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October 14, 2024

Via First-Class Mail

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



Re:	Our Client	:	Community Day School
	Matter	:	Data Security Incident on September 11, 2024
	LBBS File #	:	16516.590

Dear Attorney General Brown:

We represent Community Day School ("CDS"), headquartered in Pittsburgh, Pennsylvania with respect to a potential data security incident described in more detail below. CDS takes the security and privacy of the information in its control seriously, and has taken steps to prevent a similar incident from occurring in the future.

This letter will serve to inform you of the nature of the security breach, the number of Maryland residents that were potentially affected, what information has been compromised, and the steps that CDS is taking in response to this incident. We have also enclosed hereto a sample of the notification made to the potentially impacted individuals, which includes an offer of free credit monitoring.

1. Nature of the Security Incident

On or around September 11, 2024, CDS discovered that a former employee violated school policy by sending multiple files to the employee's personal Gmail account during the employee's final days of employment, after the employee had been given notice of their termination. The transfer of data occurred on or between May 23, 2024 and June 5, 2024.

Upon discovering the incident, CDS took immediate action, working with data breach experts, launching a thorough investigation, and gathering as much information surrounding this incident as possible to ensure that it never happens again.

Although CDS has found no evidence any information has been specifically accessed for misuse, the documents contained student name, date of birth, mailing address, information regarding student progress, graduation plan(s), and/or health-related information. Notably, the types of information affected were different for each individual, and not every individual had all of the elements listed above exposed.

As of this writing, CDS has not received any reports of related identity theft since the date of the incident (September 11, 2024 to present).

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2. Maryland Residents Notified

A total of one (1) resident of Maryland was potentially affected by this security incident. A notification letter to this individual was mailed on October 16, 2024, by first class mail. A sample copy of the notification letter is included with this letter.

3. Steps Taken

The security and privacy of personal data remain among CDS's highest priorities. Upon discovering this incident, CDS officials moved quickly to initiate a response, which included conducting a thorough investigation of all transferred files, and attempting to confirm that all records were properly destroyed and not forwarded to any third parties. We have conducted a root cause analysis to understand how the incident occurred, and to prevent similar incidents from occurring in the future. We have also reported the incident to law enforcement authorities.

Although CDS is not aware of any evidence of misuse of personal information, CDS extended to all potentially impacted individuals an offer for free credit monitoring and identity theft protection through TransUnion. This service will include 12 months of credit monitoring, along with a fully managed identity theft recovery service, should the need arise.

4. Contact Information

CDS remains dedicated to protecting the sensitive information in its control. If you have any questions or need additional information, please do not hesitate to contact me at Tawana.Johnson@lewisbrisbois.com or 404.476.2089.

Very truly yours,

Lewis Brisbois Bisgaard & Smith, LLC



Tawana Johnson, Esq.

cc: (Lewis Brisbois LLC)

Enclosures: *Sample notification letter*

Community Day School
c/o Cyberscout
PO Box 1286
Dearborn, MI 48120-9998

Via First-Class Mail



October 16, 2024

Notice of Data Security Incident

Dear Parent or Guardian of [REDACTED]:

Community Day School takes the confidentiality of our students' data very seriously, and we work very hard to maintain the confidentiality of that data. We are writing to notify you of a data security incident that exposed your child or children's personal information, and we want to provide you with information and resources you can use to protect this information.

What Happened and What Information Was Involved:

On or around September 11, 2024, Community Day School discovered that a former employee violated Community Day School policy by sending multiple files to the employee's personal Gmail account during the employee's final days of employment after the employee had been given notice of their termination. The transfer of data occurred on or between May 23, 2024 and June 5, 2024. The documents contained your child's name, date of birth, mailing address, information about your child's class progress, graduation plan(s), and/or health-related information. Notably, not every student had all of the above-listed elements exposed.

Upon discovering the incident, Community Day School took immediate action, working with data breach experts, launching a thorough investigation, and gathering as much information surrounding this incident as possible to ensure that it never happens again.

What We Are Doing:

Upon discovering this incident, Community Day School officials moved quickly to initiate a response, which included conducting a thorough investigation of all transferred files, and attempting to confirm that all records were properly destroyed and not forwarded to any third parties. We have conducted a root cause analysis to understand how the incident occurred, and to prevent similar incidents from occurring in the future. We have also reported the incident to law enforcement authorities.

Importantly, the investigation did not identify specific activity around your child's information, and Community Day School is not aware of any fraud or identity theft because of this incident. As of this writing, Community Day School has not received any reports of identity theft or misuse of any protected information since the date of discovery of the incident (September 11, 2024, to present).

Additionally, in response to the incident, Community Day School is providing the parents of impacted minor dependents with access to Cyber Monitoring services for you and your minor child for twelve (12) months at no charge. Cyber monitoring will look out for yours and your child's personal data on the dark web and alert you if you or your child's personally identifiable information is found online. Community Day School is also providing you with proactive fraud assistance to help with any questions you might have or in the event your child become a victim of fraud. These services will be provided by Cyberscout, a TransUnion company specializing in fraud assistance and remediation services.



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What You Can Do:

To enroll in Cyber 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: **86E719B91352**. *Once you have completed the enrollment for yourself, click on your name in the top right of your dashboard and then "Add Family Member" to enroll your child. To complete the child's enrollment, click on the child's name and provide the requested information for monitoring.*

The enrollment requires an internet connection and e-mail account and will require enrollment by parent or guardian first. Also, please note when signing up for monitoring services, you may be asked to verify personal information for your own protection to confirm your identity. In order for you to receive the monitoring services described above, you must enroll within 90 days from the date of this letter.

For More Information:



You can also call the fraud help line at 1-800-405-6108 between the hours of 8:00 a.m. to 8:00 p.m. Eastern Time Monday through Friday, excluding holidays, for more information. If you call the fraud help line, please be prepared to supply the fraud specialist with your unique code listed above.

You are encouraged to take full advantage of these services. Enclosed you will find additional materials regarding the resources available to you, and the steps you can take to further protect your child's personal information.

Community Day School values the security of the personal data that we maintain, and understand the frustration, concern, and inconvenience that this incident may have caused.

Sincerely,

A handwritten signature in black ink that reads 'Casey Weiss'.

Casey Weiss, Head of School

Community Day School

Additional Information

Credit Reports: You may obtain a copy of your credit report, free of charge, whether or not you suspect any unauthorized activity on your account. You may obtain a free copy of your credit report from each of the three nationwide credit reporting agencies. To order your free credit report, please visit www.annualcreditreport.com, or call toll-free at 1-877-322-8228. You can also order your annual free credit report by mailing a completed Annual Credit Report Request Form (available at <https://www.consumer.ftc.gov/articles/0155-free-credit-reports>) to: Annual Credit Report Request Service, P.O. Box 105281, Atlanta, GA, 30348-5281.

Security Freeze: You also have the right to place a security freeze on your credit report. A security freeze is intended to prevent credit, loans, and services from being approved in your name without your consent. To place a security freeze on your credit report, you need to make a request to each consumer reporting agency. You may make that request by certified mail, overnight mail, regular stamped mail, or by following the instructions found at the websites listed below. The following information must be included when requesting a security freeze (note that if you are requesting a credit report for your spouse or a minor under the age of 16, this information must be provided for him/her as well):

- (1) full name, with middle initial and any suffixes;
- (2) Social Security number;
- (3) date of birth;
- (4) current address and any previous addresses for the past five years; and
- (5) any applicable incident report or complaint with a law enforcement agency or the Registry of Motor Vehicles.

The request must also include a copy of a government-issued identification card and a copy of a recent utility bill or bank or insurance statement. It is essential that each copy be legible, display your name and current mailing address, and the date of issue. As of September 21, 2018, it is free to place, lift, or remove a security freeze. You may also place a security freeze for children under the age of 16. You may obtain a free security freeze by contacting any one or more of the following national consumer reporting agencies:

Equifax Security Freeze P.O. Box 105788 Atlanta, GA 30348 1-888-298-0045 https://www.equifax.com/personal/credit-report-services/credit-freeze/	Experian Security Freeze P.O. Box 9554 Allen, TX 75013 1-888-397-3742 www.experian.com/freeze/center.html	TransUnion Security Freeze P.O. Box 160 Woodlyn, PA 19094 1-800-916-8800 www.transunion.com/credit-freeze
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Fraud Alerts: You can place fraud alerts with the three credit bureaus by phone and online with:

- Equifax (https://assets.equifax.com/assets/personal/Fraud_Alert_Request_Form.pdf);
- TransUnion (<https://www.transunion.com/fraud-alerts>); or
- Experian (<https://www.experian.com/fraud/center.html>).

A fraud alert tells creditors to follow certain procedures, including contacting you, before they open any new accounts or change your existing accounts. For that reason, placing a fraud alert can protect you, but also may delay you when you seek to obtain credit. As of September 21, 2018, initial fraud alerts last for one year. Victims of identity theft can also get an extended fraud alert for seven years. The phone numbers for all three credit bureaus are listed above.

Monitoring: You should always remain vigilant and monitor your accounts for suspicious or unusual activity.

File Police Report: You have the right to file or obtain a police report if you experience identity fraud. Please note that in order to file a crime report or incident report with law enforcement for identity theft, you will likely need to provide proof that you have been a victim. A police report is often required to dispute fraudulent items. You can generally report suspected incidents of identity theft to local law enforcement or to the Attorney General.

FTC and Attorneys General: You can further educate yourself regarding identity theft, fraud alerts, security freezes, and the steps you can take to protect yourself, by contacting the consumer reporting agencies, the Federal Trade Commission, or your state Attorney General.



The Federal Trade Commission can be reached at: 600 Pennsylvania Avenue NW, Washington, DC 20580, www.identitytheft.gov, 1-877-ID-THEFT (1-877-438-4338), 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. You can obtain further information on how to file such a complaint by way of the contact information listed above. 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. This notice has not been delayed by law enforcement.

For Arizona residents, the Attorney General may be contacted at the Consumer Protection & Advocacy Section, 2005 North Central Avenue, Phoenix, AZ 85004, 1-602-542-5025.

For Colorado residents, the Attorney General may be contacted through Consumer Protection 1300 Broadway, 9th Floor, Denver, CO 80203 1-720-508-6000, www.coag.gov.

For Iowa residents, you can report any suspected identity theft to law enforcement or to the Attorney General.

For District of Columbia residents, the District of Columbia Attorney General may be contacted at: 400 6th Street, NW, Washington, D.C. 20001; 202-727-3400; and oag.dc.gov.

For Maryland residents, the Maryland Attorney General can be contacted at 200 St. Paul Place, 16th Floor, Baltimore, MD 21202, 1-888-743-0023, and www.oag.state.md.us.

For Massachusetts residents, it is required by state law that you are informed of your right to obtain a police report filed in regard to 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.

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, the consumer reporting agencies must correct or delete inaccurate, incomplete, or unverifiable information; consumer reporting agencies may not report outdated negative information; access to your file is limited; you must give your consent for credit reports to be provided to employers; you may limit "prescreened" offers of credit and insurance you get based on information in your credit report; 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 www.consumerfinance.gov/f/201504_cfpb_summary_your-rights-under-fcra.pdf or by writing Consumer Response Center, Room 130-A, Federal Trade Commission, 600 Pennsylvania Ave. N.W., Washington, D.C. 20580.

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

For North Carolina residents, the Attorney General can be contacted at 9001 Mail Service Center, Raleigh, NC 27699-9001, 1-877-566-7226 or 1-919-716-6400, and www.ncdoj.gov.

For Rhode Island residents, the Rhode Island Attorney General can be reached at 150 South Main Street, Providence, Rhode Island 02903, www.riag.ri.gov, and 1-401-274-4400. Under Rhode Island law, you have the right to obtain any police report filed in regard to this incident. There are approximately <<X>> Rhode Island residents that may be impacted by this event.

For Vermont Residents: If you do not have internet access but would like to learn more about how to place a security freeze on your credit report, contact the Vermont Attorney General's Office at 802-656-3183 (800-649-2424 toll free in Vermont only).