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June 30, 2022

VIA 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 Attorney General Frosh:

We are writing on behalf of our client, World Travel Service, LLC, (“WTS”) to notify your office of a security incident.

On December 16, 2021, WTS identified suspicious activity on certain computer systems in its network. WTS promptly began an investigation, a cybersecurity firm was engaged, and measures were taken to restore its systems from backups. WTS also notified law enforcement and is supporting its investigation. Evidence from the investigation showed that an unauthorized party accessed WTS systems between December 6, 2021 and December 12, 2021. The evidence also showed that there was unauthorized access to files on WTS’s file servers. WTS reviewed the contents of the files for personal information. The review concluded on April 28, 2022. WTS then conducted an investigation to locate contact information for the involved individuals. On June 2, 2022 WTS determined that one or more of the files contained the name and passport number of nine Maryland residents.

Beginning on June 30, 2022, WTS will mail a notification letter via United States First-Class mail to the Maryland residents in accordance with Md. Code Ann., Com. Law § 14-3504.¹ A copy of the notification letter is enclosed. WTS is encouraging all notice recipients to remain vigilant by reviewing their financial accounts for unauthorized activity. WTS has also established

¹ This report is not, and does not constitute, a waiver of World Travel Service, LLC’s objection that Maryland lacks personal jurisdiction over the company related to this matter.

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a dedicated, toll-free phone number where all notice recipients may obtain more information regarding the incident.

To help prevent this type of incident from happening again, WTS has implemented additional measures to enhance its existing cybersecurity protocols and is re-educating its employees to be aware of these types of incidents so they can proactively reduce any reoccurrence.

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

Sincerely,

A handwritten signature in black ink that reads "M. Scott Koller". The signature is written in a cursive, slightly slanted style.

M. Scott Koller
Partner

Enclosure



Return Mail Processing Center
P.O. Box 6336
Portland, OR 97228-6336

<<Mail ID>>
<<Name 1>>
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<<City>><<State>><<Zip>>
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Dear <<Name 1>>:

World Travel Service, LLC is writing to notify you that we identified and addressed a security incident that involved some of your personal information. This notice explains the incident, measures we have taken, and additional steps you may consider taking in response.

We recently completed an investigation after identifying suspicious activity on certain computer systems in its network. Upon discovery, we promptly took steps to secure our network, restore systems from backups, and launch an investigation with the assistance of cybersecurity professionals. Through the investigation, we learned that an unauthorized party accessed our systems from December 6, 2021 to December 12, 2021 and acquired a limited number of files from certain servers. We reviewed the contents of the files involved and on April 28, 2022, determined that some of your personal information was contained in a file including your <<Variable Data (PI)>>.

We wanted to let you know this happened and assure you we take it very seriously. We encourage you to remain vigilant by regularly reviewing your credit reports and financial account statements for any unauthorized activity. If you see charges or activity you did not authorize, please contact the relevant financial institution immediately.

For more information on identity theft prevention, please see the pages following this letter. To help prevent a similar incident in the future, we are implementing several changes to enhance our existing security measures, including additional internal controls and safeguards. Should you have any further questions or concerns regarding this incident, please contact our dedicated help line at 1-855-523-0873, Monday through Friday, 9am – 9pm, Eastern Time.

Sincerely,

Alex Eaton

Alex Eaton
President | World Travel Service, LLC
A BCD Travel Joint Venture and
Signature Affiliated Travel Management Company

ADDITIONAL STEPS YOU CAN TAKE

We remind you it is always advisable to be vigilant for incidents of fraud or identity theft by reviewing your account statements and free 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 740241, Atlanta, GA 30374, www.equifax.com, 1-800-685-1111
- *Experian*, PO Box 2002, Allen, TX 75013, www.experian.com, 1-888-397-3742
- *TransUnion*, PO Box 2000, Chester, PA 19016, www.transunion.com, 1-800-916-8800

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 Attorney General's office in your state. 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. Contact information for the Federal Trade Commission is as follows:

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

Fraud Alerts and Credit or Security Freezes:

Fraud Alerts: There are two types of general fraud alerts you can place on your credit report to put your creditors on notice that you may be a victim of fraud—an initial alert and an extended alert. You may ask that an initial fraud alert be placed on your credit report if you suspect you have been, or are about to be, a victim of identity theft. An initial fraud alert stays on your credit report for one year. You may have an extended alert placed on your credit report if you have already been a victim of identity theft with the appropriate documentary proof. An extended fraud alert stays on your credit report for seven years.

To place a fraud alert on your credit reports, contact one of the nationwide credit bureaus. A fraud alert is free. The credit bureau you contact must tell the other two, and all three will place an alert on their versions of your report.

For those in the military who want to protect their credit while deployed, an Active-Duty Military Fraud Alert lasts for one year and can be renewed for the length of your deployment. The credit bureaus will also take you off their marketing lists for pre-screened credit card offers for two years, unless you ask them not to.

Credit or Security Freezes: You have the right to put a credit freeze, also known as a security freeze, on your credit file, free of charge, which makes it more difficult for identity thieves to open new accounts in your name. That's because most creditors need to see your credit report before they approve a new account. If they can't see your report, they may not extend the credit.

How do I place a freeze on my credit reports? There is no fee to place or lift a security freeze. Unlike a fraud alert, you must separately place a security freeze on your credit file at each credit reporting company. For information and instructions to place a security freeze, contact each of the credit reporting agencies at the addresses below:

- **Experian Security Freeze**, PO Box 9554, Allen, TX 75013, www.experian.com
- **TransUnion Security Freeze**, PO Box 2000, Chester, PA 19016, www.transunion.com
- **Equifax Security Freeze**, PO Box 105788, Atlanta, GA 30348, www.equifax.com

You'll need to supply your name, address, date of birth, Social Security number and other personal information.

After receiving your freeze request, each credit bureau will provide you with a unique PIN (personal identification number) or password. Keep the PIN or password in a safe place. You will need it if you choose to lift the freeze.

How do I lift a 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 by phone, a credit bureau must lift a freeze within one hour. If the request is made by mail, then the bureau must lift the freeze no later than three business days after getting your request.

If you opt for a temporary lift because you are applying for credit or a job, and you can find out which credit bureau the business will contact for your file, you can save some time by lifting the freeze only at that particular credit bureau. Otherwise, you need to make the request with all three credit bureaus.

World Travel Service, LLC is located at 110 S. Hartford Avenue, Suite 300 | Tulsa, OK 74120 and can be reached via telephone at 918.743.8856

Additional Information for Residents of the Following States:

Maryland: You may contact and obtain information from your state attorney general at: *Maryland Attorney General's Office*, 200 St. Paul Place, Baltimore, MD 21202, 1-888-743-0023 / 1-410-576-6300, www.oag.state.md.us

New York: You may contact and obtain information from these state agencies: *New York Department of State Division of Consumer Protection*, One Commerce Plaza, 99 Washington Ave., Albany, NY 12231-0001, 518-474-8583 / 1-800-697-1220, <http://www.dos.ny.gov/consumerprotection>; and *New York State Office of the Attorney General*, The Capitol, Albany, NY 12224-0341, 1-800-771-7755, <https://ag.ny.gov>

North Carolina: You may contact and obtain information from your state attorney general at: *North Carolina Attorney General's Office*, 9001 Mail Service Centre, Raleigh, NC 27699, 1-919-716-6000 / 1-877-566-7226, www.ncdoj.gov

A Summary of Your Rights Under the Fair Credit Reporting Act: The federal Fair Credit Reporting Act (FCRA) promotes the accuracy, fairness, and privacy of information in the files of consumer reporting agencies. There are many types of consumer reporting agencies, including credit bureaus and specialty agencies (such as agencies that sell information about check writing histories, medical records, and rental history records). Your major rights under the FCRA are summarized below. For more information, including information about additional rights, go to www.consumerfinance.gov/learnmore or write to: Consumer Financial Protection Bureau, 1700 G Street NW, Washington, DC 20552.

- You must be told if information in your file has been used against you.
- You have the right to know what is in your file.
- You have the right to ask for a credit score.
- You have the right to dispute incomplete or inaccurate information.
- Consumer reporting agencies must correct or delete inaccurate, incomplete, or unverifiable information.
- Consumer reporting agencies may not report outdated negative information.
- Access to your file is limited.
- You must give your consent for reports to be provided to employers.
- You may limit “prescreened” offers of credit and insurance you get based on information in your credit report.
- You have a right to place a “security freeze” on your credit report, which will prohibit a consumer reporting agency from releasing information in your credit report without your express authorization.
- You may seek damages from violators.
- Identity theft victims and active duty military personnel have additional rights.