

Volkswagen/Audi Data Incident Litigation
P.O. Box 3637
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Notice of Class Action Settlement

*Service et al. v. Volkswagen Group of
America, Inc., et al.,
Case No. MSC22-01841*

If you are a former, current or prospective Volkswagen or Audi customer who was sent notice in June 2021 that your personal information may have been compromised in a data security incident, you are eligible for a monetary award from a class action settlement.

A court has authorized this Notice. This is not a solicitation from a lawyer.

Para el notificación en Español visitar nuestro sitio web en www.AudiDataSettlement.com

A settlement has been reached with Volkswagen Group of America, Inc., Audi of America LLC, and Sanctus LLC d/b/a Shift Digital (“Defendants”) in a class action lawsuit, titled *Service v. Volkswagen Group of America, Inc.*, Case No. MSC22-01841 (Contra Costa Superior Ct.). The lawsuit arises from an alleged data security incident (the “Incident”) involving the personal information (“PI”) and sensitive personal information (“SPI”) of certain current, former, and prospective Volkswagen and Audi customers.

Who is included in the settlement? You are included in the settlement and are a settlement class member if you reside in the United States and were sent a notice in June 2021 by Volkswagen and/or Audi that your PI or SPI may have been exposed in the Incident. **Our records indicate that you are a settlement class member and a member of the [N/A] Subclass.**

What does the settlement provide? To fully settle and release the claims of the settlement class members related to the Incident, Defendants have agreed to pay \$3.5 million into a settlement fund, which will be used to pay (1) cash settlement awards to settlement class members who file valid claims; (2) settlement administration expenses; (3) attorneys’ fees and costs; and (4) service awards to the named plaintiffs. Settlement awards include cash payments (\$350 to California SPI Subclass members, \$80 to Nationwide SPI Subclass members, and \$20 to Nationwide PI Subclass members, subject to upward and downward proration) or reimbursement of out-of-pocket losses fairly traceable to the Incident (California SPI and Nationwide SPI Subclass members

only, subject to downward proration). The payment amounts depend on the number of valid claims received.

How do I get an award from the settlement? To receive a settlement award, you must properly complete and timely submit a claim form either online at www.AudiDataSettlement.com or by mail. You can obtain a paper claim form at www.AudiDataSettlement.com or by calling toll-free 1-866-329-0166. The claim form must be submitted electronically or postmarked by **April 12, 2023**. ***You will need your Unique ID and PIN, located on the front of this Notice.***

What are my other options? If you do not wish to submit a claim, you may (1) do nothing; (2) object to the settlement; or (3) exclude yourself from the settlement class. If you object to the settlement or do nothing, you are choosing to stay in the settlement class. You will be legally bound by all orders of the Court and you will not be able to start, continue, or be part of any other lawsuit against Defendants or related parties concerning the Incident. To object to the settlement and tell the Court why you think that the Court should not finally approve the settlement, you must submit a written objection to the settlement administrator by March 13, 2023 or appear at the final approval hearing, which is currently set for May 18, 2023. If you do not want to be bound by the settlement, you may exclude yourself from the settlement class by filing a request for exclusion by March 13, 2023.

For more information or to view important settlement documents visit www.AudiDataSettlement.com or call 1-866-329-0166.