



MULLEN  
COUGHLIN<sub>LLC</sub>  
ATTORNEYS AT LAW

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1275 Drummers Lane, Suite 302  
Wayne, PA 19087

May 8, 2018

**INTENDED FOR ADDRESSEE(S) ONLY**

**VIA U.S. MAIL**

Consumer Protection Division  
Security Breach Notifications  
Office of the Attorney General of Iowa  
1305 E. Walnut Street  
Des Moines, Iowa 50319-0106

RECEIVED  
18 MAY 16 AM 9:44  
CONSUMER PROTECTION DIV.

**Re: Notice of Data Event**

Dear Sir or Madam:

We represent the Global University ("Global"), 1211 S. Glenstone Ave., Springfield MO 65804, and are writing to notify your office of an incident that may affect the security of some personal information relating to one thousand two hundred ninety-one (1,291) Iowa residents. The investigation into this event is ongoing, and this notice will be supplemented with any new significant facts learned subsequent to its submission. By providing this notice, Global does not waive any rights or defenses regarding the applicability of Iowa law or personal jurisdiction.

**Nature of the Data Event**

On February 1, 2018, Global learned of the potential exposure of certain information related to current and former Global students. Global immediately launched an investigation and began working with third-party forensic investigators to confirm the nature and scope of the incident. Through this investigation, Global determined on February 23, 2018, that a database containing information related to current and former Global students was misconfigured and accessible to the Internet from December 31, 2017 to January 31, 2018. On or around March 21, 2018, Global confirmed the personal information that may have been accessible as a result of the misconfiguration and the identities of the individuals relating to this personal information.

The investigation confirmed that the following types of personal information related to current and former Global students may have been accessible as a result of the misconfiguration: name and Social Security Number. To date, Global has not received any reports of the misuse of this information.

### Notice to Iowa Residents

On May 8, 2018, Global will begin providing notice of this incident to individuals identified as having personal information potentially accessible as a result of the misconfiguration, which includes one thousand two hundred ninety-one (1,291) Iowa residents. Notice letters will be provided in substantially the same form as the letter attached here as *Exhibit A*. Notice will be posted on Global's website and disseminated to media outlets on May 8, 2017, in substantially the same form as *Exhibits B & C*. Global is also providing electronic notice to those for whom Global has email addresses, but does not have sufficient information to mail notice letters. The email notice will be provided in substantially the same form as *Exhibit D*.

### Other Steps Taken and To Be Taken

Upon discovering the potential exposure of certain information related to current and former Global students, Global moved quickly to confirm whether personal information may have been affected by this incident, to identify the individuals related to this personal information, to put in place resources to assist them, and to provide them with notice of this incident. Global is also reviewing its existing policies and procedures, and working to implement additional safeguards to protect the security of information in its systems.

Global is providing potentially affected individuals access to one (1) free year of credit monitoring and identity restoration services through AllClear, and has established a dedicated hotline for potentially affected individuals to contact with questions or concerns regarding this incident. Additionally, Global is providing potentially impacted individuals with guidance on how to better protect against identity theft and fraud, including 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. Global is also providing written notice of this incident to the FBI, other state regulators, and major consumer reporting agencies as necessary.

### Contact Information

Should you have any questions regarding this notification or other aspects of the data security event, please contact us at 267-930-4799.

Very truly yours,



Sian M. Schafle of  
MULLEN COUGHLIN LLC

SMS:awf  
Enclosures

# **EXHIBIT A**



GLOBAL  
UNIVERSITY

Processing Center • P.O. BOX 141578 • Austin, TX 78714



01820  
JOHN Q. SAMPLE  
1234 MAIN STREET  
ANYTOWN US 12345-6789

May 8, 2018

Re: Notice of Data Breach

Dear John Sample:

Global University (“Global”) is writing to inform you of a recent event that may impact the security of some of your personal information. We wanted to provide you with information about the incident, our response, and steps you may take to better protect against the possibility of identity theft and fraud, should you feel it is necessary to do so.

**What Happened?** On February 1, 2018, Global learned of the potential exposure of certain information related to current and former Global students. Global immediately launched an investigation and began working with third-party forensic investigators to confirm the nature and scope of the incident. Through this investigation, Global determined on February 23, 2018, that a database containing information related to current and former Global students was misconfigured and accessible to the Internet from December 31, 2017 to January 31, 2018. On or around March 21, 2018, Global confirmed the identities of the individuals who may have had information accessible as a result of the misconfiguration.

**What Information Was Involved?** The review of the database determined that the following types of information related to you were contained in the misconfigured database: name and Social Security number. To date, Global has not received any reports of misuse of your information.

**What We Are Doing.** We take this incident and the security of your personal information seriously. As part of our ongoing commitment to the security of personal information in our care, we are working to review our existing policies and procedures and to implement additional safeguards to further secure the information in our systems. We will also be notifying state regulators, as required.

As an added precaution, we have arranged to have AllClear ID protect your identity for 12 months at no cost to you. The following identity protection services start on the date of this notice and you can use them at any time during the next 12 months.

AllClear Identity Repair: This service is automatically available to you with no enrollment required. If a problem arises, simply call 1-855-803-1482 and a dedicated investigator will help recover financial losses, restore your credit and make sure your identity is returned to its proper condition.



01-02-2-00

AllClear Fraud Alerts with Credit Monitoring: This service offers the ability to set, renew, and remove 90-day fraud alerts on your credit file to help protect you from credit fraud. In addition, it provides credit monitoring services, a once annual credit score and credit report, and a \$1 million identity theft insurance policy. For a child under 18 years old, AllClear ID ChildScan identifies acts of fraud against children by searching thousands of public databases for use of your child's information. To enroll in this service, you will need to provide your personal information to AllClear ID. You may sign up online at [enroll.allclearid.com](http://enroll.allclearid.com) or by phone by calling 1-855-803-1482 using the following redemption code: Redemption Code.

Please note: Following enrollment, additional steps are required by you in order to activate your phone alerts and fraud alerts, and to pull your credit score and credit file. Additional steps may also be required in order to activate your monitoring options.

**What You Can Do.** You may consider taking certain steps outlined in the enclosed *Steps You Can Take to Better Protect Your Information*.

**For More Information.** We understand that you may have questions about this incident that are not addressed in this letter. If you have additional questions, please call our dedicated assistance line at 1-855-803-1482 (toll free), Monday through Saturday, 9:00 a.m. through 9:00 p.m. Eastern Standard Time.

We sincerely regret any inconvenience or concern this incident has caused.

Sincerely,

A handwritten signature in black ink that reads "Gary L. Seevers, Jr." in a cursive script.

Gary L. Seevers, Jr., Ph.D.  
President  
Global University

## **STEPS YOU CAN TAKE TO BETTER PROTECT YOUR INFORMATION**

### **Monitor Your Accounts.**

***Credit Reports.*** 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. 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](http://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.

***Fraud Alerts.*** 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  
1-800-525-6285  
[www.equifax.com](http://www.equifax.com)

Experian  
P.O. Box 2002  
Allen, TX 75013  
1-888-397-3742  
[www.experian.com](http://www.experian.com)

TransUnion  
P.O. Box 2000  
Chester, PA 19106  
1-800-680-7289  
[www.transunion.com](http://www.transunion.com)

***Security Freeze.*** 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, lift, 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. Fees vary based on where you live, but commonly range from \$3 to \$15. You will need to place a security freeze separately with each of the three major credit bureaus listed above if you wish to place a freeze on all of your credit files. In order to request a security freeze, you will need to supply your full name, address, date of birth, Social Security number, current address, all addresses for up to five previous years, email address, a copy of your state identification card or driver’s license, and a copy of a utility bill, bank or insurance statement, or other statement proving residence. 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  
[www.freeze.equifax.com](http://www.freeze.equifax.com)

Experian Security Freeze  
P.O. Box 9554  
Allen, TX 75013  
1-888-397-3742  
[www.experian.com/freeze/](http://www.experian.com/freeze/)

TransUnion  
P.O. Box 2000  
Chester, PA 19016  
1-888-909-8872  
[www.transunion.com/credit-freeze/place-credit-freeze](http://www.transunion.com/credit-freeze/place-credit-freeze)



### **Additional Information.**

You can further educate yourself regarding identity theft, fraud alerts, and the steps you can take to protect yourself, by contacting 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](http://www.identitytheft.gov); 1-877-ID-THEFT (1-877-438-4338); and TTY: 1-866-653-4261. **For Maryland residents**, the Maryland Attorney General can be reached at: 200 St. Paul Place, 16th Floor, Baltimore, MD 21202; 1-888-743-0023; and [www.oag.state.md.us](http://www.oag.state.md.us). Global is located at 1211 S. Glenstone Avenue, Springfield, MO 65804. **For 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 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. We encourage you to review your rights pursuant to the Fair Credit Reporting Act by visiting [www.consumerfinance.gov/f/201504\\_cfpb\\_summary\\_your-rights-under-fcra.pdf](http://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 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 [www.ncdoj.gov](http://www.ncdoj.gov). **For Rhode Island residents**, the Attorney General can be contacted by mail at 150 South Main Street, Providence, RI 02903; by phone at (401) 274-4400; and online at [www.riag.ri.gov](http://www.riag.ri.gov). A total of 394 Rhode Island residents may be impacted by this incident. 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 crime report or incident report with law enforcement for identity theft, you will likely need to provide some kind of proof that they have been a victim. Instances of known or suspected identity theft should also be reported to law enforcement. This notice has not been delayed by law enforcement.

# **EXHIBIT B**



## Notice of Data Event

### Notice of Data Security Event: Global University – May 8, 2018

***What Happened?*** On February 1, 2018, Global University (“Global”) learned of the potential exposure of certain information related to current and former Global students. Global immediately launched an investigation and began working with third-party forensic investigators to confirm the nature and scope of the incident. Through this investigation, Global determined on February 23, 2018, that a database containing information related to current and former Global students was misconfigured and accessible to the Internet from December 31, 2017 to January 31, 2018. On or around March 21, 2018, Global confirmed the personal information that may have been accessible as a result of the misconfiguration and the identities of the individuals relating to this personal information.

***What Information Was Involved?*** The investigation in this matter confirmed that the following types of personal information related to current and former Global students may have been accessible as a result of the misconfiguration: name, date of birth and/or Social Security number. To date, Global has not received any reports of the misuse of this information.

***What is Global Doing?*** Global takes this incident and the security of personal information seriously. Upon discovering the potential exposure of certain information related to current and former Global students, Global moved quickly to confirm whether personal information may have been affected by this incident, to identify the individuals related to this personal information, to put in place resources to assist them, and to provide them with notice of this incident. Global is also reviewing its existing policies and procedures, and working to implement additional safeguards to protect the security of information in its systems.

***What You Can Do.*** Global has established a dedicated hotline for potentially affected individuals to contact with questions or concerns regarding this incident. For additional information, please call 1-855-803-1482 (toll-free), Monday through Saturday from 9:00 a.m. to 9:00 p.m. EST. Impacted individuals are also encouraged to take certain steps outlined in the *Steps You Can Take to Better Protect Your Information* discussed below.

### **STEPS YOU CAN TAKE TO BETTER PROTECT YOUR INFORMATION**

#### **Monitor Your Accounts.**

***Credit Reports.*** 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. 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](http://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.

***Fraud Alerts.*** 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

## Notice of Data Event

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](http://www.equifax.com)

Experian  
P.O. Box 2002  
Allen, TX 75013  
888-397-3742  
[www.experian.com](http://www.experian.com)

TransUnion  
P.O. Box 2000  
Chester, PA 19106  
800-680-7289  
[www.transunion.com](http://www.transunion.com)

**Security Freeze.** 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, lift, 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. Fees vary based on where you live, but commonly range from \$3 to \$15. You will need to place a security freeze separately with each of the three major credit bureaus listed above if you wish to place a freeze on all of your credit files. In order to request a security freeze, you will need to supply your full name, address, date of birth, Social Security number, current address, all addresses for up to five previous years, email address, a copy of your state identification card or driver's license, and a copy of a utility bill, bank or insurance statement, or other statement proving residence. 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  
[www.freeze.equifax.com](http://www.freeze.equifax.com)

Experian Security Freeze  
P.O. Box 9554  
Allen, TX 75013  
1-888-397-3742  
[www.experian.com/freeze/](http://www.experian.com/freeze/)

TransUnion  
P.O. Box 2000  
Chester, PA 19016  
1-888-909-8872  
[www.transunion.com/credit-freeze/place-credit-freeze](http://www.transunion.com/credit-freeze/place-credit-freeze)

### **Additional Information.**

You can further educate yourself regarding identity theft, fraud alerts, and the steps you can take to protect yourself, by contacting 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](http://www.identitytheft.gov); 1-877-ID-THEFT (1-877-438-4338); and TTY: 1-866-653-4261

**For Maryland residents,** the Maryland Attorney General can be reached at: 200 St. Paul Place, 16th Floor, Baltimore, MD 21202; 1-888-743-0023; and [www.oag.state.md.us](http://www.oag.state.md.us). Global is located at 1211 S. Glenstone Avenue, Springfield, MO 65804.

**For 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

## Notice of Data Event

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 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. We encourage you to review your rights pursuant to the Fair Credit Reporting Act by visiting [www.consumerfinance.gov/f/201504\\_cfpb\\_summary\\_your-rights-under-fcra.pdf](http://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 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 [www.ncdoj.gov](http://www.ncdoj.gov).

**For Rhode Island residents**, the Attorney General can be contacted by mail at 150 South Main Street, Providence, RI 02903; by phone at (401) 274-4400; and online at [www.riag.ri.gov](http://www.riag.ri.gov). A total of 394 Rhode Island residents may be impacted by this incident. 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 crime report or incident report with law enforcement for identity theft, you will likely need to provide some kind of proof that they have been a victim. Instances of known or suspected identity theft should also be reported to law enforcement.

This notice has not been delayed by law enforcement.

# **EXHIBIT C**

*Media Contact: Sian Schafle  
(267) 930-4799*

### **GLOBAL UNIVERSITY PROVIDES NOTICE OF DATA BREACH**

**Springfield, Missouri (May 8, 2018)** – Global University (“Global”) is providing notice to current and former students of a recent event involving the potential exposure of certain personal information. To date, Global has not received any reports that the information has been misused.

***What Happened?*** On February 1, 2018, Global learned of the potential exposure of certain information related to current and former Global students. Global immediately launched an investigation and began working with third-party forensic investigators to confirm the nature and scope of the incident. Through this investigation, Global determined on February 23, 2018, that a database containing information related to current and former Global students was misconfigured and accessible to the Internet from December 31, 2017 to January 31, 2018. On or around March 21, 2018, Global confirmed the personal information that may have been accessible as a result of the misconfiguration and the identities of the individuals relating to this personal information.

***What Information Was Involved?*** The investigation determined the misconfigured database contained personal information including names, Social Security numbers, and for a limited number of individuals, date of birth.

***What is Global Doing?*** Global takes this incident and the security of personal information in its care very seriously. As part of Global’s ongoing commitment to the security of personal information, Global is working to review its existing policies and procedures and to implement additional safeguards to further secure the information in its systems. Global also reported this event to law enforcement and is notifying state regulators, as required.

On May 8, 2018, Global will begin providing notice to individuals potentially impacted by this incident, and will be offering these individuals access to one year of free identity protection services.

***What You Can Do.*** Global encourages potentially impacted individuals to review their accounts, explanations of benefits, and credit reports for suspicious activity, and to report any suspicious activity to the affiliated institutions immediately. Global is providing potentially impacted individuals with contact information for the three major credit reporting agencies, as well as providing advice on how to obtain free credit reports and how to place fraud alerts and security freezes on their credit files. Additional information can be found in the *Steps You Can Take To Protect Your Information* below.

***For More Information.*** Global has set up a call center to answer questions from those who might be impacted by this incident. The call center can be reached at 1-855-803-1482 (toll free), Monday through Saturday, 9:00 a.m. to 9:00 p.m. ET. If you do not receive a letter in the coming weeks, but want to confirm whether you are affected, please contact the call center at the number listed above. Additional information can also be found at Global’s website, <https://www.globaluniversity.edu>.

Global takes the security of information very seriously, and is taking steps to help ensure that a similar situation does not occur again.

### **STEPS YOU CAN TAKE TO PROTECT YOUR INFORMATION**

We encourage potentially impacted individuals to remain vigilant against incidents of identity theft and fraud by reviewing their account statements and monitoring their free credit reports for suspicious activity

*Media Contact: Sian Schafle  
(267) 930-4799*

over the next 12 to 24 months. Under U.S. law, individuals are entitled to one free credit report annually from each of the three major credit reporting bureaus. To order a free credit report, visit [www.annualcreditreport.com](http://www.annualcreditreport.com) or call, toll-free, 1-877-322-8228. Individuals may also contact the three major credit bureaus directly to request a free copy of their credit report. The credit reporting agencies may be contacted as follows:

Equifax  
P.O. Box 105069  
Atlanta, GA 30348  
1-800-525-6285  
[www.equifax.com](http://www.equifax.com)

Experian  
P.O. Box 2002  
Allen, TX 75013  
1-888-397-3742  
[www.experian.com](http://www.experian.com)

TransUnion  
P.O. Box 2000  
Chester, PA 19016  
1-800-680-7289  
[www.transunion.com](http://www.transunion.com)

Potentially impacted individuals may also find information regarding identity theft, fraud alerts, security freezes and the steps they may take to protect their information by contacting the credit agencies, and the Federal Trade Commission. The Federal Trade Commission can be reached at: 600 Pennsylvania Avenue NW, Washington, DC 20580; [www.identitytheft.gov](http://www.identitytheft.gov); 1-877-ID-THEFT (1-877-438-4338); and TTY: 1-866-653-4261. The Federal Trade Commission encourages those who discover that their information has been misused to file a complaint with them. Instances of known or suspected identity theft should be promptly reported to law enforcement, the Federal Trade Commission, and your state Attorney General. 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 crime report or incident report with law enforcement for identity theft, you will likely need to provide some kind of proof that you have been a victim. This notice has not been delayed as the result of a law enforcement investigation.

**For North Carolina residents**, the North Carolina 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 [www.ncdoj.gov](http://www.ncdoj.gov). **For Maryland residents**, the Maryland Attorney General can be reached at: 200 St. Paul Place, 16th Floor, Baltimore, MD 21202; 1-888-743-0023; and [www.oag.state.md.us](http://www.oag.state.md.us). Global is located at 1211 S. Glenstone Avenue, Springfield, MO 65804. **For 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 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. We encourage you to review your rights pursuant to the Fair Credit Reporting Act by visiting [www.consumerfinance.gov/f/201504\\_cfpb\\_summary\\_your-rights-under-fcra.pdf](http://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 Rhode Island residents**, the Attorney General can be contacted by mail at 150 South Main Street, Providence, RI 02903; by phone at (401) 274-4400; and online at [www.riag.ri.gov](http://www.riag.ri.gov). A total of 394 Rhode Island residents may be impacted by this incident.

# **EXHIBIT D**

Re: Notice of Data Breach

**Dear [insert name]:**

Global University ("Global") is writing to inform you of a recent event that may impact the security of some of your personal information. We wanted to provide you with information about the incident, our response, and steps you may take to better protect against the possibility of identity theft and fraud, should you feel it is necessary to do so.

**What Happened?** On February 1, 2018, Global learned of the potential exposure of certain information related to current and former Global students. Global immediately launched an investigation and began working with third-party forensic investigators to confirm the nature and scope of the incident. Through this investigation, Global determined on February 23, 2018, that a database containing information related to current and former Global students was misconfigured and accessible to the Internet from December 31, 2017 to January 31, 2018. On or around March 21, 2018, Global confirmed the identities of the individuals who may have had information accessible as a result of the misconfiguration.

**What Information Was Involved?** The review of the database determined that the following types of information related to you were contained in the misconfigured database: name, Social Security number, and/or date of birth. To date, Global has not received any reports of misuse of your information.

**What We Are Doing.** We take this incident and the security of your personal information seriously. As part of our ongoing commitment to the security of personal information in our care, we are working to review our existing policies and procedures and to implement additional safeguards to further secure the information in our systems. We also be notifying state regulators, as required.

As an added precaution, we have arranged to have AllClear ID protect your identity for [time] months at no cost to you. The following identity protection services start on the date of this notice and you can use them at any time during the next [time] months.

**AllClear Identity Repair:** This service is automatically available to you with no enrollment required. If a problem arises, simply call [DID Phone] and a dedicated investigator will help recover financial losses, restore your credit and make sure your identity is returned to its proper condition.

**AllClear Fraud Alerts with Credit Monitoring:** This service offers the ability to set, renew, and remove 90-day fraud alerts on your credit file to help protect you from credit fraud. In addition, it provides credit monitoring services, a once annual credit score and credit report, and a \$1 million identity theft insurance policy. For a child under 18 years old, AllClear ID ChildScan identifies acts of fraud against children by searching thousands of public databases for use of your child's information.] To enroll in this service, you will need to provide your personal information to AllClear ID. You may sign up online at enroll.allclearid.com or by phone by calling [DID Phone] using the following redemption code: [redacted].

Please note: Following enrollment, additional steps are required by you in order to activate your phone alerts and fraud alerts, and to pull your credit score and credit file. Additional steps may also be required in order to activate your monitoring options.

**What You Can Do.** You may consider taking certain steps outlined in the enclosed *Steps You Can Take to Better Protect Your Information*.

**For More Information.** We understand that you may have questions about this incident that are not addressed in this letter. If you have additional questions, please call our dedicated assistance line at 1-855-803-1482 (toll-free), Monday through Saturday from 9:00 a.m. to 9:00 p.m. EST. We sincerely regret any inconvenience or concern this incident has caused.

Sincerely,

Gary L. Seevers, Jr., Ph.D.  
President  
Global University



## **STEPS YOU CAN TAKE TO BETTER PROTECT YOUR INFORMATION**

### **Monitor Your Accounts.**

**Credit Reports.** 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. 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](http://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.

**Fraud Alerts.** 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](http://www.equifax.com)

Experian  
P.O. Box 2002  
Allen, TX 75013  
888-397-3742  
[www.experian.com](http://www.experian.com)

TransUnion  
P.O. Box 2000  
Chester, PA 19106  
800-680-7289  
[www.transunion.com](http://www.transunion.com)

**Security Freeze.** 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, lift, 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. Fees vary based on where you live, but commonly range from \$3 to \$15. You will need to place a security freeze separately with each of the three major credit bureaus listed above if you wish to place a freeze on all of your credit files. In order to request a security freeze, you will need to supply your full name, address, date of birth, Social Security number, current address, all addresses for up to five previous years, email address, a copy of your state identification card or driver’s license, and a copy of a utility bill, bank or insurance statement, or other statement proving residence. 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  
[www.freeze.equifax.com](http://www.freeze.equifax.com)

Experian Security Freeze  
P.O. Box 9554  
Allen, TX 75013  
1-888-397-3742  
[www.experian.com/freeze/](http://www.experian.com/freeze/)

TransUnion  
P.O. Box 2000  
Chester, PA 19016  
1-888-909-8872  
[www.transunion.com/credit-freeze/place-credit-freeze](http://www.transunion.com/credit-freeze/place-credit-freeze)

### **Additional Information.**

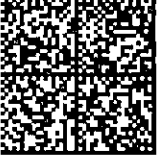
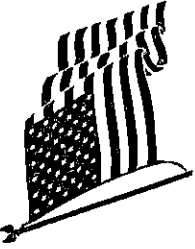
You can further educate yourself regarding identity theft, fraud alerts, and the steps you can take to protect yourself, by contacting the Federal Trade Commission or your state Attorney General. The Federal Trade Commission can be reached at: 600 Pennsylvania Avenue NW, Washington, DC 20580; [www.identitytheft.gov](http://www.identitytheft.gov); 1-877-ID-THEFT (1-877-438-4338); and TTY: 1-866-653-4261 **For Maryland residents**, the Maryland Attorney General can be reached at: 200 St. Paul Place, 16th Floor, Baltimore, MD 21202; 1-888-743-0023; and [www.oag.state.md.us](http://www.oag.state.md.us). Global is located at 1211 S. Glenstone Avenue, Springfield, MO 65804. **For 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 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. We encourage you to review your rights pursuant to the Fair Credit Reporting Act by visiting [www.consumerfinance.gov/f/201504\\_cfpb\\_summary\\_your-rights-under-fcra.pdf](http://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 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 [www.ncdoj.gov](http://www.ncdoj.gov). **For Rhode Island residents**, the Attorney General can be contacted by mail at 150 South Main Street, Providence, RI 02903; by phone at (401) 274-4400; and online at [www.riag.ri.gov](http://www.riag.ri.gov). A total of 394 Rhode Island residents may be impacted by this incident. 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 crime report or incident report with law enforcement for identity theft, you will likely need to provide some kind of proof that they have been a victim. Instances of known or suspected identity theft should also be reported to law enforcement. This notice has not been delayed by law enforcement.



MULLEN  
COUGHLIN

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Wayne, Pennsylvania 19087



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Consumer Protection Division  
Security Breach Notifications  
Office of the Attorney General of Iowa  
1305 E. Walnut Street  
Des Moines, Iowa 50319-0106