



MULLEN
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March 3, 2023

VIA EMAIL

Office of the Attorney General
Attn: Security Breach Notification
200 St. Paul Place
Baltimore, MD 21202
Email: idtheft@oag.state.md.us

Re: Notice of Data Event

To Whom It May Concern:

We represent Global Communities located at 8601 Georgia Avenue, Suite 300, Silver Spring, MD 20910, and are writing to notify your office of an incident that may affect the security of certain personal information relating to three (3) Maryland residents. This notice will be supplemented with any new significant facts learned subsequent to its submission. By providing this notice, Global Communities does not waive any rights or defenses regarding the applicability of Maryland law, the applicability of the Maryland data event notification statute, or personal jurisdiction.

Nature of the Data Event

On January 22, 2023, Global Communities discovered suspicious activity in its network. Global Communities immediately took steps to secure its systems and initiated an investigation into the nature and scope of the event with the assistance of third-party computer forensic specialists. The investigation determined that there was unauthorized access to certain systems on Global Communities' network and a small number of files containing information related to Global Communities were acquired by an unknown actor. Global Communities provided preliminary email notification about the incident to individuals on February 15, 2023, prior to confirming what information was in the affected files and which individuals were actually impacted. By February 16, 2023, Global Communities completed a detailed review of the affected files and identified the individuals whose information was impacted. Global Communities is not aware of any actual or attempted fraudulent misuse of any individual's information as a result of this incident.

The information that could have been subject to unauthorized access includes name, bank account number, and routing number for two (2) individuals and, for one (1) individual, name and passport number.

Notice to Maryland Residents

As noted above, Global Communities sent preliminary notice to potentially impacted individuals on February 15, 2023. On March 3, 2023, Global Communities provided written notice of this incident to the impacted individuals in the United States, including three (3) Maryland residents. Written notice is being provided in substantially the same form as the letter attached here as ***Exhibit A***.

Other Steps Taken and To Be Taken

Upon discovering the event, Global Communities moved quickly to investigate and respond to the incident, assess the security of Global Communities systems, and identify potentially affected individuals. Further, Global Communities notified federal law enforcement regarding the event. Global Communities is also working to implement additional safeguards and training to its employees. Global Communities is providing access to credit monitoring services for two (2) years, through IDX, to individuals whose personal information was affected by this incident, at no cost to these individuals.

Additionally, Global Communities is providing impacted individuals with guidance on how to better protect against identity theft and fraud, including advising individuals to report any suspected incidents of identity theft or fraud to their credit card company and/or bank. Global Communities is providing individuals with information on how to place a fraud alert and security freeze on one's credit file, information on protecting against tax fraud, the contact details for the national consumer reporting agencies, information on how to obtain a free credit report, a reminder to remain vigilant for incidents of fraud and identity theft by reviewing account statements and monitoring free credit reports, and encouragement to contact the Federal Trade Commission, their state Attorney General, and law enforcement to report attempted or actual identity theft and fraud.

Global Communities is providing written notice of this incident to relevant state regulators, as required.

Contact Information

Should you have any questions regarding this notification or other aspects of the data security event, please contact us at (267) 930-4839.

Very truly yours,

Rebecca J. Jones of
MULLEN COUGHLIN LLC

RJJ/ajl
Enclosure

EXHIBIT A

Logo/Global Communities

Global Communities
8601 Georgia Avenue
Suite 300
Silver Spring, MD 20910

<<Name 1>> <<Name 2>>
<<Address 1>>
<<City>>, <<State>> <<Zip>>
<<Country>>

March 3, 2023

NOTICE OF DATA SECURITY INCIDENT

Dear <<Name 1>> <<Name 2>>:

Global Communities is writing to notify you of an incident that occurred on our systems which has impacted the privacy of some of your personal information. As you know, Global Communities is a non-profit organization that aims to bring together local ingenuity and global insights to save lives, advance equity, and secure strong futures. We are providing you with information about the incident, our response to it, and resources we are making available to you to help protect your information, should you wish to do so.

What Happened? On January 22, 2023, Global Communities discovered suspicious activity in our network. We immediately took steps to secure our systems and initiated an investigation into the nature and scope of the incident with the assistance of forensic specialists. The investigation determined that there was unauthorized access to certain systems on Global Communities' network, and a small number of files containing information related to Global Communities were acquired by an unknown actor. We provided preliminary email notifications about the incident to you on February 12 and 15, prior to confirming what information was in the affected files and which individuals were actually impacted. By February 16, 2023, Global Communities completed a detailed review of the affected files and identified the individuals whose information was impacted. Global Communities is not aware of any actual or attempted fraudulent misuse of any individual's information as a result of this incident.

What Information Was Involved? The investigation determined that your name and <<Data Elements>> were impacted by this event.

What We Are Doing. The confidentiality, privacy, and security of personal information is among Global Communities' highest priorities, and we have strict security measures in place to protect information in our care. Upon becoming aware of this incident, we immediately secured our systems and performed a full investigation. We have implemented additional security measures to further protect against similar incidents moving forward. We also reported this incident to law enforcement.

Additionally, we are offering credit monitoring and identity protection services for twenty-four (24) months through IDX, at no cost to you. The deadline to enroll in these services is **June 3, 2023**. Please note that you will not be automatically enrolled in these services. Should you wish to do so, you will need to enroll yourself in these services, as we are not able to do so on your behalf. You will find instructions on how to enroll in these services in the enclosed *Steps You Can Take to Help Protect Personal Information*. As a reminder, we provided these instructions along with the enrollment code assigned to you via email on February 15, 2023. Please do not hesitate to contact us with any questions.

What You Can Do. We encourage you to remain vigilant against incident of identity theft and fraud by reviewing your account statements and monitoring your free credit reports for suspicious activity and to detect errors. You may also review the information contained in the enclosed *Steps You Can Take to Help Protect Personal Information*. There you will find more information on the complimentary credit monitoring and identity protection services we are making available to you.

For More Information. We understand that you may have questions about this incident that are not addressed in this letter. If you have additional questions or need assistance, please call our dedicated assistance line at 1-800-939-4170 between the hours of 6:00 a.m. and 6:00 p.m., Pacific Time, Monday through Friday, excluding major U.S. holidays. You may also write to Global Communities at 8601 Georgia Avenue, Suite 300 Silver Spring, MD 20910.

We sincerely regret any inconvenience or concern this incident may cause you. Protecting your information is very important to us, and we remain committed to safeguarding the information in our care.

Sincerely,

Sheila Crowley
Global Communities
Executive Vice President and COO
scrowley@globalcommunities.org

STEPS YOU CAN TAKE TO PROTECT PERSONAL INFORMATION

Enroll in Credit Monitoring and Identity Protection Services

IDX Enrollment and Steps You Can Take to Help Protect Your Information

1. Website and Enrollment. Go to <https://app.idx.us/account-creation/protect> and follow the instructions for enrollment using your Enrollment Code.

Enrollment Code: <<IDX Code>>

Enrollment Deadline: June 3, 2023

2. Activate the credit monitoring provided as part of your IDX identity protection membership. The monitoring included in the membership must be activated to be effective. Note: You must have established credit and access to a computer and the internet to use this service. If you need assistance, IDX will be able to assist you.

3. Review your credit reports. We recommend that you remain vigilant by reviewing account statements and monitoring credit reports. Under federal law, you also are entitled every 12 months to one free copy of your credit report from each of the three major credit reporting companies. To obtain a free annual credit report, go to www.annualcreditreport.com or call 1-877-322-8228. You may wish to stagger your requests so that you receive a free report by one of the three credit bureaus every four months.

If you discover any suspicious items and have enrolled in IDX identity protection, notify them immediately by calling or by logging into the IDX website and filing a request for help.

If you file a request for help or report suspicious activity, you will be contacted by a member of our ID Care team who will help you determine the cause of the suspicious items. In the unlikely event that you fall victim to identity theft as a consequence of this incident, you will be assigned an ID Care Specialist who will work on your behalf to identify, stop and reverse the damage quickly.

4. Place Fraud Alerts with the three credit bureaus, if you suspect fraudulent activity using your information. If you choose to place a fraud alert, we recommend you do this after activating your credit monitoring. You can place a fraud alert at one of the three major credit bureaus by phone and also via Experian's or Equifax's website. A fraud alert tells creditors to follow certain procedures, including contacting you, before they open any new accounts or change your existing accounts. For that reason, placing a fraud alert can protect you, but also may delay you when you seek to obtain credit. The contact information for all three bureaus is as follows:

Monitor Your Accounts

Under U.S. law, a consumer is entitled to one free credit report annually from each of the three major credit reporting bureaus, Equifax, Experian, and TransUnion. To order your free credit report, visit www.annualcreditreport.com or call, toll-free, 1-877-322-8228. You may also directly contact the three major credit reporting bureaus listed below to request a free copy of your credit report.

Consumers have the right to place an initial or extended "fraud alert" on a credit file at no cost. An initial fraud alert is a 1-year alert that is placed on a consumer's credit file. Upon seeing a fraud alert display on a consumer's credit file, a business is required to take steps to verify the consumer's identity before extending new credit. If you are a victim of identity theft, you are entitled to an extended fraud alert, which is a fraud alert lasting seven years. Should you wish to place a fraud alert, please contact any one of the three major credit reporting bureaus listed below.

As an alternative to a fraud alert, consumers have the right to place a “credit freeze,” also known as a security freeze, on a credit report, which will prohibit a credit bureau from releasing information in the credit report without the consumer’s express authorization. The credit freeze is designed to prevent credit, loans, and services from being approved in your name without your consent. However, you should be aware that using a credit freeze to take control over who gets access to the personal and financial information in your credit report may delay, interfere with, or prohibit the timely approval of any subsequent request or application you make regarding a new loan, credit, mortgage, or any other account involving the extension of credit. Pursuant to federal law, you cannot be charged to place or lift a credit freeze on your credit report. To request a credit freeze, you may need to provide the following information, depending on whether the request is made online, by phone, or by mail:

1. Full name (including middle initial as well as Jr., Sr., II, III, etc.);
2. Social Security number or copy of Social Security card;
3. Date of birth;
4. Addresses for the prior two to five years;
5. Proof of current address, such as a current utility bill or telephone bill;
6. A legible photocopy of a government-issued identification card (state driver’s license or ID card, etc.); and
7. A copy of either the police report, investigative report, or complaint to a law enforcement agency concerning identity theft if you are a victim of identity theft.

Should you wish to place a credit freeze, please contact the three major credit reporting bureaus listed below:

Equifax	Experian	TransUnion
https://www.equifax.com/personal/credit-report-services/	https://www.experian.com/help/	https://www.transunion.com/credit-help
1-888-298-0045	1-888-397-3742	1-800-916-8800
Equifax Fraud Alert, P.O. Box 105069 Atlanta, GA 30348-5069	Experian Fraud Alert, P.O. Box 9554, Allen, TX 75013	TransUnion Fraud Alert, P.O. Box 2000, Chester, PA 19016
Equifax Credit Freeze, P.O. Box 105788 Atlanta, GA 30348-5788	Experian Credit Freeze, P.O. Box 9554, Allen, TX 75013	TransUnion Credit Freeze, P.O. Box 160, Woodlyn, PA 19094

Additional Information

You may further educate yourself regarding identity theft, fraud alerts, credit freezes, and the steps you can take to protect your personal information by contacting the consumer reporting bureaus, the Federal Trade Commission, or your state Attorney General. The Federal Trade Commission may be reached at: 600 Pennsylvania Avenue NW, Washington, DC 20580; www.identitytheft.gov; 1-877-ID-THEFT (1-877-438-4338); and TTY: 1-866-653-4261. The Federal Trade Commission also encourages those who discover that their information has been misused to file a complaint with them. You can obtain further information on how to file such a complaint by way of the contact information listed above. You have the right to file a police report if you ever experience identity theft or fraud. Please note that in order to file a report with law enforcement for identity theft, you will likely need to provide some proof that you have been a victim. Instances of known or suspected identity theft should also be reported to law enforcement and your state Attorney General. This notice has not been delayed by law enforcement.

For District of Columbia residents, the District of Columbia Attorney General may be contacted at: 400 6th Street, NW, Washington, DC 20001; 202-727-3400; and oag.dc.gov.

For Maryland residents, the Maryland Attorney General may be contacted at: 200 St. Paul Place, 16th Floor, Baltimore, MD 21202; 1-410-528-8662 or 1-888-743-0023; and www.oag.state.md.us.

For North Carolina residents, the North Carolina Attorney General may be contacted at: 9001 Mail Service Center, Raleigh, NC 27699-9001; 1-877-566-7226 or 1-919-716-6000; and www.ncdoj.gov.