

**NOTICE OF HEARING FOR THE APPROVAL OF A SETTLEMENT 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**").

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 Settlement must be approved by the Court before it is finalized.

As a Class Member, you have a right to take part in the approval hearing if you wish. The process for taking part in the approval hearing is set out below.

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.

The Class Action includes all individuals who, between July 24, 2010 and June 27, 2016, were located in the province of Ontario and, for personal, family or household purposes, and not for business purposes, (a) purchased or licensed one or more of the Norton Products through the websites www.norton.com or www.symantec.com, or (b) paid to renew a purchase or license of one or more of the Norton Products through an automatic renewal service provided by Symantec.

Symantec denies the allegations in the Ontario Class Action and maintains that none of the Norton Products contained vulnerabilities or design defects that reduced their utility or caused threats to computer systems. The Settlement is a compromise of disputed claims, without any admission of liability, wrongdoing or fault, on the part of the Defendant, or any admission of concessions on the part of the Plaintiffs.

A parallel class action for purchasers of the Norton Products in Quebec bearing Court File No. 500-06-000894-176 (the "**Quebec Class Action**") has also been settled as part of the Settlement, subject to the approval of the Quebec Superior Court.

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 www.nortonproductsettlement.com. A copy can also be obtained by contacting Class Counsel (see page 2). 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 payment plus either a 90-day free licence of "Norton AntiVirus Plus" ("**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 both the Ontario Class Action and the Quebec 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.

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.

At the hearing of the Application for Approval of the Settlement, Class Counsel will also seek Court approval of their share of the legal fees payable by the Defendant as per the Settlement for their work on this class action over the past seven (7) years.

Specifically, subject to the Court's approval, Class Counsel in the Ontario and Quebec Class Action will collectively receive \$5,040,000 CAD plus applicable taxes (calculated at the date of payment), over and above the Settlement Benefits paid to Class Members.

In addition, the Defendant will pay \$172,000 CAD to Ontario Class Counsel and \$192,393.92 CAD to Quebec Class Counsel for disbursements, inclusive of taxes.

HEARING FOR APPROVAL OF SETTLEMENT

The Settlement is subject to Court approval. A motion to approve the Settlement will be heard on May 6, 2024, at 10:00 a.m. (EST) via Zoom by videoconference. Instructions for viewing the hearing remotely will be posted on the website of Class Counsel (www.investigationcounsel.com) and on the website of the Class Administrator www.nortonproductsettlement.com.

At the hearing of the motion, the Court will determine whether the terms of the Settlement are fair and reasonable and in the best interests of the Class. The Plaintiffs and Class Counsel believe that the Settlement is fair, reasonable and in the best interests of the Class. If the Court is satisfied with the fairness of the Settlement, it will be approved.

Members of the Class and the public may attend the approval motion hearing, but are not required to do so. Class Members are entitled, but not obligated, to express their opinions about the Settlement and whether or not it should be approved at the motion hearing.

If Class Members wish to make a written submission to the Court, they must deliver written submissions to Class Counsel at the address below, no later than May 1, 2024 so that it can be brought to the attention of the Court and the Parties in advance. Any written submissions must include:

- The Court (Ontario Superior Court) and Court Docket Number of the Class Action (CV-16-562278-00CP);
- Your name and contact information;
- A brief statement of the reasons why you support or oppose the Settlement;
- Your email address, if any, associated with the account held with the Defendant for your licence of the Norton Products; and
- Confirmation of whether you intend to attend the Settlement Approval Hearing.

Please note that any written submissions will NOT be confidential, and they will be shared with the Defendant and filed publicly with the Court.

If, following the hearing, the Settlement is approved, Class Members will receive another notice that will notify them of the Settlement approval, provide information about how they can submit a Claim, and indicate the Claims Deadline.

FOR FURTHER INFORMATION

For more information and to obtain a complete copy of the terms of the Settlement, you can access the following website: www.nortonproductsettlement.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.