

**SHORT FORM NOTICE TO MEMBERS REGARDING THE AUTHORIZATION BY THE COURT  
OF A CLASS ACTION RELATING TO THE COLLECTION AND USE OF FACIAL IMAGES  
AND PERSONAL INFORMATION**

**500-06-001129-218**

**TAKE NOTICE** that the institution of a class action against Clearview AI Inc. (“**Clearview**”) has been authorized by the Honourable Justice Dominique Poulin of the Superior Court of Quebec (the “**Superior Court**”) on October 29, 2024, on behalf of the following class of persons:

**CLASS**

*All individuals who, since August 18, 2017, have had their facial images and Personal Information collected, used or disclosed by Clearview while they were residents of Quebec*

You are a class member if you meet the following criteria:

- You are a natural person residing in Quebec or who was a resident of Quebec at any time since August 18, 2017; and
- Since August 18, 2017, one or more photographs of your face as well as your personal information have been collected, used, or disclosed by the defendant, Clearview. You could be a member of the class if one or more photographs of your face were published on a publicly accessible webpage during that period, including, for example, on a social media profile page such as Facebook, LinkedIn, or Instagram.

This class action will be brought in the judicial district of Montreal.

Ms. Doan has been appointed as the representative plaintiff for the class action.

The authorization judgment ended a preliminary step. This judgment does not decide the liability of Clearview, who will present its grounds of defense at trial. Following this trial, the Superior Court will determine Clearview’s liability and whether class members are entitled to receive compensation and/or the issuance of the requested orders.

The representative plaintiff alleges that Clearview has collected, included in its database, retained and used facial images and personal information, including biometric data, of individuals residing in Quebec (the “**Data**”), without their knowledge or consent. The representative plaintiff seeks to prove that these actions violate the fundamental rights of class members, more specifically their right to privacy, to the preservation of their dignity and their right to control their image. She also intends to prove that Clearview has violated Quebec and Canadian laws applicable to the collection and use of personal information.

The Superior Court will need to decide whether Clearview committed faults and, if so, whether and to what extent (i) the members should be compensated and (ii) the members are entitled to the other orders sought against Clearview notably to remove and destroy the members’ Data from its database and to cease collecting the members’ Data without

their consent.

**You are not required to do anything in order to become a member of this class action.** You are automatically included in the class if you meet the above criteria.

**If you do not want the judgment rendered in the class action to apply to you,** you must opt out by **January 31, 2026**, at 4:30 pm. In this case, you will not be able to receive compensation if the class action is successful or if a settlement is reached between the parties.

To opt out, you must notify the clerk of the Superior Court of Quebec in the judicial district of Montreal, by registered or certified mail, prior to the deadline for opting out of the class, at the following address: Greffe civil de la Cour supérieure du Palais de justice de Montréal, 1 Notre-Dame Street East, Montréal, Québec H2Y 1B6. You must state that you wish to opt out of the class action of *Doan v. Clearview AI inc.* (case number: 500-06-001129-218). The deadline for opting out is **January 31, 2026**, at 4:30 pm.

Any class member who has not opted out of the class action by this date in the manner set forth above, will be bound by any judgment rendered in this class action.

This is a short form notice. A more detailed notice is available on the Central Registry of Class Actions at the following website:

<https://www.registredesactionscollectives.quebec/fr/Consulter/ApercuDemande?NoDosier=500-06-001129-218>

*For more information about this class action, you can contact counsel for the class by the following means:*

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**THE PUBLICATION OF THIS NOTICE HAS BEEN ORDERED BY THE COURT**

**N° : 500-06-001129-218**

(Class Action Division)

**SUPERIOR COURT**

District of Montréal

**HA VI DOAN**

Plaintiff

v.

**CLEARVIEW AI INC.**

Defendant

**PROCUREUR GÉNÉRAL DU QUÉBEC**

Mis en cause

**SHORT-FORM NOTICE TO MEMBERS REGARDING  
THE COURT'S AUTHORIZATION OF A CLASS  
ACTION**

(Art. 579 and following *CCP*)

**ORIGINAL**

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