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July 10, 2015

# VIA U.S. MAIL

Attorney General Joseph Foster Office of the New Hampshire Attorney General Attn: Security Breach Notification 33 Capitol Street Concord, NH 03301

Re:

Notice of Data Security Incident

Dear Attorney General Foster:

We represent New Horizons Computer Learning Centers, Inc. ("New Horizons"), 100 4 Falls Corporate Center, Suite 408, West Conshohocken, Pennsylvania 19428, and are writing to notify you of a data security incident that may affect the security of personal information of one New Hampshire resident. The investigation into this event is ongoing, and this notice will be supplemented with any new significant facts learned subsequent to its submission. In addition, New Horizons is providing voluntary notice to your office of the incident's impact on two businesses operating in New Hampshire. By providing this notice, New Horizons does not waive any rights or defenses regarding the applicability of New Hampshire law or personal jurisdiction.

## Nature of the Data Security Event

On May 28, 2015, New Horizons detected suspicious activity on a certain server within its corporate network. New Horizons immediately launched an investigation into the activity and, on June 11, 2015, determined unauthorized access to certain information stored on the network had occurred. The information accessed included a combination of any two or more of the following: name, Social Security number, date of birth, bank account information, tax identification number, employee benefit information, driver's license number, dependent information, and address. New Horizons is unaware of any actual or attempted misuse of this information.

New Horizons' investigation into this incident is ongoing. New Horizons has retained third-party forensic investigators to assist in the investigation. Additionally, New Horizons reported this incident to the FBI, and the FBI's investigation into this incident is ongoing.

Attorney General Joseph Foster July 10, 2015 Page 2

# Notice to New Hampshire Resident and Businesses

New Horizons has identified one New Hampshire resident and two businesses operating in New Hampshire as being impacted by this incident. On or about July 13, 2015, New Horizons will mail written notice of this incident to the affected New Hampshire resident in substantially the same form as the letter attached hereto as *Exhibit A*. On that same day, New Horizons will mail written notice of this incident to these impacted businesses operating in New Hampshire in substantially the same form as the letter attached hereto as *Exhibit B*.

## Other Steps Taken and To Be Taken

New Horizons' and the FBI's investigation into this incident is ongoing. New Horizons is providing those individuals affected by this incident with access to two free years of credit monitoring and identity restoration services with AllClear ID. New Horizons is also providing both individuals and businesses impacted by this incident helpful information on how to protect against identity theft and fraud. New Horizons has taken steps to prevent additional unauthorized access to its corporate network and continues to monitor its systems for suspicious activity. In addition to providing notice of this incident to you, New Horizons is providing notice of this incident to other regulators where required.

### **Contact Information**

Should you have any questions regarding this notification or other aspects of the data security event, please contact us at 215-977-4081.

Very truly yours,

Jennifer A. Coughlin of LEWIS BRISBOIS BISGAARD & SMITH LLP

JAC:aw

Enc.

# EXHIBIT A



ACD1234 00-ACIDLT1E-2 00001 JOHN Q. SAMPLE 1234 MAIN STREET ANYTOWN US 12345-6789

July 13, 2015

Dear John Sample,

New Horizons Computer Learning Centers, Inc. ("New Horizons") recently discovered an incident that may affect the security of your personal information. While New Horizons is unaware of any actual or attempted misuse of this information, we are writing to provide you with information regarding the incident, steps we've taken since discovering this incident, and what you can do to protect against identity theft and fraud if you feel it is appropriate to do so.

What Happened? On May 28, 2015, we detected suspicious activity on a certain server within our network. We immediately launched an investigation into the activity and, on June 11, 2015, determined unauthorized access to certain employee and vendor information stored on our network had occurred. While our investigation is ongoing, we've determined the following information relating to you was accessed without authorization: name, Social Security number, date of birth, and address. Again, we are unaware of any actual or attempted misuse of this information.

What is New Horizons Doing? New Horizons takes the security of your personal information very seriously. In addition to launching an investigation into this incident, we've taken steps to prevent additional unauthorized access to our network and continue to monitor our system for suspicious activity. We've retained third-party forensic investigators to assist in our investigation into this incident. We've reported the incident to the FBI, and their investigation is ongoing.

In addition to the steps above, we are also providing notice of this incident, information on how to protect against identity theft and fraud, and complimentary access to 24 months of free credit monitoring and identity restoration services with AllClear ID to individuals impacted by this incident. The enclosed Privacy Safeguards Information contains information on protecting against identity theft and fraud and instructions on how to enroll and receive the complimentary credit monitoring and identity restoration services.

What You Can Do. You can review the enclosed Privacy Safeguards Information. You can also enroll to receive the complimentary access to 24 months of free credit monitoring and identity restoration services. You can also contact the confidential inquiry line, staffed with professionals familiar with this incident and knowledgeable on what you can do to protect against identity theft and fraud, with questions or concerns regarding this incident. This confidential inquiry line is available Monday through Saturday, 8:00 am – 8:00 pm, Central Time, at 1-866-979-2512.



New Horizons takes privacy and data security very seriously, and would like to sincerely apologize for any inconvenience or concern this may have caused. We want to assure you that we continue to take appropriate actions to protect the privacy and security of your information.

Sincerely,

Earle W. Pratt III

Chief Executive Officer

### PRIVACY SAFEGUARDS INFORMATION

To help detect the possible misuse of your information, we have arranged to have AllClear ID protect your identity for 24 months at no cost to you. The following identity protection services start on the date we first provided you with enrollment instructions, and you can use them at any time during the next 24 months.

**AllClear SECURE:** The team at AllClear ID is ready and standing by if you need identity repair assistance. This service is automatically available to you with no enrollment required. If a problem arises, simply call 1-866-979-2512 and a dedicated investigator will do the work to recover financial losses, restore your credit and make sure your identity is returned to its proper condition. AllClear ID maintains an A+ rating at the Better Business Bureau.

AllClear PRO: This service offers additional layers of protection including credit monitoring and a \$1 million identity theft insurance policy. For a child under 18 years old, AllClear ID ChildScan identifies acts of credit, criminal, medical or employment fraud against children by searching thousands of public databases for use of your child's information. To use the PRO service, you will need to provide your personal information to AllClear ID. You may sign up online at <a href="mailto:enroll.allclearid.com">enroll.allclearid.com</a> or by phone by calling 1-866-979-2512 using the following redemption code: Redemption Code.

Please note: Additional steps may be required by you in order to activate your phone alerts.

We encourage you to remain vigilant, to review your account statements, and to monitor your credit reports and explanation of benefits forms for suspicious activity. Under U.S. law you are entitled to one free credit report annually from each of the three major credit reporting bureaus. To order your free credit report, visit <a href="www.annualcreditreport.com">www.annualcreditreport.com</a> or call, toll-free, 1-877-322-8228. You may also contact the three major credit bureaus directly to request a free copy of your credit report.

At no charge, you can also have these credit bureaus place a "fraud alert" on your file that alerts creditors to take additional steps to verify your identity prior to granting credit in your name. Note, however, that because it tells creditors to follow certain procedures to protect you, it may also delay your ability to obtain credit while the agency verifies your identity. As soon as one credit bureau confirms your fraud alert, the others are notified to place fraud alerts on your file. Should you wish to place a fraud alert, or should you have any questions regarding your credit report, please contact any one of these agencies:

Equifax
P.O. Box 105069
Atlanta, GA 30348
800-525-6285
www.equifax.com

Experian
P.O. Box 2002
Allen, TX 75013
888-397-3742
www.experian.com

TransUnion
P.O. Box 2000
Chester, PA 19022-2000
800-680-7289
www.transunion.com

You may also place a security freeze on your credit reports. A security freeze prohibits a credit bureau from releasing any information from a consumer's credit report without the consumer's written authorization. However, please be advised that placing a security freeze on your credit report may delay, interfere with, or prevent the timely approval of any requests you make for new loans, credit mortgages, employment, housing or other services.

If you have been a victim of identity theft, and you provide the credit bureau with a valid police report, it cannot charge you to place, list or remove a security freeze. In all other cases, a credit bureau may charge you a fee to place, temporarily lift, or permanently remove a security freeze. You will need to place a security freeze separately with each of the three major credit bureaus listed above if you wish to place the freeze on all of your credit files.

To find out more on how to place a security freeze, you can use the following contact information:



Equifax Security Freeze
P.O. Box 105788
Atlanta, GA 30348
1-800-685-1111
(NY residents please call
1-800-349-9960)
www.equifax.com/help/
credit-freeze/en cp

Experian Security Freeze P.O. Box 9554 Allen, TX 75013 1-888-397-3742 www.experian.com/ freeze/center.html TransUnion Fraud Victim
Assistance
P.O. Box 6790
Fullerton, CA 92834
Fraud Division
800-680-7289
www.transunion.com/freeze

You can further educate yourself regarding identity theft, fraud alerts, security freezes, and the steps you can take to protect yourself, by contacting your state Attorney General or the Federal Trade Commission. The Federal Trade Commission also encourages those who discover that their information has been misused to file a complaint with them. The Federal Trade Commission can be reached at: 600 Pennsylvania Avenue, NW, Washington, DC 20580; <a href="www.ftc.gov/idtheft">www.ftc.gov/idtheft</a>; 1-877-ID-THEFT (1-877-438-4338); and TTY: 1-866-653-4261. For Maryland residents, the Attorney General can be reached at: 200 St. Paul Place, 16<sup>th</sup> Floor, Baltimore, MD 21202; 1-888-743-0023; and <a href="www.oag.state.md.us">www.oag.state.md.us</a>. For North Carolina residents, the Attorney General can be contacted by mail at 9001 Mail Service Center, Raleigh, NC 27699-9001; toll-free at 1-877-566-7226; by phone at 1-919-716-6400; and online at <a href="www.ncdoj.gov">www.ncdoj.gov</a>.

Instances of known or suspected identity theft should be reported to law enforcement, your Attorney General, and the FTC.

# EXHIBIT B





03057 JOHN Q. SAMPLE 1234 MAIN STREET ANYTOWN US 12345-6789

July 13, 2015

Dear John Sample,

New Horizons Computer Learning Centers, Inc. ("New Horizons") recently discovered an incident that may affect the security of your business information. While New Horizons is unaware of any actual or attempted misuse of this information, we are writing to provide you with information regarding the incident, steps we've taken since discovering this incident, and what you, as the business owner, can do to protect yourself against identity theft and fraud if you feel it is appropriate to do so.

What Happened? On May 28, 2015, we detected suspicious activity on a certain server within our network. We immediately launched an investigation into the activity and, on June 11, 2015, determined unauthorized access to certain employee and vendor information stored on our network had occurred. While our investigation is ongoing, we've determined the following information relating to your business was accessed without authorization: name, and bank account information. Again, we are unaware of any actual or attempted misuse of this information.

What is New Horizons Doing? New Horizons takes the security of your business information very seriously. In addition to launching an investigation into this incident, we've taken steps to prevent additional unauthorized access to our network and continue to monitor our system for suspicious activity. We've retained third-party forensic investigators to assist in our investigation into this incident. We've reported the incident to the FBI, and their investigation is ongoing.

in addition to the steps above, we are also providing notice of this incident and information on how to protect yourself against identity theft and fraud. The enclosed Privacy Safeguards Information contains information on protecting against identity theft and fraud.

What You Can Do. You can review the enclosed Privacy Safeguards Information. You can also contact the confidential inquiry line, staffed with professionals familiar with this incident and knowledgeable on what you can do to protect yourself against identity theft and fraud, with questions or concerns regarding this incident. This confidential inquiry line is available Monday through Saturday, 8:00 am - 8:00 pm, Central Time, at 1-866-979-2512 (toll free) or 1-512-579-2521 (toll).

New Horizons takes privacy and data security very seriously, and would like to sincerely apologize for any inconvenience or concern this may have caused. We want to assure you that we continue to take appropriate actions to protect the privacy and security of your information.

Sincerely,

Earle W. Pratt III

Chief Executive Officer



#### PRIVACY SAFEGUARDS INFORMATION

We encourage you to remain vigilant, to review your account statements, and to monitor your credit reports and explanation of benefits forms for suspicious activity. Under U.S. law you are entitled to one free credit report annually from each of the three major credit reporting bureaus. To order your free credit report, visit <a href="https://www.annualcreditreport.com">www.annualcreditreport.com</a> or call, toll-free, 1-877-322-8228. You may also contact the three major credit bureaus directly to request a free copy of your credit report.

At no charge, you can also have these credit bureaus place a "fraud alert" on your file that alerts creditors to take additional steps to verify your identity prior to granting credit in your name. Note, however, that because it tells creditors to follow certain procedures to protect you, it may also delay your ability to obtain credit while the agency verifies your identity. As soon as one credit bureau confirms your fraud alert, the others are notified to place fraud alerts on your file. Should you wish to place a fraud alert, or should you have any questions regarding your credit report, please contact any one of the agencies listed below.

Equifax
P.O. Box 105069
Atlanta, GA 30348
800-525-6285
www.equifax.com

Experian
P.O. Box 2002
Allen, TX 75013
888-397-3742
www.experian.com

TransUnion
P.O. Box 2000
Chester, PA 19022-2000
800-680-7289
www.transunion.com

You may also place a security freeze on your credit reports. A security freeze prohibits a credit bureau from releasing any information from a consumer's credit report without the consumer's written authorization. However, please be advised that placing a security freeze on your credit report may delay, interfere with, or prevent the timely approval of any requests you make for new loans, credit mortgages, employment, housing or other services.

If you have been a victim of identity theft, and you provide the credit bureau with a valid police report, it cannot charge you to place, list or remove a security freeze. In all other cases, a credit bureau may charge you a fee to place, temporarily lift, or permanently remove a security freeze. You will need to place a security freeze separately with each of the three major credit bureaus listed above if you wish to place the freeze on all of your credit files.

To find out more on how to place a security freeze, you can use the following contact information:

Equifax Security Freeze
P.O. Box 105788
Atlanta, GA 30348
1-800-685-1111
(NY residents please call
1-800-349-9960)
www.equifax.com/help/
credit-freeze/en cp

Experian Security Freeze
P.O. Box 9554
Allen, TX 75013
1-888-397-3742
www.experian.com/
freeze/center.html

TransUnion Fraud Victim
Assistance
P.O. Box 6790
Fullerton, CA 92834
Fraud Division
800-680-7289
www.transunion.com/freeze

You can further educate yourself regarding identity theft, fraud alerts, security freezes, and the steps you can take to protect yourself, by contacting your state Attorney General or the Federal Trade Commission. The Federal Trade Commission also encourages those who discover that their information has been misused to file a complaint with them. The Federal Trade Commission can be reached at: 600 Pennsylvania Avenue, NW, Washington, DC 20580; <a href="www.ftc.gov/idtheft">www.ftc.gov/idtheft</a>; 1-877-ID-THEFT (1-877-438-4338); and TTY: 1-866-653-4261. For Maryland residents, the Attorney General can be reached at: 200 St. Paul Place, 16<sup>th</sup> Floor, Baltimore, MD 21202; 1-888-743-0023; and <a href="www.oag.state.md.us">www.oag.state.md.us</a>. For North Carolina residents, the Attorney General can be contacted by mail at 9001 Mail Service Center, Raleigh, NC 27699-9001; toll-free at 1-877-566-7226; by phone at 1-919-716-6400; and online at <a href="www.ncdoj.gov">www.ncdoj.gov</a>.

Instances of known or suspected identity theft should be reported to law enforcement, your Attorney General, and the FTC.

