

In re LastPass Canadian Consumer Privacy Class Action

LONG-FORM NOTICE OF SETTLEMENT APPROVAL

Please read this notice carefully. A settlement may affect your legal rights.
You may have to take prompt action.

This notice is directed to: All individuals and entities residing or domiciled in Canada whose Private Information was accessed by unauthorized parties in, during or as a result of the Data Breach. For the purposes of this definition, Private Information means the Defendants' customer data that was compromised in the Data Breach, and it includes the following information: (a) company names; (b) end-user names; (c) billing addresses; (d) email addresses; (e) telephone numbers; (f) the IP addresses from which customers were accessing the LastPass service; and (g) the backup of customer vault data. For the purposes of this definition, Data Breach means the data breach that affected the Defendants' computer systems and networks in 2022 and resulted in the compromise of customer data, which was reported on by the Defendants in or between August 2022 and March 2023.

(hereinafter, "**Class**" or "**Class Members**")

IMPORTANT DEADLINE TO FILE A CLAIM FOR COMPENSATION

Claims Bar Deadline (to file a claim for compensation): 11:59 p.m. Pacific Time on **June 23, 2026**.

PURPOSE OF THIS NOTICE

The purpose of this notice is to advise Class Members of the approval of the settlement of the class proceeding brought on behalf of Class Members.

THE ACTION AND CLASS CERTIFICATION

On February 8, 2023, a class action was filed ("**Action**") in the Supreme Court of British Columbia on behalf of Canadian customers of LastPass who were allegedly affected in a data security breach that was initially reported by LastPass in August 2022 ("**Data Breach**"). The defendants in this class action are GoTo Technologies USA, Inc., LastPass US LP, GoTo Technologies Canada Ltd., and LastPass Technologies Canada ULC (collectively, and for convenience of reference, the "**Defendants**").

On September 22, 2025, the Supreme Court of British Columbia certified the Action as a class action for settlement purposes.

SETTLEMENT APPROVAL

On September 10, 2025, the Plaintiffs and the Defendants have executed a Settlement Agreement providing for the settlement of the Action (“**Settlement**”). The Settlement Agreement provides for the payment of US\$3,000,000 (“**Settlement Amount**”) in full and final settlement of the claims advanced against the Defendants in this class action. The Settlement Amount includes all legal fees, disbursements, taxes, and administration expenses.

The Settlement provides that the claims of all Class Members asserted or which could have been asserted in the Action will be fully and finally released, and the Action will be dismissed. The Settlement is not an admission of liability, wrongdoing or fault on the part of the Defendants, all of whom have denied, and continue to deny, the allegations against them. On February 18, 2026, the Supreme Court of British Columbia approved the Settlement and ordered that it be implemented in accordance with its terms.

This Canadian proceeding is distinct and independent of the proceeding brought and pending in the United States District Court, District of Massachusetts, Action No. 22-12047. The Settlement is NOT available to persons or entities other than Canadian-resident users of LastPass.

The Court also awarded Hammerco Lawyers LLP and KND Complex Litigation (“**Class Counsel**”) total legal fees of USD\$1,000,000, plus disbursements of CAD\$63,192.87, plus HST, GST and/or PST (“**Class Counsel Fees**”). As is customary in such cases, Class Counsel conducted the class action on a contingency fee basis. Class Counsel was not paid as the matter proceeded and funded the expenses of conducting the litigation. Class Counsel Fees will be deducted from the Settlement Amount before it is distributed to Class Members.

Expenses incurred or payable relating to approval, notification, implementation and administration of the Settlement (“**Administration Expenses**”) will also be paid from the Settlement Amount before it is distributed to Class Members.

The Court also approved the payment of honoraria to the Plaintiffs in the amount of CAD\$5,000 each. The honoraria will be deducted from the Settlement Amount before it is distributed to Class Members.

CLASS MEMBERS’ ENTITLEMENT TO COMPENSATION

Pursuant to the Court order approving the Settlement, claims of Class Members which were or could have been asserted in the Action are now released and the Action has been dismissed. Class Members may not pursue individual or class actions for those claims, whether or not they submit a claim for compensation from the Settlement. **The Settlement therefore represents the only means of compensation available to Class Members in respect of the claims raised in the Action.**

For instructions on how to submit a claim for compensation from the Settlement, refer to the previously-issued notice of certification and settlement approval hearing, which is available at: <https://knd.law/class-actions/lastpass/> and <https://hammerco.ca/services/class-actions/current-cases/last-pass-data-breach/>. To be eligible for compensation under the Settlement, your Claim Form must be postmarked or received by the Administrator by no later than 11:59 pm Pacific Time on **June 23, 2026**.

After deduction of Class Counsel Fees, Administration Expenses and the approved honorarium, the balance of the Settlement Amount ("**Net Settlement Amount**") will be distributed to Class Members in accordance with the Plan of Allocation approved by the Court (the capitalized terms used in below have the meanings attributed to them in the Plan of Allocation).

The Plan of Allocation provides for objective criteria to validate and determine each Eligible Class Member's Compensable Loss, and provides for a mechanism to distribute the Settlement Distribution Fund amongst the Eligible Class Members.

The Eligible Class Members are comprised of two categories:

- a) the Eligible Crypto Claimants, who would be submitting valid Claim Forms in relation to a Crypto Claim; and
- b) the Eligible Ordinary Claimants, who would be submitting valid Claims Forms in relation to Ordinary Claims. An Eligible Crypto Claimant may also submit the Claim Form with respect to Ordinary Claims.

The Plan of Allocation initially creates a fund totalling CAD\$1.4 million, which is referred to as the Crypto Claims Distribution Fund.

The Claims Administrator shall validate and determine the amount of each Eligible Crypto Claimant, which is calculated based on the total amount of alleged Crypto-asset loss multiplied by 0.046875 (or, 4.6875%), taking into account the risks associated with the continued litigation of this type of claim. Then the Claims Administrator shall aggregate the Eligible Crypto Claimants' Crypto Claims. If the amount of the aggregate value of these claims is more than CAD\$1.4 million, the Claims Administrator shall pro rate the available funds amongst the Eligible Crypto Claimants. If the amount of the aggregate value of these claims is less than CAD\$1.4 million, the Claims Administrator shall pay the Eligible Crypto Claimants' Compensable Loss in full, and it will then remit the balance remaining in the Crypto Claims Distribution Fund into the Settlement Distribution Fund, which will form the Ordinary Claims Distribution Fund.

The Plan of Allocation will allow any Eligible Ordinary Claimant to make a claim with respect to two matters, as follows:

- a) **First**, wasted time spent to address the consequences of the Data Breach. On average, a person is presumed to spend approximately 5 hours to address the immediate consequences of a Data Breach (in terms of researching the event and taking steps to protect themselves from the harms that may reasonably follow from a severe data breach). The Plan of Allocation allows each Eligible Ordinary

Claimant to claim compensation for up to 5 hours of wasted time, measured at CAD\$34.01 per hour (the average wage across Canada in 2023), or a total of CAD\$170.05. No supporting documentation would be required in relation to this kind of claim.

- b) **Second**, out of pocket expenses. The Plan of Allocation allows any Eligible Ordinary Claimant to submit the Claim Form in relation to out of pocket expenses reasonably incurred as a result of the Data Breach, for up to CAD\$500. For this type of claim, the Eligible Ordinary Claimant must provide documentation establishing that the expenses were incurred prior to May 31, 2023. The Claims Administrator must also be satisfied that the expense was reasonably connected to the Data Breach.

The Claims Administrator will aggregate the value of the claims submitted by the Eligible Ordinary Claimants, and will pro rate the Ordinary Claims Distribution Fund amongst the Eligible Ordinary Claimants.

In reaching the Settlement and designing the Plan of Allocation, Class Counsel has considered similar Canadian settlements, although not all arising from the same circumstances. Class Counsel must consider the information currently available and their best assumptions and judgment in forming a view regarding the Settlement. Class Counsel have closely reviewed the facts and circumstances in order to form the view that the Settlement, and the Plan of Allocation, as currently envisioned are fair, appropriate and in the best interests of the Class Members.

YOU HAVE TWO OPTIONS:

1. Submit a Claim Form:

Fill out a Claim Form online and submit it with supporting documentation by the deadline to apply for compensation.

2. Do Nothing:

Give up any right to compensation.

HOW TO MAKE A CLAIM

For further details and instructions regarding how to submit a Claim Form, please visit the Settlement Website at www.LastPassCanadianSettlement.ca.

COPIES OF THE SETTLEMENT DOCUMENTS

The Settlement Agreement and various other Court-approved documents set out the procedures applicable to the Settlement of the class action. The Settlement Amount, less administration costs, honorarium and lawyers' fees and disbursements, will be distributed to those who are eligible and submit a Claim Form and supporting documentation on a pro rata basis up to the value of their calculated loss, in accordance with the Court-

approved and supervised Plan of Allocation. The Plan of Allocation, Settlement Agreement, and other pertinent documents can be found at: <https://knd.law/class-actions/lastpass/> and <https://hammerco.ca/services/class-actions/current-cases/last-pass-data-breach/>.

ADMINISTRATOR

For further information about the claims process and any other inquires from class members, the Claims Administrator can be contacted at:

Concilia Services Inc.

Attn: LastPass

1-5900 Andover Avenue Montreal

Quebec, H4T 1H5

Email: LastPass@conciliainc.com

Phone: 1-888-851-0770

CLASS COUNSEL

Please note that Class Counsel are not the claims administrator and will not be addressing inquires with respect to the claims process.

Inquires for Class Counsel can be directed to:

Sage Nematollahi
KND Complex Litigation
sn@knd.law

Alexia Majidi
Hammerco Lawyers LLP
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INTERPRETATION

If there is a conflict between the provisions of this notice and the Settlement Agreement, the terms of the Settlement Agreement will prevail.

**THE SUPREME COURT OF BRITISH COLUMBIA HAS AUTHORIZED
DISTRIBUTION OF THIS NOTICE.**

**QUESTIONS ABOUT THIS NOTICE SHOULD BE DIRECTED TO THE
ADMINISTRATOR AND SHOULD NOT BE DIRECTED TO THE COURT OR CLASS
COUNSEL.**