



MULLEN
COUGHLIN^{LLC}
ATTORNEYS AT LAW

Michele Veltri
Office: (267) 930-2297
Fax: (267) 930-4771
Email: mveltri@mullen.law

75 S. Clinton Avenue, Suite 510
Rochester, NY 14604

July 12, 2023

VIA E-MAIL

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

Re: Notice of Data Event

To Whom It May Concern:

We represent World Learning, Inc. ("World Learning") located at 1 Kipling Road, PO Box 676, Brattleboro, Vermont 05302, and are writing to notify your office of an incident that may affect the security of certain personal information relating to one (1) Maryland resident. The investigation into this matter is ongoing, and this notice will be supplemented with any new significant facts learned subsequent to its submission. By providing this notice, World Learning 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 June 1, 2023, World Learning became aware of suspicious activity involving an employee's email account. World Learning quickly took steps to secure its email tenant and launched an investigation into the nature and scope of the incident. Following an investigation, it was determined that an unknown actor gained unauthorized access to the account from April 6, 2023, until June 1, 2023.

Out of an abundance of caution, World Learning performed a thorough review of the information contained within the impacted account to identify the individuals whose information may have been impacted. World Learning also reviewed internal World Learning records to identify address information for potentially impacted individuals for purposes of providing notification. This process concluded on or about June 7, 2023.

The information that could have been subject to unauthorized access includes name and passport number.

Notice to Maryland Resident

On July 12, 2023, World Learning began providing written notice of this incident to one (1) Maryland resident. 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, World Learning moved quickly to investigate and respond to the incident, assess the security of World Learning systems, and identify potentially affected individuals. Further, World Learning notified federal law enforcement regarding the event. World Learning is providing access to credit monitoring services for 12 months, through Epiq, to individuals whose personal information was potentially affected by this incident, at no cost to these individuals.

Additionally, World Learning 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. World Learning is providing individuals with information on how to place a fraud alert and security freeze on one's credit file, 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.

World Learning is providing written notice of this incident to relevant state regulators, as necessary. World Learning is unaware whether law enforcement is currently investigating the event in response to World Learning's notification regarding the event.

Contact Information

Should you have any questions regarding this notification or other aspects of the data security event, please contact us at (267) 930-2297.

Very truly yours,

Michele Veltri of
MULLEN COUGHLIN LLC

MTV/jlm
Enclosure

EXHIBIT A



World Learning Inc.

World Learning Inc.
1 Kipling Road
P.O. Box 676
Brattleboro, VT 05302

[First Name] [Last Name]
[Address 1]
[Address 2]
[City], [State] [Zip]
[Country]

[Date]

NOTICE OF DATA INCIDENT

Dear [First Name] [Last Name]:

World Learning Inc. (“World Learning”) is writing to inform you of an incident that may impact the privacy of some of your personal information. While we are unaware of any attempted or actual misuse of your information, we are providing you with information about the incident, our response, and steps you may take to protect against any misuse of your information, should you feel it is necessary to do so.

What Happened? On or about June 1, 2023, World Learning became aware of suspicious activity involving an employee’s email account when we were alerted to possible phishing emails being sent from the account. Following an investigation, it was determined that an unknown actor gained unauthorized access to the account from April 6, 2023 until June 1, 2023.

Out of an abundance of caution, World Learning performed a thorough review of the information contained within the impacted account, and we recently determined that information related to you was potentially affected. While we are unaware of any actual or attempted malicious use of your information as a result of this incident, we take the security of data we hold very seriously and are notifying you out of an abundance of caution.

What Information Was Involved? The investigation determined that your name and an image of your passport were subject to unauthorized access by an unauthorized actor.

What We Are Doing. The confidentiality, privacy, and security of personal information within our care are among World Learning’s highest priorities. Upon learning of the incident, we investigated to determine those individuals that were affected, and secured the compromised account. We are also taking additional steps to improve security and better protect against similar incidents in the future.

World Learning

1 Kipling Road, PO Box 676
Brattleboro, VT 05302-0676 USA
P: 202.408.5420
F: 202.408.5397

1015 15th Street NW, 9th Floor
Washington, DC 20005
P: 202.408.5420
F: 202.408.5397

info@worldlearning.org
worldlearning.org

As an added precaution, we would like to offer you twelve months of complimentary access to credit monitoring and identity theft protection services through Experian. If you wish to receive these services, you must enroll by following the attached enrollment instructions as we are unable to activate these services on your behalf.

What You Can Do. We encourage you to remain vigilant against incidents of identity theft and fraud by reviewing your account statements and monitoring your free credit reports for suspicious activity and to detect errors over the next 12 to 24 months. You may also review the information contained in the attached *Steps You Can Take to Protect Personal Information*.

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 you may write to us at World Learning Inc., 1 Kipling Road, P.O. Box 676, Brattleboro, Vermont 05302. You may also contact us at dpo@sit.edu.

We regret any inconvenience this incident may cause you. World Learning remains committed to safeguarding information in our care, and we will continue to take proactive steps to enhance the security of our email accounts.

Sincerely,

L. Rae
Senior Vice President, Legal Affairs & General Counsel
World Learning Inc.

STEPS YOU CAN TAKE TO PROTECT PERSONAL INFORMATION

Enroll in Monitoring Services



[First Name] [Last Name]

Enter your Activation Code: [Activation Code]

Enrollment Deadline: September 30, 2023

Equifax Complete™ Premier

*Note: You must be over age 18 with a credit file to take advantage of this product.

Key Features:

- Annual access to your 3-bureau credit report and VantageScore¹ credit scores;
- Daily access to your Equifax credit report and 1-bureau VantageScore credit score;
- 3-bureau credit monitoring² with email notifications of key changes to your credit reports;
- WebScan notifications³ when your personal information, such as Social Security number, credit/debit card or bank account numbers are found on fraudulent Internet trading sites;
- Automatic fraud alerts⁴, which encourages potential lenders to take extra steps to verify your identity before extending credit, plus blocked inquiry alerts and Equifax credit report lock⁵;

¹ The credit scores provided are based on the VantageScore® 3.0 model. For three-bureau VantageScore credit scores, data from Equifax®, Experian®, and TransUnion® are used respectively. Any one-bureau VantageScore uses Equifax data. Third parties use many different types of credit scores and are likely to use a different type of credit score to assess your creditworthiness.

² Credit monitoring from Experian and TransUnion will take several days to begin.

³ WebScan searches for your Social Security number, up to 5 passport numbers, up to 6 bank account numbers, up to 6 credit/debit card numbers, up to 6 email addresses, and up to 10 medical ID numbers. WebScan searches thousands of Internet sites where consumers' personal information is suspected of being bought and sold, and regularly adds new sites to the list of those it searches. However, the Internet addresses of these suspected Internet trading sites are not published and frequently change, so there is no guarantee that we are able to locate and search every possible Internet site where consumers' personal information is at risk of being traded.

⁴ The Automatic Fraud Alert feature is made available to consumers by Equifax Information Services LLC and fulfilled on its behalf by Equifax Consumer Services LLC.

⁵ Locking your Equifax credit report will prevent access to it by certain third parties. Locking your Equifax credit report will not prevent access to your credit report at any other credit reporting agency. Entities that may still have access to your Equifax credit report include: companies like Equifax Global Consumer Solutions, which provide you with access to your credit report or credit score, or monitor your credit report as part of a subscription or similar service; companies that provide you with a copy of your credit report or credit score, upon your request; federal, state and local government agencies and courts in certain circumstances; companies using the information in connection with the underwriting of insurance, or for employment, tenant or background screening purposes; companies that have a current account or relationship with you, and collection agencies acting on behalf of those whom you owe; companies that authenticate a consumer's identity for purposes other than granting credit, or for investigating or preventing actual or potential fraud; and companies that wish to make pre-approved offers of credit or insurance to you. To opt out of such pre-approved offers, visit www.optoutprescreen.com.

- Identity Restoration to help restore your identity should you become a victim of identity theft, and a dedicated Identity Restoration Specialist to work on your behalf;
- Up to \$1,000,000 of identity theft insurance coverage for certain out of pocket expenses resulting from identity theft⁶; and
- Lost Wallet Assistance if your wallet is lost or stolen, and one-stop assistance in canceling and reissuing credit, debit and personal identification cards.

Enrollment Instructions:

Go to www.equifax.com/activate.

Enter your unique Activation Code of <ACTIVATION CODE> then click “Submit” and follow these 4 steps:

1. Register:

Complete the form with your contact information and click “Continue”.

If you already have a myEquifax account, click the ‘Sign in here’ link under the “Let’s get started” header. Once you have successfully signed in, you will skip to the Checkout Page in Step 4.

2. Create Account:

Enter your email address, create a password, and accept the terms of use.

3. Verify Identity:

To enroll in your product, we will ask you to complete our identity verification process.

4. Checkout:

Upon successful verification of your identity, you will see the Checkout Page.

Click ‘Sign Me Up’ to finish enrolling.

You’re done!

The confirmation page shows your completed enrollment.

Click “View My Product” to access the product features.

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 a free credit report, visit www.annualcreditreport.com or call, toll-free, 1-877-322-8228. Consumers may also directly contact the three major credit reporting bureaus listed below to request a free copy of their credit report.

⁶ The Identity Theft Insurance benefit is underwritten and administered by American Bankers Insurance Company of Florida, an Assurant company, under group or blanket policies issued to Equifax, Inc., or its respective affiliates for the benefit of its Members. Please refer to the actual policies for terms, conditions, and exclusions of coverage. Coverage may not be available in all jurisdictions.

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 one-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 consumers are the victim of identity theft, they are entitled to an extended fraud alert, which is a fraud alert lasting seven years. Should consumers wish to place a fraud alert, please contact any 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” 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 a consumer’s name without consent. However, consumers should be aware that using a credit freeze to take control over who gets access to the personal and financial information in their credit report may delay, interfere with, or prohibit the timely approval of any subsequent request or application they make regarding a new loan, credit, mortgage, or any other account involving the extension of credit. Pursuant to federal law, consumers cannot be charged to place or lift a credit freeze on their credit report. To request a credit freeze, individuals may need to provide some or all of the following information:

1. Full name (including middle initial as well as Jr., Sr., II, III, etc.);
2. Social Security number;
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 they are a victim of identity theft.

Should consumers wish to place a credit freeze or fraud alert, 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

Consumers may further educate themselves regarding identity theft, fraud alerts, credit freezes, and the steps they can take to protect your personal information by contacting the consumer reporting bureaus, the Federal Trade Commission, or their state Attorney General. The Federal

Trade Commission may be reached at: 600 Pennsylvania Avenue NW, Washington, D.C. 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. Consumers can obtain further information on how to file such a complaint by way of the contact information listed above. Consumers have the right to file a police report if they ever experience identity theft or fraud. Please note that in order to file a report with law enforcement for identity theft, consumers will likely need to provide some proof that they have been a victim. Instances of known or suspected identity theft should also be reported to law enforcement and the relevant state Attorney General. This notice has not been delayed by law enforcement.

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 <https://www.marylandattorneygeneral.gov/>.

For New York residents, the New York Attorney General may be contacted at: Office of the Attorney General, The Capitol, Albany, NY 12224-0341; 1-800-771-7755; or <https://ag.ny.gov>.