

CLASS ACTION REGARDING FACEBOOK USERS' PRIVACY RIGHTS

This notice is approved by the Superior Court of Quebec to inform you of the authorization and settlement of the class action against Facebook (Meta Platforms Inc.) regarding alleged violations of its users' privacy rights.

The approval of the Settlement Agreement will be heard at 9:15 am on February 11, 2025, at the Superior Court of Montreal, located at 1, rue Notre-Dame Est, Montreal, province of Quebec, H2Y 1B6, in room 17.09.

PLEASE READ THIS NOTICE CAREFULLY AS IT MAY AFFECT YOUR RIGHTS

THE AUTHORIZATION

On August 19, 2021, the Superior Court of Quebec granted the Plaintiffs, Stuart Thiel and Brianna Thicke, authorization to represent "All persons in Quebec who had a Facebook account during the period from July 27, 2012, to present" in a class action against Facebook, Inc. (now Meta Platforms, Inc.). The Plaintiffs alleged that the defendant had violated its users' privacy rights by providing access to their personal and private information to third parties without those users' knowledge and/or consent.

The full text of the authorization judgment [is available here](#). The common questions authorized by the Court and the conclusions sought by the class action are included in that judgment and attached to this notice in its Appendix. Shortly after the judgment of authorization, Mrs. Brianna Thicke withdrew from her representative position.

HOW TO KNOW IF YOU ARE A CLASS MEMBER

You are automatically a member of the class if you had a Facebook account on or after July 27, 2012.

WHAT TO DO IF YOU ARE A MEMBER OF THE CLASS

If you belong to the class described above and do nothing, you are a class member and will be bound by the Settlement Agreement described hereafter and by any other judgment rendered in this class action.

If you do not wish to be a class member, you have until February 7, 2025, to opt out by filling out the opt-out form available on the website of Trudel Johnston & Lespérance (www.tjl.quebec) and sending it to the clerk's office of the Superior Court of Quebec:

Clerk's office of the Superior Court of Quebec
1, rue Notre-Dame Est
Montréal (Québec) H2Y 1B6

You must also send a copy of this form by e-mail or by post to Class Counsel:

Trudel Johnston & Lespérance
750, Côte de la Place d'Armes, suite 90
Montréal (Québec) H2Y 2X8
Toll Free : 1 844-588-8385
Fax : 514-871-8800
info@tjl.quebec

YOU CAN SEEK PERMISSION TO INTERVENE

A class member may apply to the Court to intervene in the class action. The Court may authorize such intervention if it deems it useful to the members.

PRESENTATION OF THE SETTLEMENT AGREEMENT

Following the authorization of the class action, Stuart Thiel, the Plaintiff negotiated and reached an agreement to settle the class action in the best interests of class members. The Plaintiff will ask the Court to approve that agreement at 9:15 am on February 11, 2025, in room 17.09 of the Superior Court of Quebec in Montreal.

DETAILS OF THE SETTLEMENT AGREEMENT

Meta Platforms, Inc. has agreed to settle the class action for \$9,000,000 CAD. The settlement is a compromise of disputed claims and is not an admission of liability by the defendant. Facebook denies any wrongdoing, and the settlement is not an admission of any of the allegations or the merits of any claim in the class action.

Given the nature of the class action and the fact that no compensatory damages were sought, no indemnity will be paid to class members. Instead, this sum, minus certain fees and disbursements, will be dedicated to financing research and teaching activities that promote and protect privacy rights in Quebec in publicly funded universities. These funds will be managed entirely independently and with no influence from either party.

After deduction of the plaintiff's legal fees, administration fees, and any amount owed to the Fonds d'aide aux actions collectives, the settlement amount will be paid in equal shares to the following academic institutions:

- Université du Québec à Montréal;
- Concordia University;
- Université Laval.

The Court may designate a different or additional academic institution to receive a share.

The full text of the Settlement Agreement is available [here](#).

CLASS COUNSEL FEES

Class Counsel will seek the Court's approval of a fee representing 25% of the global settlement amount paid by Meta Platforms, Inc., which represents \$2,250,000 CAD, plus disbursements and applicable taxes, pursuant to the agreement between class counsel and the Representative. The Court is responsible for independently approving class counsel's fees and ensuring that they are fair and reasonable.

COURT APPROVAL OF THE SETTLEMENT AGREEMENT

To be valid and final, the Settlement Agreement must be approved by the Court. Class counsel will file a formal Application for the Approval of the Settlement Agreement by December 20, 2024. That application which will be heard at the Superior Court of Montreal, located at 1, rue Notre-Dame Est, Montreal, province of Quebec, H2Y 1B6, in room 17.09 at 9:15 am on February 11, 2025.

It is not mandatory for class members to attend this hearing.

It is possible to attend the hearing virtually via the following link: [Join the Microsoft Teams Meeting](#)

The Court may change the date and time of the hearing. In that case, an update will be posted on the website of Trudel Johnston & Lespérance (www.tjl.quebec).

OBJECTIONS OR COMMENTS ON THE SETTLEMENT AGREEMENT

Class members have the right to object to and comment on the Settlement Agreement.

Subject to the above-mentioned right to opt-out, a class member will remain a class member whether or not he or she objects to or comments on the Settlement Agreement.

If you wish to object to or comment on the Settlement Agreement, you must send your objection or comment in writing no later than February 7, 2025, to Trudel Johnston & Lespérance:

- by email at: info@tjl.quebec,
- or by fax to 514-871-8800.

This document must include:

- your name, address, e-mail address, and telephone number;
- a brief statement of the reasons for your objection or comments; and
- whether you intend to attend the hearing in person or through a lawyer (in the latter case, you must provide the lawyer's name, address, e-mail address, and telephone number).

Trudel Johnston & Lespérance will send Meta Platforms, Inc. and the Court a copy of all objections and comments received from class members.

Regardless of whether they object or comment, class members need not attend or appear at the hearing for approval of the Agreement.

Plaintiff's lawyers at Trudel Johnston & Lespérance remain available to answer any questions you may have.

APPENDIX A

Questions Authorized by the Court

1. Did the Defendant enter into a contract with the class members in respect of the collection, use, retention and/or disclosure of their account information?
2. Did the contract between the Defendant and the class members contain express or implied terms that Facebook would utilize appropriate safeguards to protect the class members' account information from unauthorized access and distribution?
3. Did the Defendant breach the contract? If so how?
4. Is the Defendant liable to the class for breaches of the *Consumer Protection Act*?
5. Did the Defendant breach articles 3, 35, 36, and/or 37 of the *Civil Code of Quebec*?
6. Did the Defendant breach its statutory obligations under the *Act Respecting the Protection of Personal Information in the Private Sector*?
7. Did the Defendant breach article 5 of the *Charter of Human Rights and Freedoms*?
8. Did the Defendant breach article 9 of the *Charter of Human Rights and Freedoms*?
9. Are class members entitled to punitive damages per article 49 of the *Charter of Human Rights and Freedoms*?
10. Is the Defendant liable for punitive damages under the *Consumer Protection Act*?
11. What is the amount of the aggregate punitive damages to be awarded to the class?

Conclusions Sought by the Class Action

GRANT the plaintiff's action against the defendant;

DECLARE that the Defendant:

- Breached its contractual obligations toward class members;
- Violated its statutory obligations under the *Civil Code of Quebec* and the *Act Respecting the Protection of Personal Information in the Private Sector*;
- Breached its statutory obligations under the *Consumer Protection Act*;

➤ Intentionally and unlawfully violated class members' rights to privacy and to the non-disclosure of their confidential information under the *Charter of Human Rights and Freedoms*;

CONDEMN the Defendant to pay the class members punitive damages pursuant to article 49 of the *Charter of Human Rights and Freedoms* and article 272 of the *Consumer Protection Act* in an amount to be determined by the Court based on the evidence at trial;

ORDER collective recovery in accordance with articles 595 to 598 of the *Civil Code of Procedure*;

THE WHOLE with interest from the date of judgment and with full costs and expenses, including expert fees, notice fees and fees relating to administering the plan of distribution of the recovery in this action.