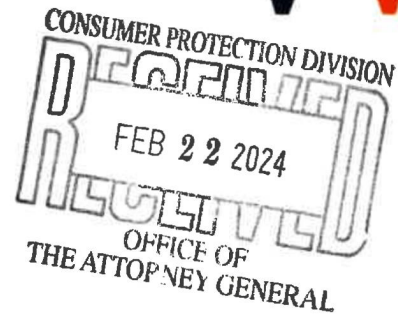




February 20, 2024

Office of the Attorney General
Attn: Security Breach Notification
200 St. Paul Place
Baltimore, MD 21202



Re: Notification of Data Security Incident

To Whom It May Concern,

WORKS International, Inc. (“**WORKS**,” “**we**,” or “**us**”) was the victim of a recent cybersecurity incident that affected Maryland residents. WORKS is headquartered at 3825 Edwards Road, Suite 400, Cincinnati, OH 45209 and provides training and compliance solutions to school districts in the United States and Alberta.

In December 2023, WORKS discovered that a third party had gained unauthorized access to certain systems in our information technology (IT) environment. In response, we immediately deployed security measures to contain and mitigate this threat, and we retained a leading incident response team to accelerate our recovery efforts. Because of the substantial security controls we implemented prior to this incident, we were able to contain the threat and return to a normal state of business within a short time.

As part of our investigation into this incident, we discovered that the perpetrator of the attack could have *potentially* accessed certain files and records that belong to our school district-clients. However, due to technical and forensic limitations, we could not determine whether this third party *actually* accessed any of these files or records. Yet, to address this issue, we undertook a comprehensive review of each of these files and records to identify whether any of them contained personal data. We recently finished this review and have now begun notifying school districts who could have *potentially* been affected by this incident.

As a result of that review, we learned the unauthorized third party could have *potentially* accessed a limited number of attachments to accident reports. These attachments were submitted by client employees to document workplace injuries which may have been eligible for insurance or workers’ compensation coverage. Some attachments included driver’s license numbers.

On January 29, 2024, after the thorough investigation into this matter, we began notifying all school district-clients whose employee data may have been impacted by this incident, which **included two (2) Maryland residents**. The aforementioned notifications were in substantially the same form as the attached email communication (See Enclosure).

WORKS has offered to our clients to provide certain individuals impacted by this incident with **complimentary, multi-year credit monitoring services**. WORKS has further established a dedicated call center to answer any questions that individuals may have about this incident. However, as of this writing, our Maryland client has not accepted our offer.

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

Sincerely,

Nick Kowalski

Counsel

Notification of Data Security Incident (Teacher and Staff Data)

Compliance <compliance@publicschoolworks.com>

Tue 1/30/2024 4:20 PM

To: purnell.kimberly@ccpsstaff.org <purnell.kimberly@ccpsstaff.org>

Cc: Cris Duvall <cduvall@publicschoolworks.com>

 2 attachments (266 KB)

District Notification of Data Security Incident.docx; Individual Notification of Data Security Incident .docx;

Dear Ms. Purnell,

WORKS International, Inc. (PSW) was recently the victim of a cybersecurity incident where certain personal identifiable information (PII) associated with your school district teachers and administrative staff may have been compromised. To be clear, this incident has not impacted your student data or student educational records.

The attached letter, District Notification of Data Security Incident, describes the nature and scope of this incident and is intended to assist your organization as you assess your own obligations, if any, to report this incident to employees or others. However, while we do not have evidence confirming that your PII was compromised, PSW would like to offer our assistance in notifying any affected individuals in your district. We have contracted with a national firm that manages notifications like the one at hand, and the attached letter, Individual Notification of Data Security Incident, is an example of what we would send to individuals impacted by this incident. Also, although we have ***not identified that any personal data has been misused***, we are prepared to offer certain of these individuals with **complimentary credit monitoring and identity theft protection services** for twenty-four (24) months.

If you would like PSW to notify teachers and administrative staff as described herein, please fill out the last known contact information for each person listed in Attachment 2 of the District Notification of Data Security Incident and send it to compliance@publicschoolworks.com by February 2, 2024.

We appreciate your understanding and deeply apologize for this inconvenience. If you have any questions, please contact compliance@publicschoolworks.com.

Thank you,

WORKS International, Inc. Executive Team



Nick Kowalski

Legal Counsel, Manager,
Research and Program Development

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