

**BELL MOBILITY RELEVANT ADVERTISING PROGRAM CLASS ACTION  
NOTICE OF CERTIFICATION AND OPT-OUT DEADLINE**

**This Notice may affect your rights. Please read carefully.**

**WHAT IS THIS CLASS ACTION ABOUT?**

This class action alleges that Bell Mobility breached some Bell Mobility and Virgin Mobile Canada customers' privacy rights by using their personal information without consent for a proposed marketing initiative called the Relevant Advertising Program (RAP). There has been no determination by the court regarding the merits of the plaintiffs' claims. Bell Mobility maintains that it did not breach any privacy laws and/or obligations, and denies that any customer received a targeted advertisement pursuant to the RAP or that Bell Mobility disclosed any personal information to third parties.

On May 13, 2019, the action was certified as a class action. The certification order and the reasons for certification are posted at [www.strosbergco.com/class-actions/bellmobility/](http://www.strosbergco.com/class-actions/bellmobility/).

**HOW DO I KNOW IF I AM A CLASS MEMBER?**

You are a Class Member if you are a person in Canada who had a Bell Mobility or Virgin Mobile Canada consumer (non-corporate) account with data service between November 16, 2013 and April 13, 2015. Employees and directors of Bell Mobility cannot be a Class Member.

**HOW DO I OPT OUT OF THE CLASS ACTION?**

If you fall within the class definition as described above, you are automatically included in the class action and need not do anything at this time if you wish to participate. You will be bound by the judgment in this action, whether favourable or not.

If you wish to be excluded from this class action lawsuit and not be bound by any order made in the action, you must complete and mail an opt-out form (found at [www.relevantadsclassaction.ca](http://www.relevantadsclassaction.ca)) in an envelope postmarked by **October 30, 2020** to the following address:

Bell RAP Class Action  
c/o RicePoint Administration Inc.  
P.O. Box 4454, Toronto Station A  
25 The Esplanade  
Toronto, ON M5W 4B1

**Alternatively, you may opt out electronically at the website [www.relevantadsclassaction.ca](http://www.relevantadsclassaction.ca).**

If you do not opt out of the class action on or before **October 30, 2020**, you will be part of this class action and you will be bound by the terms of any order, judgment or settlement, whether favourable or not, and will not be entitled to prosecute an independent action against Bell Mobility in relation to these allegations.

**Do not opt out if you wish to participate in the class action.**

**WHO ARE THE LAWYERS REPRESENTING ME?**

The law firms STROSBERG SASSO SUTTS LLP and CHARNEY LAWYERS PC represent the Class Members.

**WILL IT COST ME ANYTHING TO PARTICIPATE IN THE CLASS ACTION?**

There is no cost for Class Members to participate in the class action. If the class action is successful, Class Counsel will seek compensation for their fees and expenses from any recovery. The plaintiffs' fee agreement, which must be approved by the court, provides for payment of counsel fees based on 33% of any recovery, plus disbursements and taxes thereon.

In addition, the Class Proceedings Fund, which is providing funding and costs indemnity for this class action, is entitled to 10% of any recovery plus reimbursement of any expenses paid by the Fund, net of Class Counsel fees, disbursements and taxes thereon.

Individual issues may remain for determination after the trial. If a Class Member wishes to retain a lawyer to assist with these individual issues, the Class Member may have to pay additional fees for this service.

**WHAT IF I STILL HAVE QUESTIONS?**

Additional information about the class action can be found at [www.strosbergco.com/class-actions/bellmobility/](http://www.strosbergco.com/class-actions/bellmobility/).

Any questions regarding this Notice or opting out should be directed to:

RicePoint Administration Inc.  
1-866-684-3883

**THIS NOTICE WAS APPROVED BY THE ONTARIO SUPERIOR COURT OF JUSTICE.  
INQUIRIES SHOULD NOT BE DIRECTED TO THE COURT.**