

SHORT FORM PRE-APPROVAL NOTICE

QUEBEC AUDI PRIVACY CLASS ACTION

AUTHORIZATION AND PROPOSED SETTLEMENT NOTICE

Important Legal Notice of a Class Action Authorization and Proposed Settlement

Detailed information, the Long Form (detailed) version of this notice, and updates are available on the Settlement Website at the following address:

<https://AudiPrivacySettlementQC.ca/>.

If you were a former, current, or prospective Audi Canada customer before June 2021, and/or if you received a notice from Audi Canada in or around June 2021 informing you that your personal information may have been compromised in a data incident, your rights may be affected by an authorized class action and proposed settlement.

(Sciscente v. Audi Canada Inc., 500-06-001152-210)

You do not have to do anything and you do not have to pay anything at all in order to participate in the Class Action and/or the proposed Settlement.

On August 1, 2022, the Superior Court of Quebec authorized the bringing of the class action against Audi Canada Inc. (“**Audi**”) further to an alleged data breach of personal information which occurred at some point between August 2019 and May 2021 (the “**Class Action**”).

Although Audi denies any wrongdoing or liability, a proposed settlement was reached with the Plaintiff for the resolution of all claims pertaining to the Class Action (the “**Settlement**”), subject to approval of the Superior Court of Quebec (the “**Court**”). To fully settle and release the Class Action and all claims related to the Incident, Audi has agreed to pay an amount of CAD \$240,000 into a settlement fund, and agreed to also pay for all costs and expenses required to implement the Settlement.

The proposed Settlement provides for the following benefits for the Settlement Class Members (see below) in exchange for a full release of claims against Audi and other related entities:

- a) First, the reimbursement of out-of-pocket losses, costs, and/or unreimbursed expenses flowing from the Incident and/or from receipt of the Audi notice about the Incident, up to a maximum of CAD **\$5,000** per claimant;
- b) Second, and if funds remain, a cash payment of up to CAD **\$200** per claimant.

If the total dollar amount of the claims under the proposed Settlement exceeds the Settlement fund, the value of the claims to be paid to each beneficiary will be proportionally reduced.

You are included in the class action if you reside in Quebec and (a) your personal or financial information held by Audi was compromised in a data breach (data incident) which occurred on or before March 10, 2021, or (ii) you received an email or letter from Audi, dated on or about June 11, 2021, informing you of such a data breach.

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Audi's records indicate that you are captured by the Class Action and affected by this notice.

If you do nothing you will be bound by this Class Action and the proposed Settlement if it is approved by the Court. You may Opt-Out of the Class Action (and therefore the Settlement) by April 30, 2025, at 11:59 PM Eastern Time. This is the only opportunity for class members to opt out (exclude themselves).

Please visit the Settlement Website at <https://AudiPrivacySettlementQC.ca/> or contact the Settlement Administrators at the address below for a full copy of the Settlement Agreement and to obtain more information about:

- a) The benefits of the proposed Settlement;
- b) The approval process of the Settlement before the Court and the hearing scheduled for that purpose;
- c) How to attend hearing and/or make comments on the Settlement, as the case may be. **You do not have to attend the hearing but you may do so if you wish;**
- d) How to formulate a claim if the Settlement is approved by the Court;
- e) How to opt-out of the Class Action (and Settlement), if you so choose;
- f) The legal fees for the lawyers advancing the Class Action. **You will not be asked to pay anything at any time.**

A hearing to consider the approval of the Settlement, the benefits for the Settlement Class Members and the approval of Class Counsel Fees will be heard on May 1, 2025 before the Superior Court of Quebec in Montreal, either in person in room 15.04, at 9:15 AM, or by virtual conferencing at the following coordinates:

[Link to virtual hearing](#)

Another notice will be published and additional information will be provided if the Settlement is approved by the Court, including how and the deadline to file a claim under the Settlement.

FOR MORE INFORMATION on the status of the approval hearing or on how to opt out of the Class Action, comment or object to the proposed Settlement, or to view the Settlement Agreement and a list of other definitions that apply to this Notice, visit the Settlement Website at <https://AudiPrivacySettlementQC.ca/>, which will be periodically updated with information on the Settlement approval process and the Class Action.

The lawyers advancing the Class Action are Lex Group Inc. and can be reached at:

Mtre. David Assor
LEX GROUP INC.
4101 Sherbrooke St. West
Westmount (Quebec) H3Z 1A7
Phone: 514 451-5500 (ext. 101)
Email: davidassor@lexgroup.ca

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The Settlement Administrator is Concilia Services Inc. and can be reached at:

Concilia Services Inc.

1-5900 Andover Avenue
Montreal, Quebec, H4T 1H5
Phone: 1-888-770-6892

Email: AudiPrivacySettlementQC@conciliainc.com

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**The communication of this notice has been approved by the Superior Court
of Quebec.**