

Kennedys

By Email

Attorney General Anthony Brown
Attn: Security Breach Notification
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June 16, 2024

Dear Attorney General Brown:

Our office writes on behalf of our client Learnosity Holdings Ltd. Ireland and its subsidiary, Questionmark (collectively, “Learnosity”), to provide notice for a data breach impacting the personally identifiable information of six (6) Maryland residents arising from the compromise of a single SharePoint file of Questionmark.

On May 10, 2024, Learnosity received a security alert regarding suspicious activity on the SharePoint account of a Questionmark employee. Learnosity took prompt action to investigate the matter and secure its system. It disabled relevant directory accounts and implemented a mandatory password reset. Learnosity also engaged our firm and outside IT forensic specialists (at our direction) to assist with determining the nature and scope of the incident.

The investigation confirmed that the incident was limited to a single SharePoint account. The compromise was the result of a May 10, 2024 phishing email. The personally identifiable information impacted was limited to six Maryland residents and was name and social security number. Learnosity is providing written notice to the individuals whose data was impacted, and is offering twelve months of credit monitoring services through TransUnion. Learnosity also has set up an in-house call center to handle any queries stemming from the incident directly.

Learnosity is ISO27001 certified and will continue to follow good practice as outlined in ISO27001. Learnosity also has initiated taken additional active steps to mitigate cyber risks. As noted above, it initiated mandatory password resets to the compromised user. It also will deploy additional cyber awareness employee training, including more frequent phishing email training. It also will review and update its incident response plan and conduct tabletop exercises.

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Attorney General Anthony Brown
Office of the Attorney General

Should you have any further questions, please do not hesitate to contact me. Thank you.

Very truly yours,

/s/ Joshua A. Mooney

Joshua A. Mooney

Partner
for Kennedys

Learnosity Limited
c/o Cyberscout
P.O. Box 3923
Syracuse, NY 13220

<Name>
<Address>
<City><State><Zip>

June 17, 2024

NOTICE OF DATA BREACH

Dear <Name>

Learnosity Holdings Ltd. Ireland and its subsidiary, Questionmark Corporation (collectively, “Learnosity”), writes to inform you of a data security incident experienced by our company that may have involved your information as described below. We take the privacy and security of all information very seriously and are providing information about the incident and steps you can take to help protect your information.

What Happened: On May 10, 2024, we learned of an unauthorized access to a single SharePoint account. Upon discovery, we took immediate action to secure our systems and to address and investigate the incident, which included engaging outside counsel and outside IT forensic specialists (at the direction of counsel) to assist with determining the nature and scope of the incident. Our investigation determined that the unauthorized actor accessed certain employment data.

What Information Was Involved: The types of information contained within the affected data includes your first and last name, in combination with the following data element(s): <Data Elements>.

What We Are Doing: Upon learning of this incident, we immediately took steps to contain the event and undertook a thorough investigation with legal counsel and forensic specialists. Additionally, we are providing you with access to Single Bureau Credit Monitoring/Single Bureau Credit Report/Single Bureau Credit Score services at no charge. These services provide you with alerts for 12 months from the date of enrollment when changes occur to your credit file. This notification is sent to you the same day that the change or update takes place with the bureau. Finally, we are providing you with proactive fraud assistance to help with any questions that you might have or in event that you become a victim of fraud. These services will be provided by Cyberscout, a TransUnion company specializing in fraud assistance and remediation services. Instructions about how to enroll in these services and additional resources available to you are included in the enclosed “*Steps You Can Take to Help Protect Your Information.*”

What You Can Do: We recommend that you remain vigilant against incidents of identity theft and fraud by reviewing your credit reports/account statements for suspicious activity and to detect errors. If you discover any suspicious or unusual activity on your accounts, please promptly contact the financial institution or company. We have provided additional information below, which contains more information about steps you can take to help protect yourself against fraud and identity theft, as well as credit monitoring enrollment instructions.

For More Information: Should you have any questions or concerns, please contact our dedicated assistance line which can be reached at 1-888-823-5713, Monday through Friday, excluding major U.S. holidays. Please know that the security of information is of the utmost importance to us. We stay committed to protecting your trust in us and continue to be thankful for your support during this time.

Sincerely,



Mark Lynch
Chief Strategy Officer and Co-Founder

STEPS YOU CAN TAKE TO HELP PROTECT YOUR INFORMATION

To enroll in Credit Monitoring services at no charge, please log on to <https://bfs.cyberscout.com/activate> and follow the instructions provided. When prompted please provide the following unique code to receive services: **E68DCC172AED**

In order for you to receive the monitoring services described above, you must enroll within 90 days from the date of this letter. The enrollment requires an internet connection and e-mail account and may not be available to minors under the age of 18 years of age. Please note that when signing up for monitoring services, you may be asked to verify personal information for your own protection to confirm your identity.

Monitor Your Accounts and Credit Reports

We encourage you to remain vigilant against incidents of identity theft and fraud by reviewing your credit reports/account statements and explanation of benefits forms for suspicious activity and to detect errors. Under U.S. law, you are entitled to one free credit report annually from each of the three major credit reporting bureaus, TransUnion, Experian, and Equifax. To order your free credit report, visit www.annualcreditreport.com or call 1-877-322-8228. Once you receive your credit report, review it for discrepancies and identify any accounts you did not open or inquiries from creditors that you did not authorize. If you have questions or notice incorrect information, contact the credit reporting bureau.

You 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, 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 lasting seven years. Should you wish to place a fraud alert, please contact any of the three credit reporting bureaus listed below.

As an alternative to a fraud alert, you 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 your 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 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 should provide the following information:

1. Full name (including middle initial as well as Jr., Sr., III, etc.);
2. Social Security number;
3. Date of birth;
4. Address for the prior two to five years;
5. Proof of current address, such as a current utility or telephone bill;
6. A legible photocopy of a government-issued identification card (e.g., state driver’s license or identification card); 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 fraud alert or credit freeze, please contact the three major credit reporting bureaus listed below:

TransUnion 1-800-680-7289 www.transunion.com TransUnion Fraud Alert P.O. Box 2000 Chester, PA 19016-2000 TransUnion Credit Freeze P.O. Box 160 Woodlyn, PA 19094	Experian 1-888-397-3742 www.experian.com Experian Fraud Alert P.O. Box 9554 Allen, TX 75013 Experian Credit Freeze P.O. Box 9554 Allen, TX 75013	Equifax 1-888-298-0045 www.equifax.com Equifax Fraud Alert P.O. Box 105069 Atlanta, GA 30348-5069 Equifax Credit Freeze P.O. Box 105788 Atlanta, GA 30348-5788
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Additional Information

You can further educate yourself regarding identity theft, fraud alerts, credit freezes, and the steps you can take to protect your personal information by contacting the credit reporting bureaus, the Federal Trade Commission (FTC), or your state Attorney General. The FTC also encourages those who discover that their information has been misused to file a complaint with them. The FTC may be reached at 600 Pennsylvania Ave. NW, Washington, D.C. 20580; www.identitytheft.gov; 1-877-ID-THEFT (1-877-438-4338); and TTY: 1-866-653-4261.

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, your state Attorney General, and the FTC. This notice has not been delayed by law enforcement.

For D.C. residents, the District of Columbia Attorney General may be contacted at 441 4th Street NW #1100, Washington, D.C. 20001; 202-727-3400, and <https://oag.dc.gov/consumer-protection>.

For Maryland residents, the Maryland Attorney General may be contacted at Office of the Attorney General, 200 St. Paul Place, Baltimore, MD 21202; 1-888-743-0023; or 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>.

For New Mexico residents, you have rights pursuant to the Fair Credit Reporting Act, such as the right to be told if information in your credit file has been used against you, the right to know what is in your credit file, the right to ask for your credit score, and the right to dispute incomplete or inaccurate information. Further, pursuant to the Fair Credit Reporting Act: (i) the consumer reporting agencies must correct or delete inaccurate, incomplete, or unverifiable information; (ii) the consumer reporting agencies may not report outdated negative information; (iii) access to your file is limited; (iv) you must give consent for credit reports to be provided to employers; (v) you may limit “prescreened” offers of credit and insurance you get based on information in your credit report; (vi) and you may seek damages from violators. You may have additional rights under the Fair Credit Reporting Act not summarized here. Identity theft victims and active-duty military personnel have specific additional rights pursuant to the Fair Credit Reporting Act. We encourage you to review your rights pursuant to the Fair Credit Reporting Act by visiting https://files.consumerfinance.gov/f/201504_cfpb_summary_your-rights-under-fcra.pdf, or by writing Consumer Response Center, Room 130-A, FTC, 600 Pennsylvania Ave. N.W., Washington, D.C. 20580.

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.

For Oregon residents, the Oregon Attorney General may be contacted at Oregon Department of Justice, 1162 Court St. NE, Salem, OR 97301-4096; 1-877-877-9392; and <https://doj.state.or.us/consumer-protection/>

For Rhode Island residents, the Rhode Island Attorney General may be contacted at 150 South Main Street, Providence, RI 02903; 1-401-274-4400; and www.riag.ri.gov. Under Rhode Island law, you have the right to obtain any police report filed in regard to this incident. There is 1 Rhode Island resident impacted by this incident.