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October 3, 2025

VIA ONLINE SUBMISSION

Attorney General Mike Hilgers
Office of the Attorney General
Consumer Affairs Response Team
2115 State Capital
Lincoln, NE 68509
Tel: 402-471-2683

Re: Notice of Data Security Incident

Dear Attorney General Hilgers:

Constangy, Brooks, Smith & Prophete LLP ("Constangy") represents VR Club, Inc. ("VR Club"), private, members-only luxury real estate and golf club based in Utah, in connection with the data security incident described in greater detail below. The purpose of this letter is to notify you of the of the impact to Nebraska residents in accordance with Nebraska's data breach notification statute.

1. Nature of the Security Incident

On or around February 21, 2025, VR Club became aware of unusual activity in its email environment. VR Club immediately took steps to secure the email environment and engaged cybersecurity experts to conduct an investigation. The investigation determined that an unknown actor may have accessed and acquired certain data without authorization on or about March 6, 2025. VR Club then engaged a third-party vendor to conduct a comprehensive review of the affected data to determine whether personal information may have been involved. Based on that review, on October 2, 2025, VR Club confirmed the scope of the impact and secured information sufficient to effectuate notice. VR Club then took steps to notify you of the incident as quickly as possible.

Please note that VR Club has no evidence of fraud or misuse of any of the data, only evidence that data was acquired without authorization.

2. Number of Affected Nebraska Residents & Information Involved

The incident involved personal information for approximately one (1) Nebraska resident. The information involved in the incident for the affected Nebraska resident may differ depending on the individual but may have include name and Social Security number.

3. Notification to Affected Individual

On October 3, 2025, a notification letter was sent to the affected resident by USPS First Class Mail. The notification letter provides resources and steps this individual can take to help protect their information. The notification letter also offers individuals the opportunity to enroll in twelve (12) months of complimentary identity protection services through Experian, including credit monitoring, dark web monitoring, $1 million identity fraud loss reimbursement policy, and fully managed identity theft recovery services. A sample notification letter sent to the impacted individual is included with this correspondence.

4. Steps Taken Relating to the Incident

In response to the incident, VR Club retained cybersecurity experts and launched a forensics investigation to determine the source and scope of the compromise. VR Club also implemented additional security measures to further harden its environment in an effort to prevent a similar event from occurring in the future.

Finally, VR Club is notifying the affected individuals and providing them with steps they can take to protect their personal information as discussed above. VR Club has also established a toll-free call center through Experian, a leader in risk mitigation and response, to answer any questions about the incident and address related concerns.

5. Contact Information

VR Club remains dedicated to protecting the personal information in its control. If you have any questions or need additional information, please do not hesitate to contact Donna Maddux at dmaddux@constangy.com.

Best regards,

Donna Maddux
CONSTANGY, BROOKS, SMITH & PROPHETE LLP

Enclosure: Sample Notification Letter

Return Mail Processing
PO Box 999
Suwanee, GA 30024

1 1 1 ******************AUTO**ALL FOR AADC 303
SAMPLE A. SAMPLE - L01
APT ABC
123 ANY ST
ANYTOWN, US 12345-6789

October 3, 2025

Subject: Notice of Data [Extra1]

Dear Sample A. Sample:

We are writing to inform you of a recent data security incident that may have affected your personal information. VR Club Inc. ("VR Club") takes the privacy and security of all information within its possession very seriously. Please read this letter carefully as it contains information regarding the incident and steps that you can take to help protect your personal information, including the opportunity to enroll in credit monitoring and identify protection services at no cost to you.

What Happened? On or around February 21, 2025, we became aware of unusual activity in our email environment. We immediately took steps to secure our email environment and engaged cybersecurity experts to conduct an investigation. The investigation determined that an unknown actor may have accessed and acquired certain data without authorization sometime prior to March 6, 2025. We then engaged a third-party vendor to conduct a comprehensive review of the affected data to determine whether personal information may have been involved. Based on that review, on October 1, 2025, we confirmed the scope of the impact and secured information sufficient to effectuate notice. We then took steps to notify you of the incident as quickly as possible. Please note that we have no evidence of the misuse, or attempted misuse, of any potentially impacted information.

What Information Was Involved? The data involved included your name in combination with your [Extra2].

What We Are Doing: In addition to the steps described above, we implemented additional security measures to further protect our email environment and minimize the risk of future incidents.

To help protect your identity, we are offering identity theft protection services through Experian, a data breach and recovery services expert. Experian identity protection services include: [Extra3] of credit monitoring, a $1,000,000 insurance reimbursement policy, and fully managed id theft recovery services. With this protection, Experian will help you resolve issues if your identity is compromised.

Please note that Identity Restoration is available to you for [Extra3] months from the date of this letter and does not require any action on your part at this time. The Terms and Conditions for this offer are located at www.ExperianIDWorks.com/restoration.

While identity restoration assistance is immediately available to you, we also encourage you to activate the fraud detection tools available through Experian IdentityWorks as a complimentary [Extra3]-month membership. This product provides you with superior identity detection and resolution of identity theft. To start monitoring your personal information, please follow the steps below:

- Ensure that you **enroll by** November 28, 2025 (Your code will not work after this date.)
- **Visit** the Experian IdentityWorks website to enroll: https://www.experianidworks.com/credit
- Provide your **activation code**: ABCDEFGHI

If you have questions about the product, need assistance with Identity Restoration, or would like an alternative to enrolling in Experian IdentityWorks online, please contact Experian's customer care team at 833-420-2884 by November 28, 2025. Be prepared to provide engagement number [Engagement Number] as proof of eligibility for the Identity Restoration services by Experian.

ADDITIONAL DETAILS REGARDING YOUR [Extra3]-MONTH EXPERIAN IDENTITYWORKS MEMBERSHIP

A credit card is not required for enrollment in Experian IdentityWorks. You can contact Experian immediately regarding any fraud issues, and have access to the following features once you enroll in Experian IdentityWorks:

- **Experian credit report at signup:** See what information is associated with your credit file. Daily credit reports are available for online members only.*
- **Credit Monitoring:** Actively monitors Experian file for indicators of fraud.
- **Identity Restoration:** Identity Restoration specialists are immediately available to help you address credit and non-credit related fraud.
- **Experian IdentityWorks ExtendCARE™:** You receive the same high-level of Identity Restoration support even after your Experian IdentityWorks membership has expired.
- **$1 Million Identity Theft Insurance**:** Provides coverage for certain costs and unauthorized electronic fund transfers.

What You Can Do: You can follow the recommendations on the following page to help protect your personal information. You can also enroll in the complimentary services offered to you through Experian by contacting 833-420-2884 or going to https://www.experianidworks.com/credit and using the enrollment code above. Please note the deadline to enroll is November 28, 2025.

For More Information: Further information about how to protect your personal information appears on the following page. If you have questions or need assistance, please call Experian at 833-420-2884 from 8:00am to 8:00pm Central Time, Monday through Friday (excluding holidays). Please be prepared to provide your engagement [Engagement Number].

Sincerely,

VR Club, Inc.
7865 North Victory Ranch Drive
Kamas, Utah, 84036

* Offline members will be eligible to call for additional reports quarterly after enrolling.

** The Identity Theft Insurance is underwritten and administered by American Bankers Insurance Company of Florida, an Assurant company. Please refer to the actual policies for terms, conditions, and exclusions of coverage. Coverage may not be available in all jurisdictions.

ADDITIONAL STEPS YOU CAN TAKE TO FURTHER PROTECT YOUR INFORMATION

Review Your Account Statements and Notify Law Enforcement of Suspicious Activity: As a precautionary measure, we recommend that you remain vigilant by reviewing your account statements and monitoring free credit reports closely for errors and by taking other steps appropriate to protect accounts, including promptly changing passwords. If you detect any suspicious activity on an account, you should promptly notify the financial institution or company with which the account is maintained for remediation assistance or contact a remediation service provider. You also should promptly report any fraudulent activity or any suspected incidence of identity theft to proper law enforcement authorities, your state attorney general, and/or the Federal Trade Commission (FTC). 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. Contact information for the FTC is as follows:

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

Copy of Credit Report: You may obtain a free copy of your credit report from each of the three major credit reporting agencies once every 12 months by visiting http://www.annualcreditreport.com/, calling toll-free 877-322-8228, or by completing an Annual Credit Report Request Form and mailing it to Annual Credit Report Request Service, P.O. Box 105281, Atlanta, GA 30348. You can print this form at https://www.annualcreditreport.com/cra/requestformfinal.pdf. You also can contact one of the following three national credit reporting agencies:

- *Equifax*, P.O. Box 740241, Atlanta, GA 30374, 1-800-525-6285, www.equifax.com.
- *Experian*, P.O. Box 9532, Allen, TX 75013, 1-888-397-3742, www.experian.com.
- *TransUnion*, P.O. Box 2000, Chester, PA 19016, 1-800-916-8800, www.transunion.com.

Fraud Alerts: There are two kinds of general fraud alerts you can place on your credit report—an initial alert and an extended alert. You may want to consider placing either or both fraud alerts on your credit report. An initial fraud alert is free and will stay on your credit file for at least 90 days. The alert informs creditors of possible fraudulent activity within your report and requests that the creditor contact you prior to establishing any accounts in your name. You may have an extended alert placed on your credit report if you have already been a victim of identity theft and provide the appropriate documentary poof. An extended fraud alert is also free and will stay on your credit report for seven years. To place a fraud alert on your credit report, contact any of the three credit reporting agencies identified above. Additional information is available at http://www.annualcreditreport.com. Military members may also place an Active Duty Military Fraud Alert on their credit reports while deployed. An Active Duty Military Fraud Alert lasts for one year and can be renewed for the length of your deployment

Credit or Security Freezes: Under U.S. law, you have the right to put a credit freeze, also known as a security freeze, on your credit file, for up to one year at no cost. The freeze will prevent new credit from being opened in your name without the use of a PIN number that is issued to you when you initiate the freeze. A security freeze is designed to prevent potential creditors from accessing your credit report without your consent. As a result, using a security freeze may interfere with or delay your ability to obtain credit.

You must separately place a security freeze on your credit file with each credit reporting agency. There is no fee to place or lift a security freeze. For information and instructions on how to place a security freeze, contact any of the credit reporting agencies or the FTC identified above. In order to place a security freeze, you may be required to provide the consumer reporting agency with information that identifies you including your full name, Social Security number, date of birth, current and previous addresses, a copy of your state-issued identification card, and a recent utility bill, bank statement or insurance statement. After receiving your freeze request, each credit bureau will provide you with a unique PIN or password. Keep the PIN or password in a safe place as you will need it if you choose to lift the freeze.

A freeze remains in place until you ask the credit bureau to temporarily lift it or remove it altogether. If the request is made online or via phone, a credit bureau must lift the credit freeze within an hour. If the request is made by mail then the bureau must lift the freeze no later than three business days after receiving your request.

IRS Identity Protection PIN: You can obtain an identity protection PIN (IP PIN) from the IRS that prevents someone else from filing a tax return using your Social Security number. The IP PIN is known only to you and the IRS and helps the IRS verify your identity when you file your electronic or paper tax return. You can learn more and obtain your IP PIN here: https://www.irs.gov/identity-theft-fraud-scams/get-an-identity-protection-pin.

You also have certain rights under the Fair Credit Reporting Act (FCRA): These rights include the right to know what is in your file; to dispute incomplete or inaccurate information; to have consumer reporting agencies correct or delete inaccurate, incomplete, or unverifiable information. For more information about the FCRA, and your rights pursuant to the FCRA, please visit http://files.consumerfinance.gov/f/201504_cfpb_summary_your-rights-under-fcra.pdf.

Additional Free Resources: You can obtain information from the consumer reporting agencies, the FTC, or from your respective state attorney general about fraud alerts, security freezes, and steps you can take toward preventing identity theft. You may report suspected identity theft to local law enforcement, including to the FTC or to the attorney general in your state.

Additional information:

California: California Attorney General can be reached at: 1300 I Street, Sacramento, CA 95814; 800-952-5225; www.oag.ca.gov/privacy

Iowa: Iowa Attorney General can be reached at: 1305 E. Walnut St., Des Moines, IA 50319; 888-777-4590; www.iowaatorneygeneral.gov

Maryland: Maryland Attorney General can be reached at: 200 St. Paul Place Baltimore, MD 21202; 888-743-0023; oag@state.md.us or IDTheft@oag.state.md.us

Oregon: Oregon Attorney General can be reached at: 1162 Court St., NE, Salem, OR 97301; 877-877-9392; www.doj.state.or.us/consumer-protection

New York: New York Attorney General can be reached at: Bureau of Internet and Technology Resources, 28 Liberty Street, New York, NY 10005; 212-416-8433; https://ag.ny.gov/

North Carolina: North Carolina Attorney General's Office, Consumer Protection Division, can be reached at: 9001 Mail Service Center Raleigh, NC 27699-9001; 877-5-NO-SCAM (Toll-free within North Carolina); 919-716-6000; www.ncdoj.gov