## Individuals who were notified by Einstein Healthcare Network that their Personal Identifiable Information ("PII") or Protected Health information ("PHI") was or may have been compromised in a Data Incident that occurred in August 2020 may be eligible for a payment from a class action settlement.

A Pennsylvania state court ordered this notice. This is not a solicitation from a lawyer.

A settlement has been reached with Einstein Healthcare Network ("Einstein") in a class action lawsuit about the data security incident ("the Data Incident") that occurred between August 5, 2020 and August 17, 2020. Einstein first announced the Data Incident on or about October 9, 2020 and began mailing notice letters to patients whose information was identified as compromised. Einstein sent an additional round of notice letters to affected individuals between January 21, 2021 and February 8, 2021. The lawsuit was filed asserting claims against Einstein relating to the Data Incident. Einstein denies all of the claims and says it did not do anything wrong.

**WHAT HAPPENED?** Plaintiffs allege that between August 5, 2020 and August 17, 2020, Einstein was the target of a Data Incident in which an unauthorized user accessed Einstein's employees' email accounts which contained your protected personally identifying information ("PII") and protected health information ("PII"). Plaintiffs allege that during this time an unauthorized user gained access to Plaintiffs' and Einstein's patients' PII and PHI, including, names, dates of birth, medical record and patient account numbers, health insurance information, and treatment information such as diagnoses, medications, providers, types of treatment, treatment locations, and in some instances, social security numbers.

**WHO IS INCLUDED? You received this notice because Einstein's records show you are a member of the Settlement Class.** The Settlement Class includes all residents of the United States whose PHI and/or PII was involved in the Data Incident who received notice of the settlement.

**SETTLEMENT BENEFITS.** All Settlement Class Members may elect to receive identity monitoring services through Experian Identity for a period of one year from the Effective Date of the settlement. You must file a Claim Form requesting services and, when the settlement becomes final, you will be provided an activation code for enrollment directly with Experian.

The settlement also provides cash reimbursement of up to \$20 per hour (for a maximum of 3 hours) as compensation for time lost dealing with the Data Incident, up to \$1,500 per person for documented "ordinary expenses" occurred in responding to the Data Incident, and up to \$7,500 per person for documented "extraordinary expenses" incurred in responding to the Data Incident. The total claims for lost time, ordinary expenses, and extraordinary expenses will be capped at \$1,500,000. If the total claims exceed the cap, the funds will be reduced and distributed proportionally.

Further detailed information about the settlement's benefits is available on the website: www.EinsteinIncidentSettlement.com.\_\_\_\_\_

**CLAIM FORM.** You must file a Claim Form to receive the Settlement Benefits. You can file a claim online at www.EinsteinIncidentSettlement.com, download a Claim Form at the website and mail it, or you may call 1-866-742-4955 and ask that a Claim Form be mailed to you. You need to use the ID and Password assigned to you to file a Claim Form. The last day to postmark or file a claim online, is August 6, 2022. To file a claim online, you must use the Login and Password provided below.

## LOGIN: XXXXXX PASSWORD:XXXXXX

Further instructions on how to file a claim are on the website.

**OTHER OPTIONS.** If you do not want to be legally bound by the settlement, you must exclude yourself by July 7, 2022. If you stay in the settlement, you must object to it by July 7, 2022. A more detailed notice is available to explain how to exclude yourself or object. Please visit the website www.EinsteinIncidentSettlement.com or call the toll-free number for a copy of the more detailed notice. On September 15, 2022, the Court will hold a hearing on whether to approve the settlement, Class Counsel's request for attorneys' fees and reasonable costs and expenses of up to \$375,000, and service awards for each of the four Representative Plaintiffs (up to \$1,500 each for Plaintiffs Nanette Katz, Christina Kreski, and Nghi Ta and up to \$1,000 for Britney Richardson, as parent guardian of S.H.). You or your own lawyer, if you have one, may ask to appear and speak at the hearing at your own cost, but you do not have to. Detailed information is available at the website and by calling the toll-free number below.

Questions? Call 1-866-742-4955 or visit www.EinsteinIncidentSettlement.com