

Schedule C

Long Form Pre-Approval Notice

La Place 0-5 Data Breach Class Action Pre-Approval Notice of Settlement Approval Hearing

A proposed Settlement has been reached in a putative class action *Dubé c. Coopérative de services enfancefamille.org and Procureur general du Québec* (500-06-001148-218) relating to the La Place 0-5 data breach that occurred on May 8, 2021, when an unknown third-party was able to gain unauthorized access to certain customer data from the La Place 0-5 records. This proposed Settlement is subject to Court approval.

The proposed settlement is on behalf of the following Settlement Class:

The 8,589 persons in Québec whose personal information was accessed and downloaded during the Data Breach which occurred on May 8, 2021;

The Defendants in the class action are the Coopérative de services enfancefamille.org (hereinafter the “**Coopérative**”) and the Procureur général du Québec (hereinafter the “**PGQ**”) (hereinafter collectively the “**Defendants**”).

On February 1, 2024, the Superior Court of Quebec authorized the Class Action for settlement purposes only.

WHAT IS THIS CASE ABOUT?

The lawsuit claims that certain elements of La Place 0-5 user data were illegally accessed and downloaded by an unauthorized third party during a Data Breach that occurred on or about May 8, 2021. La Place 0-5 alleges that it informed its affected users of the Data Breach, by either email, letter or telephone, between May 14, 2021 and June 2, 2021 (the “**La Place 0-5 Notice(s)**”). The lawsuit alleges that the compromised personal data caused users monetary damages, costs or losses (including without limitation costs of credit monitoring measures) and moral damages for stress, anxiety and inconveniences. Defendants denies all liability for the Data Breach.

AM I A MEMBER OF THE SETTLEMENT CLASS?

You may be a Settlement Class Member if you are one of the 8,589 persons in Québec, whose personal information was accessed and downloaded in the Data Breach which occurred on or about May 8, 2021 (you may have received a letter, email or call from La Place 0-5 advising you that your information was compromised in the context of the Data Breach).

WHAT DOES THIS SETTLEMENT PROVIDE?

Pursuant to the proposed Settlement, the Defendants will pay a total amount of \$250,000 CAD (the “**Cap**”). This Cap will pay for all administration costs, notice costs and legal fees and disbursements. The remainder (the “**Net Cap**”) will be used toward the reimbursement of substantiated costs, losses and/or unreimbursed expenses made from May 8, 2021, to February

1, 2024 by Settlement Class Members who provide evidence to the effect that said losses were caused by the Data Breach and/or incurred as a result of the Data Breach or the receipt of the La Place 0-5 Notice(s) (between May 14, 2021 and June 2, 2021), as accepted by the Claims Administrator (at its discretion) pursuant to the Distribution Protocol attached to the Settlement Agreement. Each Claimant may only make substantiated and documented monetary claims up to a maximum of \$1,000 CAD per person (the Documentary Supported Claims will be reduced on a *pro rata* basis in case of lack of total funds in the Net Cap).

WHAT ARE MY OPTIONS?

If you are a Settlement Class Member, you may (1) object to or comment on the Settlement; (2) exclude yourself from the Class Action (opt-out); and/or (3) do nothing. If you do not wish to be legally bound by the Class Action, you must exclude yourself from the Class Action (opt-out). To do so, you must complete and submit an Opt-Out Form to the Court by no later March 15, 2024. Anyone who opts out of the Class Action cannot object to or comment on the Settlement and may be eligible to pursue an individual claim. If you do nothing, you will stay in the Class Action and be bound by the Settlement, if approved by the Court.

If you stay in the Class Action, you may object to or comment on the Settlement by submitting a written objection to the Court by no later than February 28, 2024. You have no obligation to object to or comment on the settlement.

WHEN AND WHERE WILL THE COURT DECIDE IF THE SETTLEMENT IS APPROVED?

The Superior Court of Quebec must be satisfied that the Settlement is fair, reasonable and in the best interests of Settlement Class Members.

The Settlement Approval Hearing will take place on March 19, 2024 at 9:30 A.M. in room 12.61 at the Montreal Courthouse located at 1 Notre-Dame St. East, Montreal, Quebec (or any other courtroom determined by the Court).

You do not have to attend the hearing but you may do so if you wish.

If you have submitted a written objection to the Court, you (or your lawyer) may present arguments with regards to the proposed Settlement.

You do not have to do anything and you do not have to pay anything at all in order to participate in the Class Action and/or the proposed settlement.

You will not be asked to pay anything at any time.

WHAT BENEFITS MAY SETTLEMENT CLASS MEMBERS RECEIVE FROM THE SETTLEMENT?

Each Settlement Class Member may be eligible for the reimbursement substantiated costs, losses and/or unreimbursed expenses made from May 8, 2021 to February 1, 2024 that they can establish were caused by the Data Breach and/or incurred as a result of the Data Breach or the receipt of the La Place 0-5 Notice(s). Settlement Class Members must be able to provide reasonable documentary support of the costs and losses caused by the Data Breach or the receipt of the La Place 0-5 Notice(s), in this regard. Eligible claims include but are not limited to the

following types of costs or expenses caused by the Data Breach and/or incurred by Settlement Class Members as a result of the Data Breach or the receipt of the La Place 0-5 Notice(s):

- Credit monitoring, credit insurance, and/or identity theft protection purchased;
- Credit reports purchased or the activation of a freeze or alert on a credit report;
- Services aimed at correcting an error in a credit report or credit score;
- Other costs, losses and/or unreimbursed expenses related to identity theft suffered by the Settlement Class Member;
- Other costs, losses and/or unreimbursed expenses related to fraud suffered by the Settlement Class Member;
- Any other documented cost, losses and/or unreimbursed expenses where it can be established that it was caused by or incurred because of the Data Breach or the receipt of the Place 0-5 Notice(s).

WHAT ARE THE EFFECTS OF STAYING IN THE CLASS ACTION?

Unless you exclude yourself from the Class Action (opt-out), you cannot sue the Defendants and/or the other Released Parties (as defined in the Settlement Agreement) or be part of any other lawsuit against the Defendants and/or the other Released Parties (as defined in the Settlement Agreement) about the issues this settlement resolves. Unless you exclude yourself from the Class Action (opt-out), all of the decisions by the Court will bind you. If the proposed Settlement is approved by the Court, all Settlement Class Members who have not opted out will be “releasing” the Defendants and the other Released Parties (as defined in the Settlement Agreement).

The Settlement Agreement describes the released claims with specific descriptions, so read it carefully. If you have any questions, you can talk to the Class Counsel law firm for free, or you can, of course, talk to your own lawyer (at your own expense) if you have questions about what this means.

You will not be asked to pay anything at any time.

HOW CAN I EXCLUDE MYSELF FROM THE CLASS ACTION? (OPT-OUT)

If you want to keep the right to sue or continue to sue the Defendants and/or the Released Parties (as defined in the Settlement Agreement) based on claims this proposed settlement resolves, you must take the following steps to get out of the Class Action (opt-out / exclude yourself).

A Settlement Class Member who wishes to opt out of the Class Action may do so before March 15, 2024, by advising the Clerk of the Superior Court of Québec in the District of Montréal in writing, indicating the case name and Court number: *Dubé c. Coopérative de services enfancefamille.org and Procureur general du Québec* (500-06-001148-218) :

Clerk of the Superior Court of Québec
PALAIS DE JUSTICE DE MONTRÉAL,
Room 1.120 1, rue Notre-Dame est
Montréal (Québec) H2Y 1B6

You cannot exclude yourself by telephone or by email. You cannot exclude yourself by mailing a request to any other location or after the deadline. You cannot exclude yourself if you intend to object to or comment on the Settlement. Your Opt-Out Form must be signed by you, personally, and not your lawyer or anyone else acting on your behalf.

IF I DO NOT EXCLUDE MYSELF, CAN I SUE THE DEFENDANTS FOR THE SAME THING LATER?

No. Unless you exclude yourself, you give up the right to sue the Defendants and the other Released Parties (as defined in the Settlement Agreement) for the claims that this settlement resolves.

IF I EXCLUDE MYSELF, DO I STILL GET A PAYMENT?

No. You will not get a payment if you exclude yourself from the Class Action and the proposed Settlement is ultimately approved by the Court.

DO I HAVE A LAWYER IN THIS CASE?

Yes. The attorneys representing the Settlement Class Members are the law firm of Lex Group Inc. (Class Counsel). You will not be charged by this law firm for its work on the case. If you want to be represented by your own lawyer, you may hire one at your own expense.

HOW WILL THE LAWYERS BE PAID?

As part of the settlement of this case, the Defendants have agreed to pay Class Counsel Fees in the amount of up to \$75,000, plus applicable taxes, for their fees, and \$2,500 for their disbursements, subject to the Court's approval. This amount is payable out of the Cap.

You are **not** required to pay any portion of these attorneys' fees and disbursements under any circumstances.

WHAT IF I DISAGREE WITH THE PROPOSED SETTLEMENT?

If you disagree with the proposed settlement, you can object to or comment on the settlement by delivering a written submission on or before February 28, 2024. You cannot file an objection to the settlement if you exclude yourself from the Class Action (opt-out). You may also attend the Approval Hearing which will take place on March 19, 2024 in order to present your objection to the Court. Your objection must be sent to Class Counsel by letter, email, or fax, and include all of the following information:

- a) a heading which refers to the name and Court number of this proceeding (Dubé vs. Coopérative de services enfancefamille.org and Procureur général du Québec (500-06-001148-218));

- b) your full name, mailing address, telephone number(s), and email address and, if represented by counsel, the name, address, telephone number, fax number, and email address of your counsel;
- c) a statement whether you intend to appear at the Settlement Approval Hearing, either in person or through counsel;
- d) a declaration that you consider yourself to be a Settlement Class Member;
- e) a statement of the objection and the grounds supporting the objection or comments;
- f) copies of any papers, briefs, or other documents upon which the objection is based;
- g) a declaration under the penalty of perjury that the foregoing information is true and correct;
- h) your signature.

Do NOT send an objection directly to the Court. Class Counsel will file copies of all objections with the Court.

You have no obligation to object to or comment on the settlement.

HOW CAN YOU GET MORE INFORMATION?

If needed, Settlement Class Members can contact the Class Counsel, Lex Group Inc.

WHO REPRESENTS THE PARTIES?

LEX GROUP INC.
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www.lexgroup.ca
Counsel for the Settlement Class Members

This Notice has been approved by the Superior Court of Quebec.