

June 6, 2023

VIA ELECTRONIC MAIL

Attorney General Anthony G. Brown
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 Security Incident

Dear Attorney General Brown:

Constangy, Brooks, Smith & Prophete, LLP represents CIBT, Inc. (“CIBT”), a global provider of visa services, in connection with a recent data security incident described in greater detail below. The purpose of this letter is to notify you of the incident in accordance with Maryland’s data breach notification statute.

Nature of the Security Incident

On November 19, 2022, CIBT became aware of unusual activity on its network. In response, CIBT immediately took steps to secure its digital environment and engaged a leading cybersecurity firm to assist with an investigation and determine whether sensitive or personal information may have been accessed or acquired during the incident. As a result of the investigation, CIBT identified that a limited amount of data may have been accessed or acquired without authorization. CIBT then engaged an independent firm to conduct a comprehensive review of all potentially affected data, and on April 21, 2023, CIBT determined that the personal information of some individuals, including certain employees and customers that received visa services from CIBT, may have been affected. CIBT then diligently worked to locate relevant address information to effectuate notification to such individuals, which was completed on May 23, 2023.

The information affected varied between individuals but may have included name, address, date of birth, Social Security number, driver’s license or state identification number, passport number, international tax identification number, health insurance information, and limited medical information. Please note that we have no current evidence to suggest misuse or attempted misuse of personal information involved in the incident.

Number of Maryland Residents Involved

On June 6, 2023, CIBT notified one hundred and fifty-seven (157) Maryland residents of this data security incident via U.S. First-Class Mail or electronic mail. A sample copy of the notification letter or email sent to the impacted individuals is included with this correspondence.

Steps Taken to Address the Incident

In response to the incident, CIBT is providing individuals with information about steps that they can take to help protect their personal information, and, out of an abundance of caution, it is also offering individuals complimentary credit monitoring and identity protection services through Kroll. Additionally, to help reduce the risk of a similar future incident, CIBT has implemented additional technical security measures throughout the environment.

Contact Information

CIBT remains dedicated to protecting the information in its control. If you have any questions or need additional information, please do not hesitate to contact me at LFunk@Constangy.com.

Sincerely,



Laura K. Funk
Partner
CONSTANGY, BROOKS, SMITH & PROPHETE,
LLP

Enclosure: Sample Notification Letter

CIBTvisas

{{User.UserAttributes.SubjectLine}}

Dear {{User.UserAttributes.FirstName}} {{User.UserAttributes.LastName}},

We are writing to provide you with information about a recent data security incident experienced by CIBT, Inc. ("CIBT"), a global provider of travel visa services, that may have involved your personal information. At CIBT, we take the privacy and security of all information within our possession very seriously. This is why we are notifying you of the incident, providing you with steps you can take to help protect your personal information, and offering you the opportunity to activate the complimentary identity monitoring services.

What Happened?

On November 19, 2022, CIBT experienced a data security incident. In response, we immediately took steps to secure our digital environment, engaging a leading cybersecurity firm to assist with an investigation and determine whether sensitive or personal information may have been accessed or acquired during the incident. As a result of the investigation, in collaboration with the cybersecurity firm, we identified that a limited amount of data may have been accessed or acquired without authorization. CIBT then engaged an independent firm to conduct a comprehensive review of all potentially affected data, and on April 21, 2023, CIBT determined that the personal information of some individuals, including certain customers that received visa services from CIBT, may have been affected. CIBT then diligently worked to locate relevant contact information to effectuate notification to such individuals, which was completed on May 23, 2023.

What Information Was Involved?

The potentially affected information varied between individuals but may have included your {{User.UserAttributes.ImpactedData1}} {{User.UserAttributes.ImpactedData2}} {{User.UserAttributes.ImpactedData3}}. Please note that there is no current evidence to suggest misuse or attempted misuse of the personal information. Nonetheless, out of an abundance of caution, we are notifying you of this incident and offering resources to help you help protect your personal information.

What We Are Doing.

As soon as we discovered this incident, we took the steps described above. Further, we notified law enforcement authorities and will cooperate with any resulting investigation. As part of the response process, we implemented additional measures to reduce the risk of a similar incident occurring in the future.

Additionally, CIBT has secured the services of Kroll (www.Kroll.com) to provide identity monitoring at no cost to you for 12 months. Kroll is a global leader in risk mitigation and response, and their team has extensive experience helping people who have sustained an unintentional exposure of confidential data. Your identity monitoring services include Credit Monitoring, Web Watcher, Public Persona, Quick Cash Scan, \$1 Million Identity Fraud Loss Reimbursement, Fraud Consultation, and Identity Theft Restoration.

Visit <https://enroll.krollmonitoring.com> to activate and take advantage of your identity monitoring services.

You have until {{User.UserAttributes.ActivationDeadline}} to activate your identity monitoring services.

Membership Number: {{User.UserAttributes.MembershipNumber}}

Zip Code: {{User.UserAttributes.PostalCode}}

To receive credit services, you must be over the age of 18 and have established credit in the U.S., have a Social Security number in your name, and have a U.S. residential address associated with your credit file.

Kroll's activation website is only compatible with the current version or one version earlier of Internet Explorer, Chrome, Firefox, and Safari.

What You Can Do.

We recommend that you activate your complimentary Kroll services by going to the activation website provided above. Representatives are available from 9:00 a.m. to 6:30 p.m. Eastern Time from Monday to Friday, excluding some major U.S. holidays. In addition, we recommend that you review the guidance included with this email about additional steps you can take to help protect your personal information.

For More Information.

If you have questions, please call [xxx-xxx-xxxx](tel:xxx-xxx-xxxx), Monday through Friday from 9:00 a.m. to 6:30 p.m. Eastern Time, excluding some major U.S. holidays.

CIBT takes this matter very seriously. Please accept our sincere apologies and know that we deeply regret any worry or inconvenience that this may cause you.

Sincerely,

Nima Abrishamchian
Chief Financial Officer
CIBT, Inc.

STEPS YOU CAN TAKE TO HELP PROTECT YOUR PERSONAL 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 help 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 Federal Trade Commission 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 1000, 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 proof. 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 Federal Trade Commission 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:

Washington D.C.: The Office of the Attorney General for the District of Columbia can be reached at 400 6th Street, NW, Washington, DC 20001; 202-727-3400; oag@dc.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

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

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/>

Rhode Island: Rhode Island Attorney General can be reached at: 150 South Main Street Providence, RI 02903, <http://www.riag.ri.gov>.



TAKE ADVANTAGE OF YOUR IDENTITY MONITORING SERVICES

You have been provided with access to the following services from Kroll:

Single Bureau Credit Monitoring

You will receive alerts when there are changes to your credit data—for instance, when a new line of credit is applied for in your name. If you do not recognize the activity, you'll have the option to call a Kroll fraud specialist, who will be able to help you determine if it is an indicator of identity theft.

Web Watcher

Web Watcher monitors internet sites where criminals may buy, sell, and trade personal identity information. An alert will be generated if evidence of your personal identity information is found.

Public Persona

Public Persona monitors and notifies when names, aliases, and addresses become associated with your Social Security number. If information is found, you will receive an alert.

Quick Cash Scan

Quick Cash Scan monitors short-term and cash-advance loan sources. You will receive an alert when a loan is reported, and you can call a Kroll fraud specialist for more information.

\$1 Million Identity Fraud Loss Reimbursement

Reimburses you for out-of-pocket expenses totaling up to \$1 million in covered legal costs and expenses for any one stolen identity event. All coverage is subject to the conditions and exclusions in the policy.

Fraud Consultation

You have unlimited access to consultation with a Kroll fraud specialist. Support includes showing you the most effective ways to help protect your identity, explaining your rights and protections under the law, assistance with fraud alerts, and interpreting how personal information is accessed and used, including investigating suspicious activity that could be tied to an identity theft event.

Identity Theft Restoration

If you become a victim of identity theft, an experienced Kroll licensed investigator will work on your behalf to resolve related issues. You will have access to a dedicated investigator who understands your issues and can do most of the work for you. Your investigator will be able to dig deep to uncover the scope of the identity theft, and then work to resolve it.

Kroll's activation website is only compatible with the current version or one version earlier of Chrome, Firefox, Safari and Edge.

To receive credit services, you must be over the age of 18 and have established credit in the U.S., have a Social Security number in your name, and have a U.S. residential address associated with your credit file.

CIBTvisas

<<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 (Variable Subject)>>

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

We are writing to provide you with information about a recent data security incident experienced by CIBT, Inc. ("CIBT"), a global provider of travel visa services, that may have involved your personal information. At CIBT, we take the privacy and security of all information within our possession very seriously. This is why we are notifying you of the incident, providing you with steps you can take to help protect your personal information, and offering you the opportunity to activate the complimentary identity monitoring services.

What Happened? On November 19, 2022, CIBT experienced a data security incident. In response, we immediately took steps to secure our digital environment, engaging a leading cybersecurity firm to assist with an investigation and determine whether sensitive or personal information may have been accessed or acquired during the incident. As a result of the investigation, in collaboration with the cybersecurity firm, we identified that a limited amount of data may have been accessed or acquired without authorization. CIBT then engaged an independent firm to conduct a comprehensive review of all potentially affected data, and on April 21, 2023, CIBT determined that the personal information of some individuals, including certain customers that received visa services from CIBT, may have been affected. CIBT then diligently worked to locate relevant address information to effectuate notification to such individuals, which was completed on May 23, 2023.

What Information Was Involved? The potentially affected information varied between individuals but may have included your <<b2b_text_2 (Data Elements)>>. **Please note that there is no current evidence to suggest misuse or attempted misuse of the personal information.** Nonetheless, out of an abundance of caution, we are notifying you of this incident and offering resources to help you protect your personal information.

What We are Doing. As soon as we discovered this incident, we took the steps described above. Further, we notified law enforcement authorities and will cooperate with any resulting investigation. As part of the response process, we implemented additional measures to reduce the risk of a similar incident occurring in the future.

Additionally, CIBT has secured the services of Kroll to provide identity monitoring at no cost to you for 12 months. Kroll is a global leader in risk mitigation and response, and their team has extensive experience helping people who have sustained an unintentional exposure of confidential data. Your identity monitoring services include Credit Monitoring, Web Watcher, Public Persona, Quick Cash Scan, \$1 Million Identity Fraud Loss Reimbursement, Fraud Consultation, and Identity Theft Restoration.

Visit <https://enroll.krollmonitoring.com> to activate and take advantage of your identity monitoring services.

You have until <<b2b_text_6 (activation date)>> to activate your identity monitoring services.

Membership Number: <<Membership Number s_n>>

For more information about Kroll and your Identity Monitoring services, you can visit info.krollmonitoring.com.

Additional information describing your services is included with this letter.

What You Can Do. We recommend that you activate your complimentary Kroll services by going to the activation website provided above. Representatives are available from 9:00 a.m. to 6:30 p.m. Eastern Time from Monday to Friday, excluding some major U.S. holidays. In addition, we recommend that you review the guidance included with this letter about additional steps you can take to help protect your personal information.

For More Information. If you have questions or need assistance, please call Kroll at (866) 547-1463, Monday through Friday from 9:00 a.m. to 6:30 p.m. Eastern Time, excluding some major U.S. holidays.

CIBT takes this matter very seriously. Please accept our sincere apologies and know that we deeply regret any worry or inconvenience that this may cause you.

Sincerely,

Nima Abrishamchian
Chief Financial Officer

CIBT, Inc.
1600 International Drive
Suite 600
McLean, VA 22102

STEPS YOU CAN TAKE TO HELP PROTECT YOUR PERSONAL 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 help 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 Federal Trade Commission 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 1000, 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 proof. 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 Federal Trade Commission 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:

Washington D.C.: The Office of the Attorney General for the District of Columbia can be reached at 400 6th Street, NW, Washington, DC 20001; 202-727-3400; oag@dc.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

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

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/>

Rhode Island: Rhode Island Attorney General can be reached at: 150 South Main Street Providence, RI 02903, <http://www.riag.ri.gov>.



TAKE ADVANTAGE OF YOUR IDENTITY MONITORING SERVICES

You have been provided with access to the following services from Kroll:

Single Bureau Credit Monitoring

You will receive alerts when there are changes to your credit data—for instance, when a new line of credit is applied for in your name. If you do not recognize the activity, you'll have the option to call a Kroll fraud specialist, who will be able to help you determine if it is an indicator of identity theft.

Web Watcher

Web Watcher monitors internet sites where criminals may buy, sell, and trade personal identity information. An alert will be generated if evidence of your personal identity information is found.

Public Persona

Public Persona monitors and notifies when names, aliases, and addresses become associated with your Social Security number. If information is found, you will receive an alert.

Quick Cash Scan

Quick Cash Scan monitors short-term and cash-advance loan sources. You will receive an alert when a loan is reported, and you can call a Kroll fraud specialist for more information.

\$1 Million Identity Fraud Loss Reimbursement

Reimburses you for out-of-pocket expenses totaling up to \$1 million in covered legal costs and expenses for any one stolen identity event. All coverage is subject to the conditions and exclusions in the policy.

Fraud Consultation

You have unlimited access to consultation with a Kroll fraud specialist. Support includes showing you the most effective ways to help protect your identity, explaining your rights and protections under the law, assistance with fraud alerts, and interpreting how personal information is accessed and used, including investigating suspicious activity that could be tied to an identity theft event.

Identity Theft Restoration

If you become a victim of identity theft, an experienced Kroll licensed investigator will work on your behalf to resolve related issues. You will have access to a dedicated investigator who understands your issues and can do most of the work for you. Your investigator will be able to dig deep to uncover the scope of the identity theft, and then work to resolve it.

Kroll's activation website is only compatible with the current version or one version earlier of Chrome, Firefox, Safari and Edge.

To receive credit services, you must be over the age of 18 and have established credit in the U.S., have a Social Security number in your name, and have a U.S. residential address associated with your credit file.