

NOTICE OF PROPOSED CLASS ACTION SETTLEMENT

Pearson v. Transak USA, LLC
Case No. CACE-25-010305
Circuit Court for Broward County, Florida

**IF YOUR PRIVATE INFORMATION WAS COMPROMISED IN THE
SEPTEMBER 2024 TRANSAK USA, LLC DATA INCIDENT
A PROPOSED CLASS ACTION SETTLEMENT MAY AFFECT YOUR RIGHTS,
AND ENTITLE YOU TO A CASH PAYMENT.**

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 Transak USA, LLC (“Transak” or “Defendant”) in a class action lawsuit. This case is about the targeted cyberattack on Transak's computer systems that occurred in September 2024 (“Data Incident”). Certain files that contained Private Information were accessed. These files may have contained addresses, driver’s license numbers, and dates of birth.
- The lawsuit is called *Pearson v. Transak USA, LLC*, Case No. CACE-25-010305. It is pending in the Circuit Court for Broward County, Florida (“Litigation”).
- Transak denies that it did anything wrong, and the Court has not decided who is right.
- The Parties have agreed to settle the lawsuit (“Settlement”) to avoid the costs and risks, disruptions, and uncertainties of continuing the Litigation.
- Transak's records indicate that you are a Settlement Class Member, and entitled to benefits under the Settlement. You may have received a previous notice directly from Transak.
- 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
SUBMIT A CLAIM	The only way to receive a Cash Payment from this Settlement is by submitting a valid and timely Claim Form. The fastest way to submit your Claim Form is online at www.TransakUSASettlement.com. 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.	December 1, 2025
OPT-OUT OF THE SETTLEMENT	You can choose to opt-out of the Settlement and receive no Cash Payment. This option allows you to sue, continue to sue, or be part of another lawsuit against the Defendants related to the legal claims resolved by this Settlement. You can hire your own lawyer at your own expense.	November 17, 2025
OBJECT TO THE SETTLEMENT AND/OR ATTEND A HEARING	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 a Cash Payment.	November 17, 2025
DO NOTHING	Unless you opt-out of the Settlement, you are automatically part of the Settlement. If you do nothing, you will not receive a Cash Payment from this Settlement and you will give up the right to sue, continue to sue, or be part of another lawsuit against the Defendant 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 approve the Settlement.

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Basic Information

1. Why was this Notice issued?

The Circuit Court for Broward County, Florida, 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 *Pearson v. Transak USA, LLC*, Case No. CACE-25-010305. It is pending in the Circuit Court for Broward County, Florida. The people that filed this lawsuit are called the “Plaintiffs” (or “Class Representatives”) and the company they sued, Transak USA, LLC, is called the “Defendant.”

2. What is this lawsuit about?

This lawsuit alleges that during September 2024, there was a targeted cyberattack on Transak's computer systems and certain files that contained Private Information were accessed. These files may have contained personal information such as names, addresses, driver’s license numbers, and dates of birth.

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 Representatives are Shane Pearson, Christian Parton, and Noah Goodwin. Everyone included in this Action are the Settlement Class Members.

4. Why is there a Settlement?

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

Who is in the Settlement?

5. Who is included in the Settlement?

The court has defined the Settlement Class as: “All living individuals in the United States whose Private Information was implicated in the Data Incident.”

6. Are there exceptions to being included?

Yes. Excluded from the Settlement Class are: (1) the Judge in this case, and the Judge’s family and staff; (2) Transak and its employees, officers, and directors; (3) anyone who validly excludes themselves from the Settlement; (4) anyone who perpetrated the Data Incident; and (5) government entities.

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@TransakUSASettlement.com
- Call toll free, 24/7: 1-844-496-1190
- By mail: Transak Data Incident Settlement, c/o Settlement Administrator, P.O. Box 25226, Santa Ana, CA 92799-9958.

You may also view the Settlement Agreement at www.TransakUSASettlement.com.

The Settlement Benefits

7. What does the Settlement provide?

Transak has agreed to pay for one of the following two **Cash Payment** options:

Cash Payment A – Documented Losses

OR

Cash Payment B – Alternate Cash Payment

These payments are explained below.

Cash Payment A – Documented Losses. If you incurred actual, documented out-of-pocket losses due to the Data Incident, you can get back up to **\$1,500.00**. The losses must have occurred between September 23, 2024, and December 1, 2025.

This benefit covers out-of-pocket expenses like:

- losses because of identity theft or fraud
- 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 bank statements or 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.

Alternate Cash Payment. Instead of Cash Payment A, you may claim a one-time **\$50.00** cash payment. You do not have to provide any proof or explanation to claim this payment.

In the event the total of all Cash Payments exceeds \$601,000, Cash Payments will be reduced *pro rata* for all Settlement Class Members.

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

- Email: info@TransakUSASettlement.com
- Call toll free, 24/7: 1-844-496-1190
- By mail: Transak Data 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 Settlement Class, you won't be able to be part of any other lawsuit against Transak about the issues that this Settlement covers. The "Releases" section of the Settlement Agreement (Section VI) describes the legal claims that you give up if you remain in the Class. The Settlement Agreement is available at www.TransakUSASettlement.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.TransakUSASettlement.com. If you prefer, you can download a printable Claim Form from the website and mail it to the Settlement Administrator at:

Transak Data 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, 1-844-496-1190, by email info@TransakUSASettlement.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 December 1, 2025. 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 December 1, 2025.

11. When will the Settlement benefits be issued?

The Court will hold a Final Approval Hearing on December 15, 2025 (**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.

Cash 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 has appointed attorney Jeff Ostrow of Kopelowitz Ostrow P.A., to represent you and other Settlement 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 \$200,000.00 as reasonable attorney's fees and costs of litigation. This amount will be paid by Transak.

Class Counsel will also ask for Service Award payments of \$1,500.00 for each of the Class Representatives. Service Awards will also be paid by Transak.

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 or “opting-out.” If you opt-out, you will not receive a Cash Payment. However, you will keep any rights you may have to sue Transak 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 a Cash Payment if you exclude yourself.

The deadline to exclude yourself from the Settlement is November 17, 2025.

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

- (1) the name of the Litigation: *Pearson v. Transak USA, LLC*, Case No. CACE-25-010305, pending in the Circuit Court for Broward County, Florida;
- (2) your full name, 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:

Transak Data 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 November 17, 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 Litigation: *Pearson v. Transak USA, LLC*, Case No. CACE-25-010305, pending in the Circuit Court for Broward County, Florida;
- (2) your full name, mailing address, telephone number, and email address;
- (3) a clear description of all the reasons you object; include any legal support, such as documents, you may have for your objection;
- (4) if you have hired your own lawyer to represent you at the Final Approval Hearing, provide their name and telephone number;
- (5) if you or your lawyer have objected in any other cases in the past five years, list the names, courts, the orders ruling on your objections, and civil action numbers for each of those cases;
- (6) whether or not you or your lawyer would like to speak at the Final Approval Hearing;
- (7) if you plan on calling witnesses or submitting documents at the Final Approval Hearing, provide a full list of both;
- (8) your signature (if you have hired your own lawyer, your lawyer's signature is not sufficient).

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

Class Counsel and/or Defendant's counsel may conduct discovery on any objector, including taking depositions and propounding discovery requests.

To be considered by the Court, you must file your complete objection with the Clerk of Court by November 17, 2025. You must also send a copy of the objection to the Settlement Administrator, Class Counsel, and counsel for Defendants. Their mailing addresses are provided below.

Clerk of the Court	Settlement Administrator
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Clerk of the Court Broward County Courthouse 201 SE 6th Street, Courtroom WW 15170 Fort Lauderdale, FL 33301	Transak Data Incident Settlement ATTN: Objections P.O. Box 25226 Santa Ana, CA 92799-9958
Class Counsel	Counsel for Defendants
Jeff Ostrow Kopelowitz Ostrow P.A. 1 West Las Olas Blvd. Suite 500 Fort Lauderdale, FL 33301	Joshua A. Mooney Daniel S. Marvin Kennedys Law LLP 22 Vanderbilt Ave. Suite 2400 New York, NY 10017

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 on **December 15, 2025, at 8:30 a.m. Eastern Time**, in Room WW 15170 of the Circuit Court for Broward County, Florida, at 201 SE 6th Street, Fort Lauderdale, FL 33301.

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 Service Awards to the Class Representatives. The Court will also consider any objections to the Settlement.

If you are a Settlement 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.TransakUSASettlement.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.TransakUSASettlement.com.

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

- Email: info@TransakUSASettlement.com
- Call toll free, 24/7: 1-844-496-1190
- By mail: Transak Data 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, Broward County Courthouse 201 SE 6th Street, Courtroom WW 15170 Fort Lauderdale, FL 33301

DO NOT CONTACT THE COURT OR CLERK OF COURT REGARDING THIS SETTLEMENT