



MULLEN
COUGHLIN^{LLC}
ATTORNEYS AT LAW

RECEIVED

JAN 11 2021

CONSUMER PROTECTION

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426 W. Lancaster Avenue, Suite 200
Devon, PA 19333

December 28, 2020

VIA U.S. MAIL

Consumer Protection Bureau
Office of the New Hampshire Attorney General
33 Capitol Street
Concord, NH 03301

Re: Notice of Data Event

Dear Sir or Madam:

We represent Window to the World Communications, Inc. ("WWCI") at 5400 N. Saint Louis Avenue, Chicago, Illinois 60625-4698, and are writing to notify your office of an incident that may affect the security of some personal information relating to a New Hampshire resident. The investigation into this matter is ongoing, and this notice will be supplemented with any new significant facts learned subsequent to its submission. By providing this notice, WWCI does not waive any rights or defenses regarding the applicability of New Hampshire law, the applicability of the New Hampshire data event notification statute, or personal jurisdiction.

Nature of the Data Event

On August 21, 2020, WWCI became aware of unusual activity relating to an employee email account. WWCI immediately commenced an investigation with the assistance of third-party computer specialists. On September 4, 2020, the investigation determined that certain WWCI email accounts were accessed without authorization at varying times beginning approximately December 18, 2018 until August 21, 2020. WWCI promptly began a thorough review of the contents of the account to determine whether sensitive information was present at the time of the incident.

On or around October 29, 2020, WWCI determined that personal information was present in the affected email accounts at the time of the incident, including the name, and Social Security number. To date, the investigation has found no evidence of actual or attempted misuse of personal information as a result of this incident.

Notice to New Hampshire Resident

On December 28, 2020, WWCI provided written notice of this incident to potentially affected individuals, which includes one (1) New Hampshire resident. Written notice is being provided in substantially the same form as the letter attached here as *Exhibit A*.

Other Steps Taken and To Be Taken

Upon learning of this incident, WWCI promptly changed the email account credentials and investigated to confirm the security of its email network. After the investigation had determined that an email account was potentially accessible, WWCI moved quickly to review the accounts for sensitive information. The preliminary review confirmed the accounts contained some sensitive information, but they did not contain address information for many of individuals associated with this information. As such, WWCI reviewed its internal records and worked with a third party to identify address information for purposes of providing notification of this incident. WWCI then promptly began notifying individuals.

WWCI is providing notified individuals access to credit monitoring services for twenty-four (24) months, through Kroll, at no cost to these individuals. Notice to these individuals also includes guidance on how to better protect against identity theft and fraud. WWCI is also providing individuals with information on how to place a fraud alert and security freeze on one's credit file, the contact details for the national consumer reporting agencies, information on how to obtain a free credit report, a reminder to remain vigilant for incidents of fraud and identity theft by reviewing account statements and monitoring free credit reports, and encouragement to contact the Federal Trade Commission, their state Attorney General, and law enforcement to report attempted or actual identity theft and fraud.

As part of its ongoing commitment to data security, WWCI is also taking steps to enhance its data security; these include reviewing existing policies and procedures, conducting additional employee training, and implementing additional security measures.

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Contact Information

Should you have any questions regarding this notification or other aspects of the data security event, please contact us at (267) 930-4842.

Very truly yours,



Vincent F. Regan of
MULLEN COUGHLIN LLC

VFR/jcl

EXHIBIT A

STATE OF NH
DEPT OF JUSTICE

2021 JAN 11 PM 1:56



5400 N. Saint Louis Avenue
Chicago, Illinois 60625 4698
Telephone 773 583 5000

<<Date>> (Format: Month Day, Year)

<<first_name>> <<middle_name>> <<last_name>> <<suffix>>
<<address_1>>
<<address_2>>
<<city>>, <<state_province>> <<postal_code>>
<<country >>

Dear <<first_name>> <<middle_name>> <<last_name>> <<suffix>>,

Window to the World, Inc. ("WWCI") writes to notify you of a recent incident that may affect the security of some of your personal information. While there is currently no evidence that your information has been misused as a result of this incident, we are providing you with information on the event, measures we have taken, and what you may do to better protect your personal information should you feel it appropriate to do so.

What Happened? WWCI recently became aware of unusual activity relating to an employee email account. We immediately commenced an investigation with the assistance of third-party computer specialists. On September 4, 2020, the investigation determined that a certain WWCI email account was accessed without authorization at varying times from December 18, 2018 until August 21, 2020. We immediately began a thorough review of the contents of the accounts to determine whether sensitive information was present at the time of the incident. On October 29, 2020, we determined that certain information relating to you was present in the impacted email account. To date, WWCI is unaware of any actual or attempted misuse of your information as a result of this incident.

What Information Was Involved? WWCI's investigation confirmed the information present within the impacted account at the time of the incident includes your <<b2b_text_1(DataElements)>>. Please note that while our investigation did not reveal evidence that your information was actually viewed by the unauthorized actor, we are providing you this notice to ensure you are aware of this incident.

What We Are Doing. Information privacy and security are among our highest priorities. WWCI has strict security measures in place to protect information in our care. Upon learning of this incident, we promptly changed the email account credentials and investigated to confirm the security of our email network. We are also taking steps to enhance our data security; these include reviewing existing policies and procedures, conducting additional employee training, and implementing additional security measures.

Although we are unaware of any actual or attempted misuse of your information as a result of this incident, we are offering you access to identity monitoring services through Kroll for twenty-four (24) months at no cost to you as an added precaution. A description of services and instructions on how to activate can be found within the enclosed "Steps You Can Take to Help Protect Personal Information." Please note that you must complete the activation process yourself, as we are not permitted to activate these services on your behalf.

What You Can Do. We encourage you to remain vigilant against incidents of identity theft and fraud. You may review the information contained in the enclosed "Steps You Can Take to Help Protect Personal Information." You may also activate the identity monitoring services we are making available to you as we are unable to activate these services on your behalf.

For More Information. We understand you may have questions about this incident that are not addressed in this letter. To ensure your questions are answered in a timely manner, we established a dedicated assistance line at [1-800-877-7777](tel:1-800-877-7777) which can be reached Monday through Friday from 9:00 a.m. to 6:30 p.m. Eastern Time, excluding major U.S. holidays. You may also contact WWCI by mail at 5400 N. Saint Louis Avenue, Chicago, Illinois 60625-4698.

Sincerely,

A handwritten signature in black ink, appearing to read "Jitin Garg".

Jitin Garg
Chief Financial Officer
Window to the World Communications, Inc

Steps You Can Take to Help Protect Your Personal Information

Activate your Identity Monitoring

To help relieve concerns and restore confidence following this incident, we have secured the services of Kroll to provide identity monitoring at no cost to you for two years. Kroll is a global leader in risk mitigation and response, and their team has extensive experience helping people who have sustained an unintentional exposure of confidential data. Your identity monitoring services include Credit Monitoring, Fraud Consultation, and Identity Theft Restoration.

Visit <https://enroll.idheadquarters.com> to activate and take advantage of your identity monitoring services.

You have until **March 29, 2021** to activate your identity monitoring services.

Membership Number: <<Member ID>>

Additional information describing your services is included with this letter.

Monitor Your Accounts

We encourage you to remain vigilant against incidents of identity theft and fraud. 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 www.annualcreditreport.com 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.

You have the right to place a "security freeze" on your credit report, which will prohibit a consumer reporting agency from releasing information in your credit report without your express authorization. The security 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 security freeze to take control over who gets access to the personal and financial information in your credit report 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 security freeze on your credit report. Should you wish to place a security freeze, please contact the major consumer reporting agencies listed below:

Experian
P.O. Box 9554
Allen, TX 75013
1-888-397-3742

www.experian.com/freeze/center.html

TransUnion
P.O. Box 160
Chester, PA 19094
1-888-909-8872

www.transunion.com/credit-freeze

Equifax
P.O. Box 105788
Atlanta, GA 30348-5788
1-800-685-1111

www.equifax.com/personal/credit-report-services

In order to request a security freeze, you will need to provide the following information:

1. Your full name (including middle initial as well as Jr., Sr., II, III, etc.);
2. Social Security number;
3. Date of birth;
4. If you have moved in the past five (5) years, provide the addresses where you have lived over the prior five years;
5. Proof of current address, such as a current utility bill or telephone bill;
6. A legible photocopy of a government-issued identification card (state driver's license or ID card, military identification, etc.);
7. If you are a victim of identity theft, include a copy of either the police report, investigative report, or complaint to a law enforcement agency concerning identity theft.

As an alternative to a security freeze, you have the right to place an initial or extended "fraud alert" on your file at no cost. An initial fraud alert is a 1-year alert that is placed on a consumer's credit file. Upon seeing a fraud alert display on a consumer's credit file, 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, which is a fraud alert lasting seven years. Should you wish to place a fraud alert, please contact any one of the agencies listed below:

Experian
P.O. Box 2002
Allen, TX 75013
1-888-397-3742

www.experian.com/fraud/center.html

TransUnion
P.O. Box 2000
Chester, PA 19106
1-800-680-7289

www.transunion.com/fraud-victim-resource/place-fraud-alert

Equifax
P.O. Box 105069
Atlanta, GA 30348
1-888-766-0008

www.equifax.com/personal/credit-report-services

Additional Information

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), and 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. This notice has not been delayed by law enforcement.

Maryland Residents: Office of the Attorney General of Maryland, Consumer Protection Division 200 St. Paul Place Baltimore, MD 21202; www.oag.state.md.us/Consumer; and Telephone: 1-888-743-0023.

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 a violator. 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. You can 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.

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/>.

North Carolina Residents: Office of the Attorney General of North Carolina, Consumer Protection Division, 9001 Mail Service Center Raleigh, NC 27699-9001, www.ncdoj.gov, Telephone: 1-919-716-6400, 877-566-7226 (toll free within NC).



TAKE ADVANTAGE OF YOUR IDENTITY MONITORING SERVICES

You have been provided with access to the following services from Kroll:

Single Bureau Credit Monitoring

You will receive alerts when there are changes to your credit data—for instance, when a new line of credit is applied for in your name. If you do not recognize the activity, you will have the option to call a Kroll fraud specialist, who will be able to help you determine if it is an indicator of identity theft.

Fraud Consultation

You have unlimited access to consultation with a Kroll fraud specialist. Support includes showing you the most effective ways to protect your identity, explaining your rights and protections under the law, assistance with fraud alerts, and interpreting how personal information is accessed and used, including investigating suspicious activity that could be tied to an identity theft event.

Identity Theft Restoration

If you become a victim of identity theft, an experienced Kroll licensed investigator will work on your behalf to resolve related issues. You will have access to a dedicated investigator who understands your issues and can do most of the work for you. Your investigator will be able to dig deep to uncover the scope of the identity theft, and then work to resolve it.

Kroll's activation website is only compatible with the current version or one version earlier of Chrome, Firefox, Safari and Edge. To receive credit services, you must be over the age of 18 and have established credit in the U.S., have a Social Security number in your name, and have a U.S. residential address associated with your credit file.