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OFFICE OF CONSUMER PROTECTION
INVESTIGATIONS

State of Hawaii Department of Commerce and Consumer Affairs Office of Consumer Protection Leiopapa A Kamehameha Building aka State Office Tower 235 South Beretania Street Honolulu, Hawaii 96813

RE: Notification of Data Security Breach Incident

Dear Sir:

This letter is being sent in accordance with Hawaii law to inform your office that our company recently suffered an incident in which certain personal information about approximately 3486 Hawaii residents may have been accessible by unauthorized persons via a YapStone URL vulnerability. The information potentially exposed included a combination of name, driver's license number, bank account number and/or Social Security Number. Immediately upon our discovery of this incident on August 4, 2015 YapStone immediately blocked unauthorized access to the URL and retained outside experts to investigate the incident, to understand the level of impact, and to remediate any security vulnerability. While we have no information to indicate that information has been or will be misused, we are providing notification and 24 months of credit monitoring services to affected individuals. We have enclosed a copy of the notice letter that we will be sending to potentially affected individuals on a nationwide basis on 9/11/2015.

Should you have any additional questions, you may contact me directly at 925-954-6647

Sincerely,

David Durant

General Counsel

YapStone, Inc.

2121 N. California Blvd, Suite 400

Walnut Creek, CA 94596

Enclosure



Return Mail Processing Center P.O. Box 588 Claysburg, PA 16625-0588

September 11, 2015

Dear Sample A Sample,

YapStone (which you may know as VacationRentPayment), a provider of payment services is writing to inform you that certain personal information you provided on your VacationRent Payments application that was stored by YapStone may have been accessible by unauthorized persons via a YapStone URL between approximately July 15, 2014 and August 5, 2015. Unfortunately, due to this application being available, your email, Social Security number, driver's license, date of birth, and bank account were potentially exposed. Please review the enclosed FAQ for additional information.

Upon learning of the issue on August 4, 2015, YapStone immediately blocked unauthorized access to the application and retained outside experts to investigate the incident to understand the level of impact. While we have no information to indicate that your information has been or will be misused, we believe it is important that you be informed of this inadvertent information disclosure and that you take precautions to protect against possible misuse or identity theft.

Thus, we wanted to provide you with information on how to protect yourself. YapStone has arranged for you to receive two years of credit protection services from Experian at no cost to you through Experian's ProtectMyID Alert service which includes: 24 months of credit monitoring services, insurance reimbursement policy and educational materials and access to expert fraud resolution representatives. To enroll in this service, follow these three steps:

- ENSURE That You Enroll By: December 31, 2015 (Your code will not work after this date.)
- 2. VISIT the ProtectMyID Web Site to enroll: www.protectmyid.com/alert
- 3. PROVIDE Your Activation Code: ABCDEFGHI

If you have questions or need an alternative to enrolling online, please call (877) 297-7780 and provide engagement #: **PC96449**. Once your ProtectMyID membership is activated, you will receive the following features:

- Free copy of your Experian credit report
- Surveillance Alerts for:
 - Daily Bureau Credit Monitoring: Alerts of key changes & suspicious activity found on your Experian credit report.
- Identity Theft Resolution & ProtectMyID ExtendCARE: Toll-free access to US-based customer care and a dedicated Identity Theft Resolution agent who will walk you through the process of fraud resolution from start to finish for seamless service. They will investigate each incident; help with contacting credit grantors to dispute charges and close accounts including credit, debit and medical insurance cards; assist with freezing credit files; contact government agencies.
 - To offer extended protection, you will receive ExtendCARE™, which provides you with the same high-level of Fraud Resolution support even after your ProtectMyID membership has expired.

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 \$1 Million Identity Theft Insurance¹: Immediately covers certain costs including, lost wages, private investigator fees, and unauthorized electronic fund transfers.

You should remain vigilant for incidents of fraud and identity theft including by regularly reviewing your account statements and monitoring free credit reports. If you discover any suspicious or unusual activity on your accounts or suspect identity theft or fraud, be sure to report it immediately to your financial institutions. In addition, you may contact the Federal Trade Commission ("FTC") or law enforcement to report incidents of identity theft or to learn about steps you can take to protect yourself from identity theft. To learn more, you can go to the FTC's Web site, at www.consumer.gov/idtheft, call the FTC, at (877) IDTHEFT (438-4338) or write to Federal Trade Commission, Consumer Response Center, 600 Pennsylvania Avenue, NW, Washington, DC 20580. In addition, under U.S. law, you are entitled to one free credit report annually from each of the three nationwide consumer-reporting agencies. You may order one, two, or all three reports at the same time, or you may stagger your requests during a 12-month period to keep an eye on the accuracy and completeness of the information in your reports. To order your free credit reports, visit www.annualcreditreport.com or by calling (877) 322-8228. You may contact the nationwide credit reporting agencies at:

Equifax 800-525-6285 P.O. Box 740241 Atlanta, GA 30374-0241 www.equifax.com Experian 888-397-3742 P.O. Box 9532 Allen, TX 75013 www.experian.com TransUnion Corp 800-680-7289 Fraud Victim Assistance P.O. Box 6790 Fullerton, CA 92834-6790 www.transunion.com

Even if you do not find any suspicious activity on your initial credit reports, the FTC recommends that you check your credit reports periodically. Checking your credit reports periodically can help you spot problems and address them quickly.

In addition, you may obtain additional information from the FTC and the credit reporting agencies about fraud alerts and security freezes. You can add a fraud alert to your credit report file to help protect your credit information. A fraud alert tells creditors to contact you before they open any new accounts or change your existing accounts. Call any one of the three major credit bureaus listed above to place a fraud alert on your credit file. As soon as one credit bureau confirms your fraud alert, the others are notified to place fraud alerts. In addition, you can contact the nationwide credit reporting agencies regarding if and how you may place a security freeze on your credit report to prohibit a credit reporting agency from releasing information from your credit report without your prior written authorization.

YapStone takes the security of your personal information very seriously, and sincerely regrets that this incident may affect you. We apologize for this error. YapStone has set up a confidential inquiry line to answer any further questions you may have. It is available Monday through Friday, 9:00 a.m. to 7:00 p.m. E.D.T. at (877) 238-3816. Please use reference number 5284090115 when calling.

Sincerely,

Thomas J. Villante Chief Executive Officer

YapStone, Inc. 2121 N. California Blvd, Suite 400 Walnut Creek, CA 94596

¹ Identity theft insurance is underwritten by insurance company subsidiaries or affiliates of American International Group, Inc. (AIG). The description herein is a summary and intended for informational purposes only and does not include all terms, conditions and exclusions of the policies described. Please refer to the actual policies for terms, conditions, and exclusions of coverage. Coverage may not be available in all jurisdictions.

IF YOU ARE A CALIFORNIA RESIDENT. Even if you do not find any signs of fraud on you. credit reports, the California Office of Privacy Protection recommends that you check your credit reports every three months for the next year. The law allows you to order a free credit report from each agency every 12 months. You may order one, two, or all three reports at the same time, or you may stagger your requests during a 12-month period to monitor the accuracy and completeness of the information in your reports. Just call one of the numbers above to order your report and keep the "fraud alert" in place. For more information on identity theft, you may visit the California Office of Privacy Protection website, www.oag.ca.gov/privacy.

IF YOU ARE AN INDIANA RESIDENT: For additional steps you may want to take to protect yourself please read the Indiana Identity Theft Prevention section online at www.IndianaConsumer.com for more information about situation-specific actions and responses.

IF YOU ARE AN IOWA RESIDENT: You may contact local law enforcement or the Iowa Attorney General's Office to report suspected incidents of identity theft. You can contact the Iowa Attorney General at:

Office of the Attorney General 1305 E. Walmut Street Des Moines, IA 50319 (515) 281-5164 http://www.iowaattorneygeneral.gov/

IF YOU ARE A MARYLAND RESIDENT: You may obtain information about avoiding identity theft from the FTC or the Maryland Attorney General's Office. These offices can be reached at:

Federal Trade Commission Consumer Response Center 600 Pennsylvania Avenue, NW Washington, DC 20580 (877) IDTHEFT (438-4338) http://www.ftc.gov/idtheft/ Office of the Attorney General Consumer Protection Division 200 St. Paul Place Baltimore, MD 21202 (888) 743-0023

IF YOU ARE A NEW YORK RESIDENT: For more information on identity theft, we suggest that you visit the New York State Consumer Protection Board website at www.dos.ny.gov/consumerprotection.

www.oag.state.md.us

IF YOU ARE A NORTH CAROLINA RESIDENT: You may obtain information about preventing identity theft from the FTC or the North Carolina Attorney General's Office. These offices can be reached at:

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

North Carolina Department of Justice Attorney General Roy Cooper 9001 Mail Service Center Raleigh, NC 27699-9001 (877) 566-7226 http://www.ncdoj.com

IF YOU ARE A WEST VIRGINIA RESIDENT: You have the right to obtain a security freeze. 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 West Virginia law. 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 business days you will be provided a unique personal identification number or password to use if you choose to remove the freeze on your credit report or to temporarily authorize the distribution of your credit report for a 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; and (3) The period of time for which the report shall be available to users of the credit report.

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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 business days after receiving the request. A security freeze does not apply to circumstances in which 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 account review, collection, fraud control or similar activities. If you are actively seeking credit, 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, a few days before actually applying for new credit. You have the 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.

Frequently Asked Questions September, 2015

Q1: What happened?

A1: YapStone (which you may know as VacationRentPayment) discovered that certain personal information provided on your VacationRent Payments application that was stored by YapStone may have been accessible by unauthorized persons via a YapStone URL between approximately July 15, 2014 and August 5, 2015.

Q2: Who is YapStone?

A2: YapStone is a leading online payment service provider delivering large market payment solutions that give businesses the ability to accept online payments.

O3: How do I know if I'm affected?

A3: YapStone has sent letters to customers who were affected. If you did not receive a letter your information was not exposed. If you are still concerned, you may call the toll-free number set up by YapStone: (877) 238-3816. Representatives are available to talk to you Monday through Friday, 9:00 a.m. to 7:00 p.m. E.D.T.

Q4: What information was potentially exposed?

A4: The initial investigation indicates that certain customer information provided to YapStone through account applications was exposed through this incident. The letter that YapStone sent you identifies the nature of information about you that was exposed. In some cases, the exposed information may include names, e-mail addresses, physical addresses, dates of birth, bank account and Social Security numbers.

There was no exposure to traveler credit card and passwords. If you are still concerned, you may call the toll-free number set up by YapStone: (877) 238-3816. Representatives are available to talk to you Monday through Friday, 9:00 a.m. to 7:00 p.m. E.D.T.

Q5: Was traveler payment information exposed?

A5: No. No traveler payment or credit card information was exposed and no YapStone account information was exposed. If you are still concerned, you may call the toll-free number set up by YapStone: (877) 238-3816. Representatives are available to talk to you Monday through Friday, 9:00 a.m. to 7:00 p.m. E.D.T.

Q6: What is YapStone doing to protect my information?

A6: Upon discovery, YapStone immediately blocked unauthorized access to the URL and immediately began an investigation to identify and remediate any security vulnerability. YapStone sincerely regrets any inconvenience this may cause, and YapStone is working with a team of third-party forensics experts to investigate and enhance data security and protection. The forensic investigation to date has indicated that unauthorized access to the exposed information occurred between approximately July 15, 2014 and August 5, 2015.

Despite this unauthorized access, YapStone has no evidence that any of the exposed information has been misused.

YapStone is continuing to take steps to remediate and enhance the security of its systems. Remedial efforts include increasing the security protections of the YapStone site, enhancing and strengthening YapStone's internal password rules, and storage mechanisms, and increased active monitoring of the affected systems.

In addition, YapStone has engaged Experian®, the largest credit bureau in the U.S., to offer you a complimentary two-year membership to Experian's ProtectMyID® Elite credit monitoring and identity restoration services. Instructions on how to enroll and receive these services are contained in the Notice of Privacy Safeguards included with notification letters.

Q7: To what extent were Social Security Numbers exposed?

A7: Some Social Security Numbers were exposed. Most customers provided only the last four digits of their Social Security Number, but some provided the full number. The letter YapStone sent you identifies the nature of information about you that was exposed.

Q8: To what extent may my financial information have been exposed?

A8: YapStone's investigation showed that information that was accessed did not include credit card numbers. However, if your bank account information was contained in your application, then this information was potentially accessible. This may include your bank account number and your bank routing number. The letter that YapStone sent you identifies the nature of information about you that was exposed. If you are still concerned, you may call the toll-free number set up by YapStone: (877) 238-3816. Representatives are available to talk to you Monday through Friday, 9:00 a.m. to 7:00 p.m. E.D.T.

Q9: If my information was exposed, what should I do?

A9: Immediately check for any suspicious or unusual activity on your accounts. You should also enroll in the credit monitoring services available through Experian, as described in your letter. The letter also explains steps you may wish to take with respect to fraud alerts and security freezes.

In addition, YapStone recommends that you contact one of the three credit reporting bureaus and place a 90-day Initial Fraud Alert on your credit file. That bureau will notify the other two bureaus and will send you confirmation that the alert has been placed along with a free copy of your credit report. Review your credit report carefully to see if there has been any new credit requested. You may contact the nationwide credit reporting agencies at:

Equifax Experian TransUnion Corp 800-525-6285 888-397-3742 800-680-7289

P.O. Box 740241 P.O. Box 9532 Fraud Victim Assistance

Atlanta, GA 30374-0241 Allen, TX 75013 P.O. Box 6790

www.equifax.com www.experian.com Fullerton, CA 92834-6790 www.transunion.com

You should remain vigilant for incidents of fraud and identity theft by regularly reviewing your account statements and monitoring free credit reports. If you discover any suspicious or unusual activity on your accounts or suspect identity theft or fraud, be sure to report it immediately to your financial institutions. In addition, you may contact the Federal Trade Commission ("FTC") or law enforcement to report incidents of identity theft or to learn about steps you can take to protect yourself from identity theft.

To learn more, you can go to the FTC's Web site, at www.consumer.gov/idtheft, call the FTC, at (877) IDTHEFT (438-4338) or write to Federal Trade Commission, Consumer Response Center, 600 Pennsylvania Avenue, NW, Washington, DC 20580. In addition, under U.S. law, you are entitled to one free credit report annually from each of the three nationwide consumer-reporting agencies. You may order one, two, or all three reports at the same time, or you may stagger your requests during a 12-month period to keep an eye on the accuracy and completeness of the information in your reports. To order your free credit reports, visit www.annualcreditreport.com or by calling (877) 322-8228. You may also contact the nationwide credit reporting agencies noted above.

Mark your calendar to review all this information again every three months. Sometimes identity thieves will wait for time to pass before using your information.

Q10: How will I know if my information was used by someone else to open a fraudulent account or gain unauthorized access to my accounts?

A10: The best way to find out is to get a copy of your credit report from one of the three credit reporting bureaus. The credit report will show if there has been any new credit requested using your information. You can get a copy of your credit report from www.annualcreditreport.com.

You should also check your account statements carefully. If someone else has used your bank account number the activity will appear on your statement. If you see activity that you did not authorize, call your bank at the number on the back of your statement immediately and tell them that the activity was not authorized and ask the bank to change your account number.

Q11: How do I put a Fraud Alert on my credit report?

A11: U.S. law allows you to put a "fraud alert" on your credit report. This is a free service. A 90-day Initial Fraud Alert puts a statement on your credit file that you may have been or are about to become the victim of identity theft or other fraud. If you specify a telephone number, anyone using your credit report must call that number or take reasonable steps to verify your identity to confirm that a credit application is not the result of identity theft.

After you put a fraud alert on your credit report, you will be asked to provide proof of your identification when you apply for credit. This may limit your ability to apply for instant credit for in-store purchases but it should not interfere with your daily use of existing credit cards or banking accounts.

You can put a 90-day Initial Alert on your credit report by contacting one of the three major credit bureaus. The one you contact will notify the others. This will entitle you to a free credit report. You will receive confirmation of the alert from the bureau you contact. At the end of the 90-day period you may place an additional Initial Fraud Alert on your credit file. YapStone suggests that you do this every 90 days for at least one year.

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Q12: How can I get in touch with the credit bureaus?

A12: There are three major credit bureaus. They are:

Equifax Experian TransUnion Corp 800-525-6285 888-397-3742 800-680-7289 P.O. Box 740241 P.O. Box 9532 Fraud Victim Assistance Atlanta, GA 30374-0241 Allen, TX 75013 P.O. Box 6790 www.equifax.com Fullerton, CA 92834-6790 www.experian.com www.transunion.com

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Q13: Do I have to pay for a credit report?

A13: YapStone has arranged for you to receive two years of credit protection services from Experian at no cost to you through Experian's® ProtectMyID® Alert service which includes: 24 months of credit monitoring services, insurance reimbursement policy and educational materials and access to expert fraud resolution representatives. To enroll in this service, please refer to the instructions and personal Activation Code provided in the letter sent to you by YapStone.

You are also entitled to one free credit report a year from each of the three credit reporting bureaus. This means that you can receive one today from one (e.g. Experian), you can receive another in four months (e.g. from Equifax), and you can receive another in eight months (e.g. from TransUnion). By spacing out your requests for your free credit report you can monitor your credit over the course of a year. If you want to receive more than one credit report form any of the credit reporting bureaus during the same year, you may have to pay a small charge.

Q14: How long will it take to get my credit report?

A14: You can access your credit report online at www.annualcreditreport.com. You can download or print the report from that site. You may also request the report by telephone (by calling 1-877-322-8228 and answering some questions to verify who you are) or by mail (by downloading the request form from www.annualcreditreport.com and mailing it to Annual Credit Report Request Service, P.O. Box 105281, Atlanta, GA 30348-5281). If you request your report by phone or by mail it will take approximately two weeks to process the request, so you should allow two to three weeks for delivery to you.

Q15: Is there a long-term fraud alert?

A15: A fraud alert is a message added to your credit report that tells anyone who pulls a copy of your credit report that there is possible fraud associated with your account. It gives them a telephone number to call you before issuing any new credit.

A 90-day Initial Fraud Alert expires after 90 days. If you have been the victim of identity theft you may be able to place a 7-year fraud alert on your account. You can obtain more information online at http://www.ftc.gov/bcp/edu/microsites/idtheft/consumers/index.html.

Q16: How long does a fraud alert last?

A16: The Initial Fraud Alert lasts 90 days after it is placed on your report. You can remove the alert by calling the credit bureaus before the 90 days expires. You can place an initial alert every 90 days by calling one of the credit bureaus. If you are eligible for a long-term fraud alert, it will last for 7 years.

Q17: Will a fraud alert stop me from using my credit cards?

A17: No. However, a fraud alert may interfere with your ability to get immediate credit, for instance, if you apply for instant credit at a department store. This is because the department store credit office will have to call you to verify your identity before issuing you credit.

Q18: Can I still apply for credit if I put a fraud alert on my credit report?

A18: Yes. The fraud alert may slow down the process of getting approval for credit because the fraud alert will require that the creditor verify your identity before approving new credit.

Q19: What should I watch out for on my credit report?

A19: Look for any accounts that you don't recognize especially new accounts. Look in the personal information section to see if the residence and employment information is correct or has changed.

These things could be indications of fraud. If you see information you do not understand or that is wrong, call the credit bureau at the number on the report and speak to a staff member. If the information cannot be explained, contact your local police or sheriff's office.

Q20: If someone has used my information, what should I do?

A20: You should immediately notify your local police or sheriff's office and file a report. Get a copy of the police report, because you may need to give a copy to the credit bureaus or creditors. Also contact one of the three credit bureaus and place a fraud alert on your account. For more information you can visit the website: www.consumer.gov/idtheft

Q21: Do I need to call all three credit bureaus?

A21: No. When you call one bureau, it will pass the report on to the other two. You should receive a confirming letter from each of the three bureaus. If you do not receive confirmations from all three credit bureaus, call the bureau that did not confirm the alert.

O22: Will YapStone contact me to ask for my personal information because of this event?

A22: No. YapStone will not contact you unless you call or write to YapStone first. YapStone will not ask for bank account information or personal identification numbers (PINs) or for your full credit card or social security number. If you are contacted directly by someone who claims to be with YapStone and who asks you for your personal information, please **immediately** contact YapStone as well as your local sheriff's office to report the suspicious contact.

Q23: I have been contacted directly by someone claiming to be from YapStone or a law enforcement agency asking for my personal information (e.g., social security number, etc.). Did you contact me? What should I do?

A23: No. YapStone did not contact you unless you called or wrote YapStone first. YapStone will never contact you asking for bank account information or personal identification numbers (PINs) or for your full credit card or social security number. If you were contacted directly by someone who claimed to be with YapStone or law enforcement and who asks you for your personal information, please immediately contact us as well as your local sheriff's office to report the suspicious contact. You may also provide YapStone with your name and telephone number and YapStone will have the appropriate authorities contact you directly. When law enforcement contacts you, they will reference your contact with YapStone.

Q24: Will you contact me by email to sign up for credit monitoring/identity protection services?

A24: No. You should be aware of scam email campaigns targeting individuals of a recent data breech. These scams, designed to capture personal information (known as "phishing"), appear as if they are from YapStone and include a "click here" link for credit monitoring. These emails are NOT from YapStone. Do not reply to the email or reach out to the senders in any way. Do not supply any information on the website that may open, if you have clicked on a link in email. Do not open any attachments that arrive with email.

YapStone is not calling individuals regarding the security incident and are not asking for credit card information or Social Security numbers over the phone or via email. For more guidance on recognizing scam email, please visit the FTC Website: http://www.consumer.ftc.gov/articles/0003-phishing.

REFERENCE SHEET FOR WEBSITES:

Credit Reporting Bureaus:

Annual Credit Reports: http://www.annualcreditreport.com

Experian:

888-397-3742 P.O. Box 2002 Allen, TX 75013 http://www.experian.com

Equifax:

800-525-6285 P.O. Box 740241 Atlanta, GA 30374-0241 http://www.equifax.com

Trans Union:

800-680-7289
Fraud Victim Assistance Division
P.O. Box 6790
Fullerton, CA 92834-6790
http://www.transunion.com

Federal Trade Commission

Identity Theft

Hotline: 877-ID-THEFT (877-438-4338)

http://www.ftc.gov/bcp/edu/microsites/idtheft/consumers/index.html Affidavit: http://www.ftc.gov/bcp/edu/resources/forms/affidavit.pdf

Filing a Complaint with the FTC

http://www.ftc.gov

1-877-FTC-HELP (1-877-382-4357) (TTY: 1-866-653-4261)

Social Security Administration

Fraud Hotline: 800-269-0271 Benefits Statement: 800-772-1213

http://www.ssa.gov

Privacy Rights Clearing House Identity Theft Resources

https://www.privacyrights.org/topics/7

This not-for-profit organization provides statistics, fact sheets and government records about identity theft.

Identity Theft Resource Center

http://www.idtheftcenter.org

This not-for-profit organization is dedicated exclusively to identity theft. It provides consumer and victim support about identity theft and includes resources, consumer alerts and instructions for victims.

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