

Notice of Proposed Class Action Settlement *Sequin v. SelectQuote Insurance Service*

This is not a solicitation from a lawyer.

Supreme Court of the State of New York, County of Nassau

- A proposed Settlement has been reached with SelectQuote Insurance Service (“Defendant”) over the alleged disclosure of personal information of Plaintiffs and members of the Settlement Class to at least Facebook and TikTok as a result of SelectQuote’s use of at least the Meta Pixel and TikTok Pixel on its website, www.selectquote.com (the “Website Usage Disclosure”).
- The Defendant agrees to make available up to Eight Million Two Hundred Fifty Thousand Dollars and No Cents (\$8,250,000.00) which shall be used by the Settlement Administrator to pay for: (i) reasonable Notice and Claims Administration Costs incurred pursuant to this Settlement Agreement as approved by the Parties and approved by the Court, (ii) any taxes owed, (iii) any Service Awards approved by the Court, (iv) any Attorneys’ Fees, Costs, and Expenses Award as approved by the Court, and (v) any benefits to Settlement Class Members, pursuant to the terms and conditions of the Settlement Agreement.
- Your legal rights will be affected whether you act or do not act. You should read this entire Notice carefully.

YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT:	
FILE A CLAIM FORM DEADLINE: JULY 31, 2025	Submitting a Claim Form is the only way to be eligible to receive a Settlement Payment under the terms of the Settlement.
EXCLUDE YOURSELF FROM THIS SETTLEMENT DEADLINE: JULY 1, 2025	This is the only option that allows you to sue, continue to sue, or be part of another lawsuit against the Defendant and Released Persons, for the claims this Settlement resolves. If you exclude yourself, you will give up the right to receive a Settlement Payment.
OBJECT TO OR COMMENT ON THE SETTLEMENT DEADLINE: JULY 1, 2025	You may object to the Settlement by writing to the Court and informing it why you do not think the Settlement should be approved. If you exclude yourself from the Settlement, you cannot object to it. If you object, you may also file a Claim Form to receive a Settlement Payment.
GO TO THE FINAL APPROVAL HEARING JULY 29, 2025	You may attend the Final Approval Hearing where the Court may hear arguments concerning approval of the Settlement. If you wish to speak at the Final Approval Hearing, you must make a request to do so in your written objection or comment. You are <u>not</u> required to attend the Final Approval Hearing.
DO NOTHING	If you do nothing, you will not receive a Settlement Payment and you will give up your rights to sue the Defendant and Released Persons for the claims this Settlement resolves.

- These rights and options—**and the deadlines to exercise them**—are explained in this Notice.

The Court in charge of this case still has to decide whether to approve the Settlement. No Settlement Payments will be issued unless the Court approves the Settlement, and it becomes final.

Questions? Visit www.SQDataSettlement.com or call toll-free 1-877-939-4067.

BASIC INFORMATION

1. Why is there a Notice?

The Court authorized this Notice because you have the right to know about the proposed Settlement of this class action lawsuit and about all of your rights and options before the Court decides whether to grant final approval of the Settlement. This Notice explains the lawsuit, the Settlement, your legal rights, what benefits are available, who is eligible for the benefits, and how to receive those benefits.

The case is known as *Sequin, et al. v. SelectQuote Insurance Service*, Case No. 616858/2024 (“Litigation”), pending in the Supreme Court of the State of New York, County of Nassau. The people who filed this lawsuit are called the “Plaintiffs” and the company they sued, SelectQuote Insurance Service (“SelectQuote”), is called the “Defendant.”

2. What is this lawsuit about?

Plaintiffs allege SelectQuote disclosed the personal information of Plaintiffs and members of the Settlement Class to Facebook and TikTok as a result of SelectQuote’s use of the Meta Pixel and TikTok Pixel on its website, www.selectquote.com.

3. Why is this a class action?

In a class action, one or more people called the “Plaintiffs”, or “Class Representatives” sue on behalf of all people who have similar claims. Together, all of these people are called a “class” or “class members.” One court resolves the issues for all class members, except for those class members who exclude themselves from the class.

The Plaintiffs and Settlement Class Representatives in this case are Leonardo Sequin, Vishal Shah, Valerie Torres, Anthony Salazar, David Greene, Marilyn Fogg, and Thomas Makin.

4. Why is there a Settlement?

The Plaintiffs and Defendant disagree over the legal claims made in this Action. Defendant has denied and continues to deny any wrongdoing whatsoever. The Litigation has not gone to trial, and the Court has not decided in favor of the Plaintiffs or the Defendant (collectively referred to as the “Parties”). Instead, the Parties have agreed to settle the Action and agree that the Settlement Agreement offers significant benefits to all Settlement Class Members and is fair, reasonable, adequate, and in the best interest of the Plaintiffs and all Settlement Class Members.

WHO IS INCLUDED IN THE SETTLEMENT?

5. How do I know if I am part of the Settlement?

The Settlement Class includes all persons who provided their information on www.selectquote.com for the purposes of obtaining a quote for insurance products during the following periods: (1) from October 17, 2019 through October 17, 2023 for Florida residents at the time of obtaining the quote; (2) from October 17, 2020 through October 17, 2023 for California, Maryland and Massachusetts residents at the time of obtaining the quote; and (3) from October 17, 2021 through October 17, 2023 for all other persons who obtained quotes.

6. Are there exceptions to individuals who are included in the Settlement Class?

Yes, excluded from the Class are SelectQuote and its affiliates, parents, subsidiaries, officers, and directors, as well as the judge(s) presiding over this matter and the clerks of said judge(s). This exclusion does not apply, and

should not be read to apply, to those employees of SelectQuote and its Related Entities who received notification of this Settlement.

7. What if I am still not sure whether I am part of the Settlement?

If you are still not sure whether you are a Settlement Class Member, you may go to the Settlement Website at www.SQDataSettlement.com, or call toll-free 1-877-939-4067. You may also email the Settlement Administrator at info@SQDataSettlement.com.

THE SETTLEMENT CLASS MEMBER BENEFITS

8. What does the Settlement provide?

Defendant agrees to make available up to Eight Million Two Hundred Fifty Thousand Dollars and No Cents (\$8,250,000.00) which shall be used by the Settlement Administrator to pay for: (i) reasonable Notice and Claims Administration Costs incurred pursuant to this Settlement Agreement as approved by the Parties and approved by the Court, (ii) any taxes owed, (iii) any Service Awards approved by the Court, (iv) any Attorneys' Fees, Costs, and Expenses Award as approved by the Court, and (v) any benefits to Settlement Class Members, pursuant to the terms and conditions of the Settlement Agreement.

9. What is the Cash Compensation available to Settlement Class Members?

Settlement Class Members may file a claim for a cash payment of up to \$20 per Settlement Class Member.

10. What am I giving up in order to receive a Settlement Payment or stay in the Class?

Unless you exclude yourself, you are choosing to remain in the Class. If the Settlement is approved and becomes final, all of the Court's orders will apply to you and legally bind you. You will not be able to sue, continue to sue, or be part of any other lawsuit against the Defendant about the legal issues in this Litigation, resolved by this Settlement, and released by the Settlement Agreement. The specific rights you are giving up are called Released Claims (*see* next question).

11. What are the Released Claims?

Released Claims include any and all past, present, and future claims, counterclaims, lawsuits, set-offs, costs, expenses, attorneys' fees and costs, losses, rights, demands, charges, complaints, actions, suits, causes of action, obligations, debts, contracts, penalties, damages, or liabilities of any nature whatsoever, known, unknown, or capable of being known, in law or equity, fixed or contingent, accrued or unaccrued and matured or not matured that arise out of, are connected to the Website Usage Disclosure that were or could have been asserted in the Litigation (the "Plaintiffs' Release").

More information is provided in the Settlement Agreement, which is available at www.SQDataSettlement.com.

HOW TO GET A SETTLEMENT PAYMENT — SUBMITTING A CLAIM FORM

12. How do I make a claim for a Settlement Payment?

Visit www.SQDataSettlement.com to submit your claim online or to download a full Claim Form to complete and return it by mail. Claim Forms must be submitted online by **11:59 p.m. PST July 1, 2025**. Claim Forms submitted by mail must be postmarked no later than **July 1, 2025**. Settlement Class Members can also request a Claim Form by calling toll-free 1-877-939-4067 or by writing to the Settlement Administrator:

Mail: SelectQuote Pixel Settlement, Attn: Claim Form Request, 1650 Arch Street, Suite 2210, Philadelphia, PA 19103.

Email: info@SQDataSettlement.com

13. Where do I send my completed Claim Form?

Completed Claim Forms not submitted online must be mailed to the Settlement Administrator at: SelectQuote Pixel Settlement, Attn: Claim Form Submissions, 1650 Arch Street, Suite 2210, Philadelphia, PA 19103. Claim Forms submitted by mail must be postmarked no later than **July 1, 2025**.

14. What happens if my contact information changes after I submit a claim?

If you need to update your contact information after you submit a Claim Form, you may notify the Settlement Administrator of any changes by writing to the Settlement Administrator via mail or email. Please include your Notice ID number with any written requests to assist the Settlement Administrator in identifying you.

15. When and how will I receive a Settlement Payment?

Settlement Payments will be issued by the Settlement Administrator after the Settlement is approved and becomes Final. Settlement Payments will be issued via the payment selection made on the Claim Form. It is your responsibility to inform the Settlement Administrator of any updates to your payment information after the submission of your Claim Form.

The Settlement approval process may take time and there may be appeals that must be resolved before any Settlement Payments can be issued. Please be patient and check www.SQDataSettlement.com for updates.

THE LAWYERS REPRESENTING YOU

16. Do I have a lawyer in this case?

Yes, the Court has appointed Milberg Coleman Bryson Phillips Grossman, PLLC and Cafferty Clobes Meriwether & Sprengel, LLP as Class Counsel to represent you and the Settlement Class for the purposes of this Settlement. You may hire your own lawyer at your own cost and expense if you want someone other than Class Counsel to represent you in this Action.

17. How will Class Counsel be paid?

Class Counsel shall request the Court to approve an award of attorneys' fees, costs and expenses not to exceed Two Million Seven Hundred and Fifty Thousand Dollars (\$2,750,000). Class Counsel shall request the Court to approve a service award of Three Thousand Five Hundred Dollars (\$3,500) for each of the named Plaintiffs, which award is intended to recognize Plaintiffs for their efforts in the litigation and commitment on behalf of the Settlement Class ("Service Award"). The Court may award less than these amounts.]

EXCLUDING YOURSELF FROM THE SETTLEMENT

If you are a Settlement Class Member and want to keep any right you may have to sue or continue to sue the Defendant and/or the other Released Persons on your own based on the claims raised in this Litigation or released by the Released Claims, then you must take steps to get out of the Settlement. This is called excluding yourself from—or "opting out" of—the Settlement.

18. How do I get out of the Settlement?

To exclude yourself from the Settlement, you must complete and sign a Request for Exclusion. The Request for Exclusion must be in writing and identify the case of the proceeding, *Sequin v. SelectQuote Pixel Settlement*, Case 616858/2024, Supreme Court of the State of New York, County of Nassau, include the full name and current address of the individual requesting exclusion, and include a statement indicating a request to be excluded from

the Settlement Class.

The Request for Exclusion must be postmarked or received by the Settlement Administrator at the address below no later than **July 1, 2025**:

SelectQuote Pixel Settlement
Attn: Exclusion Requests
P.O. Box 58220
Philadelphia, PA 19102

You may also submit a Request for Exclusion online at www.SQDataSettlement.com. Your Request for Exclusion must be submitted online no later than **July 1, 2025**.

You cannot exclude yourself by telephone or by email.

19. If I exclude myself, can I still receive a Settlement Payment?

No. If you exclude yourself, you are telling the Court that you do not want to be part of the Settlement. You are only eligible to receive a Settlement Payment if you stay in the Settlement and submit a valid Claim Form.

20. If I do not exclude myself, can I sue the Defendant for the same thing later?

No. Unless you exclude yourself, you give up any right to sue the Defendant and the Released Persons for the claims that this Settlement resolves. You must exclude yourself from this Litigation to start or continue with your own lawsuit or be part of any other lawsuit against the Defendant or the Released Persons. If you have a pending lawsuit, speak to your lawyer in that case immediately.

OBJECT TO OR COMMENT ON THE SETTLEMENT

21. How do I tell the Court that I do not like the Settlement?

Settlement Class Members may object to the Settlement by submitting written objections to the Court no later than **July 1, 2025**. Any objection to the proposed Settlement must be in writing. For an objection to be considered by the Court, the objection must:

- (i) set forth the Settlement Class Member's full name, current address, telephone number, and email address;
- (ii) contain the Settlement Class Member's original signature;
- (iii) contain proof that the Settlement Class Member is a member of the Settlement Class (e.g., copy of settlement notice);
- (iv) state that the Settlement Class Member objects to the Settlement, in whole or in part;
- (v) set forth a statement of the legal and factual basis for the Objection;
- (vi) provide copies of any documents that the Settlement Class Member wishes to submit in support of his/her position;
- (vii) identify all counsel representing the Settlement Class Member, if any; and
- (viii) contain the signature of the Settlement Class Member's duly authorized attorney or other duly authorized representative, along with documentation setting forth such representation.

Objections must be filed with the Court and served on Class Counsel and Defendant's Counsel no later than **July 1, 2025**.

Court	Defendant's Counsel
Supreme Court Nassau County 100 Supreme Court Drive Mineola, New York 11501	James F. Monagle Mullen Coughlin LLC 500 Capitol Mall, Suite 23250 Sacramento, California 95813

Questions? Visit www.SQDataSettlement.com or call toll-free 1-877-939-4067.

Class Counsel	Class Counsel
Gary M. Klinger Milberg Coleman Bryson Phillips Grossman 227 W. Monroe Street, Suite 2100 Chicago, Illinois 60606	Daniel O. Herrera Cafferty Clobes Meriwether & Sprengel LLP 135 S. LaSalle Street, Suite 3210 Chicago, Illinois 60603

If the objecting Settlement Class Member intends to appear at the Final Approval Hearing through counsel, he or she must also identify the attorney(s) representing the objecting Settlement Class Member who will appear at the Final Approval Hearing and include the attorney(s) name, address, phone number, e-mail address, state bar(s) to which counsel is admitted, as well as associated state bar numbers.

Any Settlement Class Member who fails to timely file and serve an Objection and notice, if applicable, of his or her intent to appear at the Final Approval Hearing in person or through counsel pursuant to the Settlement Agreement, and otherwise as ordered by the Court, shall not be permitted to object to the approval of the Settlement at the Final Approval Hearing and shall be foreclosed from seeking any review of the Settlement or the terms of the Settlement Agreement by appeal or other means.

Any Settlement Class Member who does not submit a timely Objection in complete accordance with this Settlement Agreement, or as otherwise ordered by the Court, shall not be treated as having filed a valid Objection to the Settlement and shall forever be barred from raising any objection to the Settlement.

22. What is the difference between objecting and requesting exclusion?

Objecting is telling the Court you do not like something about the Settlement. You can object only if you stay in the Settlement Class (that is, do not exclude yourself). Requesting exclusion is telling the Court you do not want to be part of the Class or the Settlement. If you exclude yourself, you cannot object to the Settlement because it no longer affects you.

THE FINAL APPROVAL HEARING

23. When and where will the Court decide whether to approve the Settlement?

The Court will hold a Final Approval Hearing on **July 29, 2025 at 10:00 a.m. EST** in Courtroom **445**, located at **100 Supreme Court Drive, Mineola, New York 11501**. The date and time of the Final Approval Hearing is subject to change without further notice to the Settlement Class, so please check www.SQDataSettlement.com for updates.

At this hearing, the Court will consider whether the Settlement is fair, reasonable, and adequate, and will decide whether to approve the Settlement, Class Counsel’s application for Attorneys’ Fees and Costs and Expenses, and the Service Awards for the Class Representatives. If there are objections, the Court will consider them. The Court will also listen to people who have asked to speak at the hearing.

24. Do I have to come to the Final Approval Hearing?

No. Class Counsel will answer any questions the Court may have. However, you are welcome to attend at your own expense. If you submit a timely and complete objection, the Court will consider it, and you do not have to come to Court to talk about it.

25. May I speak at the Final Approval Hearing?

Questions? Visit www.SQDataSettlement.com or call toll-free 1-877-939-4067.

Yes. If you wish to attend and speak at the Final Approval Hearing, you must indicate this in your written objection (see Question 21). Your objection must state that it is your intention to appear at the Final Approval Hearing and must identify any witnesses you may call to testify or exhibits you intend to introduce into evidence at the Final Approval Hearing. If you plan to have your attorney speak for you at the Final Approval Hearing, your objection must also include your attorney's name, address, and phone number.

IF YOU DO NOTHING

26. What happens if I do nothing at all?

If you are a Settlement Class Member and you do nothing, you will not receive a Settlement Payment. You will also give up certain rights, including your right to start a lawsuit, continue with a lawsuit, or be part of any other lawsuit against the Defendant or Released Persons about the legal issues in this Litigation and released by the Settlement.

GETTING MORE INFORMATION

27. How do I get more information?

This Notice summarizes the proposed Settlement. For the precise terms and conditions of the Settlement, please see the Settlement Agreement available at www.SQDataSettlement.com. You may also contact the Settlement Administrator by mail or email:

Mail: SelectQuote Pixel Settlement, 1650 Arch Street, Suite 2210, Philadelphia, PA 19103.

Email: info@SQDataSettlement.com

**PLEASE DO NOT CONTACT THE COURT OR THE CLERK'S OFFICE
TO INQUIRE ABOUT THIS SETTLEMENT OR THE CLAIM PROCESS.**