
www.ihg.com

Dear Madam:

I am writing to inform you of an incident involving payment card information that occurred at the Willard InterContinental Hotel in Washington D.C.

On September 19, 2009, we detected malicious code on one of the computers that the Hotel uses to process payments. The code captured credit card information during processing and transmitted it to an unauthorized party. The malicious code was immediately removed and the fraud teams at VISA, MasterCard, American Express and Discover notified.

We understand that the payment card issuers have notified affected card holders and replaced those payment cards that were compromised. The card issuers continue to monitor the individual accounts for any additional misuse. The Hotel also notified its guests and offered them an identity theft protection product.

As required by the banks, we have also completed an independent Qualified Incident Response Assessment (QIRA), remediated the systems and verified compliance with applicable PCI data security requirements. The events have also been reported to the appropriate law enforcement authorities. We are continuing to work with the payment card companies to resolve any issues related to misuse of the intercepted cardholder information.

Please find attached a copy of the notification letter that the Hotel mailed in December 2009 to the affected guests, of which 11 are residents of Maine. We would be happy to answer any questions that you may have.

Yours very truly,

David. A. Hom  
Vice President & Associate General Counsel

CONSUMER PROTECTION DIVISION  
RECEIVED  
FEB 18 2010

OFFICE OF ATTORNEY GENERAL



Six Continents Hotels, Inc.  
A Member of the InterContinental Hotels Group



WILLARD  
INTERCONTINENTAL®  
WASHINGTON D.C.

December 9, 2009

Re: Your credit card ending in XXXX (last 4 digits)

Dear [Name]:

We wish to inform you of an incident that may have exposed your credit card account number to an unauthorized person during your stay at the Willard InterContinental hotel earlier this year. Please know that we are working closely with federal law enforcement agencies to resolve this incident. Your card issuer has been notified about this matter, and you may receive a call to verify recent charges. We also want you to know that the Hotel deeply values guest privacy and regrets this incident.

**What Happened?**

In September 2009, we discovered unauthorized malicious software on the Hotel's payment processing computers. This software may have allowed unauthorized individuals to access your name, credit or payment card number and card verification data from your payment card. The information did not include your Social Security number, address or any other personal information. The malicious software was promptly removed from the Hotel's computers.

**What is the Hotel Doing to Protect Me?**

We are working closely with the payment card issuers to protect you. When we discovered this incident, we provided each of the payment card companies (Visa, Mastercard, American Express, and Discover) with the actual card numbers that may have been involved in this incident. Your payment card issuer may contact you to verify charges. If they suspect the account has been compromised, you may receive a new payment card. We are also working with law enforcement to investigate how the malware was installed, to apprehend those responsible, and to prosecute them to the fullest extent possible.

**What are the Risks that My Information will be Misused?**


There is a possibility that your payment card number may be misused. If you notice fraudulent activity, please report it immediately to your financial institution.

**What Should I Do?**

As always, you should continue to carefully review your credit and debit card account statements and alert your financial institution to any inappropriate charges. This is the most important step that you can take to detect any unauthorized use of your credit or debit card number.

If you detect any misuse of your payment card number, please report it to your financial institution or call us at 888-515-2210 to speak to a specially-trained Customer Care Agent. We will help you resolve any issues caused by this incident.

1401 Pennsylvania Avenue NW Washington, DC 20004-1010 USA  
Tel: +1(202) 628 9100 Fax: +1(202) 637 7326 [washington@ihg.com](mailto:washington@ihg.com) [www.intercontinental.com](http://www.intercontinental.com)

Printed on 30%  
Recycled Paper 



### Will You Provide Credit Monitoring?

While Social Security numbers were not compromised, your security is of the greatest importance to us, which is why we've chosen ProtectMyID.com™ to offer you one year of free identity theft protection.

ProtectMYID.com is part of Experian®, a leader in identity theft protection and a name you can trust. We believe that ProtectMyID.com can help you mitigate the potential effects of this data breach on your financial assets and identity. This product will also protect your identity from other threats, even if those threats are not a result of our incident.

To enroll, please visit [www.protectmyid.com/enroll](http://www.protectmyid.com/enroll) and use the activation code [XXX] to activate your free identity theft protection. You must enroll by March 31, 2010.

### ProtectMyID monitors and protects your vital personal information with:

- Internet scanning:** Experian® will notify you if they find potentially unauthorized uses of your Social Security, debit or credit card numbers on the Internet.
- \$1 Million Product Guarantee:** To reimburse you for certain identity theft-related expenses up to \$1 million, should the product fail.
- Tri-Bureau credit monitoring:** Daily monitoring of your credit reports at all three Bureaus.
- 1-Bureau credit report:** Receive a free copy of your Experian credit report upon sign up.
- Access to ProtectMyID.com's Fraud Resolution Agents:** Qualified, experienced, knowledgeable agents who will help investigate identity theft incidents.
- Lost Wallet Protection:** If your wallet is lost or stolen, Experian® will help you notify your creditors to get new cards.

Once enrolled, if you suspect your identity has been compromised, call ProtectMyID.com's Fraud Resolution Agents at 1-877-441-6943 immediately so they can work with you to resolve the situation. You'll be assigned a dedicated agent to work with you in addressing your concerns.

### Should I Do Anything Else?

Although your Social Security number was not exposed, it's generally good practice to check your consumer reports annually. You may obtain a free copy of your credit report once every 12 months from each of the nationwide consumer reporting agencies by visiting <http://www.annualcreditreport.com> or by contacting the consumer reporting agencies at:

Equifax  
(800) 685-1111  
P.O. Box 740241  
Atlanta, GA 30374-0241  
[www.equifax.com](http://www.equifax.com)

Experian  
(888) 397-3742  
P.O. Box 9532  
Allen, TX 75013  
[www.experian.com](http://www.experian.com)

TransUnion  
(800) 916-8800  
P.O. Box 6790  
Fullerton, CA 92834-6790  
[www.transunion.com](http://www.transunion.com)

We also recommend that you carefully review all your other financial account statements during the next 24 months to make certain there have been no unauthorized transactions made or new accounts opened in your name. Contact your financial institutions immediately if there is unauthorized activity on your accounts or if an unauthorized account has been opened in your name.

You may also wish to place a fraud alert on your credit report. The fraud alert is a consumer statement that alerts creditors of possible fraudulent activity within your report as well as requests that they contact you prior to establishing any accounts in your name. Once the fraud alert is added to your credit report, all creditors should contact you prior to establishing any account in your name. To place a fraud alert on



your credit file, you may contact any of the consumer reporting agencies listed above. Once the fraud alert has been placed with one agency, a notification will be sent to the other two credit reporting agencies on your behalf.

**Where Can I Go For More Information?**

If you want to learn more about payment card fraud and identity theft, visit the U.S. government's identity theft information website, <http://www.consumer.gov/idtheft>. You can also contact the Federal Trade Commission via phone at 1-877-ID-THEFT (877-428-4338) or via mail to:  
Federal Trade Commission - Consumer Response Center  
600 Pennsylvania Avenue, NW, Washington, DC 20580

**Is There Anything Else I Should Know?**

Please know that the Hotel takes the security of your personal data very seriously and is committed to protecting your personal information. We maintain numerous safeguards to protect your information. We are also taking steps to increase our computer security further. Again, we apologize for this incident.

If you would like to discuss this further, please call us at 888-515-2210 to speak to a specially-trained Customer Care Agent.

Sincerely,

A handwritten signature in black ink, appearing to read "Jean-Francois Gatti", is written over a horizontal line. The signature is stylized and somewhat cursive.

Jean-Francois Gatti  
General Manager

**Additional Information for Residents of Maryland:**

Maryland residents may contact the Maryland Attorney General's Office for more information about identity theft:

Office of the Attorney General  
Consumer Protection Division  
200 St. Paul Place  
Baltimore, MD 21202  
1-888-743-0023  
[www.oag.state.md.us](http://www.oag.state.md.us)