

# NOTICE OF PROPOSED CLASS ACTION SETTLEMENT

*Barrington v. Benefit Profiles, Inc.*

Case No. 24-11543-NZ

Seventeenth Judicial Circuit in Kent County, Michigan

**IF YOU WERE IMPACTED BY THE  
BENEFIT PROFILES, INC. DATA SECURITY INCIDENT,  
A PROPOSED CLASS ACTION SETTLEMENT MAY AFFECT YOUR  
RIGHTS,**

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

*You are not being sued.*

***Please read this Notice carefully and completely.***

- A Settlement has been reached with Benefit Profiles, Inc. (“Benefit Profiles” or “Defendant”) in a class action lawsuit. This case is about the cybersecurity incident affecting Defendant which occurred on or around April 2024 (the “Data Security Incident”). Certain files that contained personal information were potentially accessed. These files may have contained personal information such as Social Security numbers and health insurance information.
- The lawsuit is called *Barrington v. Benefit Profiles Inc.*, Case No. 24-11543-NZ. It is pending in the Seventeenth Judicial Circuit in Kent County, Michigan (the “Action”).
- Benefit Profiles denies that it did anything wrong, and the Court has not decided who is right.
- The parties have agreed to settle the lawsuit (the “Settlement”) to avoid the costs and risks, disruptions, and uncertainties of continuing the Action.
- Your rights are affected whether you act or don’t act. ***Please read this Notice carefully and completely.***

SUMMARY OF YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT		DEADLINE
<b>SUBMIT A CLAIM</b>	<p>The only way to receive benefits from this Settlement is by submitting a valid and timely Claim Form.</p> <p>The fastest way to submit your Claim Form is online at <a href="http://www.BenefitProfilesDataSettlement.com">www.BenefitProfilesDataSettlement.com</a>. If you prefer, you can download the Claim Form from the Settlement Website and mail it to the Settlement Administrator. You may also call or email the Settlement Administrator to receive a paper copy of the Claim Form.</p>	<b>January 20, 2026</b>
<b>OPT OUT OF THE SETTLEMENT</b>	You can choose to opt out of the Settlement and receive no payment. This option allows you to sue, continue to sue, or be part of another lawsuit against Defendant and the Released Parties related to the legal claims resolved by this Settlement. You can hire your own lawyer at your own expense.	<b>December 19, 2025</b>
<b>OBJECT TO THE SETTLEMENT AND/OR ATTEND A HEARING</b>	If you do not opt out of the Settlement, you may object to it by writing to the Court about why you don't like the Settlement. You may also ask the Court for permission to speak about your objection at the Final Approval Hearing. If you object, you may also file a claim for Settlement benefits.	<b>December 19, 2025</b>
<b>DO NOTHING</b>	Unless you opt out of the Settlement, you are automatically part of the Settlement. If you do nothing, you will not receive benefits from this Settlement and you will give up the right to sue, continue to sue, or be part of another lawsuit against the Defendant or the Released Parties related to the legal claims resolved by this Settlement.	No Deadline

- 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 grant final approval of the Settlement.

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## Basic Information

### **1. Why was this Notice issued?**

The Seventeenth Judicial Circuit in Kent County, Michigan authorized this Notice. You have a right to know about the proposed Settlement of this class action lawsuit, and about all of your options, before the Court decides whether to grant final approval of the Settlement. This Notice explains the lawsuit, your legal rights, what benefits are available, and who can receive them.

The lawsuit is called *Barrington v. Benefit Profiles Inc.*, Case No. 24-11543-NZ. It is pending in the Seventeenth Judicial Circuit in Kent County, Michigan. The person that filed this lawsuit is called the “Plaintiff” (or “Class Representative”) and the company they sued, Benefit Profiles, Inc. is called the “Defendant.”

### **2. What is this lawsuit about?**

This lawsuit alleges that during the Data Security Incident, certain files that contained private information were potentially accessed. These files may have contained personal information such as Social Security numbers and health insurance information. Defendant firmly denies that it did anything wrong and has agreed to the settlement to avoid the expense, burden, and uncertainties associated with continuing the litigation. The Court has not decided who is right.

### **3. What is a class action?**

In a class action, one or more individuals sue on behalf of other people with similar claims. These individuals are called the “Plaintiffs” or “Class Representatives.” Together, the people included in the class action are called a “Class” or “Class Members.” One court resolves the lawsuit for all Class Members, except for those who opt out from the settlement. In this Settlement, the Class Representative is Kardeia Barrington, and everyone included in this Action are the Settlement Class Members.

## 4. Why is there a Settlement?

The Court did not decide whether the Plaintiff or the Defendant is right. Both sides have agreed to a Settlement to avoid the costs and risks of a trial, and to allow the Class Members to receive benefits from the Settlement. The Plaintiff and their attorney think the Settlement is best for all Class Members.

## Who is in the Settlement?

## 5. Who is included in the Settlement?

The court has defined the Class this way: "All living individuals residing in the United States whose Personal Information was potentially compromised in the Data Security Incident experienced by Defendant in April 2024, including all those who were mailed written notice of the Data Security Incident."

## 6. Are there exceptions to being included?

Yes. Excluded from the Settlement Class are: (i) Defendant, its insurers, agents, affiliates, parents, subsidiaries, officers and directors; (ii) all Settlement Class Members who timely and validly request exclusion from the Settlement Class; (iii) any judges assigned to this case and their staff and immediate family; and (iv) any other person found by a court of competent jurisdiction to be guilty under criminal law of initiating, causing, aiding or abetting the criminal activity occurrence of the Data Security Incident or who pleads *nolo contendere* to any such charge.

If you are not sure whether you are a Settlement Class Member, you can ask for free help any time by contacting the Settlement Administrator at:

- Email: [info@BenefitProfilesDataSettlement.com](mailto:info@BenefitProfilesDataSettlement.com)
- Call toll free, 24/7: 1-(833) 417-4909
- By mail: Benefit Profiles, Inc. Data Security Incident Settlement, c/o Settlement Administrator, P.O. Box 25226, Santa Ana, CA 92799-9958.

You may also view the Settlement Agreement at [www.BenefitProfilesDataSettlement.com](http://www.BenefitProfilesDataSettlement.com).

## The Settlement Benefits

## 7. What does the Settlement provide?

Benefit Profiles has agreed to pay for a number of different benefits. All Settlement Class Members can enroll in **two years of 3-Bureau Credit Monitoring Services**. In addition to Credit Monitoring Services, Class Members may choose between **two cash payment options**:

**OPTION 1:** Select one or more of the following benefits:

- Documented Ordinary Losses (Out-of-Pocket Expenses)
- Documented Extraordinary Losses (Losses for Identity Theft or Fraud)

**OR**

**OPTION 2:** Alternative Cash Payment.

- Receive a one-time \$50.00 cash payment in lieu of any other financial benefits.

More information about each of these benefits is below. Full details are in Paragraphs 40 and 41 of the Settlement Agreement, available at [www.BenefitProfilesDataSettlement.com](http://www.BenefitProfilesDataSettlement.com).

**CREDIT MONITORING SERVICES.** All Class Members are eligible to enroll in two years of 3-Bureau Credit Monitoring Services. This benefit includes \$1 million of identity theft protection insurance.

### **CASH PAYMENT OPTION 1**

**Documented Ordinary Losses (Out-of-Pocket Expenses).** If you incurred actual, documented out-of-pocket expenses due to the Security Incident, you can get back up to **\$500.00**. The losses must have occurred between April 3, 2024, and **January 20, 2026**.

This benefit covers out-of-pocket expenses like:

- fees for credit reports, credit monitoring, or freezing and unfreezing your credit
- cost to replace your IDs
- postage to contact banks by mail

You need to send proof, like receipts, to show how much you spent or lost. You can also send notes or papers you made yourself to explain or support other proof, but those notes or papers alone are not enough to make a valid claim.

**Documented Extraordinary Losses (Losses for Identity Theft or Fraud).** If you lost money because of identity theft or fraud, you can get back up to **\$2,500.00**.

You will need to show that:

- the theft or fraud was more likely than not caused by the Data Security Incident
- the losses are not already covered by **Ordinary Losses**
- you tried to prevent the loss or get your money back, such as by using insurance you already have

The losses must have occurred between April 3, 2024, and **January 20, 2026**.

You need to send proof, like bank statements, to show how much you spent or lost or did not get reimbursed. You can also send notes or papers you made yourself to explain or support other proof, but those notes or papers alone are not enough to make a valid claim.

### **CASH PAYMENT OPTION 2**

**Alternative Cash Payment.** Instead of the benefits in Option 1, you may claim a one-time **\$50.00** cash payment.

If you have questions about these benefits, you can ask for free help any time by contacting the Settlement Administrator at:

- Email: [info@BenefitProfilesDataSettlement.com](mailto:info@BenefitProfilesDataSettlement.com)
- Call toll free, 24/7: 1-(833) 417-4909
- By mail: Benefit Profiles, Inc. Data Security Incident Settlement, c/o Settlement Administrator, P.O. Box 25226, Santa Ana, CA 92799-9958.

## **8. What claims am I releasing if I stay in the Class?**

If you stay in the class, you won't be able to be part of any other lawsuit against Benefit Profiles about the issues that this Settlement covers. The "Release" section of the Settlement Agreement (Section XI) describes the legal claims that you give up if you remain in the Class. The Settlement Agreement is available at [www.BenefitProfilesDataSettlement.com](http://www.BenefitProfilesDataSettlement.com)

## **Submitting a Claim Form for a Settlement Payment**

### **9. How do I submit a claim for a Settlement benefit?**

The fastest way to submit your Claim Form is online at [www.BenefitProfilesDataSettlement.com](http://www.BenefitProfilesDataSettlement.com). If you prefer, you can download a printable Claim Form from the website and mail it to the Settlement Administrator at:

Benefit Profiles, Inc. Data Security Incident Settlement  
c/o Settlement Administrator  
P.O. Box 25226  
Santa Ana, CA 92799-9958

You may also contact the Settlement Administrator to request a Claim Form by telephone, toll free, **1-(833) 417-4909**, by email [info@BenefitProfilesDataSettlement.com](mailto:info@BenefitProfilesDataSettlement.com), or by U.S. mail at the address above.

### **10. Are there any important Settlement payment deadlines?**

If you are submitting a Claim Form online, you must do so by **January 20, 2026**. If you are submitting a claim by U.S. mail, the completed and signed Claim Form, including supporting documentation, must be postmarked no later than **January 20, 2026**.

### **11. When will the Settlement benefits be issued?**

The Court will hold a Final Approval Hearing on **January 16, 2026, at 8:30am (see Question 18)**. If the Court approves the Settlement, there may be appeals. We do not know if appeals will be filed, or how long it will take to resolve them if they are filed. The Final Approval Hearing may be held remotely.

Settlement payments will be distributed if the Court grants final approval, and after any appeals are resolved.

## **The Lawyers Representing You**

### **12. Do I have a lawyer in the case?**

Yes, the Court appointed attorney Cassandra Miller of Strauss Borrelli PLLC to represent you and other Class Members ("Class Counsel").

### **13. Should I get my own lawyer?**

You will not be charged for Class Counsel's services. If you want your own lawyer, you may hire one at your expense.

## 14. How will Class Counsel be paid?

Class Counsel will ask the Court to approve a payment of \$225,000.00 in attorney's fees, costs, and expenses, which if approved will be paid by Benefit Profiles.

Class Counsel will also ask for a Service Award Payment of \$3,000.00 for the Class Representative. If approved, the Service Award Payment will also be paid by Benefit Profiles.

## Excluding Yourself from the Settlement

### 15. How do I opt out of the Settlement?

If you do not want to be part of the Settlement, you must formally exclude yourself from the Settlement. This is called a Request for Exclusion, and is sometimes also called "opting out." If you opt out, you will not receive Settlement benefits or payment. However, you will keep any rights you may have to sue Benefit Profiles on your own about the legal issues in this case.

If you exclude yourself, you are telling the Court that you do not want to be part of the Settlement. You will not be eligible to receive any Settlement benefits if you exclude yourself.

The deadline to exclude yourself from the Settlement is **December 19, 2025**.

To be valid, your Request for Exclusion must have the following information:

- (1) the name of the Action: *Barrington v. Benefit Profiles Inc.*, Case No. 24-11543-NZ, pending in the Kent County Circuit Court in Michigan;
- (2) your full name, current mailing address, telephone number, and email address;
- (3) personal signature; and
- (4) the words "Request for Exclusion" or a clear and similar statement that you do not want to participate in the Settlement.

You may only exclude yourself—not any other person.

Mail your Request for Exclusion to the Settlement Administrator at:

Benefit Profiles, Inc. Data Security Incident Settlement  
ATTN: Exclusion Request  
P.O. Box 25226  
Santa Ana, CA 92799-9958

Your Request for Exclusion must be submitted, postmarked, or emailed by **December 19, 2025**.

## Commenting on or Objecting to the Settlement

### **16. How do I tell the Court if I like or do not like the Settlement?**

If you are a Class Member and do not like part or all of the Settlement, you can object to it. Objecting means telling the Court your reasons for why you think the Court should not approve the Settlement. The Court will consider your views.

You cannot object if you have excluded yourself from the Settlement (see **Question 15**)

You must provide the following information for the Court to consider your objection:

- (1) the name of the Action: *Barrington v. Benefit Profiles Inc.*, Case No. 24-11543-NZ, pending in the Seventeenth Judicial Circuit in Kent County, Michigan;
- (2) your full name, current mailing address, telephone number, and email address;
- (3) a statement that states with specificity the grounds for the objection, as well as any documents supporting the objection;
- (4) the name, address, and telephone number of any attorney(s) representing the objector;
- (5) a statement regarding whether the Settlement Class Member (or his/her attorney(s)) intends to appear at the Final Approval Hearing;
- (6) the signature of the Settlement Class Member or the Settlement Class Member's attorney;
- (7) a list, by case name, court, and docket number, of all other cases in which the objector and/or the objector's counsel has filed an objection to any proposed class action settlement within the last three (3) years.

For your objection to be valid, it must meet each of these requirements.

To be considered by the Court, you must file your complete objection with the Clerk of Court by **December 19, 2025**. You must also send a copy of the objection to the Settlement Administrator.

<b>Clerk of the Court</b>	<b>Settlement Administrator</b>
Clerk of the Court 17 <sup>th</sup> Judicial Circuit 180 Ottawa Ave NW Grand Rapids, MI 49503	Benefit Profiles, Inc. Data Security Incident Settlement ATTN: Objections P.O. Box 25226 Santa Ana, CA 92799-9958

### **17. What is the difference between objecting and excluding?**

Objecting is telling the Court that you do not like something about the Settlement. You can object to the Settlement only if you do not exclude yourself from the Settlement. Excluding yourself from the Settlement is opting out and stating to the Court that you do not want to be part of the Settlement. If you opt out of the Settlement, you cannot object to it because the Settlement no longer affects you.

## The Court's Final Approval Hearing

### **18. When is the Court's Final Approval Hearing?**

The Court will hold a Final Approval Hearing on **January 16, 2026 at 8:30am** in Room 11A of the Seventeenth Judicial Circuit in Kent County, Michigan, at 180 Ottawa Ave NW, Grand Rapids, MI 49503.

At the Final Approval Hearing, the Court will decide whether to approve the Settlement. The court will also decide how Class Counsel should be paid, and whether to award a Service Award Payment to the Class Representative. The Court will also consider any objections to the Settlement. The Final Approval Hearing may also be held remotely and, if so, instructions will be posted on the Settlement Website.

If you are a Class Member, you or your lawyer may ask permission to speak at the hearing at your own cost (**See Question 16**).

The date and time of this hearing may change without further notice. Please check [www.BenefitProfilesDataSettlement.com](http://www.BenefitProfilesDataSettlement.com) for updates.

### **19. Do I have to come to the Final Approval Hearing?**

No. Class Counsel will answer any questions the Court may have. You may attend at your own expense if you wish, but you do not have to.

If you file an objection, you do not have to come to the Final Approval Hearing to talk about it; the Court will consider it as long as it was filed on time. You may also pay your own lawyer to attend, but you do not have to.

## If I Do Nothing

### **20. What happens if I do nothing at all?**

If you do nothing, you will not receive a benefit from this Settlement.

You will also give up the rights described in **Question 8**.

## Getting More Information

### **21. How do I get more information?**

This Notice is a summary of the proposed Settlement. The full Settlement Agreement and other related documents are available at the Settlement Website, [www.BenefitProfilesDataSettlement.com](http://www.BenefitProfilesDataSettlement.com).

If you have additional questions, you can ask for free help any time by contacting the Settlement Administrator at:

- Email: [info@BenefitProfilesDataSettlement.com](mailto:info@BenefitProfilesDataSettlement.com)
- Call toll free, 24/7: 1- (833) 417-4909
- By mail: Benefit Profiles, Inc. Data Security Incident Settlement, c/o Settlement Administrator, P.O. Box 25226, Santa Ana, CA 92799-9958.

You can obtain copies of publicly filed documents by visiting the office of the Clerk of the Court, Seventeenth Judicial Circuit in Kent County, Michigan, at 180 Ottawa Ave NW, Grand Rapids, MI 49503.