

Morgan Lewis

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March 27, 2023

VIA EMAIL

Office of the Attorney General
Attn: Security Breach Notification
200 St. Paul Place, 25th Floor
Baltimore, MD 21202
Email: idtheft@oag.state.md.us

Re: Notice of Data Breach

Dear Sir or Madame:

On behalf of **Bright Horizons Family Solutions Inc. ("Bright Horizons")**, pursuant to Md. Code. Com. Law § 14-3501 *et seq.*, we are writing to notify you of a cyber incident involving one (1) potential Maryland resident.

Parties Involved

Bright Horizons is public company that provides childcare, elder care, and educational and career help. Bright Horizons is located at 2 Wells Ave., Newton, MA 02459.

Nature of the Incident

On December 11, 2022, Bright Horizons noticed unusual log-in activity on its network system. Bright Horizons immediately launched an investigation and response effort with the assistance of cyber experts and law enforcement. Bright Horizons also reported the cyber incident to law enforcement and its cybersecurity insurer and has been in regular communication with both.

Bright Horizons has worked continuously since that date, with the assistance of a third-party forensic investigation firm, to conduct a thorough forensic investigation of the incident. Bright Horizons' investigation showed that the attack was perpetrated by a known ransomware group. It appears that the initial access point was likely the Bright Horizons Citrix environment. On March 9, 2023, Bright Horizons received confirmation through its investigation that certain personal information was taken from company systems.

What Information was Involved?

After Bright Horizons' investigation, it determined that the personal information accessed included name, address, and social security number for some current or former employees. This includes one (1) current or former Maryland resident. Currently, Bright Horizons is not aware of any fraud or misuse of employee information.

Response to the Incident

After learning of the incident, Bright Horizons promptly initiated efforts to secure its system upon discovery, notified law enforcement, and initiated an investigation to determine the nature and scope of the incident. Since the incident, Bright Horizons has (i) rebuilt all new servers; (ii) ensured its backup was unaffected and restored data prior to the commencement of the incident; (iii) deleted and recreated IT privileged user

accounts; (iv) implemented additional enhanced monitoring, detection, and preventative controls; and (v) enhanced its anti-DDoS capacity.

The Maryland resident was notified on March 27, 2023. A sample notification letter is attached.

Identity Theft Protection

Bright Horizons is providing a complimentary two-year identity monitoring services through Experian, a global leader in risk mitigation and response. This identity monitoring services include Credit Monitoring, \$1 Million Identity Fraud Loss Reimbursement, Fraud Consultation, and Identity Theft Restoration. None of the notified individuals have been asked or required to waive any right of private action as a condition of accepting the credit monitoring services.

Contact Information

If you have any questions concerning this matter, please contact me on behalf of Bright Horizons at (215) 963-5710, or ezra.church@morganlewis.com.

Best regards,

A handwritten signature in black ink, appearing to read "Ezra D. Church".

Ezra D. Church

Enclosure

Sample Individual Notification Letters



<<Date>> (Format: Month Day, Year)

<<first_name>> <<middle_name>> <<last_name>> <<suffix>>
<<address_1>>
<<address_2>>
<<city>>, <<state_province>> <<postal_code>>
<<country>>

<<b2b_text_1 ("Re: Notice of Data [Security Incident / Breach]")>>

Dear <<first_name>> <<middle_name>> <<last_name>> <<suffix>>,

We are writing to notify you that a recent cyber incident may have had an impact on some of your personal information. This letter is being sent to provide you with additional information and to advise you of services Bright Horizons Family Solutions Inc. ("Bright Horizons") is offering at no charge to you to help protect your continued privacy.

It is important to note that we have no evidence that your personal information has been used inappropriately or fraudulently, but we are sending this letter to tell you what happened, what information was potentially involved, what we have done and what you can do to protect your continued privacy.

Unfortunately, these types of incidents are becoming common. They are frustrating and disruptive to organizations like ours and our employees. Despite our regular monitoring, vigilance, and prevention measures, this incident occurred, and we are working hard to ensure this does not happen again.

What Happened?

On December 11, 2022, Bright Horizons noticed unusual log-in activity on its network system. Bright Horizons immediately launched an investigation and response effort with the assistance of cyber experts and law enforcement. Our investigation revealed that an unauthorized third-party accessed Bright Horizons' corporate systems and took certain files that contained personal information of a small percentage of current or former employees. On March 9, 2023, we confirmed that your personal information was among the information that may have been taken.

What Information Was Involved?

The files at issue were records from ChildrenFirst Inc. that included your name, address, and social security number. While there is no evidence that the information has been used in an unauthorized way, we did want to make you aware of the situation out of an abundance of caution given the nature of this information.

What We Are Doing

To help protect your identity, we are offering a complimentary 24-month membership of Experian's® IdentityWorksSM. This product provides you with superior identity detection and resolution of identity theft. To activate your membership and start monitoring your personal information please follow the steps below:

- Ensure that you **enroll by:** <<b2b_text_6 (activation date)>> (Your code will not work after this date.)
- **Visit** the Experian IdentityWorks website to enroll: <https://www.experianidworks.com/3bcredit>
- Provide your **activation code:** <<Activation Code s_n>>

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 877.288.8057 by <<b2b_text_6 (activation date)>>. Be prepared to provide engagement number <<b2b_text_2 (engagement #)>> as proof of eligibility for the identity restoration services by Experian.

ADDITIONAL DETAILS REGARDING YOUR 24-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.
- **Credit Monitoring:** Actively monitors Experian, Equifax and Transunion files 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.
- **Up to \$1 Million Identity Theft Insurance:** Provides coverage for certain costs and unauthorized electronic fund transfers.

If you believe there was fraudulent use of your information and would like to discuss how you may be able to resolve those issues, please reach out to an Experian agent at 877.288.8057. If, after discussing your situation with an agent, it is determined that Identity Restoration support is needed, then an Experian Identity Restoration agent is available to work with you to investigate and resolve each incident of fraud that occurred (including, as appropriate, helping you with contacting credit grantors to dispute charges and close accounts; assisting you in placing a freeze on your credit file with the three major credit bureaus; and assisting you with contacting government agencies to help restore your identity to its proper condition).

Please note that this Identity Restoration support is available to you for 24 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. You will also find self-help tips and information about identity protection on this site.

What You Can Do

To help protect your personal information, we strongly recommend you take the following steps:

- Carefully review statements sent to you by your bank, credit card company, or other financial institutions as well as government institutions like the Internal Revenue Service (IRS). Notify the sender of these statements immediately by phone and in writing if you detect any suspicious transactions or other activity you do not recognize.
- Enroll in the credit monitoring service that we are offering to you. This will enable you to get alerts about any efforts to use your name and social security number to establish credit and to block that credit from being established if you were not the one who initiated it.
- The attached **Reference Guide** describes additional steps that you can take and provides resources for additional information. We encourage you to read and follow these steps as well.

For More Information

If you have questions, please call 1-???-???-????, Monday through Friday from 8:00 a.m. to 5:30 p.m. Central Time, excluding major U.S. holidays.

If you have questions or concerns or learn of any suspicious activity that you believe may be related to this incident, please email dataquestions2023@brighthorizons.com.

Please know that Bright Horizons takes this matter very seriously, and we apologize for any concern and inconvenience this may cause you.

Sincerely,



Javed Ikbal
Chief Information Security Officer
Bright Horizons Family Solutions Inc.

REFERENCE GUIDE

In the event that you suspect that you are a victim of identity theft, we encourage you to remain vigilant and consider taking the following steps:

Order Your Free Credit Report. To order your free credit report, visit www.annualcreditreport.com, call toll-free at 877-322-8228, or complete the Annual Credit Report Request Form on the U.S. Federal Trade Commission's website at www.ftc.gov and mail it to Annual Credit Report Request Service, P.O. Box 105281, Atlanta, GA 30348-5281. Do not contact the three credit bureaus individually; they provide your free report only through the website or toll-free number.

When you receive your credit report, review the entire report carefully. Look for any inaccuracies and/or accounts you don't recognize, and notify the credit bureaus as soon as possible in the event there are any.

You have rights under the federal Fair Credit Reporting Act ("FCRA"). These include, among others, the right to know what is in your file; to dispute incomplete or inaccurate information; and to have consumer reporting agencies correct or delete inaccurate, incomplete, or unverifiable information. For more information about the FCRA, please visit <https://www.consumer.ftc.gov/articles/pdf-0096-fair-credit-reporting-act.pdf> or www.ftc.gov.

Place a Fraud Alert on Your Credit File. To protect yourself from possible identity theft, consider placing a fraud alert on your credit file. A fraud alert helps protect you against the possibility of an identity thief opening new credit accounts in your name. When a merchant checks the credit history of someone applying for credit, the merchant gets a notice that the applicant may be a victim of identity theft. The alert notifies the merchant to take steps to verify the identity of the applicant. You can report potential identity theft to all three of the major credit bureaus by calling any one of the toll-free fraud numbers below. You will reach an automated telephone system that allows you to flag your file with a fraud alert at all three bureaus.

Equifax	P.O. Box 740241 Atlanta, Georgia 30374-0241	1-800-525-6285	www.equifax.com
Experian	P.O. Box 9532 Allen, Texas 75013	1-888-397-3742	www.experian.com
TransUnion	Fraud Victim Assistance Division P.O. Box 2000 Chester, Pennsylvania 19016	1-800-680-7289	www.transunion.com

Place a Security Freeze on Your Credit File. You have the right to place a "security freeze" on your credit file. A security freeze generally will prevent creditors from accessing your credit file at the three nationwide credit bureaus without your consent. You can request a security freeze free of charge by contacting the credit bureaus at:

Equifax	P.O. Box 740241 Atlanta, Georgia 30374-0241	www.equifax.com
Experian	P.O. Box 9554 Allen, Texas 75013	www.experian.com
TransUnion	Fraud Victim Assistance Division P.O. Box 2000 Chester, Pennsylvania 19016	www.transunion.com

The credit bureaus may require that you provide proper identification prior to honoring your request. In order to request a security freeze, you will need to provide the following information:

1. Your full name (including middle initial as well as Jr., Sr., II, III, etc.)
2. Social Security number
3. Date of birth
4. If you have moved in the past five (5) years, provide the addresses where you have lived over the prior 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, military identification, etc.)
7. If you are a victim of identity theft, include a copy of either the police report, investigative report, or complaint to law enforcement agency concerning identity theft

Placing a security freeze on your credit file may delay, interfere with, or prevent timely approval of any requests you make for credit, loans, employment, housing or other services. For more information regarding credit freezes, please contact the credit reporting agencies directly.

Contact the U.S. Federal Trade Commission. If you detect any incident of identity theft or fraud, promptly report the incident to your local law enforcement authorities, your state Attorney General and the Federal Trade Commission (“FTC”). If you believe your identity has been stolen, the FTC recommends that you take these additional steps.

- Close the accounts that you have confirmed or believe have been tampered with or opened fraudulently. Use the FTC’s ID Theft Affidavit (available at www.ftc.gov/idtheft) when you dispute new unauthorized accounts.
- File a local police report. Obtain a copy of the police report and submit it to your creditors and any others that may require proof of the identity theft crime.

You can learn more about how to protect yourself from becoming an identity theft victim (including how to place a fraud alert or security freeze) by contacting the FTC:

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

For Maryland Residents: You can obtain information from the Maryland Office of the Attorney General about steps you can take to help prevent identity theft. You can contact the Maryland Attorney General at: 200 St. Paul Place, Baltimore, MD 21202, 888-743-0023, www.oag.state.md.us

For Massachusetts Residents: You have a right to request from us a copy of any police report filed in connection with this incident. If you are the victim of identity theft, you also have the right to file a police report and obtain a copy of it. As noted above, you also have the right to place a security freeze on your credit report at no charge.

For New York Residents: You may also contact the following state agencies for information regarding security breach response and identity theft prevention and protection information:

New York Attorney General’s Office
Bureau of Internet and Technology
(212) 416-8433
<https://ag.ny.gov/internet/resource-center>

NYS Department of State’s Division of
Consumer Protection
(800) 697-1220
<https://www.dos.ny.gov/consumerprotection>

For Rhode Island Residents: You can obtain information from the Rhode Island Office of the Attorney General about steps you can take to help prevent identity theft. You can contact the Rhode Island Attorney General at: 150 South Main Street, Providence, RI 02903, (401) 274-4400, www.riag.ri.gov. As noted above, you have the right to place a security freeze on your credit report at no charge, but note that consumer reporting agencies may charge fees for other services.