

NOTICE OF CLASS ACTION AND PROPOSED SETTLEMENT

If You Were a Patient of Redeemer Health or Holy Redeemer Health (“Redeemer” or “Defendant”) Between January 1, 2019, and March 21, 2023, and Used Redeemer’s website, You May be Eligible for Benefits from a Class Action Settlement.

This is not a solicitation from a lawyer, junk mail, or an advertisement. A court authorized this Notice.

- A proposed Settlement has been reached in a class action lawsuit known as *Doe et al. v. Redeemer Health et al.*, (Case No. 250501236) filed on or about May 8, 2023, in the Philadelphia County Court of Common Pleas in Philadelphia, Pennsylvania.
- This Lawsuit arises out Plaintiffs’ allegations regarding Redeemer’s alleged use of third-party tracking technology (“Tracking Pixels”) within segments of their websites and the patient portal websites operated by third parties.
- All Settlement Class Members can receive the following benefits from the Settlement: (1) one year of CyEx Privacy Shield Pro (<https://cyex.com/privacy-shield/>), and (2) a \$25 cash payment. Defendant also agrees to implement changes to ensure Tracking Pixels on the Redeemer Web Properties materially comply with the Health Insurance Portability and Accountability Act (HIPAA), including, if applicable, requiring business associate agreements with third-party providers of Tracking Pixels technologies.
- You are included in this Settlement as a Settlement Class Member if you are a Redeemer patient who has used the Redeemer Web Properties’ Patient Portals and/or submitted Forms through the Redeemer Web Properties between January 1, 2019, and March 21, 2023.
- Your legal rights are affected regardless of whether you do or do not act. Read this Notice carefully.

YOUR LEGAL RIGHTS & OPTIONS IN THIS SETTLEMENT

Submit a Claim	You must submit a Valid Claim to get money or CyEx Privacy Shield Pro from this Settlement. Claim Forms must be submitted online by January 9, 2026, or, if mailed, postmarked no later than January 9, 2026.
Do Nothing	If you do nothing, you remain in the Settlement. You give up your rights to sue and you will not get any money.
Exclude Yourself	Get out of the Settlement. Get no money. Keep your rights. This is the only option that allows you to keep your right to sue about the claims in this lawsuit. You will not get any money from the Settlement. Your request to exclude yourself must be postmarked no later than December 9, 2025.
Submit an Objection	Stay in the Settlement but tell the Court why you think the Settlement should not be approved. Objections must be postmarked no later than December 9, 2025.
Go to a Hearing	You can ask to speak in Court about the fairness of the Settlement, at your own expense. <i>See</i> Question 18 for more details. The Final Fairness Hearing is scheduled for February 9, 2026.

WHAT THIS NOTICE CONTAINS

Basic Information..... Pages 3-4

1. How do I know if I am affected by the lawsuit and Settlement?
2. What is this case about?
3. Why is there a Settlement?
4. Why is this a class action?
5. How do I know if I am included in the Settlement?

The Settlement Benefits Pages 4-5

6. What does this Settlement provide?
7. How do I submit a Claim?
8. What am I giving up as part of the Settlement?
9. Will the Class Representative receive compensation?

Exclude Yourself..... Page 5-6

10. How do I exclude myself from the Settlement?
11. If I do not exclude myself, can I sue later?
12. What happens if I do nothing at all?

The Lawyers Representing You Page 6

13. Do I have a lawyer in the case?
14. How will the lawyers be paid?

Objecting to the Settlement..... Page 6-7

15. How do I tell the Court that I do not like the Settlement?
16. What is the difference between objecting and asking to be excluded?

The Final Fairness Hearing..... Page 7-8

17. When and where will the Court decide whether to approve the Settlement?
18. Do I have to come to the hearing?
19. May I speak at the hearing?

Do Nothing..... Page 8

20. What happens if I do nothing?

Get More Information..... Page 8

21. How do I get more information about the Settlement?

BASIC INFORMATION

1. How do I know if I am affected by the Lawsuit and Settlement?

You are a Settlement Class Member if you are a Redeemer patient who has used the Redeemer Web Properties' Patient Portals and/or submitted Forms through the Redeemer Web Properties between January 1, 2019, and March 21, 2023. Redeemer Web Properties include but are not limited to:

- webpages located at the domain www.redeemerhealth.org
- the Redeemer website "button" linking website users to the Redeemer patient portals' login webpages and the Redeemer patient portals themselves, including segments of such portals operated by Redeemer Web Properties Vendors (collectively, "Patient Portals")
- Contact Us forms (including Lafayette Contact Us form and Maternity Contact Us form), and/or Schedule an Appointment forms (collectively, "Forms")

The Settlement Class specifically excludes: (i) Defendants, their officers and directors; (ii) all Settlement Class Members who timely and validly request exclusion from the Settlement Class; and (iii) any judges assigned to this case and their staff and family. This Notice explains the nature of the lawsuit and claims being settled, your legal rights, and the benefits to the Settlement Class.

2. What is this case about?

This case is known as *Doe et al. v. Redeemer Health et al.*, (Case No. 250501236) filed on or about May 8, 2023, in the Philadelphia County Court of Common Pleas in Philadelphia, Pennsylvania. The people who sued are called the "Plaintiffs" and the company they sued, Redeemer, is known as the "Defendant" in this case.

Plaintiffs filed a lawsuit against Defendants, individually, and on behalf of anyone affected by Redeemer's alleged use of Tracking Pixels on segments of their websites and the patient portal websites operated by Redeemer Web Properties Vendors.

In this Lawsuit, Plaintiffs allege that Redeemer's use of Tracking Pixels on the Redeemer Web Properties illegally transmitted personal and health information about its patients to third parties. Defendant denies Plaintiffs' claims and denies any wrongdoing or liability.

3. Why is there a Settlement?

By agreeing to settle, both sides avoid the cost, disruption, and distraction of further litigation. The Class Representatives, Defendant, and their attorneys believe the proposed Settlement is fair, reasonable, and adequate, and in the best interest of the Settlement Class Members. The Court did not decide in favor of the Plaintiffs or Defendant. Full details about the proposed Settlement are found in the Settlement Agreement available in the Important Documents section at www.RedeemerHPixelSettlement.com.

4. Why is this a class action?

In a class action, one or more people called a “Class Representative” sue on behalf of all people who have similar claims. All these people together are the “Settlement Class” or “Settlement Class Members.”

5. How do I know if I am included in the Settlement?

You are included in the Settlement if are a Redeemer patient who has used the Redeemer Web Properties’ Patient Portals and/or submitted Forms through the Redeemer Web Properties between January 1, 2019, and March 21, 2023. Redeemer Web Properties include but are not limited to:

- webpages located at the domain www.redeemerhealth.org
- the Redeemer website “button” linking website users to the Redeemer patient portals’ login webpages and the Redeemer patient portals themselves, including segments of such portals operated by Redeemer Web Properties Vendors (collectively, “Patient Portals”)
- Contact Us forms (including Lafayette Contact Us form and Maternity Contact Us form), and/or Schedule an Appointment forms (collectively, “Forms”)

If you are not sure whether you are included as a Settlement Class Member, or have any other questions about the Settlement, visit www.RedeemerHPixelSettlement.com, call toll free 844-496-1189, or write to Redeemer Pixel Tracking Settlement, c/o Settlement Administrator, PO Box 25191, Santa Ana, CA 92799.

THE SETTLEMENT BENEFITS

6. What does this Settlement provide?

The proposed Settlement will provide the following benefits to Settlement Class Members:

Cyex Privacy Shield: All Settlement Class Members can choose to enroll in one (1) year of CyEx Privacy Shield Pro (<https://cyex.com/privacy-shield/>).

Cash Payment: All Settlement Class Members can elect a \$25 cash payment.

Prospective Relief: Redeemer will implement changes to ensure Tracking Pixels on the Redeemer Web Properties materially comply with the Health Insurance Portability and Accountability Act (HIPAA), including, if applicable, requiring business associate agreements with third-party providers of Tracking Pixels technologies.

7. How do I submit a claim?

All claims will be reviewed by the Claims Administrator. You must file a Claim Form to get any benefits from the proposed Settlement. Claim Forms must be submitted online by January 9, 2026, or postmarked no later than January 9, 2026. You can download a Claim Form at www.RedeemerHPixelSettlement.com or you can call the Claims Administrator at 844-496-1189. The unique Login and PIN that were printed on the Notice you received will be required to access the online and paper claim forms.

8. What am I giving up as part of the Settlement?

Unless you opt out of the Settlement, you won't be able to sue, continue to sue, or be part of any other lawsuit against the Defendants about any of the legal claims this Settlement resolves. The "Releases" section of the Settlement Agreement (Section IX) provides a detailed explanation of the legal claims that you give up if you remain in the Class.

The Settlement Agreement, which includes all provisions about settled claims, releases, and Released Persons, is available at www.RedeemerHPixelSettlement.com.

The only way to keep the right to sue is to exclude yourself (*see* Question 10). Otherwise you will be included in the Settlement Class, and you give up the right to sue for any of the Released Claims in this case if the Settlement is approved.

9. Will the Class Representatives receive compensation?

Yes. The Class Representatives will receive a service award of up to \$2,500 each to compensate them for their service and effort in bringing the lawsuit. The Court will make the final decision as to the amount, if any, to be paid to the Class Representatives.

EXCLUDE YOURSELF

10. How do I exclude myself from the Settlement?

If you do not want to be included in the Settlement, you must send a timely written request for exclusion. Your request for exclusion must be individually signed by you. Your request must clearly manifest your intent to be excluded from the Settlement.

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

- (1) the name of the Action: *Moser et al. v. Redeemer Health et al.*, Case No. 230501236, pending in the Philadelphia County Court of Common Pleas in Philadelphia, Pennsylvania;
- (2) your full name and current 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.

Your written request for exclusion must be postmarked no later than **December 5, 2025** to:

Redeemer Pixel Tracking Settlement,
c/o Settlement Administrator,
PO Box 25191,
Santa Ana, CA 92799

Instructions on how to submit a request for exclusion are also available at
www.RedeemerHPixelSettlement.com, and from the Claims Administrator by calling **844-496-1189**.

If you exclude yourself, you will not be able to receive any benefits from the Settlement and you cannot object to the Settlement. You will not be legally bound by anything that happens in this lawsuit and you will keep your right to sue the Defendant on your own for the claims that this Settlement resolves.

11. If I do not exclude myself, can I sue later?

No. If you do not exclude yourself from the Settlement, and the Settlement is approved by the Court, you forever give up the right to sue the Released Persons (listed in Question 8) for the claims this Settlement resolves.

12. What happens if I do nothing at all?

If you do nothing, you will be bound by the Settlement if the Court approves it, you will not get any benefits from the Settlement, you will not be able to start or proceed with a lawsuit, or be part of any other lawsuit against the Released Persons (listed in Question 8) about the settled claims in this case at any time.

THE LAWYERS REPRESENTING YOU

13. Do I have a lawyer in the case?

Yes. The Court has appointed Raina C. Borrelli of Strauss Borrelli PLLC and Foster Johnson of Ahmad, Zavitsanos & Mensing (called “Class Counsel”) to represent the interests of all Settlement Class Members in this case. You will not be charged for this lawyer. If you want to be represented by your own lawyer, you may hire one at your own expense.

14. How will the lawyers be paid?

Class Counsel will apply to the Court for an award of attorneys’ fees, costs, and litigation expenses in an amount not to exceed \$1,750,000. A copy of Class Counsel’s Application for Attorneys’ Fees, Costs, and Expenses will be posted on the Settlement Website, www.RedeemerHPixelSettlement.com, before the Final Fairness Hearing. The Court will make the final decisions as to the amounts to be paid to Class Counsel and may award less than the amount requested by Class Counsel.

OBJECTING TO THE SETTLEMENT

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

If you want to tell the Court that you do not agree with the proposed Settlement or some part of it, you can mail an objection to the Settlement Administrator telling it why you do not think the Settlement should be approved. Objections must be submitted in writing and should include all the following information:

- (1) your full name, current address, telephone number, and email address;
- (2) your original signature;
- (3) proof that you are a member of the Settlement Class (e.g., copy of settlement notice, attestation of membership);
- (4) state that you object to the Settlement, in whole or in part;

- (5) provide the legal and factual basis for why you object;
- (6) provide copies of any documents that you wish to submit to support your position;
- (7) if you have hired your own lawyer, provide their name and contact information;
- (8) if you have hired your own lawyer, they will need to provide their signature, along with documentation showing they represent you; and
- (9) contain a list, including case name, court, and docket number, of all other cases in which you or your attorney have filed an objection to any proposed class action settlement in the past three (3) years.

Objections must be submitted to the Settlement Administrator by First-Class mail, postmarked no later than **December 5, 2025**, to:

Redeemer Pixel Tracking Settlement,
c/o Settlement Administrator,
PO Box 25191,
Santa Ana, CA 92799

If your objection is not postmarked by **December 5, 2025**, you will be considered to have waived all Objections.

16. What is the difference between objecting and asking to be excluded?

Objecting is simply telling the Court that you don't like something about the Settlement. You can object only if you stay in the Class. Excluding yourself is telling the Court that you don't want to be part of the Settlement Class. If you exclude yourself, you have no basis to object because the Settlement no longer affects you.

THE FINAL FAIRNESS HEARING

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

The Court will hold the Final Fairness Hearing at February 9, 2026, virtually. The hearing may be moved to a different date, time, or location without additional notice, or it may be held via ZOOM or other remote means. Please periodically check www.RedeemerHPixelSettlement.com for updated information.

At the hearing, the Court will consider whether the proposed Settlement is fair, reasonable, adequate, and is in the best interests of Settlement Class Members, and if it should be approved. If there are valid objections, the Court will consider them and will listen to people who have asked to speak at the hearing if the request was made properly. The Court will also consider the award of Attorneys' Fees, Costs, and Expenses to Class Counsel and the request for a service award to the Class Representative.

18. Do I have to come to the hearing?

No. You are not required to come to the Final Fairness Hearing. However, you are welcome to attend the hearing at your own expense.

If you submit an Objection, you do not have to come to the hearing to talk about it. If your objection was

submitted properly and on time, the Court will consider it. You also may pay your own lawyer to attend the Final Fairness Hearing, but that is not necessary.

19. May I speak at the hearing?

Yes. You can speak at the Final Fairness Hearing, but you must ask the Court for permission. To request permission to speak, you should file an objection according to the instructions in Question 15, including all the information required. You cannot speak at the hearing if you exclude yourself from the Settlement.

DO NOTHING

20. What happens if I do nothing?

If you do nothing, you will not get any benefits from the Settlement, you will not be able to sue for the claims in this case, and you release the claims against Defendant and the Released Persons described in Question 8.

GET MORE INFORMATION

21. How do I get more information about the Settlement?

This is only a summary of the proposed Settlement. If you want additional information about this lawsuit, including a copy of the Settlement Agreement, the Complaint, the Court's Preliminary Approval Order, Class Counsel's Application for Attorneys' Fees and Expenses, and more, please visit www.RedeemerHPixelSettlement.com or call 844-496-1189. You may also contact the Claims Administrator at Redeemer Pixel Tracking Settlement, c/o Settlement Administrator, PO Box 25191, Santa Ana, CA 92799.

**PLEASE DO NOT ADDRESS ANY QUESTIONS ABOUT THE SETTLEMENT
OR LITIGATION TO THE CLERK OF THE COURT, THE JUDGE, DEFENDANT, OR
DEFENDANT'S COUNSEL.**



For complete information and to
file a claim, scan this QR code to go
directly to the Settlement website,

www.RedeemerHPixelSettlement.com