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November 26, 2024

Via Email: consumer_protection@ag.idaho.gov

Attorney General Raul Labrador
Office of the Idaho Attorney General
Consumer Protection Division
954 W. Jefferson, 2nd Floor
Boise, ID 83720

Re: Supplemental Notice of Data Security Incident

Dear Attorney General Labrador:

This notice is provided on behalf of Sage International Network of Schools (“Sage”) as a supplement to the prior notices submitted to your office on August 27, 2024 and October 9, 2024 (the “Prior Notices”). In the Prior Notices, Sage reported an incident that appeared to impact Sage’s employee database platform. On October 8, 2024, Sage determined that two (2) employee email accounts were subject to a breach of the security of the system, as defined in Idaho Code § 28-51-104(2). Sage reviewed the contents of the impacted email boxes to determine what information may have been affected and to whom that information relates, so that it could provide proper notice to individuals. On November 6, 2024, Sage completed the review and began locating address information for the impacted population to provide written notice as required by law. The affected data included Idaho residents’ names, Social Security numbers, driver’s license numbers and/or financial account information.

On November 26, 2024, Sage will provide written notice to a total of three hundred and thirty-one (331) Idaho residents via U.S. mail. The notice letter includes general advice on how to protect one’s identity, obtain free credit reports and security freezes, as well as instructions for enrolling in a one-year, complimentary membership with Experian for credit monitoring and identity theft services for those whose Social Security number and/or driver’s license number was impacted. A sample notice letter is enclosed and additional information regarding Sage’s response to this incident is below.

Because cyber threats are always evolving, Sage is continuously working to identify and mitigate threats and evaluate its IT security protocols to protect sensitive data. Since this incident Sage has taken steps to ensure the security of all employee email accounts. To further strengthen the security of the information it maintains, and to help prevent similar incidents in the future, Sage has taken the following steps:

1. Secured the impacted email accounts by changing the passwords and enhancing their complexity,
2. Enhanced security measures associated with payroll access and changes,
3. Strengthened procedure for accessing employee email accounts, and
4. Retrained employees regarding cybersecurity practices related to email.

Additionally, Sage notified the Idaho Office of Risk Management and Idaho Chief Information Security Officer regarding this incident, as well as all other appropriate state regulators.

Please do not hesitate to contact me if you have any questions or concerns.

Sincerely,

/s/ Matthew H. Meade, Esq.



Return Mail Processing
PO Box 589
Claysburg, PA 16625-0589

November 26, 2024

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APT ABC
123 ANY STREET
ANYTOWN, ST 12345-6789



NOTICE OF DATA SECURITY INCIDENT

Dear Sample A. Sample:

Sage International Network of Schools (“Sage”) is writing to inform you of a recent cyber incident involving two employee email accounts. We take this matter very seriously because we are committed to the privacy and security of all information in our possession. Therefore, we are providing this notice to tell you about the incident, offer complimentary identity monitoring services, and suggest ways that you can protect your information.

What Happened

On August 26, 2024, Sage identified suspicious activity related to its payroll system. Sage began an investigation, with the assistance of a nationally recognized digital forensics firm, to further understand what happened and to determine the scope of the incident. We also notified federal law enforcement and took steps to secure our payroll system. On October 8, 2024, through our comprehensive investigation, we discovered that there was unauthorized access to two Sage employee email accounts between July 22, 2024 and August 28, 2024 which contributed to the suspicious payroll activity. We also determined that the contents of the email accounts had been downloaded without authorization. Once we learned this, we conducted a thorough review of the emails to find out: (1) what information was involved and (2) who may have been affected. On November 6, 2024, we completed the review and determined that your personal information was included.

What Information Was Involved

The impacted information included your [Extra1 - data elements].

What We Are Doing About It

Since this incident we have taken steps to ensure the security of all Sage email accounts. To further strengthen the security of the information we maintain, and to help prevent similar incidents in the future, we have taken the following steps:

1. Secured the impacted email accounts by changing the passwords and enhancing their complexity,
2. Enhanced security measures associated with payroll access and changes,
3. Strengthened procedure for accessing employee email accounts, and
4. Retrained employees regarding cybersecurity practices related to email.

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Additionally, Sage notified the Idaho Attorney General's Office, Idaho Office of Risk Management, and Idaho Chief Information Security Officer regarding this incident, as well as all other appropriate state regulators.

What You Can Do

We recommend that you take the following preventative measures to help detect and mitigate any misuse of your information:

1. Enroll in a complimentary, one-year membership with Experian. This membership will provide you with identity monitoring services across all three credit bureaus, including a copy of your credit report at signup; credit monitoring; identity restoration; Experian IdentityWorks ExtendCARE; and up to \$1 million in identity theft insurance. Instructions on how to activate your membership are included at the end of this letter.
2. Remain vigilant for incidents of fraud and identity theft by regularly reviewing your account statements and free credit reports for unauthorized or suspicious activity. Information on additional ways to protect your information, including how to obtain a free credit report and free security freeze, can be found at the end of this notice.
3. Report any incidents of suspected identity theft to your local law enforcement, state Attorney General and the major credit bureaus.

For More Information

Please accept our apologies that this incident occurred. The privacy and security of your information is important to us, and we remain committed to protecting it. If you have any questions or concerns about this incident, you may call us at 208-391-3653 between 8:00 am and 5:00 pm Mountain Time, Monday-Friday, excluding major holidays.

Sincerely,

Andrew Johnson
Executive Director

MORE INFORMATION ABOUT IDENTITY THEFT AND WAYS TO PROTECT YOURSELF

Visit <https://www.experian.com/blogs/ask-experian/category/fraud-and-identity-theft/> for general information regarding identity protection. You can obtain additional information about fraud alerts, security freezes, and preventing identity theft from the consumer reporting agencies listed below and the Federal Trade Commission (FTC) by calling its identity theft hotline: 877-438-4338; TTY: 1-866-653-4261. They also provide information online at <https://consumer.ftc.gov/features/identity-theft>. The FTC's address is: Federal Trade Commission, Division of Privacy and Identity Protection, 600 Pennsylvania Avenue, NW, Washington, DC 20580. You have the ability to place a security freeze on your credit reports by contacting the following agencies.

National Credit Reporting Agencies Contact Information

Equifax P.O. Box 105788 Atlanta, GA 30348 1-888-298-0045 www.equifax.com	Experian P.O. Box 9554 Allen, TX 75013 1-888-397-3742 www.experian.com	TransUnion P.O. Box 2000 Chester, PA 19016 1-833-799-5355 www.transunion.com
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Obtain Your Credit Report

You should also monitor your credit reports. You may periodically obtain your credit reports from each of the national consumer reporting agencies. In addition, under federal law, you are entitled to one free copy of your credit report every 12 months from each of the three nationwide consumer reporting agencies listed above. You may obtain a free copy of your credit report by going to www.AnnualCreditReport.com or by calling (877) 322-8228. You also may complete the Annual Credit Report Request Form available from the FTC at <https://www.consumer.ftc.gov/sites/www.consumer.ftc.gov/files/articles/pdf/pdf-0093-annual-report-request-form.pdf> and mail it to Annual Credit Report Request Service, P.O. Box 105281, Atlanta, GA 30348-5281. You may also contact any of the three major consumer reporting agencies to request a copy of your credit report. You may be able to obtain one or more (depending on the state) additional copies of your credit report, free of charge. You must contact each of the credit reporting agencies directly.

If you discover inaccurate information or a fraudulent transaction on your credit report, you have the right to request that the consumer reporting agency delete that information from your credit report file.

Fraud Alerts

You may want to consider placing a fraud alert on your credit report. An initial fraud alert is free and will stay on your credit file for one year. The alert informs creditors of possible fraudulent activity within your report and requests that the creditor contact you prior to establishing any new accounts in your name. To place a fraud alert on your credit report, contact any of the three national credit reporting agencies using the contact information listed above. As soon as one credit bureau confirms the fraud alert, they will notify the others. Additional information is available at www.annualcreditreport.com.

Security Freeze

You have the ability to place a security freeze on your credit report at no cost to you. 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 may be able to use an online process, an automated telephone line, or a written request to all three of the credit reporting agencies listed above. The following information must be included when requesting a security freeze (note that if you are requesting a credit report for your spouse, 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; (5) a legible copy of a government-issued identification card, (6) proof of current address, such as a legible copy of a recent utility bill or bank or insurance statement, (7) a legible copy of a recent W-2, pay stub, or Social Security card, and (8) if you are a victim of identity theft, a copy of either the police report, investigative report, or complaint to a law enforcement agency concerning



identity theft. It is essential that each copy be legible, display your name and current mailing address, and the date of issue. **Under federal law, you cannot be charged to place, lift, or remove a security freeze.**

After receiving your freeze request, each credit reporting company will send you a confirmation letter containing a unique PIN (personal identification number) or password. Keep the PIN or password in a safe place, you will need it if you choose to lift the freeze. If you do place a security freeze *prior* to enrolling in the credit monitoring service as described above, you will need to remove the freeze in order to sign up for the credit monitoring service. After you sign up for the credit monitoring service, you may refreeze your credit file.

Additional Helpful Information

Even if you do not find any suspicious activity on your initial credit reports, the Federal Trade Commission (FTC) recommends that you check your credit reports periodically. Checking your credit report periodically can help you spot problems and address them quickly.

If you find suspicious activity on your credit reports or have reason to believe your information is being misused, call your local law enforcement agency and file a police report. Be sure to obtain a copy of the police report, as many creditors will want the information it contains to absolve you of the fraudulent debts. You may also file a complaint with the FTC by contacting them at the information provided above. This notice was not delayed as a result of a law enforcement investigation.

If your personal information has been used to file a false tax return, to open an account or to attempt to open an account in your name, or to commit fraud or other crimes against you, you may file a police report in the city in which you currently reside.

STATE SPECIFIC INFORMATION

NEW YORK residents: You may also obtain information on identity theft from the New York Department of State Division of Consumer Protection or the New York Attorney General. These agencies can be reached at:

New York Department of State
Division of Consumer Protection
1-800-697-1220
<http://www.dos.ny.gov/consumerprotection>

New York Attorney General
1-800-771-7755
<https://ag.ny.gov/>

NORTH CAROLINA residents: You may also obtain information about preventing and avoiding identity theft from the North Carolina Attorney General's Office. This office can be reached at:

North Carolina Attorney General's Office
Consumer Protection Division
9001 Mail Service Center
Raleigh, NC 27699-9001
877-566-7226 (Toll-free within North Carolina)
919-716-6000
www.ncdoj.gov

ADDITIONAL DETAILS REGARDING YOUR 12-MONTH EXPERIAN IDENTITYWORKS MEMBERSHIP

TO ACTIVATE YOUR MEMBERSHIP AND START MONITORING YOUR PERSONAL INFORMATION PLEASE FOLLOW THE STEPS BELOW:

- Ensure that you **enroll by: February 28, 2025** (Your code will not work after this date).
- **Visit** the Experian IdentityWorks website to enroll: <https://www.experianidworks.com/3bcredit>
- Provide your **activation code: ABCDEFGHI**

If you have questions about the product, need assistance with identity restoration or would like an alternative to enrolling in Experian IdentityWorks online, please contact Experian's customer care team at **833-931-7577** by **February 28, 2025**. Be prepared to provide engagement number **B135446** as proof of eligibility for the identity restoration services by Experian. A credit card is **not** required for enrollment in Experian IdentityWorks.

You can contact Experian **immediately** regarding any fraud issues, and have access to the following features once you enroll in Experian IdentityWorks:

- **Experian credit report at signup:** See what information is associated with your credit file. Daily credit reports are available for online members only.*
- **Credit Monitoring:** Actively monitors Experian, Equifax and Transunion files for indicators of fraud.
- **Identity Restoration:** Identity Restoration specialists are immediately available to help you address credit and non-credit related fraud.
- **Experian IdentityWorks ExtendCARETM:** You receive the same high-level of Identity Restoration support even after your Experian IdentityWorks membership has expired.
- **Up to \$1 Million Identity Theft Insurance**:** Provides coverage for certain costs and unauthorized electronic fund transfers.

If you believe there was fraudulent use of your information as a result of this incident and would like to discuss how you may be able to resolve those issues, please reach out to an Experian agent at **833-931-7577**. If, after discussing your situation with an agent, it is determined that Identity Restoration support is needed, then an Experian Identity Restoration agent is available to work with you to investigate and resolve each incident of fraud that occurred from the date of the incident (including, as appropriate, helping you with contacting credit grantors to dispute charges and close accounts; assisting you in placing a freeze on your credit file with the three major credit bureaus; and assisting you with contacting government agencies to help restore your identity to its proper condition).

Please note that this Identity Restoration support is available to you for 12 months from the date of this letter and does not require any action on your part at this time. The Terms and Conditions for this offer are located at www.ExperianIDWorks.com/restoration. You will also find self-help tips and information about identity protection at this site.

* Offline members will be eligible to call for additional reports quarterly after enrolling.

** The Identity Theft Insurance is underwritten and administered by American Bankers Insurance Company of Florida, an Assurant company. Please refer to the actual policies for terms, conditions, and exclusions of coverage. Coverage may not be available in all jurisdictions.

