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March 12, 2019

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Attorney General Gordon MacDonald
Office of the Attorney General
33 Capitol Street
Concord, New Hampshire 03302

Re: Data Security Incident

Dear Attorney General MacDonald:

We represent Human Resources Concepts, LLC ("HRC"), located at 111 Charles Street, Manchester, New Hampshire 03101. HRC is a provider of third-party employee benefits. HRC suffered a business email compromise described in greater detail below. HRC takes the security and privacy of the information in its control very seriously, and has taken steps to prevent a similar incident from occurring in the future

1. Nature of the security incident.

On December 10, 2018, HRC discovered that an unauthorized actor accessed an employee's email account. Some of the attachments contained in the emails possibly accessed by the unauthorized individual contained individuals' names, addresses, and Social Security numbers. One attachment in particular related to employees for one of HRC's clients, Skillsoft. Although the attachment was encrypted, the actor also obtained an email containing the password for the attachment from other emails. The incident resulted in the potential compromise of personally identifiable information ("PII") for 328 individuals, 325 of whom are employees of Skillsoft. HRC's IT vendor quickly detected the incident and promptly ended the unauthorized access.

2. Notification of potentially affected individuals.

HRC notified Skillsoft of this incident on December 20, 2018 and offered to notify the affected population on behalf of Skillsoft and at no cost to Skillsoft. However, Skillsoft chose to notify its 325 affected employees of the incident without the assistance of HRC. The data belonged to Skillsoft as it related to Skillsoft employees and HRC was merely a custodian of the data. According to Skillsoft, notice was provided to its affected employees on December 21, 2018, a copy of which is attached to this letter. Skillsoft further informed HRC that it would obtain credit monitoring and other identity protection services from its own vendor for notification-related services. Additionally, Skillsoft informed HRC that it notified Attorneys General for states of residence of the affected employees on or about January 23, 2019.

However, on March 11, 2019, Skillsoft informed HRC that it did not notify the New Hampshire Attorney General of this incident because, according to Skillsoft's legal counsel, Skillsoft believed the obligation was HRC's and not Skillsoft's. While HRC does not agree with the analysis of Skillsoft's legal counsel, HRC felt it was prudent to notify the New Hampshire Attorney General of this data security incident to ensure a full accounting of the incident was received by the New Hampshire Attorney General.

3. Number of New Hampshire residents affected.

A total of fifty-five (55) New Hampshire residents are known to have been potentially affected by this incident. We understand, based on Skillsoft's representations that Notification letters to these individuals were emailed to the affected individuals on December 21, 2018. A sample copy of the notification letter that Skillsoft provided to HRC is included with this letter.

3. Steps taken.

We take the security of all information in our control very seriously, and are taking steps to prevent a similar event from occurring in the future. This includes retaining an external computer forensic company to conduct a multifaceted security assessment and an IT vendor to provide regular consultation on network security matters. HRC also implemented a policy with its clients and staff that prohibits the exchange of file passwords using the same method of transmission of the files. Additionally, HRC is instituting an information security training plan for its staff to reinforce best practices.

4. Contact information.

HRC 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 Anjali.Das@wilsonelser.com or (312) 821-6164.

Very truly yours,

Wilson Elser Moskowitz Edelman & Dicker LLP

Anjali C. Das

Enclosure.

NOTICE OF DATA BREACH

Dear Colleague,

We value your work and respect the privacy of your information, which is why, as a precautionary measure, we are writing to let you know about a data security incident that involves your personal information.

WHAT HAPPENED?

On Thursday, December 20, we were notified by our FSA vendor, HRC Total Solutions, that the security of one of its email accounts was compromised on Monday, December 10. A password-protected file containing the information used to enroll you and 324 of your colleagues in the company's FSA program was attached to one of several email messages that were surreptitiously forwarded to the account of an as yet identified third party. Regrettably one of the other forwarded messages includes the password necessary to view the file's contents.

WHAT INFORMATION WAS INVOLVED?

The compromised file includes personal information such as your Social Security Number, full name, home address, business email address, home phone and birthdate. The file did not, however, include any medical information or personal information of dependents.

WHAT WE ARE DOING

Skillsoft values your privacy and deeply regrets that this incident occurred. Skillsoft is conducting a thorough review of the vendor's account of the breach and will notify you if there are any significant developments. Skillsoft has implemented additional security measures designed to prevent a recurrence of such an attack and to protect the privacy of Skillsoft's valued employees.

Skillsoft understands that this is a challenging experience for you. To help rectify the situation, Skillsoft is providing you the opportunity to protect your identity with PrivacyArmor Plus®, InfoArmor's identity and privacy protection plan, free of charge for one (1) year. Be sure to take full advantage of your complimentary plan.

ACTION REQUIRED: ENROLL IN PRIVACYARMOR PLUS COVERAGE

To help protect your identity and to maximize your protection, create your free account by going to www.InfoArmor.com/Skillsoft

Your PrivacyArmor Plus® coverage includes:

- Tri-Bureau Credit Monitoring
- Annual Credit Report
- Monthly Credit Score Tracking
- Full-Service Identity Restoration
- Privacy Advocate Assistance
- $1,000,00.00 Identity Theft Insurance Policy

- Dark Web Monitoring for Compromised Credentials
- Financial Account Monitoring (Non-credit transactions)
- Account Threshold Monitoring
- Social Media Reputation Monitoring
- Digital Wallet Storage & Monitoring
- Pre-Existing Conditions Accepted (No additional charge)

QUESTIONS ABOUT THE PRIVACYARMOR PLUS PROGRAM OR INFOARMOR?

Additional information about the PrivacyArmor Plus program is attached to this email. If you have trouble logging in or have additional questions, please call InfoArmor at 855-907-3282 or email clientservices@infoarmor.com. They are available 24 hours a day, 7 days a week to ensure that you have help when you need it most.

FOR MORE INFORMATION

For additional information and assistance, please contact our Director of Benefits Programs, Michelle Taupier at Michelle.Taupier@skillsoft.com, or our Corporate Counsel, Erik Zilinek at Erik.Zilinek@skillsoft.com between 9:00 a.m.- 5:00 p.m. (EST) daily, or visit www.InfoArmor.com/Skillsoft.

Sincerely,
Michelle Taupier

Michelle Taupier
Skillsoft | phone: 603.821.3491 | mobile: 508.596.3014
Director, Global Benefit Programs
michelle.taupier@skillsoft.com | www.skillsoft.com
skillsoft

PrivacyArmor
by InfoArmor

Protect your family's privacy, identity, and finances with **PrivacyArmor® Plus**

Comprehensive identity monitoring

Our proprietary monitoring platform detects high-risk activity to alert you at the first sign of fraud. We scour the dark web for compromised credentials and monitor financial transactions, all while keeping tabs on your credit reports.

Fraud remediation and restoration

Should identity theft or fraud occur, you have a dedicated Privacy Advocate® to fully manage your recovery and restore your identity. And since fraud doesn't take a holiday, our Privacy Advocates are available 24/7.

Identity theft reimbursement

You never have to worry about covering the costs of identity theft. PrivacyArmor Plus' $1 million identity theft insurance policy† covers any out-of-pocket expenses, lost wages, or legal fees. Plus, we'll reimburse funds stolen from your bank, HSA, or 401(k) accounts.

Activate Your Free Coverage Today

Go to www.InfoArmor.com/Skillsoft

Questions?
1.855.907.3282

1 Source: Wall Street Journal, "Identity Fraud Hits Record Number of People" February, 2018

†Identity theft insurance underwritten by insurance company subsidiaries or affiliates of AIG. The description herein is a summary and intended for informational purposes only and does not include all terms, conditions and exclusions of the policies described. Please refer to the actual policies for terms, conditions, and exclusions of coverage. Coverage may not be available in all jurisdictions.

InfoArmor

The most extensive **identity protection** plan available

PrivacyArmor
by InfoArmor

Identity and credit monitoring	✓
Tri-bureau credit alerts	✓
Unlimited credit reports from TransUnion	✓
Dark web monitoring	✓
Financial transaction monitoring	✓
Social media reputation monitoring	✓
Accounts secured with two-factor authentication	✓
24/7 Privacy Advocate remediation	✓
$1 million identity theft insurance policy	✓
401(k) and HSA stolen fund reimbursement	✓
Tax fraud refund advances	✓

Starting on your PrivacyArmor Plus effective date, you will automatically be covered with:

- Identity monitoring and alerts
- 24/7 Privacy Advocate® support
- $1 million identity theft insurance policy[1]

Activate Your Free Coverage Today

Go to www.InfoArmor.com/Skillsoft

Questions?
1.855.907.3282

How it works

1. **Enroll**
   Access to your full PrivacyArmor Plus capabilities begins on your effective date.
2. **We monitor**
   Our advanced technology looks for suspicious activity associated with your personal profile.
3. **We alert**
   We alert you to any activity associated with your account.
4. **We restore**
   In the event of identity theft, we fully manage the process of recovering your identity, credit, and sense of security so the impact to your life is minimal.
5. **We reimburse**
   Our $1 million identity theft insurance policy covers the costs associated with reinstating your identity.[1]

[1]Identity theft insurance underwritten by insurance company subsidiaries or affiliates of AIG. The description herein is a summary and intended for informational purposes only and does not include all terms, conditions and exclusions of the policies described. Please refer to the actual policies for terms, conditions, and exclusions of coverage. Coverage may not be available in all jurisdictions.

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