

NOTICE OF A SETTLEMENT APPROVAL
IN THE QUÉBEC CLASS ACTION AGAINST SYMANTEC CORPORATION.

Carrière v. Symantec Corporation
Court File Docket No. 500-06-000894-176

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

PURPOSE OF THIS NOTICE

You are receiving this Notice because you may be part of an authorized class action brought by Michel Carrière (the “**Plaintiff**”) in the Superior Court of Québec against Symantec Corporation (“**Symantec**”, now Gen Digital Inc. (“**Gen Digital**”) or the “**Defendant**”), bearing Court File No. 500-06-000894-176 (the “**Québec Class Action**”). The parties have reached a settlement (the “**Settlement**”), and the Settlement was approved by the Québec Superior Court on February 29, 2024.

This Notice describes the Settlement in greater detail, including who it applies to, the details of the Settlement, and the process by which Class Members will be compensated.

THE QUÉBEC CLASS ACTION

The Québec Class Action alleges that between July 24, 2010 and June 27, 2016 (the “**Class Period**”), certain Norton antivirus products licensed by Symantec (*Norton™ Antivirus*, *Norton™ Internet Security*, *Norton™ Security*, *Norton™ Security with Backup*, *Norton 360™* or *Norton™ One*) (collectively, the “**Norton Products**”) contained security vulnerabilities and design defects which reduced their utility and caused threats to computer systems.

The Class comprises: all natural persons resident in Québec at the time they purchased and/or licensed, for purposes other than their business, any of the Norton Products at any time between July 24, 2010 and June 27, 2016 (the “**Class Period**”).

TERMS OF THE SETTLEMENT

The detailed terms of the Settlement are set out in the settlement agreement between the parties (the “**Settlement Agreement**”). A copy of it can be found at <https://kklex.com/> or <https://nortonproductsettlement.com/>. A copy can also be obtained by contacting Class Counsel. This Notice contains a summary of some of the terms of the Settlement Agreement. If there is a conflict between this Notice and the Settlement Agreement, the terms of the Settlement Agreement shall prevail.

Under the Settlement, the Defendant will provide certain benefits to Class Members. Each Class Member will be entitled to choose one of the two following options by submitting a Claim:

Option 1: a \$5 CAD payment plus either a 90-day Free Licence valued at \$7.50 CAD or a Discount Code for the value of \$7.50 CAD to be applied toward the purchase of another Norton brand product sold by Gen Digital.

OR

Option 2:

- (a) Class Members who had a licence for less than three (3) years during the Class Period: either a 180-day Free Licence valued at \$15 CAD or a Discount Code for the value of \$15 CAD to be applied toward the purchase of another Norton brand product sold by Gen Digital.
- (b) Class Members who had a licence for three (3) years or more during the Class Period: either a 365-day Free Licence valued at \$30 CAD or a Discount Code for the value of \$30 CAD to be applied toward the purchase of another Norton brand product sold by Gen Digital.

The Defendant will pay \$6,000,000 CAD to establish a fund that will be used to make the \$5 CAD payments to Class Members who choose Option 1 in the Québec Class Action and the Ontario Class Action (the “**Settlement Fund**”). If a portion of the Settlement Fund remains unclaimed and undistributed by the Claims Deadline, Class Members who chose Option 1 and who held licences of the Norton Products for two (2) years or more during the Class Period shall receive additional cash payments pro rata, up to a maximum of \$5 CAD for each full year licence purchased during the Class Period.

Class Members who currently have an Account with Gen Digital and who do not submit a Claim Form in accordance with Option 1 shall be deemed to have chosen, and shall automatically receive, Option 2 ((a) or (b)).

The Defendant will provide Free Licences or Discount Codes to Class Members ranging from \$7.50 CAD to \$30 CAD depending on the compensation option that a Class Member selects and the length of time for which the Class Member licensed a Norton Product during the Class Period. The Defendant will pay the costs of the administration of the Settlement.

SUBMITTING A CLAIM

Class Members who do not submit a Claim Form in accordance with Option 1 and currently have an Account with Gen Digital will automatically receive a Discount Code according to Option 2 ((a) or (b), as the case may be), by email to their last known email address associated with their Account.

Class Members who wish to opt for Option 1 or Class Members who no longer have an Account with Gen Digital or want to provide a different email address to receive their benefits shall submit a Claim Form with the Claims Administrator, RicePoint Administration Inc. by no later than **July 30, 2024** (the “**Claims Deadline**”).

You can complete a Claim Form by clicking [here](#).

YOUR RIGHTS

If you are part of the Class, then you are bound by the Settlement Agreement. As a result, you have released any legal claim that you may have against Symantec Corporation for the same subject matter of the Québec Class Action.

FOR FURTHER INFORMATION

For more information and to obtain a complete copy of the terms of the Settlement, you can access the following website: <https://kklex.com>. If you have any questions, you can contact Class Counsel, the law firm Kugler Kandestin LLP, by mail, email or telephone.

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This Notice was approved by the Superior Court of Québec.