

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

Lawrence, et al. v. Symantec Corporation

Court File Docket No. CV-16-562278-00CP

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 a certified class action brought by Ryan Lawrence and Florence Fazari (the “**Plaintiffs**”) against Symantec Corporation (“**Symantec**”, now Gen Digital Inc. (“**Gen Digital**”) or the “**Defendant**”) in the Ontario Superior Court of Justice, bearing Court File No. CV-16-562278-00CP (the “**Ontario Class Action**”). The parties have reached a settlement (the “**Settlement**”), and the Settlement was approved by the Ontario Superior Court on May 6, 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 ONTARIO CLASS ACTION

The Ontario 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.

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://investigationcounsel.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. The Defendant will pay \$6,000,000 CAD to establish a fund that will be used to satisfy claims by Class Members in both the Ontario Class Action and the Québec Class Action (the “**Settlement Fund**”). Specifically, the Settlement Fund will be used to make the \$5 CAD payments to Class Members in both the Ontario Class Action and the Québec Class Action who choose to receive compensation in the form of cash or credit card reimbursement. The Defendant will also provide Free Licences or Discount Codes to Class Members with varying values (from \$7.50 CAD to \$30 CAD) depending on the compensation option they select and the length of time for which they had licences for Norton Products during the Class Period. The Defendant will pay the costs of the administration of the Settlement. 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 Ontario Class Action and the Québec 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 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**”).

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.

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

If you do not submit a Claim Form before the Claims Deadline, then you may not receive any payment in respect of this Settlement.

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 for the same subject matter of the Ontario 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://investigationcounsel.com/>. If you have any questions, you can contact Class Counsel, the law firm Investigation Counsel, by mail, email or telephone:

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This Notice was approved by the Ontario Superior Court of Justice.