

NOTICE OF PROPOSED CLASS ACTION SETTLEMENT

THIS IS A COURT-AUTHORIZED NOTICE. IT IS NOT A NOTICE OF A LAWSUIT AGAINST YOU OR A SOLICITATION FROM A LAWYER.

PLEASE READ THIS NOTICE CAREFULLY

To: All individuals residing in the United States who were sent a notice of the data incident that occurred on Group Health Cooperative of South Central Wisconsin's ("GHCSCW" or "Defendant") network systems on or about January 24, 2024 (the "Data Incident"), and all individuals residing in the United States whose personally identifiable information or private health information ("Private Information") may have been impacted in the Data Incident ("Settlement Class" and each individual a "Settlement Class Member").

A proposed settlement of claims against Defendant has been reached in a proposed class action lawsuit ("Settlement"). The lawsuit asserted claims against Defendant related to the Data Incident.

If you are a member of the Settlement Class, you have the following options:

YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT	
SUBMIT A CLAIM FORM BY JANUARY 20, 2026	This is the only way you can get a payment or a code for Medical Data Monitoring services.
OBJECT TO THE SETTLEMENT BY JANUARY 5, 2026	Write to the Court with reasons why you do not agree with the Settlement.
OPT-OUT OF THE SETTLEMENT BY JANUARY 5, 2026	You will receive no benefits from the Settlement, but you will retain your legal claims against the released parties.
GO TO THE FINAL APPROVAL HEARING ON FEBRUARY 4, 2026	You may ask the Court for permission for you or your attorney to speak about your objection at the final approval hearing.
DO NOTHING	You will not get any compensation or Medical Data Monitoring from this Settlement and you will give up certain legal rights. Submitting a Claim Form is the only way to obtain a Cash Payment or Medical Data Monitoring from this Settlement.

- These rights and options—and the deadlines to exercise them—are explained in this Notice. For complete details, view the Settlement Agreement, available at **www.GHCSCWSettlement.com**, or call **(833) 630-8408**.
- The Court in charge of this case still has to decide whether to grant Final Approval of the Settlement. Payments will only be made after the Court grants Final Approval of the Settlement and after any appeals of the Court's order granting final approval are resolved.

WHAT THIS NOTICE CONTAINS

BASIC INFORMATION.....	PAGE 1
1. Why is this Notice being provided?	
2. What is this lawsuit about?	
3. What is a class action?	
4. Why is there a Settlement?	
WHO IS INCLUDED IN THE SETTLEMENT?.....	PAGE 2
5. How do I know if I am part of the Settlement?	
6. Are there exceptions to being included in the Settlement?	
THE SETTLEMENT BENEFITS—WHAT YOU GET IF YOU QUALIFY	PAGE 2
7. What does the Settlement provide?	
HOW TO GET BENEFITS—SUBMITTING A CLAIM FORM.....	PAGE 3
8. How do I get benefits from the Settlement?	
9. How will claims be decided?	
10. When will I get my payment?	
REMAINING IN THE SETTLEMENT	PAGE 4
11. Do I need to do anything to remain in the Settlement?	
12. What am I giving up as part of the Settlement?	
OPTING OUT OF THE SETTLEMENT.....	PAGE 4
13. If I opt-out, can I still get payment from the Settlement?	
14. If I do not opt-out, can I sue Defendant for the same thing later?	
15. How do I get out of the Settlement?	
THE LAWYERS REPRESENTING YOU	PAGE 5
16. Do I have a lawyer in this case?	
17. How will Class Counsel be paid?	
OBJECTING TO THE SETTLEMENT	PAGES 5-6
18. How do I tell the Court that I do not like the Settlement?	
19. What is the difference between objecting to and opting-out of the Settlement?	
THE COURT’S FINAL APPROVAL HEARING.....	PAGES 6-7
20. When and where will the Court decide whether to approve the Settlement?	
21. Do I have to come to the Final Approval Hearing?	
22. May I speak at the Final Approval Hearing?	
IF YOU DO NOTHING.....	PAGE 7
23. What happens if I do nothing?	
GETTING MORE INFORMATION	PAGES 7-8
24. Are more details about the Settlement available?	
25. How do I get more information?	
26. What if my contact information changes or I no longer live at my address?	

BASIC INFORMATION

1. Why is this Notice being provided?

The Court directed that this Notice be provided because you have a right to know about a proposed settlement that has been reached in this proposed class action lawsuit and about all of your options before the Court decides whether to grant Final Approval of the Settlement. If the Court approves the Settlement, and after objections or appeals, if any, are resolved, the settlement administrator appointed by the Court (“Settlement Administrator”) will distribute the payments and Medical Data Monitoring codes that the Settlement allows. This Notice explains the lawsuit, the Settlement, your legal rights, what payments are available, who is eligible for them, and how to get them.

The Court in charge of this case is the Circuit Court of Dane County, Wisconsin. The case is known as *Pearson, et al. v. Group Health Cooperative of South Central Wisconsin*, No. 2024-CV-001077 (“Lawsuit”). The people who filed the Lawsuit are called the Plaintiffs and the entity they sued, Group Health Cooperative of South Central Wisconsin, is called the Defendant.

2. What is this lawsuit about?

The Lawsuit claims that Defendant was responsible for failing to prevent the Data Incident and asserts claims such as: negligence, negligence per se, breach of fiduciary duty, breach of implied contract, and unjust enrichment. The Lawsuit seeks, among other things, payment for persons who were injured by the Data Incident.

Defendant has denied and continues to deny all of the claims made in the Lawsuit, as well as all charges of wrongdoing or liability against it.

3. What is a class action?

In a class action, one or more people called Plaintiffs sue on behalf of people who they allege have similar claims. Together, all these people are called a Settlement Class or Settlement Class Members. One Court and one judge resolves the issues for all class members, except for those who opt-out of the Settlement.

4. Why is there a Settlement?

The Court did not decide in favor of the Plaintiffs or Defendant. Instead, Plaintiffs and Defendant negotiated a settlement that allows both Plaintiffs and Defendant to avoid the risks and costs of lengthy and uncertain litigation and the uncertainty of a trial and appeals. It also allows Settlement Class Members to obtain a Cash Payment and Medical Data Monitoring services without further delay. The Plaintiffs and their attorneys think the Settlement is best for all Settlement Class Members. This Settlement does not mean that Defendant did anything wrong.

WHO IS INCLUDED IN THE SETTLEMENT?

5. How do I know if I am part of the Settlement?

You are part of this Settlement as a Settlement Class Member if you reside in the United States and were sent a notice of the Data Incident or your Private Information may have been impacted in the Data Incident.

6. Are there exceptions to being included in the Settlement?

Yes. Specifically excluded from the Settlement Class are (1) all persons who are directors, officers, and agents of Defendant, or their respective subsidiaries and affiliated companies; (2) governmental entities; and (3) the Judge assigned to the Litigation, that Judge's immediate family, and Court staff.

THE SETTLEMENT BENEFITS—WHAT YOU GET IF YOU QUALIFY

7. What does the Settlement provide?

Defendant will create a settlement fund of \$3,500,000.00 ("Settlement Fund"), which will be used to pay for (i) reasonable notice and Settlement Administration Costs incurred pursuant to the Settlement Agreement as approved by the Parties and approved by the Court; (ii) any taxes owed by the Settlement Fund; (iii) any Service Awards approved by the Court; (iv) any attorneys' fees, costs, and expenses as approved by the Court; and (v) any benefits to Settlement Class Members, pursuant to the terms and conditions of the Settlement. The benefits to Settlement Class Members are explained below:

Medical Data Monitoring: Settlement Class Members are eligible to receive three years of CyEx's Medical Data Monitoring product that will include: (i) real time monitoring of the credit file with one credit bureau; (ii) dark web scanning with immediate notification of potential unauthorized use; (iii) security freezing assistance; (iv) victim assistance; (v) \$1,000,000.00 in identity theft insurance with no deductible; and (vi) access to fraud resolution agents to help investigate and resolve instances of identity theft.

Cash Payment A – Documented Losses: Settlement Class Members may submit a claim for up to \$5,000.00 per Settlement Class Member upon presentation of reasonable documented losses related to the Data Incident ("Documented Losses"). To receive a payment for Documented Losses, a Settlement Class member must elect Cash Payment A on the Claim Form attesting under penalty of perjury to incurring documented losses. Settlement Class Members will be required to submit reasonable documentation supporting the losses, which means documentation contemporaneously generated or prepared by a third party or the Settlement Class Member supporting a claim for expenses paid. Non-exhaustive examples of reasonable documentation include telephone records, correspondence including emails, or receipts. Personal certifications, declarations, or affidavits from the Settlement Class Member do not constitute reasonable documentation, but may be included to provide clarification, context, or support for other submitted reasonable documentation. Settlement Class Members will not be reimbursed for expenses if they have been reimbursed for the same expenses by another source, including

compensation provided in connection with the credit monitoring and identity theft protection product offered as part of the notification letter provided by Defendant or otherwise.

Cash Payment B – Alternate Cash Payment: As an alternative to a claim for Documented Losses, Settlement Class Members may submit a claim to receive a *pro rata* cash payment from the Settlement Fund (“Alternate Cash Payment”). The amount of the Alternate Cash Payment will be calculated in accordance with the Settlement Agreement, which provides for a distribution of the Settlement Fund to first cover other costs and then distribute the remaining funds evenly amongst Settlement Class Members who elected to receive an Alternate Cash Payment. The Alternate Cash Payment is estimated to be approximately \$100.00, but will be determined based on the methods discussed above.

HOW TO GET BENEFITS—SUBMITTING A CLAIM FORM

8. How do I get benefits from the Settlement?

To ask for a payment, you must complete and submit a Claim Form. Claim Forms are available at **www.GHCSCWSettlement.com**, where you may also submit your Claim Form online. You may also request one by mail by calling (833) 630-8408. Read the instructions carefully, fill out the Claim Form, and either submit it online or mail it postmarked no later than **January 20, 2026** to:

GHCSCW Data Incident
c/o Kroll Settlement Administration LLC
P.O. Box 5324
New York, NY 10150-5324

9. How will claims be decided?

The Settlement Administrator will initially decide whether the information provided on a Claim Form is complete and valid. The Settlement Administrator may require additional information from any Claimant. If the required information is not timely provided, the claim will be considered invalid and will not be paid.

Additional information regarding the claims process can be found in Section IX of the Settlement Agreement, available at **www.GHCSCWSettlement.com**.

10. When will I get my payment?

The Court has scheduled a hearing at **9:00 a.m. CT on February 4, 2026** (though this date may change), to decide whether to finally approve the Settlement (“Final Approval Hearing”). If the Court finally approves the Settlement, there may be appeals. It is always uncertain whether any appeals can be resolved favorably, and resolving them can take time. It also takes time for all the Claim Forms to be processed, depending on the number of claims submitted and whether any appeals are filed. Please be patient.

REMAINING IN THE SETTLEMENT

11. Do I need to do anything to remain in the Settlement?

You do not have to do anything to remain in the Settlement, but if you want a Cash Payment or Medical Data Monitoring services, you must submit a Claim Form postmarked or submitted online by **January 20, 2026**.

12. What am I giving up as part of the Settlement?

If the Settlement becomes final, you will give up your right to sue Defendant for the claims being resolved by this Settlement. The specific claims you are giving up against Defendant are described in Section XIII of the Settlement Agreement. You will be “releasing” Defendant and all related people or entities as described in Section XIII of the Settlement Agreement. The Settlement Agreement is available at **www.GHCSCWSettlement.com**.

The Settlement Agreement describes the released claims with specific descriptions, so read it carefully. If you have any questions about what this means, you can talk to the attorneys listed in Question 16 for free or you can talk to your own lawyer at your own expense.

OPTING-OUT OF THE SETTLEMENT

If you do not want any benefits from this Settlement, but you want to keep the right to sue Defendant about issues in the Lawsuit, then you must take steps to opt-out of the Settlement Class.

13. If I opt-out, can I still get payment from the Settlement?

No. If you opt-out of the Settlement, you will not be entitled to any benefits of the Settlement, but you will not be bound by any judgment in this case.

14. If I do not opt-out, can I sue Defendant for the same thing later?

No. Unless you opt-out from the Settlement, you give up any right to sue Defendant for the claims that this Settlement resolves. You must opt-out of the Settlement Class to start your own lawsuit or to be part of any different lawsuit relating to the claims in this case. If you opt-out, do not submit a Claim Form to ask for a payment.

15. How do I get out of the Settlement?

To opt-out of the Settlement, you must send a letter by mail stating that you want to opt-out of the Settlement. Your letter must be personally signed by the Settlement Class Member and contain the requestor’s name, address, telephone number, and email address (if any), and include a statement indicating a request to opt-out of the Settlement Class. You must mail your opt-out request postmarked no later than **January 5, 2026** to:

GHCSCW Data Incident
c/o Kroll Settlement Administration LLC
P.O. Box 5324
New York, NY 10150-5324

THE LAWYERS REPRESENTING YOU

16. Do I have a lawyer in this case?

Yes. The Court appointed Ben Barnow of Barnow and Associates, P.C. and Jeff Ostrow of Kopelowitz Ostrow P.A. to represent you and other Settlement Class Members. These lawyers are called Class Counsel. You will not be charged for these lawyers. If you want to be represented by your own lawyer, you may hire one at your own expense.

17. How will Class Counsel be paid?

If the Settlement is approved and becomes final, Class Counsel will ask the Court to award attorneys' fees not to exceed \$1,166,666.67, in addition to reasonable costs and expenses incurred in prosecuting the Litigation. Class Counsel will also request approval of Service Awards of \$2,500.00 each for the Plaintiffs, also known as class representatives.

OBJECTING TO THE SETTLEMENT

You can tell the Court that you do not agree with the Settlement or some part of it.

18. How do I tell the Court that I do not like the Settlement?

If you are a Settlement Class Member, you can object to the Settlement if you do not like it or a portion of it. You can give reasons why you think the Court should not approve the Settlement. The Court will consider your views before making a decision. To object, you must file with the Court and mail copies to Class Counsel, Defendant's Counsel, and the Settlement Administrator a written notice stating that you object to the Settlement.

Your objection must include:

- a. your full name, mailing address, telephone number, and email address (if any);
- b. all grounds for the objection, accompanied by any legal support for the objection known to the objector or objector's counsel;
- c. the number of times you have objected to a class action settlement within the five years preceding the date that you file the objection, the caption of each case in which you have made such objection, and a copy of any orders related to or ruling upon your prior objections that were issued by the trial and appellate courts in each listed case;
- d. the identity of all counsel who represent you, including any former or current counsel who may be entitled to compensation for any reason related to the objection to the Settlement and/or Class Counsel's application for attorneys' fees, costs, and service awards;
- e. the number of times in which your counsel and/or your counsel's law firm have objected to a class action settlement within the five years preceding the date of the filed objection, the caption of each case in which counsel or the firm has made such objection and a copy of any orders related to or ruling upon counsel's or the counsel's law firm's prior objections that were issued by the trial and appellate courts in each listed case;

- f. whether your counsel will appear at the Final Approval Hearing;
- g. a list of all persons who will be called to testify at the Final Approval Hearing in support of the objection (if any);
- h. a statement confirming whether you intend to personally appear and/or testify at the Final Approval Hearing; and
- i. your signature (an attorney's signature is not sufficient).

Your objection must be filed with the Clerk for the Circuit Court of Dane County, 215 S Hamilton St., Room 1000, Madison, WI 53703, and served upon Class Counsel, Defendant's Counsel, and the Settlement Administrator at the addresses below no later than **January 5, 2026**.

CLASS COUNSEL	DEFENDANT'S COUNSEL	SETTLEMENT ADMINISTRATOR
Ben Barnow Barnow and Associates, P.C. 205 W. Randolph Street, Ste. 1630 Chicago, IL 60606 b.barnow@barnowlaw.com Jeff Ostrow Kopelowitz Ostrow P.A. 1 West Las Olas Blvd., Ste. 500 Fort Lauderdale, FL 33301 ostrow@kolawyers.com	Thomas Heneghan Husch Blackwell LLP 80 South Eight Street, Ste. 4800 Minneapolis, MN 55402 tom.heneghan@huschblackwell.com Jacob Harris Husch Blackwell LLP 33 East Main Street, Suite 300 Madison, WI 53703 jacob.harris@huschblackwell.com	<i>GHSCSW Data Incident</i> c/o Kroll Settlement Administration LLC P.O. Box 5324 New York, NY 10150-5324

19. What is the difference between objecting to and opting-out of the Settlement?

Objecting is telling the Court that you do not like something about the Settlement. Opting-out is telling the Court that you do not want to be part of the Settlement Class in this Settlement. If you opt-out of the Settlement, you have no basis to object or submit a Claim Form because the Settlement no longer affects you.

THE COURT'S FINAL APPROVAL HEARING

The Court will hold a Final Approval Hearing to decide whether to finally approve the Settlement. You may attend and you may ask to speak, but you do not have to. You cannot speak at the Final Approval Hearing if you opt-out of the Settlement.

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

The Court will hold a Final Approval Hearing at **9:00 a.m. CT on February 4, 2026**, in the Circuit Court of Dane County, 215 S Hamilton St., Room 4105, Madison, WI 53703. At this hearing, the Court will consider whether the Settlement is fair, reasonable, and adequate. The Court will take

into consideration any properly-filed written objections and may also listen to people who have asked to speak at the hearing (see Question 18). The Court will also decide whether to approve attorneys' fees and reasonable costs to Class Counsel, and Service Awards to the Plaintiffs.

21. Do I have to come to the Final Approval Hearing?

No. Class Counsel will answer any questions the Court may have. However, you are welcome to attend at your own expense. If you file an objection, you do not have to come to Court to talk about it. You may also hire your own lawyer to attend, at your own expense, but you are not required to do so.

22. May I speak at the Final Approval Hearing?

Yes, you may ask the Court for permission to speak at the Final Approval Hearing. To do so, you must follow the instructions provided in Question 18 above. You cannot speak at the hearing if you opt-out of the Settlement.

IF YOU DO NOTHING

23. What happens if I do nothing?

If you do nothing, you will not receive any compensation from this Settlement. If the Court approves the Settlement, you will be bound by the Settlement Agreement and the release. This means you will not be able to start a lawsuit, continue with a lawsuit, or be part of any other lawsuit against Defendant or related parties about the issues involved in the Lawsuit, resolved by this Settlement, and released by the Settlement Agreement.

GETTING MORE INFORMATION

24. Are more details about the Settlement available?

Yes. This Notice summarizes the proposed Settlement. More details are in the Settlement Agreement, which is available at www.GHCSCWSettlement.com, or by writing to *GHCSCW Data Incident* c/o Kroll Settlement Administration LLC, P.O. Box 5324, New York, NY 10150-5324.

25. How do I get more information?

Go to www.GHCSCWSettlement.com, call (833) 630-8408, or write to the *GHCSCW Data Incident* c/o Kroll Settlement Administration LLC, P.O. Box 5324, New York, NY 10150-5324.

***Please do not call the Court or the Clerk of the Court for additional information.
They cannot answer any questions regarding the Settlement or the Lawsuit.***

26. What if my contact information changes or I no longer live at my address?

It is your responsibility to inform the Settlement Administrator of your updated information. You may do so at the address below, calling toll-free **(833) 630-8408**, or at the Contact page of the Settlement Website:

GHCSCW Data Incident
c/o Kroll Settlement Administration LLC
P.O. Box 5324
New York, NY 10150-5324