

**NOTICE OF PROPOSED CLASS ACTION SETTLEMENT**

Superior Court of Arizona in Maricopa County  
*Jackson v. Ciox Health, LLC d/b/a Datavant Group*, No. CV2025-062690

**Were you notified that your personal information may have been affected by a data security incident at Ciox Health, LLC d/b/a Datavant Group?**

**You may be eligible for benefits from a class action settlement.**

*A Court authorized this Notice. You are not being sued. This is not a solicitation from a lawyer.*

- A settlement has been reached with Ciox Health, LLC d/b/a Datavant Group, (the “Defendant” or “Datavant”) in a class action about a phishing email attack that allegedly allowed unauthorized access to a company email account between May 8, 2024 and May 9, 2024 and that potentially exposed certain personal information (the “Data Security Incident”). Datavant denies any wrongdoing.
- You are included in this settlement as a Settlement Class Member because you were previously provided notice that your information may have been compromised in the Data Security Incident and/or your personal information may have been affected in the Data Security Incident.
- Your legal rights are affected whether you do or do not act. Please read this Notice carefully.

<b>YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT</b>		<b>DEADLINE</b>
<b>SUBMIT A CLAIM FORM</b>	The only way to receive benefits from this Settlement is to submit a valid and timely Claim Form.	<b>August 18, 2026</b>
<b>OPT OUT OF THE SETTLEMENT</b>	If you opt out, you will not be bound by the terms of the Settlement and you keep the right to sue the Defendant about the claims resolved by this Settlement. You will not receive any benefits from the Settlement.	<b>July 20, 2026</b>
<b>OBJECT TO THE SETTLEMENT AND/OR ATTEND A HEARING</b>	If you do not opt out of the Settlement, you may object to it and tell the Court what you do not like about it. You may also ask the Court for permission to speak about your objection at the Final Approval Hearing. If you object, you can still submit a Claim Form for benefits.	<b>July 20, 2026</b>
<b>DO NOTHING</b>	If you do nothing, you will not get any benefits and you give up the right to sue the Defendant about the claims resolved by this Settlement.	No Deadline

- These rights and options—**and the deadlines to exercise them**—are explained in this Notice.
- The Court in charge of this case still must decide whether to approve the Settlement.

## WHAT THIS NOTICE CONTAINS

### **Basic Information**

1. Why was this Notice issued?.....	3
2. What is this Action about?.....	3
3. What as a class action?.....	3
4. Why is there a Settlement?.....	3

### **Who is in the Settlement?**

5. Who is included in the Settlement?.....	3
6. Are there exceptions to being included? .....	4

### **The Settlement Benefits**

7. What can I get from this Settlement?.....	4
8. Tell me more about Cash Payment A – Documented Losses.....	4
9. Tell me more about Cash Payment B – Alternative Cash Payment.....	5
10. Tell me more about Credit Monitoring.....	5
11. What claims am I releasing if I stay in the Settlement Class?.....	5

### **How to get Settlement Benefits – Making a Claim**

12. How do I submit a Claim Form and get Settlement Benefits?.....	5
13. When will I get the Settlement Benefits?.....	6

### **The Lawyers Representing You**

14. Do I have a lawyer in this case?.....	6
15. Should I get my own lawyer?.....	6
16. How will the lawyers be Paid?.....	6

### **Excluding Yourself from the Settlement**

17. How do I opt out of the Settlement?.....	6
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### **Objecting to the Settlement**

18. How do I tell the Court if I do not like the Settlement?.....	7
19. What is the difference between objecting and opting out?.....	8

### **The Court’s Final Approval Hearing**

20. When is the Court’s Final Approval Hearing?.....	8
21. Do I have to come to the Final Approval Hearing?.....	8

### **If You Do Nothing**

22. What happens if I do nothing at all?.....	8
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### **Getting More Information**

23. How do I get more information?.....	8
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## **BASIC INFORMATION**

### **1. Why was this Notice issued?**

A Court authorized this Notice because you have a right to know about the proposed Settlement of this class action and about all of your options before the Court decides whether to grant Final Approval of the Settlement. This Notice explains the class action settlement, your legal rights, what benefits are available, and who can receive them.

This class action (the “Action”) is called *Jackson v. Ciox Health, LLC d/b/a Datavant Group*, No. CV2025- 062690 (Superior Court of Arizona in Maricopa County). The person who filed this Action is called the “Plaintiff” and the company he sued, Ciox Health, LLC d/b/a Datavant Group, is called the “Defendant” or “Datavant.”

### **2. What is this Action about?**

This Action alleges that the Defendant is liable for negligence, unjust enrichment, and violations of the Illinois Consumer Fraud and Deceptive Business Practices Act (815 ILCS 505/1 et seq.) arising from the Data Security Incident. The Data Security Incident allegedly permitted unauthorized access to a company email account and may have exposed certain personal information, including names, dates of birth, addresses, contact information, Social Security numbers, financial account information, driver’s license and passport numbers, and health-related data (“Private Information”).

The Defendant denies all of the Plaintiff’s claims and maintains that it did not do anything wrong and instead asserts that it had appropriate cybersecurity safeguards in place at the time of the Data Security Incident and that no one has been harmed as a result of the Data Security Incident.

### **3. What is a class action?**

In a class action, one or more individuals sue on behalf of other people with similar claims. These individuals who sue are known as “Class Representatives” or “Plaintiffs.” Together, the people included in the class action are called a “Settlement Class” or “Settlement Class Members.” One court resolves the lawsuit for all Settlement Class Members, except for those who exclude themselves (sometimes called, “opting out”) from a settlement. In this Action, the Class Representative is Bill Jackson.

### **4. Why is there a Settlement?**

The Court did not decide in favor of the Plaintiff or the Defendant. The Defendant denies all claims and contends that it has not violated any laws. The Plaintiff and the Defendant agreed to a Settlement to avoid the costs and risks of a trial and, through the Settlement, Settlement Class Members are eligible to claim benefits. The Plaintiff and his attorney, who also represents Settlement Class Members, think the Settlement is best for all Settlement Class Members.

## **WHO IS IN THE SETTLEMENT?**

### **5. Who is included in the Settlement?**

The Settlement Class consists of approximately 58,309 individuals whose Private Information may have been compromised in the Data Security Incident experienced by the Defendant between May 8, 2024 and May 9, 2024.

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

Yes, there are exceptions to being included. You are excluded from the Settlement Class if you are: (1) the Judge(s) presiding over the this action and members of their immediate families and their staff; (2) Defendant and its subsidiaries, parent companies, successors, predecessors, and any Entity in which the Defendant, has a controlling interest; (3) natural persons who properly execute and submit a Request for Exclusion prior to the expiration of the Opt-Out Period; and (4) the successors or assigns of any such excluded natural person.

## **THE SETTLEMENT BENEFITS**

## **7. What can I get from this Settlement?**

If approved by the Court, the Defendant will pay \$900,000 (the “Settlement Fund”) to resolve the Action. After deducting court-approved attorneys’ fees and costs, the Service Award payment, and Administrative Expenses, the balance will be used to provide Settlement Benefits.

Settlement Class Members may file a Claim Form to receive either (i) Cash Payment A – Documented Loss Payment or (ii) Cash Payment B – Alternative Cash Payment, as described below. Settlement Class Members may also choose to receive Expanded Identity Theft and Fraud Monitoring.

Any funds remaining after all payments have been made to Settlement Class Members who make a claim will be distributed to a *cy pres* recipient mutually agreed upon by the parties to the lawsuit and approved by the Court.

## **8. Tell me more about Cash Payment A – Documented Loss Payment.**

Settlement Class Members may choose to receive up to \$5,000 for reimbursement for out-of-pocket losses and expenses attributable to the Data Security Incident and time spent dealing with it. Documentation must be provided. Losses include:

- Long distance telephone charges.
- Cell phone minutes (if charged by the minute).
- Internet usage charges (if either charged by the minute or incurred solely as a result of the Data Security Incident).
- Costs of credit reports purchased between May 9, 2024 and the Claims Deadline.
- Documented costs paid for credit monitoring services and/or fraud resolution services purchased between May 9, 2024 and the Claims Deadline, provided Claimant provides sworn statement that the monitoring or service was purchased primarily because of the Data Security Incident and not for other purposes.
- Documented expenses directly associated with dealing with identity theft or identity fraud related to the Data Security Incident.
- Other Documented Losses incurred by Class Members that are fairly traceable to the Data Security Incident as determined by the Settlement Administrator.
- Any claim submitted by a Settlement Class Member for a Documented Loss Payment that is deemed by the Settlement Administrator to be deficient (and which cannot be cured after a reasonable period of time) will be deemed to be a claim for an Alternative Cash Payment, rather than be denied outright.

Settlement Class Members who make a claim for Cash Payment A can also choose to receive one year of Expanded Identity Theft and Fraud Monitoring.

## 9. Tell me more about Cash Payment B – Alternative Cash Payment.

As an alternative to Cash Payment A above, Settlement Class Members may submit a Claim Form to receive an Alternative Cash Payment (Cash Payment B). The exact amount of this payment will be determined based on the total number of valid Claim Forms submitted, this is called a *pro rata* distribution. Settlement Class Members who elect to receive an Alternative Cash Payment (Cash Payment B) are not eligible to receive any Documented Loss Payment (Cash Payment A) described in Section 8 above.

Settlement Class Members who make a claim for Cash Payment B can also choose to receive one year of Expanded Identity Theft and Fraud Monitoring.

## 10. Tell me more about Credit Monitoring.

In addition to one of the Cash Payments above, Settlement Class Members may also choose to receive one year of Expanded Identity Theft and Fraud Monitoring.

Class Members who choose to receive Expanded Identity Theft and Fraud Monitoring will receive a code to enroll in an identity theft and fraud monitoring program. The program will provide single bureau credit monitoring, lasting one year and offering up to \$1,000,000 in insurance for any losses due to fraud or identity theft during that time as well as access to a dedicated fraud/identity theft rehabilitation specialist. Settlement Class Members who accepted the Defendant's original offer of identity theft and fraud monitoring are entitled to an additional year of monitoring if they claim this benefit.

The cost of the Expanded Identity Theft and Fraud Monitoring (but not the Defendant's original offer of monitoring) will be paid from the Settlement Fund. Class Members will not need to supply any documentary proof to select this option.

## 11. What claims am I releasing if I stay in the Settlement Class?

Unless you opt out of the Settlement, you cannot sue, continue to sue, or be part of any other lawsuit against the Defendant or Released Parties about any of the legal claims this Settlement resolves. The Release section in the Settlement Agreement describes the legal claims that you give up if you remain in the Settlement Class. The Settlement Agreement can be found at [www.DatavantDataIncidentSettlement.com](http://www.DatavantDataIncidentSettlement.com).

## **HOW TO GET SETTLEMENT BENEFITS – MAKING A CLAIM**

## 12. How do I submit a Claim Form and get Settlement Benefits?

You must submit a completed Claim Form online by **August 18, 2026 at 11:59 p.m. MT** at [www.DatavantDataIncidentSettlement.com](http://www.DatavantDataIncidentSettlement.com), or postmarked by **August 18, 2026** and mailed to the Settlement Administrator at:

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

### **13. When will I get the Settlement Benefits?**

Settlement Benefits will be paid after the Settlement is “finally approved” and any challenges to that approval are finally resolved. The Court is scheduled to hold a Final Approval Hearing on **September 4, 2026, at 11:00 a.m. local Arizona time**, to decide whether to approve the Settlement, how much in attorneys’ fees and costs to award to Class Counsel for representing the Settlement Class, and whether to approve a Service Award to the Class Representative who brought this Action on behalf of the Settlement Class.

If the Court approves the Settlement, there may be appeals. It is always uncertain whether appeals will be filed and, if so, how long it will take to resolve them. Settlement Benefits will be distributed as soon as possible, if and when the Court grants Final Approval of the Settlement and after any appeals are resolved.

## **THE LAWYERS REPRESENTING YOU**

### **14. Do I have a lawyer in this Case?**

Yes, the Court appointed John J. Nelson of Milberg Coleman Bryson Phillips Grossman, PLLC and Cristina Perez Hesano of Perez Law Group, PLLC as Settlement Class Counsel. You will not be charged directly for these lawyers; instead, they will receive compensation from the Settlement Fund (subject to Court approval).

If you want to be represented by your own lawyer, you may hire one at your own expense.

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

It is not necessary for you to hire your own lawyer because Settlement Class Counsel works for you. If you want to be represented by your own lawyer, you may hire one at your own expense.

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

Settlement Class Counsel will ask the Court to approve attorneys’ fees of up to 35% of the Settlement Fund (i.e., \$315,000), plus reimbursement of any litigation expenses and reasonable costs, not to exceed \$30,000.

Settlement Class Counsel will also ask the Court to approve up to a \$2,500 Service Award payment to the Class Representative for bringing and settling the case.

## **EXCLUDE YOURSELF FROM THE SETTLEMENT**

### **17. How do I opt out of the Settlement?**

If you do not want to receive any benefits from the Settlement, and you want to keep your right to separately sue the Defendant about the legal issues in this case, you must take steps to exclude yourself from the Settlement Class. This is called “opting out” of the Settlement Class. The deadline to opt out of the Settlement by submitting a “Request for Exclusion” is **July 20, 2026**.

To exclude yourself from the Settlement, you must submit a written Request for Exclusion to the Settlement Administrator that includes the following information:

- A statement indicating that you want to be excluded from the Settlement Class, such as, “I hereby request to be excluded from the proposed Settlement Class in *“Bill Jackson v. Ciox*

*Health LLC d/b/a Datavant Group, No. CV2025-062690 .”*

- You must provide your name, address, telephone number and Settlement Class Member ID number (from the front of the mailed Postcard Notice) identify any lawyer representing the Settlement Class Member seeking to opt out, if any; and your physical signature.
- If you do not know your Settlement Class Member ID number, please contact the Settlement Administrator through the “Contact Us” form on the Settlement Website ([www.DatavantDataIncidentSettlement.com](http://www.DatavantDataIncidentSettlement.com)) or through the mailing address below.

Your request for exclusion must be mailed to the Settlement Administrator at the address below, postmarked no later than **July 20, 2026**.

*Datavant Data Security Incident Litigation*  
c/o Kroll Settlement Administration LLC  
ATTN: Request for Exclusion  
P.O. Box 5324  
**New York, NY 10150-5324**

### **OBJECT TO THE SETTLEMENT**

#### **18. How do I tell the Court if I do not like the Settlement and want to object to it?**

If you are a Settlement Class Member, you can choose (but are not required) to object to the Settlement if you do not like it or a portion of it, whether that be to the Settlement Benefits, the request for attorneys’ fees and costs, the Service Award payment, the Releases provided to the Defendant, or some other aspect of the Settlement. Through an objection, you give reasons why you think the Court should not approve the Settlement.

Objections must be filed with the Court and must include:

- your full name, current mailing address, telephone number, and email address (if any);
- include proof that you are part of the Settlement Class by providing a copy of the Settlement Notice or copy of the original notice of the Data Security Incident;
- provide the specific factual and legal grounds for the objection;
- shall state whether it applies only to the objector, to a specific subset of the class, or to the entire class
- identify all counsel representing the Settlement Class Member, if any;
- include a list, including case name, court, and docket number, of all other cases in which the objector and/or the objector’s counsel has filed an objection to any proposed class action settlement in the past five (5) years; and
- contain a statement regarding whether the Settlement Class Member (or counsel of his or her choosing) intends to appear at the Final Approval Hearing
- your signature (an attorney’s signature is not sufficient).

All objections must filed with the Court by **July 20, 2026**.

**19. What is the difference between objecting and opting out?**

Objecting is telling the Court that you do not like something about the Settlement. You can object to the Settlement only if you do not exclude yourself from it. Excluding yourself from the Settlement means telling the Court you do not want to be part of the Settlement. If you exclude yourself or opt out of the Settlement, you cannot object to it because the Settlement no longer affects you.

**THE COURT’S FINAL APPROVAL HEARING**

**20. When is the Court’s Final Approval Hearing?**

The Court is scheduled to hold a Final Approval Hearing on **September 4, 2026 at 11:00 a.m. MT**, virtually, to decide whether to approve the Settlement, Class Counsel’s request for attorneys’ fees and costs, and the Service Award to the Class Representative who brought this Action on behalf of the Settlement Class. The date and time of this hearing may change without further notice. Please check [www.DatavantDataIncidentSettlement.com](http://www.DatavantDataIncidentSettlement.com) for updates.

**21. 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 file an objection, you may, but you do not have to come to the Final Approval Hearing to talk about it. If you file your written objection on time and in accordance with the requirements above, the Court will consider it. You may also pay your own lawyer to attend, but it is not necessary.

**IF YOU DO NOTHING**

**22. What happens if I do nothing at all?**

If you are a Settlement Class Member and you do nothing, you will give up your right to start a lawsuit, continue a lawsuit, or be part of any other lawsuit against the Defendant and the Released Parties, as defined in the Settlement Agreement, about the legal issues resolved by this Settlement. In addition, you will be bound by the Release in the Settlement and not be eligible to receive any Settlement Benefits.

**GETTING MORE INFORMATION**

**23. How do I get more information?**

This Notice summarizes the proposed Settlement. Complete details are provided in the Settlement Agreement. The Settlement Agreement and other related documents are available at the Settlement Website, [www.DatavantDataIncidentSettlement.com](http://www.DatavantDataIncidentSettlement.com).

If you have additional questions or need to update your address, you may contact the Settlement Administrator by phone at (833) 754-9441 or by mail at

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

**PLEASE DO NOT CONTACT THE COURT OR DEFENDANT.**