

## Notice of The Bank of Canton Data Breach Class Action Settlement

**If you received notice from The Bank of Canton that your personally identifiable information was potentially compromised in the 2023 MOVEit Security Incident that occurred at Fiserv Inc., a third-party financial industry service provider, then you could get a payment from a class action settlement.**

A federal court has authorized this Notice. This is not a solicitation from a lawyer.

**Please read this Notice carefully and completely. Your legal rights are affected whether you act or don't act.**

**THIS NOTICE MAY AFFECT YOUR RIGHTS. PLEASE READ IT CAREFULLY.**

- A settlement has been proposed in a class action lawsuit against The Bank of Canton. The Settlement will resolve claims against The Bank of Canton related to a May 2023 cybersecurity incident experienced by Fiserv, a financial industry service provider, in which a criminal actor allegedly used a vulnerability in Progress Software's MOVEit file transfer application to access information in Fiserv's possession. The information allegedly included personally identifiable information ("PII") of customers of The Bank of Canton.
- Under the proposed Settlement, you may be eligible to receive either (1) reimbursement of ordinary losses up to \$2,500 and reimbursement of extraordinary losses up to \$10,000; or (2) an alternative cash payment of \$100. (These payments are subject to *pro rata* adjustment based on total claim submission.) To receive a payment, you must complete and timely submit a Claim Form.
- Please read this Notice carefully. Your legal rights will be affected, and you have a choice to make now.

Summary of Your Legal Rights and Options		Deadline
<b>SUBMIT A CLAIM FORM</b>	The only way to get a payment.	Online or Postmarked by <b>October 9, 2025</b>
<b>EXCLUDE YOURSELF BY OPTING OUT</b>	Get no payment. Keep your right to file your own lawsuit against The Bank of Canton for the same claims resolved by this Settlement.	Postmarked by <b>September 9, 2025</b>
<b>OBJECT TO THE SETTLEMENT AND/OR ATTEND A HEARING</b>	Tell the Court the reasons why you do not believe the Settlement should be approved. You can also ask to speak to the Court at the hearing on October 21, 2025, about the fairness of the Settlement, with or without your own attorney.	Postmarked by <b>September 9, 2025</b>
<b>DO NOTHING</b>	Get no payment and be bound by the terms of the Settlement.	

- These rights and options—**and the deadlines to exercise them**—are explained in this Notice.
- The Court in charge of this case still has to decide whether to approve the Settlement. Payments will be made if the Court approves the Settlement after any appeals are resolved.

**Questions? Go to [CantonSettlement.com](https://CantonSettlement.com) or call +1 888-884-3492**

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## BASIC INFORMATION

### 1. Why did I get this Notice?

You received this Notice because you have been identified as a person whose PII may have been impacted by the 2023 MOVEit Security Incident that impacted The Bank of Canton. A similarly situated individual, Plaintiff Stephen Gilmore (“Plaintiff”), brought a proposed class action lawsuit against The Bank of Canton in 2023, alleging that The Bank of Canton was negligent due to its data security practices. The Bank of Canton denies the allegations and denies that it would be found liable. The Parties have now reached a proposed settlement of the lawsuit.

A court authorized this Notice because you have a right to know about your rights under the proposed class action Settlement before the Court decides whether to approve the Settlement. If the Court approves the Settlement, and after objections and appeals are resolved, a Settlement Administrator appointed by the Court will make the payments that the Settlement allows, and the pending legal claims against The Bank of Canton will be released and dismissed.

This package explains the lawsuit, the Settlement, your rights, what benefits are available, who is eligible for them, and how to get them. Judge Allison D. Burroughs of the United States District Court for the District of Massachusetts is in charge of this case. The case is *Gilmore v. The Bank of Canton*, No. 1:23-cv-12711 (D. Mass.), which has been transferred to and coordinated with *In re: MOVEit Customer Data Security Breach Litig.*, MDL No. 1:23-md-03083-ADB (D. Mass.).

### 2. What is this lawsuit about?

This matter is a putative class action (the “Litigation”) arising from the MOVEit Security Incident that impacted The Bank of Canton on or around May 27, 2023, whereby cybercriminals allegedly gained unauthorized access to the MOVEit file transfer software that was used by a third-party service provider of The Bank of Canton, resulting in potential access to the PII of The Bank of Canton customers, including, potentially, account names, account numbers, and Social Security numbers. The lawsuit asserts various common law claims against The Bank of Canton for alleged negligent data security practices.

The Bank of Canton denies any allegation of wrongdoing and denies that Plaintiff would prevail or be entitled to any relief should this matter proceed to be litigated.

### 3. What is a class action?

In a class action one or more people called “Class Representative(s)” sue on behalf of themselves and other people who have similar claims. This group of people is called the “class,” and the people in the class are called “Settlement Class Members” or the “Settlement Class.” One court resolves the issues for all Settlement Class Members, except for people who exclude themselves from the class. The person or persons who sue are called the Plaintiff(s). The entity sued—The Bank of Canton—is called the Defendant.

### 4. Why is there a settlement?

The Court did not decide in favor of Plaintiff or The Bank of Canton. Instead, both sides agreed to a settlement. That way, they avoid the costs and risks of a trial, and Settlement Class Members can get benefits or compensation. The Settlement Class Representative and Class Counsel think the Settlement is in the best interest of the Settlement Class.

## WHO IS IN THE SETTLEMENT

### 5. Who is in the Settlement?

The Settlement Class is defined as: “all current, former, and/or prospective customers of The Bank of Canton in the United States whose Personally Identifiable Information was included in files impacted by the MOVEit Security Incident.”

### 6. Are there exceptions to being included?

Yes, the following are not included in the Settlement Class: (i) The Bank of Canton and The Bank of Canton’s officers, directors, legal representatives, successors, subsidiaries, and assigns; (ii) any judge, justice, or judicial officer presiding over the Litigation and the members of their immediate families and judicial staff; (iii) Class Counsel, their staff members, and their immediate family; and (iv) any individual not included in the Class List.

**Questions? Go to [CantonSettlement.com](https://CantonSettlement.com) or call +1 888-884-3492**

## 7. What should I do if I am not sure whether I am included?

If you are not sure whether you are included in the Settlement Class, you can ask for free help by calling the Settlement Administrator at +1 888-884-3492 or you can visit [CantonSettlement.com](http://CantonSettlement.com) for more information.

## THE SETTLEMENT BENEFITS

### 8. What does the Settlement provide?

Under the Settlement, The Bank of Canton will pay \$300,000 into a Settlement Fund, which will be used to pay all valid claims made by Settlement Class Members, Costs of Notice and Administration, a Service Award to the Settlement Class Representative (if approved by the Court), and Class Counsel's attorneys' fees and expenses (if approved by the Court). Settlement Class Members may file a claim to receive either (1) reimbursement of ordinary losses up to \$2,500 and reimbursement of extraordinary losses up to \$10,000; or (2) an alternative cash payment of \$100.

If the total value of all valid claims exceeds the Net Settlement Fund (the monies remaining in the Settlement Fund after the Costs of Notice and Administration, Service Award, and attorneys' fees and expenses are deducted), the Settlement Administrator shall reduce all Settlement Payments on a *pro rata* basis to the highest amount that will allow all Approved Claims to be paid using the Net Settlement Fund available. In the event all valid claims do not exhaust the Net Settlement Fund, the Settlement Administrator, prior to distribution of the Alternative Cash Payments, shall increase the value of the alternative cash payments on a *pro rata* basis until the Net Settlement Fund is exhausted. No part of the Settlement Fund will revert back to The Bank of Canton.

### 9. What can I get from the Settlement?

Settlement Class Members may file a claim for the following settlement benefits:

**Reimbursement of Ordinary Losses:** Settlement Class Members may file a claim for reimbursement of ordinary losses up to two thousand and five hundred United States Dollars (\$2,500) (inclusive of up to four [4] hours of lost time at \$25 per hour [up to \$100 total]) incurred as a result of the MOVEit Security Incident. Such ordinary losses include, but are not limited to, (1) bank fees, long distance phone calls, cell phone charges (only if charged by the minute), data charges (only if based on the amount of data used), postage, or gasoline for local travel, and (2) fees for credit reports, credit monitoring, or other identity theft insurance product purchased between May 27, 2023 and the date of the close of the Claims Period.

**Reimbursement of Extraordinary Losses:** Settlement Class Members may submit a claim for up to ten thousand United States Dollars (\$10,000) in compensation for proven monetary losses, professional fees (e.g., attorneys' fees and accountants' fees), and fees for credit repair services as a result of the MOVEit Security Incident.

**Alternative Cash Payment:** In lieu of filing claims for reimbursement of ordinary or extraordinary losses, Settlement Class Members may elect to file a claim to receive a cash payment of \$100 without the need to document losses or attest to time spent as a result of the MOVEit Security Incident.

Settlement Payments are subject to *pro rata* adjustment. If the total value of all approved claims exceeds the Net Settlement Fund available for distribution to Settlement Class Members, then the Settlement Administrator will reduce all Settlement Payments on a *pro rata* basis. If the approved claims do not exhaust the Net Settlement Fund, then the Settlement Administrator will increase the alternative cash payments on a *pro rata* basis until the Net Settlement Fund is exhausted.

### 10. What am I giving up if I stay in the Settlement Class?

If you are a Settlement Class Member and you do not exclude yourself from the Settlement, you will give up your right to sue, continue to sue, or be part of any other lawsuit against The Bank of Canton concerning the claims released by this Settlement. The "Releases and Waivers of Rights" section in the Settlement Agreement describes the legal claims that you give up if you do not exclude yourself from the Settlement. The entire text of the Settlement Agreement can be viewed at [CantonSettlement.com](http://CantonSettlement.com).

**Questions? Go to [CantonSettlement.com](http://CantonSettlement.com) or call +1 888-884-3492**

## HOW TO GET A PAYMENT – MAKING A CLAIM

### 11. How can I get a payment?

You must complete and submit a Claim Form. Claim Forms may be submitted online at [CantonSettlement.com](http://CantonSettlement.com) or mailed to the address on the form. Claim Forms must be submitted electronically or postmarked by **October 9, 2025**.

Be sure to read the Claim Form instructions carefully and include all required information and your signature.

The Settlement Administrator will review your claim to determine the validity and amount of your payment.

### 12. How much will my payment be?

The amount of your payment will depend on the approved amount of your claim and the total value of all approved claims.

If you are seeking reimbursement for ordinary and/or extraordinary losses under the Settlement, you must describe the losses, their amount, and when and why you incurred them. You must also attest that you incurred those losses in response to the MOVEit Security Incident in this case.

Your claim must be reasonably documented. You must enclose or upload documentation sufficient to show (1) the amount of unreimbursed loss that you suffered, and (2) why you believe that the loss was more likely than not caused by the MOVEit Security Incident in the case. Documents for financial expenses may include credit card or bank statements, emails, invoices, receipts, or telephone records, including photographs of the same. Personal statements or declarations are not considered reasonable documentation, but they may be used to provide clarification, context, or support for other documentation.

### 13. When will I get my payment?

The Court will hold a Final Approval Hearing on **October 21, 2025**, at 1:00 p.m. to decide whether to approve the Settlement. Payments will be made after the Settlement is approved and becomes final (meaning there is no further appeal from the order approving the Settlement). Updates regarding the Settlement will be posted on the Settlement Website, [CantonSettlement.com](http://CantonSettlement.com).

## THE LAWYERS REPRESENTING YOU

### 14. Do I have a lawyer in this case?

The Court appointed E. Michelle Drake of Berger Montague, PC, Gary F. Lynch of Lynch Carpenter, LLP, Douglas J. McNamara of Cohen Milstein Sellers & Toll PLLC, Karen H. Riebel of Lockridge Grindal Nauen PLLP, Charles E. Schaffer of Levin Sedran & Berman LLP, and Kristen A. Johnson of Hagens Berman Sobol Shapiro LLP as attorneys to represent the Settlement Class. These lawyers are called Class Counsel. You will not be charged for their services.

### 15. Should I get my own lawyer?

If you want your own lawyer, you may hire one, but you will be responsible for any payment for that lawyer's services. For example, you can ask your own lawyer to appear in court for you if you want someone other than Class Counsel to speak for you. You may also appear for yourself without a lawyer.

### 16. How will the lawyers be paid?

The attorneys representing the Settlement Class have not yet received any payment for their legal services or any reimbursement of the costs or out-of-pocket expenses they have incurred. Class Counsel plans to ask the Court for an award of attorneys' fees and expenses of up to twenty-five (25) percent of the Settlement Fund. Class Counsel will file their request for attorneys' fees and expenses as a percentage of the Settlement Fund.

The Settlement Class is represented by one named individual (the "Settlement Class Representative"). In addition to the benefits that the Settlement Class Representative will receive as a member of the Settlement Class—and subject to the approval of the Court—Class Counsel will request a Service Award, not to exceed \$5,000, to the Settlement Class Representative for the efforts he has expended on behalf of the Settlement Class.

**Questions? Go to [CantonSettlement.com](http://CantonSettlement.com) or call +1 888-884-3492**

The Court will determine whether to approve the amount of attorneys' fees and expenses requested by Class Counsel and the proposed Service Award to the Settlement Class Representative. Class Counsel will file an application for attorneys' fees and expenses and for a Service Award no later than August 19, 2025. The application will be available on the Settlement Website, [CantonSettlement.com](http://CantonSettlement.com), or you can request a copy by contacting the Settlement Administrator.

## EXCLUDING YOURSELF FROM THE SETTLEMENT

### 17. How do I get out of the Settlement?

If you are a Settlement Class Member, do not want the benefits from the Settlement, and want to keep your right, if any, to sue The Bank of Canton on your own about the legal issues in this case, then you must take steps to get out of the Settlement. This is called excluding yourself from—or “opting out” of—the Settlement.

You may opt out of the Settlement by **September 9, 2025**. To opt out, you must send a letter or postcard via U.S. Mail to the address below. Your letter or postcard must include:

- the name of this Litigation (*Gilmore v. The Bank of Canton*, No. 1:23-cv-12711 [D. Mass.]) or a decipherable approximation thereof;
- your full name, mailing address, telephone number, and signature; and
- the words “Opt Out” or “Request for Exclusion” at the top of the document and/or a clear and unequivocal statement that you want to be excluded from the Settlement.

To be valid, any request for exclusion that is filed on behalf of a Settlement Class Member by a person other than the Settlement Class Member who is legally authorized to act on the Settlement Class Member's behalf must include:

- the name of this Litigation (*Gilmore v. The Bank of Canton*, No. 1:23-cv-12711 [D. Mass.]) or a decipherable approximation thereof;
- the full name and address of the Settlement Class Member;
- the words “Opt Out” or “Request for Exclusion” at the top of the document and/or a clear and unequivocal statement that the Settlement Class Member wants to be excluded from the Settlement;
- the person's full name, address, phone number, and relationship to the Settlement Class Member;
- an attestation that the person is legally authorized to make the request for exclusion on behalf of the Settlement Class Member and a description of the basis for that authority; and
- the person's signature.

You must mail your opt-out request via First-Class postage prepaid U.S. Mail, postmarked no later than **September 9, 2025**, to:

*MOVEit Gilmore v. Bank of Canton*  
Settlement Administrator  
P.O. Box 4875  
Portland, OR 97208-4875

If you fail to include the required information, your request will be deemed invalid and you will be bound by the Settlement, including all releases.

### 18. If I am a Settlement Class Member and don't opt out, can I sue The Bank of Canton for the same thing later?

No. You must opt out of the Settlement to keep your right to sue The Bank of Canton or other released parties for any of the claims resolved by the Settlement.

**Questions? Go to [CantonSettlement.com](http://CantonSettlement.com) or call +1 888-884-3492**



## 19. What happens if I opt out?

If you opt out of the Settlement, you will not have any rights as a member of the Settlement Class. You cannot submit a claim, and you will not receive a payment as part of the Settlement. You will not be bound by the Settlement, releases, or by any further orders or judgments in this case. You will keep the right, if any, to sue on the claims alleged in the case at your own expense.

In addition, if you opt out of the Settlement, you cannot object to this Settlement because the Settlement no longer affects you. If you object to the Settlement and request to exclude yourself, your objection will be voided, and you will be deemed to have excluded yourself.

## COMMENTING ON OR OBJECTING TO THE SETTLEMENT

### 20. How do I tell the Court if I don't like the Settlement?

If you are a Settlement Class Member and you do not opt out of the Settlement, you can object to the Settlement if you do not think it is fair, reasonable, or adequate. You can give reasons why you think the Court should not approve it. You cannot ask the Court to change or order a different settlement; the Court can only approve or deny this Settlement. If the Court denies approval, no settlement payments will be sent out and the lawsuit will continue. If that is what you want to happen, you must object.

You may object to any part of the proposed Settlement in writing. You may also appear at the Final Approval Hearing, either in person or through your own attorney. If you appear through your own attorney, you are responsible for paying that attorney.

Your objection must be in writing and must include:

- the name of this Litigation (*Gilmore v. The Bank of Canton*, No. 1:23-cv-12711 [D. Mass.]) or a decipherable approximation thereof;
- your full name, mailing address, and telephone number;
- the full name, address, telephone number, and email address of your counsel (if you are represented by counsel);
- a statement describing the grounds for your objection with specificity;
- a statement confirming whether your objection applies only to you, to a specific subset of the Settlement Class, or to the entire Settlement Class;
- a statement confirming whether you intend to appear at the Final Approval Hearing and, if so, whether you will appear in person or through counsel; and
- your signature or the signature of an individual authorized to act on your behalf.

If the Objector or his or her counsel intends to call witnesses or present evidence at the Final Approval Hearing, the objection also must contain a list identifying each witness and a detailed description of the anticipated testimony that each witness will offer at the hearing.

Any objection must be either filed electronically with the Court or mailed to the Clerk of Court at the address set forth below. The objection must be filed with the Court—or, if mailed, it must be postmarked—no later than **September 9, 2025**.

United States District Court  
for the District of Massachusetts  
Clerk of Court  
John Joseph Moakley U.S. Courthouse  
1 Courthouse Way, Suite 2300  
Boston, MA 02210

## 21. What's the difference between objecting and opting out?

Objecting is telling the Court that you don't like something about the Settlement. You can object to the Settlement only if you are a Settlement Class Member and do not opt out of the Settlement. Opting out of the Settlement is telling the Court that you don't want to be part of the Settlement. If you opt out of the Settlement, you cannot object to it because it does not affect you.

## THE COURT'S FINAL APPROVAL HEARING

## 22. When and where will the Court decide whether to approve the Settlement?

The Court will hold a Final Approval Hearing at 1:00 p.m. on **October 21, 2025**, in Courtroom 17, 5<sup>th</sup> Floor at the federal courthouse located at 1 Courthouse Way, Boston, MA 02210, before Judge Allison D. Burroughs. At this hearing, the Court will consider whether the Settlement is fair, reasonable, and adequate; whether to approve Class Counsel's application for attorneys' fees and expenses; and whether to approve the Service Award to the Settlement Class Representative. If there are objections, the Court will consider them. The Court may choose to hear from people who have asked to speak at the hearing. At or after the hearing, the Court will decide whether to approve the Settlement. There is no deadline by which the Court must make its decision.

The Court may reschedule the Final Approval Hearing or change any of the deadlines described in this Notice. The date of the Final Approval Hearing may change without further notice to the Settlement Class Members. Be sure to check the website, [CantonSettlement.com](https://CantonSettlement.com), for updates. You can also access the case docket via the Court's Public Access to Court Electronic Records (PACER) system at <https://ecf.mad.uscourts.gov>.

Class Counsel will file a motion for final approval of the Settlement by September 19, 2025. Objectors, if any, must file any response to Class Counsel's motion by October 3, 2025. Responses to any objections and any replies in support of final approval of the Settlement and/or Class Counsel's application for attorneys' fees, costs, and expenses, and Service Award will be filed by October 10, 2025.

## 23. Do I have to come to the Final Approval Hearing?

No. Class Counsel will answer any questions the Court may have. You may attend at your own expense if you wish. If you send an objection, you do not have to come to the hearing to talk about it. As long as you mailed or filed your written objection on time, the Court will consider it. You may also pay your own lawyer to attend, but it is not necessary.

## 24. May I speak at the hearing?

You may ask the Court for permission to speak at the Final Approval Hearing. To do so, you must include a statement in your written objection (*see* Question 20) that you intend to appear at the hearing. Be sure to include your name, address, and signature as well. You cannot speak at the hearing if you opt out or exclude yourself from the Settlement.

## IF I DO NOTHING

## 25. What happens if I do nothing at all?

If you are a Settlement Class Member and do nothing, you will not get any money from this Settlement, and you will not be able to sue The Bank of Canton or other released parties for the claims released by the Settlement Agreement.

## GETTING MORE INFORMATION

## 26. Are there more details about the Settlement available?

This Notice summarizes the proposed Settlement. More details are in the Settlement Agreement and other case documents available at [CantonSettlement.com](https://CantonSettlement.com), by accessing the docket in this case through the Court's Public Access to Court Electronic Records (PACER) system at <https://ecf.mad.uscourts.gov>, or by visiting the office of the Clerk of the Court for the United States District Court for the District of Massachusetts, 1 Courthouse Way, Suite 2300, Boston, MA 02210, between 8:30 a.m. and 4:30 p.m., Monday through Friday, excluding Court holidays.



## 27. How do I get more information?

Visit the website, [CantonSettlement.com](http://CantonSettlement.com), where you will find more information, including the Claim Form, a copy of the Settlement Agreement, and answers to questions about the Settlement and other information to help you determine whether you are eligible for a payment.

Contact the Settlement Administrator, Epiq, at +1 888-884-3492 or by writing to:

*MOVEit Gilmore v. Bank of Canton*  
Settlement Administrator  
P.O. Box 4875  
Portland, OR 97208-4875

Speak with Class Counsel by calling 1-412-322-9243 or by writing to Bank of Canton Class Action, Lynch Carpenter, LLP, Attn: Gary F. Lynch, 1133 Penn Avenue, 5<sup>th</sup> Floor, Pittsburgh, PA 15222.

**PLEASE DO NOT CONTACT THE COURT, THE COURT CLERK'S OFFICE, OR DEFENDANT TO INQUIRE ABOUT THIS SETTLEMENT OR THE CLAIM PROCESS.**

**Questions? Go to [CantonSettlement.com](http://CantonSettlement.com) or call +1 888-884-3492**