NOTICE OF PROPOSED CLASS ACTION SETTLEMENT

CIRCUIT COURT FOR THE 17TH JUDICIAL CIRCUIT IN AND FOR BROWARD COUNTY, FLORIDA
Brewer, et al. v. CVS Pharmacy, Inc. and Criteo Corp., Case No. CACE-26-008094

If You Accessed CVS Digital Properties in the United States Prior to July 27, 2026, You May Be Entitled to a Payment From a Class Action Settlement.

A court authorized this notice. This is not a solicitation from a lawyer.
You are not being sued.

- A settlement has been reached in a class action lawsuit against the Defendants, CVS Pharmacy, Inc. and Criteo Corp. ("Defendants"), arising from or related to the alleged disclosure of data of users of the CVS Digital Properties[1], including but not limited to users of www.cvs.com, www.cvshealth.com, and the CVS digital application, to Criteo or other technology providers or third parties through technology embedded on any of the CVS Digital Properties in violation of state and federal law. Defendants deny that they violated any law but have agreed to the Settlement to avoid the uncertainties, business disruptions, and expenses associated with continuing the lawsuit. The Settlement does not determine which party is correct and the Court has not decided who is right.
- You are included if you accessed the CVS Digital Properties prior to July 27, 2026.
- Read this notice carefully. Your legal rights are affected whether you act, or do not act.

YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT	
DO NOTHING	You **will not** get a share of the Settlement Class Member Benefits and will give up your rights to sue the Defendants and other Released Parties about the claims in the case.
FILE A CLAIM FOR A CASH PAYMENT BY NOVEMBER 16, 2026	This is the **only** way to receive a Cash Payment of either: (1) up to Five U.S. Dollars ($5.00) without documentation, or (2) up to Ten U.S. Dollars ($10.00) with proof of membership in the Settlement Class. You will also give up your rights to sue the Defendants about the claims in the case. The fastest way to submit your Claim Form is online at www.CVSDigitalPrivacySettlement.com. If you prefer, you

[1] Capitalized terms herein have the same meanings as those defined in the Settlement Agreement, a copy of which may be found online at the Settlement Website below.

YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT	
	can download the Claim Form from the Settlement Website and mail it to the Settlement Administrator.
EXCLUDE YOURSELF BY NOVEMBER 2, 2026	You will receive **no** Settlement Class Member Benefits, but you will retain any rights you may have to sue the Defendants about the claims in this case.
OBJECT BY NOVEMBER 2, 2026	Write to the Court explaining why you do **not** like the Settlement.
GO TO THE HEARING ON DECEMBER 1, 2026	Ask to speak in Court about your opinion of the Settlement.

Your 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. If it does, and after any appeals are resolved, benefits will be distributed to those who submit qualifying Claim Forms. Please be patient.

	For complete information and to file a claim online, scan this QR code to go directly to the Settlement website, **www.CVSDigitalPrivacySettlement.com**

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Basic Information

1. Why was this Notice issued?

A Court authorized this Notice because you have a right to know about a proposed Settlement of this class action lawsuit and about all of your options, before the Court decides whether to give final approval to the Settlement. This Notice explains the lawsuit, the Settlement, and your legal rights.

The case is called *Brewer, et al. v. CVS Pharmacy, Inc. and Criteo Corp.*, Case No. CACE-26-008094 pending in the Circuit Court for the 17th Judicial Circuit in and for Broward County, Florida. The people who sued are called the Plaintiffs. The Defendants are CVS Pharmacy, Inc. and Criteo Corp.

2. What is a class action?

In a class action, one or more people called class representatives (in this case, Ariel Brooks, Justin Brewer, Alex Sisti, and Marc Weinberger) sue on behalf of a group or a "class" of people who have similar claims. In a class action, the court resolves the issues for all class members, except for those who exclude themselves from the Class.

3. What is this lawsuit about?

This lawsuit asserts claims under state and federal law arising from or related to the alleged disclosure of health or private information, personal information, browsing data, identifiers, or other data of users of the CVS Digital Properties to Criteo or other technology providers or third parties through technology embedded on any of the CVS Digital Properties. The Defendants deny they violated any law. The Court has not determined who is right. Rather, the Parties have agreed to settle the lawsuit to avoid the uncertainties and expenses associated with ongoing litigation.

4. Why is there a Settlement?

The Court has not decided whether the Plaintiffs or the Defendants should win this case. Instead, both sides agreed to a Settlement. That way, they avoid the uncertainties and expenses associated with ongoing litigation, and Settlement Class Members will get compensation sooner rather than, if at all, after the completion of a trial. Plaintiffs and their lawyers think the proposed Settlement is best for everyone who is affected.

Who's Included in the Settlement?

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

The Court decided that everyone who fits the following description is a member of the **Settlement Class**:

> All living individuals who accessed the CVS Digital Properties in the United States prior to July 27, 2026.

If you are not sure whether you are in the Settlement Class or have any other questions about the Settlement, visit the Settlement Website at www.CVSDigitalPrivacySettlement.com or call the toll-free number, 1-888-654-1271. You also may send questions to the Settlement Administrator at info@CVSDigitalPrivacySettlement.com.

The Settlement Class Member Benefits

6. What does the Settlement provide?

Compensatory Relief. Settlement Class Members may submit a valid Claim Form online at the Settlement Website, www.CVSDigitalPrivacySettlement.com, to receive a cash payment of up to either (1) Five U.S. Dollars ($5.00) without documentation, or (2) Ten U.S. Dollars ($10.00) if you provide proof of membership in the Settlement Class. If you prefer, you can download the Claim Form from the Settlement Website and mail it to the Settlement Administrator at CVS Digital Privacy Settlement, c/o Settlement Administrator, PO Box 1110, Costa Mesa, CA 92628.

Defendants have agreed to pay all approved claims to the Settlement Class, together with Settlement Administration Costs, approved attorneys' fees and costs to Class Counsel, and Service Awards to the Class Representatives.

A detailed description of the Settlement Class Member Benefits can be found in the Settlement Agreement, a copy of which is accessible on the Settlement Website, www.CVSDigitalPrivacySettlement.com.

7. How much will my cash payment be?

You **must** submit a Claim Form (see instructions below) to receive a Cash Payment. If you submit a valid Claim Form without documentation, you will receive a Cash Payment of up to Five U.S. Dollars ($5.00). If you provide valid proof of membership in the Settlement Class with your Claim Form, you will receive a Cash Payment of up to Ten U.S. Dollars ($10.00). The amount of the Cash Payments may decrease proportionately depending on the number of Valid Claims submitted. You may be responsible for any applicable taxes on your Cash Payment.

8. When will I get my payment?

The hearing to consider the fairness of the Settlement is scheduled for **December 1, 2026**. If the Court approves the Settlement, you will receive your Cash Payment if you submitted a valid claim one hundred and twenty (120) days after the Settlement has been finally approved and/or after any appeals process is complete. If you elected a Cash Payment, your payment will be made in the form you elected (PayPal, Venmo, Zelle, or check), and all checks will expire and become void one hundred and eighty (180) days after they are issued.

How to Get Benefits

9. How do I get a payment?

Settlement Class Members must submit a valid Claim Form online at the Settlement Website, www.CVSDigitalPrivacySettlement.com, to receive a cash payment of up to either (1) the estimated Five U.S. Dollars ($5.00), or (2) the estimated Ten U.S. Dollars ($10.00). If you prefer, you can download the Claim Form from the Settlement Website and mail it to the Settlement Administrator at CVS Digital Privacy Settlement, c/o Settlement Administrator, PO Box 1110, Costa Mesa, CA 92628. If you file a Claim Form, then you must file it by 11:59 p.m. EST on **November 16, 2026**.

Remaining in the Settlement

10. What am I giving up if I stay in the Class?

If the Settlement becomes final, you will give up your right to sue the Defendants and other Released Parties for the claims being resolved by this Settlement. The specific claims you are giving up against the Defendants are described in the Settlement Agreement in Section II.52. You will be "releasing" the Defendants and certain of its affiliates, employees and representatives as described in Section II.53 of the Settlement Agreement. Unless you opt-out (see Question 13), you are "releasing" the claims, regardless of whether you claim your Settlement Class Member Benefit or not. The Settlement Agreement is available through the "Important Documents" link on the website.

The Settlement Agreement describes the released claims with specific descriptions, so read it carefully. If you have any questions you can talk to the lawyers listed in Question 11 for free or you can, of course, talk to your own lawyer if you have questions about what this means.

The Lawyers Representing You

11. Do I have a lawyer in the case?

The Court has appointed Jeff Ostrow of Kopelowitz Ostrow P.A., Jonathan M. Jagher of Justice Jagher London and Millen LLC, Katrina Carroll of Carroll Shamberg LLC, Mariya Weekes of Milberg PLLC, and Yitzchak Kopel of Bursor & Fisher, P.A. to represent the Settlement Class. They are called "Class Counsel." They believe, after conducting an extensive investigation, that the Settlement Agreement is fair, reasonable, and in the best interests of the Settlement Class. You will not be charged for these lawyers. If you want to be represented by your own lawyer in this case, you may hire one at your expense.

12. How will the lawyers be paid?

Class Counsel shall apply to the Court for an award of attorneys' fees and costs, and expenses of up to thirty-seven and a half percent (37.5%) of the Maximum Cash Payment, but the Court may award less than this amount.

Class Counsel shall request Service Awards for the Class Representatives in an amount not to exceed Two Thousand and Five Hundred U.S. Dollars ($2,500.00), but the Court may award less than this amount.

Excluding Yourself from the Settlement

13. How do I get 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 Class Member Benefits or payment. However, you will keep any rights you may have to sue Defendants 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 Class Member Benefits if you exclude yourself.

To opt-out of the Settlement, you must submit a request for exclusion by 11:59 p.m. EST on **November 2, 2026**.

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

(1) a statement that you want to be excluded from the *Brewer, et al. v. CVS Pharmacy, Inc. and Criteo Corp.*, Case No. CACE-26-008094 (Fla. Cir. Ct., Broward Cnty.) settlement;
(2) your name, your address, telephone number, and email address (if any);
(3) a statement that you accessed the CVS Digital Properties prior to July 27, 2026; and
(4) your signature.

Any opt-out request must be personally signed by the Settlement Class Member. If you choose to submit a request for exclusion by mail, you must mail or deliver your exclusion request, postmarked no later than **November 2, 2026**, to the following address:

CVS Digital Privacy Settlement
ATTN: Exclusion Requests
PO Box 1110
Costa Mesa, CA 92628

14. If I don't exclude myself, can I sue the Defendants for the same thing later?

No. Unless you exclude yourself, you give up any right to sue the Defendants and other Released Parties for the claims being resolved by this Settlement.

15. If I opt-out, can I get anything from this Settlement?

No. If you opt-out, you will not receive any payment from the Maximum Cash Payment.

Objecting to the Settlement

16. How do I object to the Settlement?

If you are a Class Member, you can object to the Settlement if you do not like any part of it. You can give reasons why you think the Court should not approve it. The Court will consider your views.

You cannot object if you have excluded yourself from the Settlement.

To object, you must file with the Court a letter or brief stating that you object to the Settlement in *Brewer, et al. v. CVS Pharmacy, Inc. and Criteo Corp.*, Case No. CACE-26-008094 (Fla. Cir. Ct., Broward Cnty.) and identify all your reasons for your objections (including citations and supporting evidence) and attach any materials you rely on for your objections. Your letter or brief must also include:

(1) Your full name, your mailing address, telephone number, email address (if any);
(2) The basis upon which you claim to be a Class Member;
(3) All grounds for the objection, accompanied by any legal support for the objection known to you or your counsel;
(4) The name and contact information of any and all attorneys representing, advising, or in any way assisting you in connection with your objection, including any former or current counsel who may be entitled to compensation for any reason related to the objection to the Settlement and/or Application for Attorneys' Fees, Costs, and Service Awards;
(5) If you, or an attorney assisting you with your objection, have ever objected to any class action settlement where you or the objecting attorney has asked for or received payment in exchange for dismissal of the objection (or any related appeal) without modification to the settlement, you must include a statement in your objection identifying each such case by full case caption;
(6) You must also include the number of times in which your counsel and/or counsel's law firm have objected to a class action settlement within the five (5) years preceding the date of the filed objection, the caption of each case in which counsel or the firm has made such objection;

(7) A copy of any orders related to or ruling upon your counsel or the counsel's law firm's prior objections that were issued by the trial and appellate courts in each listed case;
(8) You must also state whether you or your counsel intend to personally appear at the Final Approval Hearing on December 1, 2026, and whether you or any other persons intend to testify in support of the objection;
(9) Whether you and/or the objector's counsel used any form of artificial intelligence in the preparation of the objection;
(10) You must also personally sign the objection (an attorney's signature is not sufficient); and
(11) Mail or deliver a copy of your letter or brief to Class Counsel and Defendants' Counsel listed below.

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

Class Counsel will file with the Court and post on this website its request for attorneys' fees by October 17, 2026.

If you want to appear and speak at the Final Approval Hearing to object to the Settlement, with or without a lawyer (explained below in answer to Question Number 20), you must say so in your letter or brief. File the objection with the Court (or mail the objection to the Court) and mail a copy of the objection to Class Counsel and Defendants' Counsel, at the addresses below, postmarked no later than November 2, 2026.

Court	Class Counsel	Defendants' Counsel
The Honorable Shari A. Olefson Circuit Court for the 17th Judicial Circuit in and for Broward County, Florida 201 SE 6th Street Fort Lauderdale, FL 33301	Jeff Ostrow **Kopelowitz Ostrow P.A.** 1 West Las Olas Blvd., Ste. 500 Fort Lauderdale, FL 33301 Jonathan M. Jagher **Justice Jagher London and Millen LLC** 100 Tri-State International Drive, Suite 128 Lincolnshire, IL 60069 Katrina Carroll **Carroll Shamberg LLC** 200 N. LaSalle Suite 1650 Chicago, IL 60601 Mariya Weekes **Milberg PLLC** 333 SE 2nd Avenue, Suite 2000 Miami, FL 33131 Yitzchak Kopel **Bursor & Fisher, P.A.** 1330 Avenue of the Americas, 32nd Floor New York, NY 10019	**If to CVS or CVS's Counsel**: Lauri Mazzuchetti Whitney Smith **Kelley Drye & Warren LLP** 7 Giralda Farms, Suite 340 Madison, NJ 07940 lmazzuchetti@kelleydrye.com wsmith@kelleydrye.com **If to Criteo or Criteo's Counsel**: Tenaya Rodewald **Sheppard, Mullin, Richter & Hampton LLP** 1540 El Camino Real, Suite 120 Menlo Park, CA 94026 trodewald@sheppard.com

17. What's the difference between objecting and opting-out of the Settlement?

Objecting simply means telling the Court that you do not like something about the Settlement. You can object only if you stay in the Class. Opting-out of the Class is telling the Court that you don't want to be part of the Class. If you opt-out, you have no basis to object because the case no longer affects you.

The Court's Final Approval Hearing

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

The Court has not yet finally approved the Settlement. The Court will hold the Final Approval Hearing at **9:30 a.m. EST on December 1, 2026, virtually by Zoom**. The purpose of the hearing will be for the Court to determine whether to approve the Settlement as fair, reasonable, adequate, and in the best interests of the Class; to consider the Class Counsel's request for attorneys' fees and costs; and to consider the request for Service Awards to the Class Representatives. At that hearing, the Court will be available to hear any objections and arguments concerning the fairness of the Settlement.

The hearing may be postponed to a different date or time without notice, so it is a good idea to check for updates by visiting the Settlement Website at www.CVSDigitalPrivacySettlement.com or calling 1-888-654-1271. If, however, you timely objected to the Settlement and advised the Court that you intend to appear and speak at the Final Approval Hearing, you will receive notice of any change in the date of the Final Approval Hearing.

19. Do I have to come to the hearing?

No. Class Counsel will answer any questions the Court may have. But, you are welcome to come at your own expense. If you send an objection or comment, you do not have to come to Court to talk about it. As long as you filed and mailed your written objection on time, the Court will consider it. You may also pay another lawyer to attend, but it is not required.

20. May I speak at the hearing?

Yes. You may ask the Court for permission to speak at the Final Approval Hearing. To do so, you must include in your letter or brief objecting to the Settlement a statement saying that it is your "Notice of Intent to Appear in *Brewer, et al. v. CVS Pharmacy, Inc. and Criteo Corp.*, Case No. CACE-26-008094 (Fla. Cir. Ct., Broward Cnty.)." It must include your name, address, telephone number and signature as well as the name and address of your lawyer, if one is appearing for you. Your objection and notice of intent to appear must be filed with the Court and postmarked no later than **November 2, 2026** and be sent to the addresses listed in Question 16.

Getting More Information

21. Where do I get more information?

This Notice summarizes the Settlement. More details are in the Settlement Agreement. You can get a copy of the Settlement Agreement and other related documents available at the Settlement Website, www.CVSDigitalPrivacySettlement.com.

You may also write with questions to CVS Digital Privacy Settlement, c/o Settlement Administrator, PO Box 1110, Costa Mesa, CA 92628. You can call the Settlement Administrator at 1-888-654-1271 or Class Counsel at 1-646-837-7150, if you have any questions. Before doing so, however, please read this full Notice carefully. You may also find additional information elsewhere on the case website.

	For complete information and to file a claim online, scan this QR code to go directly to the Settlement website, **www.CVSDigitalPrivacySettlement.com**

Public court record.

This copy was downloaded from https://cw.simpluris.com/docs/public/downloads/CBC4/LONG_FORM
on 2026-11-02 and is hosted, unaltered, for reference at
https://chimo.ai/class-action/cvs-digital-privacy

Court: Circuit Court of the 17th Judicial Circuit, Broward County, Florida
Case number: CACE-26-008094

Chimo hosts public court records for readers' reference; documents are
unaltered copies from the court docket or the court-approved settlement website.