



MULLEN
COUGHLIN^{LLC}
ATTORNEYS AT LAW

411 Theodore Fremd, Ste 206S
Rye, NY 10580

November 27, 2023

VIA E-MAIL

Office of the New Hampshire Attorney General
Consumer Protection & Antitrust Bureau
33 Capitol Street
Concord, NH 03301
E-mail: DOJ-CPB@doj.nh.gov

Re: Notice of Data Event

To Whom It May Concern:

We represent World Learning, Inc. (“World Learning”) located at 1 Kipling Road, P.O. Box 676, Brattleboro, Vermont 05302-0676, and are writing to notify your office of an incident that may affect the security of certain personal information relating to forty-one (41) New Hampshire residents. 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, World Learning 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 or about June 6, 2023, World Learning detected suspicious activity related to certain systems within its environment. World Learning took steps to secure its environment and launched an investigation to determine the nature and scope of the incident. The investigation determined that certain computer systems were subject to unauthorized access between April 20, 2023, and June 6, 2023, and that certain files stored on accessed computer systems were acquired by an unknown third party without authorization. World Learning began a diligent and comprehensive review of relevant systems to determine the information that may have been impacted and to whom it related. That process completed on October 23, 2023.

The information that could have been subject to unauthorized access or acquisition includes

Notice to New Hampshire Residents

On or about November 27, 2023, World Learning provided written notice of this incident to forty-one (41) New Hampshire residents. 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 discovering the event, World Learning moved quickly to investigate and respond to the incident, assess the security of World Learning systems, and identify potentially affected individuals. Further, World Learning notified federal law enforcement regarding the event. World Learning is also working to implement additional safeguards and training to its employees. World Learning is providing access to credit monitoring services for _____, through TransUnion, to individuals whose personal information was potentially affected by this incident, at no cost to these individuals.

Additionally, World Learning is providing impacted individuals with guidance on how to better protect against identity theft and fraud. World Learning is 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.

World Learning is providing written notice of this incident to relevant state regulators, as necessary, and to the three major credit reporting agencies, Equifax, Experian, and TransUnion.

Contact Information

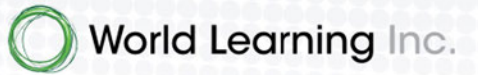
Should you have any questions regarding this notification or other aspects of the data security event, please contact us at _____.

Very truly yours,

Michele Veltri of
MULLEN COUGHLIN LLC

MTV/kld
Enclosure

EXHIBIT A



1 Kipling Road
P.O. Box 676
Brattleboro, VT 05302

[First Name] [Last Name]
[Address 1]
[Address 2]
[City], [State] [Zip]
[Country]

[Date]

NOTICE OF DATA [INCIDENT/BREACH]

Dear [First Name] [Last Name]:

World Learning Inc. (“World Learning”) is writing to inform you of a recent event that may impact some of your information. World Learning takes this event very seriously and the confidentiality, privacy, and security of information in our care is among our highest priorities. While there is no evidence of actual or attempted misuse of your information, we are providing you with information about the event, our response, and resources to help further protect your information, should you feel it is appropriate to do so.

What Happened?

On or about June 6, 2023, World Learning discovered some suspicious activity on certain servers. World Learning immediately took the servers offline and took steps to ensure the security of the network. World Learning also launched an investigation into the nature and scope of the event. The investigation determined that between April 20, 2023, and June 6, 2023, an unauthorized actor gained access to certain World Learning systems and potentially accessed or acquired information on these systems.

As part of the investigation into the nature and scope of the event, World Learning undertook a thorough and comprehensive review of the impacted data to determine whether it included any sensitive information and to whom the information relates. This review was completed on October 23, 2023, and World Learning is notifying you because the review determined that some of your information was within the impacted data.

What Information Was Involved?

The information that relates to you includes your [data elements] and name. To date, World Learning is not aware of any actual or attempted misuse of your information as a result of this event and is providing you this notice out of an abundance of caution.

What We Are Doing.

World Learning takes this event and the security of information in our care very seriously. Upon learning of the event, we moved quickly to respond and investigate the event, assess the security of our network, and notify potentially impacted individuals. As part of World Learning's ongoing commitment to information security, we are currently reviewing our policies and procedures, as well as assessing new cybersecurity tools, to reduce the risk of a similar event from occurring in the future. World Learning also notified law enforcement and will be notifying relevant regulators, as required.

World Learning is also offering you [12/24] months of complimentary credit monitoring through Transunion. You must enroll in these services as World Learning cannot do so on your behalf. Enrollment instructions can be found in the enclosed *Steps You Can Take to Help Protect Your Information* below.

What You Can Do.

We encourage you to remain vigilant against incidents of identity theft and fraud by reviewing your account statements and monitoring your free credit reports for suspicious activity and to detect errors. Please review the enclosed *Steps You Can Take to Help Protect Your Information*, which includes further information on what you can do to protect your information against misuse, should you feel it appropriate to do so. Additionally, World Learning encourages you to enroll in the complimentary credit monitoring services being offered.

For More Information.

World Learning understands that you may have questions about this event not answered in this letter. If you have additional questions, please contact our dedicated assistance line at [CALL CENTER]. You may also write to World Learning at 1 Kipling Road, P.O. Box 676, Brattleboro, Vermont 05302.

We sincerely regret any inconvenience this may cause.

Sincerely,

World Learning Inc.

STEPS YOU CAN TAKE TO HELP PROTECT YOUR INFORMATION

Enroll in Monitoring Services

[enrollment instructions]

Monitor Your Accounts

Under U.S. law, a consumer is entitled to one free credit report annually from each of the three major credit reporting bureaus, Equifax, Experian, and TransUnion. To order a free credit report, visit www.annualcreditreport.com or call, toll-free, 1-877-322-8228. Consumers may also directly contact the three major credit reporting bureaus listed below to request a free copy of their credit report.

Consumers 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 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 consumers are the victim of identity theft, they are entitled to an extended fraud alert, which is a fraud alert lasting seven years. Should consumers wish to place a fraud alert, please contact any of the three major credit reporting bureaus listed below.

As an alternative to a fraud alert, consumers 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 the consumer’s express authorization. The credit freeze is designed to prevent credit, loans, and services from being approved in a consumer’s name without consent. However, consumers should be aware that using a credit freeze to take control over who gets access to the personal and financial information in their credit report may delay, interfere with, or prohibit the timely approval of any subsequent request or application they make regarding a new loan, credit, mortgage, or any other account involving the extension of credit. Pursuant to federal law, consumers cannot be charged to place or lift a credit freeze on their credit report. To request a credit freeze, individuals may need to provide some or all of the following information:

1. full name (including middle initial as well as Jr., Sr., II, III, etc.);
2. Social Security number;
3. date of birth;
4. addresses for the prior two to 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, etc.); and
7. a copy of either the police report, investigative report, or complaint to a law enforcement agency concerning identity theft if they are a victim of identity theft.

Should consumers wish to place a credit freeze or fraud alert, please contact the three major credit reporting bureaus listed below:

Equifax	Experian	TransUnion
https://www.equifax.com/personal/credit-report-services/	https://www.experian.com/help/	https://www.transunion.com/credit-help
1-888-298-0045	1-888-397-3742	1-800-916-8800
Equifax Fraud Alert, P.O. Box 105069 Atlanta, GA 30348-5069	Experian Fraud Alert, P.O. Box 9554, Allen, TX 75013	TransUnion Fraud Alert, P.O. Box 2000, Chester, PA 19016

Equifax Credit Freeze, P.O. Box 105788 Atlanta, GA 30348-5788	Experian Credit Freeze, P.O. Box 9554, Allen, TX 75013	TransUnion Credit Freeze, P.O. Box 160, Woodlyn, PA 19094
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Additional Information

Consumers may further educate themselves regarding identity theft, fraud alerts, credit freezes, and the steps they can take to protect your personal information by contacting the consumer reporting bureaus, the Federal Trade Commission, or their state Attorney General. The Federal Trade Commission may be reached at: 600 Pennsylvania Avenue NW, Washington, D.C. 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. Consumers can obtain further information on how to file such a complaint by way of the contact information listed above. Consumers have the right to file a police report if they ever experience identity theft or fraud. Please note that in order to file a report with law enforcement for identity theft, consumers will likely need to provide some proof that they have been a victim. Instances of known or suspected identity theft should also be reported to law enforcement and the relevant state Attorney General. This notice has not been delayed by law enforcement.

For District of Columbia residents, the District of Columbia Attorney General may be contacted at: 400 6th Street, NW, Washington, D.C. 20001; 1-202-727-3400; and oag.dc.gov.

For Maryland residents, the Maryland Attorney General may be contacted at: 200 St. Paul Place, 16th Floor, Baltimore, MD 21202; 1-410-528-8662 or 1-888-743-0023; and <https://www.marylandattorneygeneral.gov/>.

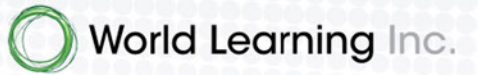
For New Mexico residents, consumers have rights pursuant to the Fair Credit Reporting Act, such as the right to be told if information in their credit file has been used against them, the right to know what is in their credit file, the right to ask for their credit score, and the right to dispute incomplete or inaccurate information. Further, pursuant to the Fair Credit Reporting Act, the consumer reporting bureaus must correct or delete inaccurate, incomplete, or unverifiable information; consumer reporting agencies may not report outdated negative information; access to consumers' files is limited; consumers must give consent for credit reports to be provided to employers; consumers may limit "prescreened" offers of credit and insurance based on information in their credit report; and consumers may seek damages from violators. Consumers 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 consumers to review their 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 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 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 Rhode Island residents, the Rhode Island Attorney General may be reached at: 150 South Main Street, Providence, RI 02903; www.riag.ri.gov; and 1-401-274-4400. Under Rhode Island law, individuals have the right to obtain any police report filed in regard to this event. There are approximately [#] Rhode Island residents that may be impacted by this event.

EXHIBIT A



1 Kipling Road
P.O. Box 676
Brattleboro, VT 05302

[First Name] [Last Name]
[Address 1]
[Address 2]
[City], [State] [Zip]
[Country]

[Date]

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1-888-298-0045	1-888-397-3742	1-800-916-8800
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