

**NOTICE OF SETTLEMENT APPROVAL HEARING AND OPT-OUT
Regarding General Motors Financial of Canada, Ltd.**

Did you receive notice in 2015 from General Motors Financial of Canada, Ltd. (formerly FinanciaLinx Corporation) advising about a disclosure of your personal information?

IF YES, YOUR LEGAL RIGHTS WILL BE AFFECTED.

WHAT IS THIS NOTICE ABOUT?

This Notice is directed to all persons who provided personal information to General Motors Financial of Canada, Ltd. or its predecessor, FinanciaLinx Corporation, (“**GM Financial**”) while obtaining automobile financing solution services and who received notice from GM Financial informing them in 2015 of a data breach (the “**Class**” or “**Class Members**”).

This Notice concerns the proposed settlement of a class action lawsuit (the “**Settlement**”) that was commenced against GM Financial and other individuals in the Ontario Superior Court of Justice (the “**Court**”). The action alleges that from approximately 2012 to 2015, a customer relations employee at GM Financial inappropriately accessed customer files to collect the personal information of approximately 2,200 customers. The action further alleges that the employee disseminated or sold the customer information in an identity theft scheme.

The Settlement is a compromise of disputed claims and is not an admission of liability, wrongdoing, or fault on the part of GM Financial, which has disputed, and continues to dispute, the allegations advanced in the class action.

The Court certified this case as a class proceeding for the purposes of settlement on March 24, 2026.

If you received notice of a data breach from GM Financial in 2015, you are a member of the Class. If you are not sure whether or not you are a member of the Class, you should speak to Class Counsel, whose address is provided below.

THE PROPOSED SETTLEMENT

The parties have entered into a Settlement. In order for the Settlement to become effective, it must be approved by the Court. The Settlement provides up to \$898,930 (the “**Settlement Amount**”) in total compensation to settle the claims of the Class Members, including Class Counsel Fees and Disbursements, Administrative Expenses and an honorarium for the representative plaintiff, in return for a release and a dismissal of the class action. If you would like a copy of the Settlement Agreement, it is available at www.GMFinancialClassAction.com, or a copy can be obtained by contacting Class Counsel as listed below.

Under the Settlement, you may be eligible for compensation if you demonstrate that you are a Class Member. The amount of compensation that you may be eligible for will depend on whether

you suffered provable identity theft from 2012 to 2015 as a result of the data breach, and the amount of harm that you suffered. Class Members who suffered Identity Theft (as defined in the Settlement Agreement) (“**Group 1 Claimants**”) and who submit a claim may be entitled to up to \$12,000 in compensation as follows:

- 1) up to \$7,000 if they provide evidence to establish that they suffered Identity Theft (as defined in the Settlement Agreement) between 2012 and 2015 as a result of the data breach; and
- 2) up to \$5,000 for documented Out of Pocket Expenses (as defined in the Settlement Agreement) that a Class Member actually incurred.

All eligible Class Members who have not suffered provable Identity Theft (as defined in the Settlement Agreement) will be compensated a nominal payment of up to \$85 (“**Group 2 Claimants**”).

Included in the Settlement Amount is the value of one year of credit monitoring and identity theft insurance, which has already been provided and paid for by GM Financial. Any compensation payable to eligible Class Members will be paid out of Net Settlement Proceeds (as defined in the Settlement Agreement) and, in accordance with the Settlement Agreement, Group 1 Claimants will be paid in priority to Group 2 Claimants to the maximum amounts contemplated under the Settlement Agreement and the amounts paid may be proportionately reduced in accordance with the Settlement Agreement. Any unclaimed amounts from the Net Settlement Proceeds will be donated to Pro Bono Ontario.

You cannot make a Claim until after the Settlement is approved. If the Settlement is approved, further notice of the Settlement will NOT be given. You should monitor the Settlement Website at www.GMFinancialClassAction.com and check it regularly for the latest information on the status of the Settlement and the details and deadline for making a Claim.

If you have suffered provable identity theft from 2012 to 2015 as a result of the data breach, please contact Class Counsel as soon as possible at the e-mail address provided below.

OPTING OUT IF YOU DO NOT WISH TO PARTICIPATE IN THIS CLASS ACTION

If you fall within the Class definition, you are automatically included in the Class, and you will be bound by the Settlement if it is approved by the Court, unless you choose to exclude yourself by opting out. If you opt out, you will not be a Class Member, and you will not be eligible to participate in any settlement approved by the court.

If you do not want to be part of the class action lawsuit, you can exclude yourself by “opting out” from the class action. To do so, you must email a request to opt-out or a fully completed Opt-Out Form to info@gmfinancialclassaction.com, on or before May 31, 2026. A copy of the Opt-Out Form can be found at www.GMFinancialClassAction.com.

If you opt out, you will not be eligible to receive any settlement benefits from the class action but you will have the right to start an action against GM Financial over the legal issues in the lawsuit on your own. However, if you do so, you will have full responsibility to take all legal steps to protect any claim(s) you may have, including addressing any relevant limitation periods. If you choose to pursue any legal action on your own, it will be at your own expense, including lawyers' fees and any risk of adverse legal costs against you personally should you not succeed.

If you wish to participate in the class action, you do not need to do anything at all, and in particular, you do not need to opt-out.

SETTLEMENT APPROVAL HEARING

The Court will hold a virtual Settlement Approval Hearing at the courthouse at 161 Elgin Street, Ottawa, Ontario on Tuesday, July 14, 2026 at 10:00 a.m. ET to consider whether the proposed Settlement is fair, reasonable and in the best interests of the Class (the “**Settlement Approval Hearing**”). Class Members and members of the public may attend the virtual Settlement Approval Hearing but are not required to do so. The details on how to attend remotely will be posted to www.GMFinancialClassAction.com.

As a Class Member, you are entitled, but not obligated, to express your opinions about the proposed Settlement and whether it should be approved. If you wish to make a submission to the Court supporting or objecting to the proposed Settlement, you must send your submissions in writing by email to the Claims Administrator, at info@gmfinancialclassaction.com, and ensure they are received no later than May 31, 2026. The Claims Administrator will provide all submissions to the Court and the parties in advance of the Settlement Approval Hearing. Your written submissions should include:

- your name, address and telephone number;
- a brief statement of the reasons that you support or oppose the proposed Settlement terms; and
- whether you plan to attend the Settlement Approval Hearing.

HOW MUCH WILL THIS COST?

Class Members do not have to pay any legal fees or court costs out-of-pocket. Class Counsel will only be paid on a contingency fee basis, meaning that they will only be paid if the settlement is approved or, if the settlement is not approved but the class action succeeds at trial. The Plaintiff and Class Counsel have agreed to a contingency fee of 30% of the total amount recovered for the Class Members, but the Court will decide what fees are fair and reasonable to be paid, once the case is resolved.

ADMINISTRATION COSTS AND LEGAL FEES

The Court will be asked to approve payment of the following costs out of the Settlement Amount: (a) The costs of providing notice and administering the settlement; and (b) legal fees, plus disbursements and taxes. In no case, however, shall the collective amount of administrative

costs, legal fees, disbursements, and taxes exceed \$325,000. Class Counsel will also be asking that the Court approve an honorarium of \$2,000 to be awarded to the Plaintiff in recognition of his role in this litigation (the “**Honorarium**”).

SUBMIT YOUR EMAIL ADDRESS FOR E-TRANSFER PAYMENT

Class Members are encouraged to provide their current email address to the Claims Administrator at info@gmfinancialclassaction.com. Submitting an email address will allow your payment to be sent quickly and securely via Interac e-Transfer, if preferred, and will help avoid delays or issues with regular mail.

WHAT IF I HAVE MORE QUESTIONS?

More information on the case is available at www.GMFinancialClassAction.com along with the Statement of Claim, the Order certifying the action, and other Court Documents.

For questions regarding this Notice or the proposed Settlement, please contact Class Counsel as follows:

Spiteri & Ursulak LLP
1010-141 Laurier Avenue West
Ottawa, ON
K1P 5J3

Norman Mizobuchi
Tel: 613-563-1010
E-mail: nm@sulaw.ca

Please do not call GM Financial or the Court about this action.

INTERPRETATION

This Notice has been approved by the Court and contains a summary of some of the terms of the proposed Settlement. If there is a conflict between the provisions of this Notice and the Settlement Agreement, the Settlement Agreement shall prevail.

THIS NOTICE WAS APPROVED BY THE ONTARIO SUPERIOR COURT OF JUSTICE.