

CANADA
PROVINCE OF QUÉBEC
DISTRICT OF MONTRÉAL

No: **500-06-001367-255**

SUPERIOR COURT
(Class Action)

KATÉRIE LAKPA

Applicant

v.

ZOOMINFO TECHNOLOGIES INC.

and

ZOOMINFO TECHNOLOGIES LLC.

and

ZOOMINFO CANADA CORP.

Defendants

SWORN STATEMENT OF BRANDON TUCKER

I, the undersigned, Brandon Tucker, exercising my profession at ZoomInfo Technologies, LLC, located at 330 W Columbia, Floor 8, Vancouver, Washington, 98660, United States, solemnly declare that:

I. INTRODUCTION

1. I am the Chief Data Officer at ZoomInfo Technologies, LLC since July 2024. I have been employed at ZoomInfo Technologies, LLC since October 2019.
2. In this role, I have knowledge and understanding of the company's business practices.
3. I have read an unofficial English translation of the *Demande pour autorisation d'exercer une action collective et pour être désigné représentant* dated March 17, 2025 (the "**Application**"), and I have knowledge surrounding the facts alleged.

II. OVERVIEW OF THE DEFENDANTS

A. ZoomInfo Technologies Inc.

4. ZoomInfo Technologies Inc. is the parent holding corporation for all other ZoomInfo entities. It serves as their public reporting entity, as its securities are registered with the U.S. Securities and Exchange Commission. It does not carry on business other than acting as a holding company.
5. ZoomInfo Technologies Inc. does not have any employees.
6. ZoomInfo Technologies Inc. does not collect, hold, use, communicate, sell, or otherwise process any data handled by ZoomInfo Technologies, LLC.
7. ZoomInfo Technologies Inc. is a US corporation registered under the laws of Delaware and domiciled in Vancouver, Washington, U.S.A.

B. ZoomInfo Technologies, LLC

8. ZoomInfo Technologies, LLC is the principal operating entity and the primary contracting entity in ZoomInfo's organizational structure. It operates the ZoomInfo database and intelligence platform ("**ZoomInfo**"), which is the subject of these proceedings.
9. ZoomInfo Technologies, LLC is a US limited liability corporation registered under the laws of Delaware, having its head office located in Vancouver, Washington, U.S.A.

C. ZoomInfo Canada Corp

10. ZoomInfo Canada Corp. ("**ZoomInfo Canada**") is an indirect subsidiary of ZoomInfo Technologies, LLC. ZoomInfo Canada's primary function is to enable ZoomInfo Technologies, LLC to conduct business in Canada.
11. ZoomInfo Canada is domiciled in Vancouver, British Columbia, Canada.
12. ZoomInfo Canada does not collect, hold, use, communicate, sell, or otherwise process any data handled by ZoomInfo Technologies, LLC.

13. None of the defendants have establishments in the Province of Quebec.

III. DESCRIPTION OF ZOOMINFO'S OPERATIONS

A. Nature of Information Collected

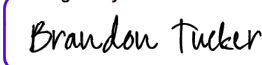
14. ZoomInfo is a comprehensive business-to-business (B2B) database and intelligence platform that provides organizations with access to detailed company and business contact information.
15. ZoomInfo Technologies, LLC collects business information – such as name, job company name and description, company phone number, work email, job title, and company address – through various sources, such as aggregation from publicly accessible sources, including company websites, professional profiles, and public government records. This business information is generally available in the public domain or shared by individuals in a professional context.
16. ZoomInfo Technologies, LLC does not collect nor retain personal information such as, among other categories, age, race, gender, sexual orientation, religion, political affiliations, health information, biometric data, or consumer financial information.
17. ZoomInfo Technologies, LLC employs safeguards designed to exclude personal email addresses and personal mobile phone numbers that are not used in a professional context.

IV. MS. LAKPA

18. As part of our global notice and choice program, ZoomInfo Technologies, LLC sends a “Notice of Personal Information Processing” (the “**Personal Information Notice**”) to every contact whose ZoomInfo profile includes an email address, in accordance with our “*Manage Your Personal Privacy*” policy (Exhibit P-17). The Personal Information Notice is a proactive notice of data collection of personal information, outlining, among other things, the personal information processed, the purposes of processing, the lawful basis for collection, categories of recipients, retention period, and international transfer.

19. Between approximately 2022 and 2025, ZoomInfo Technologies, LLC collected Ms. Lakpa's publicly available business contact information.
20. ZoomInfo Technologies, LLC maintains records reflecting the most recent date the company sent a Personal Information Notice to each individual in its database. These records reflect that on January 6, 2025, ZoomInfo Technologies, LLC sent Ms. Lakpa a Personal Information Notice at the following email address: katerie.lakpa@umontreal.ca. Our internal records indicate that this email was successfully delivered and did not bounce back.
21. To the best of my knowledge, Ms. Lakpa has not exercised her right under our "*Manage Your Personal Privacy*" policy (Exhibit P-17) to request the removal or deletion of her profile from ZoomInfo.
22. I affirm that the information compiled to create Ms. Lakpa's ZoomInfo profile, when considered in isolation, does not possess any intrinsic economic value. Rather, any value to our users arises from the ZoomInfo database as a whole, which functions as a comprehensive and integrated resource.
23. All the facts alleged herein are true to the best of my knowledge, information, and belief.

AND I HAVE SIGNED:

Signed by:

2AE54E43DE1B4B6...

BRANDON TUCKER

Solemnly declared before me by
technological means in Montreal, Québec,
on this 19th day of December 2025

 #126844

Commissioner of Oaths for the Province
of Quebec

Confirmation de la transmission des documents



Succès

Vos documents ont bien été transmis.

Numéro de demande : 2025-PROC-00441019

Date et heure de transmission : 2025-12-21 18:57:53

Numéro de dossier judiciaire : 500-06-001367-255

Titre : Sworn Statement of Brandon Tucker

Aucun courriel de confirmation ne sera transmis. Il est recommandé d'imprimer cette page en vue de conserver ces informations pour vos dossiers.

Si des frais judiciaires sont prescrits pour le dépôt d'un acte de procédure ou d'un document, celui-ci ne sera légalement reçu que lorsque les frais judiciaires auront été acquittés en totalité. Le cas échéant, le greffe vous transmettra un avis de paiement par courriel.

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SWORN STATEMENT OF BRANDON TUCKER

ORIGINAL

Code : BO 0323

N/D: 1268865

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