

Long Form Approval Notice

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

A 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.

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

On March 22, 2024, this Settlement was approved by the Court.

The 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**”).

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 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).

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).

HOW DO I SUBMIT A CLAIM?

To submit a claim, you must, no later than August 14, 2024:

- Complete a Claim Form online at www.place0-5settlement.ca; **or**
- Obtain a Claim Form in paper format from the [website](#) or the Claims Administrator, complete it and send it by email or by mail to the Claims Administrator at the address below.

HOW CAN YOU GET MORE INFORMATION?

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

WHO IS THE CLAIMS ADMINISTRATOR?

CONCILIA SERVICES INC.
5900 Andover Ave. Suite 1
Montreal, Quebec, H4T 1H5
1-888-770-6892
place0-5@conciliainc.com
www.conciliainc.com

WHO REPRESENTS THE SETTLEMENT CLASS?

LEX GROUP INC.
c/o Mtre David Assor
4101 Sherbrooke Street West
Westmount, Québec, H3Z 1A7
www.lexgroup.ca

Please note that in case of any discrepancy between the terms of this Notice and the Settlement Agreement, the terms of the Settlement Agreement shall prevail. Any term not defined in this Approval Notice shall have the meaning ascribed in the Settlement Agreement.

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