



**FREQUENTLY ASKED QUESTIONS**

*This FAQ was prepared by class counsel following the distribution of the notice to members.*

*Thiel v. Meta Platforms Inc. (formerly Facebook Inc.) - 500-06-000961-181*

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*The Authorized Class Action*

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**1. What is the Meta class action?**

The Meta class action, filed against Meta Platforms Inc. (formerly Facebook) under case number 500-06-000961-181, focuses on a single issue: Meta's sharing of personal data belonging to users in Quebec with smartphone manufacturers and companies developing Facebook-compatible applications. These applications include quizzes, horoscopes, ads, fitness trackers, and more.

This class action does not target Meta's overall business model or any other potential privacy violations.

It alleges that Meta allowed companies to access users' personal information in Quebec without their consent, violating their privacy rights. The goal of this class action is to hold Meta accountable for these actions and prevent similar behaviours in the future.

It is important to note that this case does not seek monetary compensation for class members.

**2. Do I have to do anything to take part in the class action or sign up?**

No, you don't need to do anything to be part of the class action. If you have had a Facebook account at any time since July 27, 2012, you are automatically a member of the group.

You don't need to register, confirm your participation, or provide your contact information. You are included as a member unless you choose to opt out (see question 5 for instructions on how to opt out).

Being a member does not require you to take any active steps, such as participating in court proceedings, attending hearings, paying fees, testifying, or sharing details about your situation.

**3. What are the consequences of being included in this class action?**

If you are a class member and do not opt out, you will automatically be bound by the Settlement Agreement (if it is approved by the Superior Court) and any judgments made in this class action.

In practical terms, this means you will not be able to sue Meta for the specific practice covered by this class action. However, your inclusion in this class action does not



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affect your right to sue Meta or participate in other class actions related to different issues, such as other privacy violations.

#### **4. Who pays the legal fees and other costs associated with the class action?**

You don't have to pay anything.

The lawyers' fees and other costs related to the class action will be deducted from the total amount obtained if the class action is successful or from the settlement amount. In this case, the fees and other costs will be paid out of the total amount that Meta has agreed to pay under the Settlement Agreement.

For more details, please refer to questions 17 and 18 of this FAQ, which explain the professional fees class counsel will request the Superior Court to approve.

#### **5. How can I opt out of this class action?**

To exclude yourself from the class action, you must submit a completed [Opting-Out Form](#) by **February 7, 2025** :

1. By mail to the Superior Court of Quebec:

**Grefe de la Cour supérieure du Québec**  
1 Notre-Dame Street East Montréal, Québec  
H2Y 1B6

2. **AND** by e-mail or mail to class counsel:

**Trudel Johnston & Lespérance**  
750 Côte de la Place d'Armes, Suite 90  
Montréal (Québec) H2Y 2X8  
[info@tjl.quebec](mailto:info@tjl.quebec)

If you have **already submitted your Opting-Out Form**, there is **no need to send it again**.

#### **6. Can the group's lawyers help me with other issues related to my Facebook account?**

No, the group's lawyers cannot assist with technical issues related to your Facebook account, such as changing your password or addressing a blocked account.

Additionally, due to the high volume of correspondence, the lawyers are unable to review or take on new class actions proposed by individual class members.



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**7. Can I access the documents, procedures, and judgments related to this class action? Are these documents available in French and English?**

Yes, the main documents related to this class action are available on the website of class counsel, in the "Proceedings and Judgments" section of the page dedicated to this case. You can access them here: [Facebook \(Meta\)'s violation of its users' privacy rights - Trudel Johnston & Lespérance](#).

You can also consult the Registry of Class Action of the Superior Court of Québec under the "Documents and proceedings" section at this link: [Overview of the application 500-06-000961-181 - Registry of class actions](#).

While some documents are available only in French or English, both the Settlement Agreement and the Notice to Members are available in both languages.

**8. Who is Proactio? Why did they contact me, and how did they get my personal information? Is this a fraud?**

Proactio, a division of Raymond Chabot Grant Thornton, is the company appointed by the Superior Court to manage the distribution of notices to members of this class action.

[The Superior Court ordered Meta](#) to provide certain information about Facebook users (such as names, email addresses, and phone numbers) to Proactio. This information is being used solely for the purpose of distributing notices to members.

This court-approved notice to members distributing process is designed to ensure that all affected members are informed about the class action and can learn about the case, opt out, object, or comment on the Settlement Agreement.

If you received a communication from Proactio announcing the authorization of this class action or the Settlement Agreement, it is not a fraud.



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*The Settlement Agreement*

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**9. What does the Settlement Agreement cover?**

Under the Settlement Agreement, Meta has agreed to pay CAD 9,000,000. This amount will be distributed among three Quebec universities—Concordia University, Université du Québec à Montréal, and Université Laval—to fund projects aimed at promoting and protecting privacy rights in Quebec.

No funds will be paid directly to members of the class action.

**10. Will I receive part of the settlement amount?**

No, class members will not receive any payments under the Settlement Agreement. The settlement is a remedial measure aimed at promoting and protecting privacy rights in Quebec through the funding of academic initiatives. These projects, undertaken by academic institutions, are designed to benefit all Facebook users in Quebec.

If you have received a payment (such as an Interac transfer or cheque) since the notice was sent to members, it is not related to this class action. You may be part of another class action involving Meta. Please carefully review the documentation that came with the cheque or contact the issuer directly for more information.

**11. Why was the class action settled?**

The class action was settled because class counsel, in collaboration with the representative plaintiff, Mr. Stuart Thiel, determined that the Settlement Agreement with Meta was in the best interests of the members.

This decision was based on several considerations. Legal risks and uncertainties made the outcome of a trial unpredictable. Even in the event of a successful trial, there was no guarantee that the amount of punitive damages awarded would have exceeded CAD 9,000,000 provided for in the Settlement Agreement. Additionally, continuing the litigation would have been lengthy, costly, and complex, requiring significant resources from both the parties and the judicial system.

For more detailed information about the reasons for entering into the Settlement Agreement, please refer to the [Application for Approval of Settlement Agreement and Plaintiff's Attorneys' Fees](#) (French only).



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## **12. Can another university be added to receive funds from the settlement?**

No, the universities benefiting from the settlement were selected by the parties and are named in the Settlement Agreement. Class counsels cannot add additional institutions.

However, the Settlement Agreement is subject to approval by the Superior Court. The Court has the authority to designate another academic institution or additional institutions to receive part of the settlement funds if it deems it appropriate.

## **13. What will the selected universities do to promote and protect privacy rights in Quebec?**

Each beneficiary university has prepared a plan for using the settlement funds, developed in collaboration with class counsel to ensure the money is used effectively to promote and protect privacy rights in Quebec.

Here are some concrete examples of planned initiatives:

- Educational activities: Organizing conferences, workshops, and courses on privacy rights for students, professionals, and the general public.
- Academic research: Funding research projects to understand and address current challenges in personal data protection.
- Tools and awareness: Creating practical guides and educational resources to help citizens better protect their privacy online.
- Interdisciplinary collaboration: Partnering with experts in technology, law, and social sciences to explore innovative solutions to privacy issues.
- Public reporting: Each university will produce an annual report detailing how the funds are used and the outcomes achieved, ensuring transparency and accountability.

These initiatives aim to strengthen the protection of personal data and raise public awareness of privacy issues in an evolving digital world.

## **14. What are the next steps in making the Settlement Agreement official?**

For a Settlement Agreement in a class action to be valid and final, it must be approved by the Court, which ensures that it is in the best interests of the members. This is a legal requirement.

Class Counsel have filed an [Application for Approval of the Settlement Agreement](#) (French only). The application will be heard by the Superior Court of Montreal on



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**February 11, 2025, at 9:15 a.m.**, in room **17.09**, located at 1 Notre-Dame Street East, Montreal, Quebec, H2Y 1B6.

Class members are not required to attend this hearing whether you support the agreement or wish to oppose it. If you would like to attend, you can do so virtually using the following link: [Join the Microsoft Teams meeting](#).

### **15. What is the difference between opting out of the class action and objecting to the Settlement Agreement?**

Opting out of the class action: If you choose to opt out, you will no longer be a member of the class action. This means you will not be bound by the Settlement Agreement or any judgments rendered in the case. You will retain the right to file an individual lawsuit against Meta based on the same facts, but you will not be entitled to any benefits from the settlement. For details on how to opt out, see question 5.

Objecting to the Settlement Agreement: If you wish to remain a class member but are dissatisfied with the terms of the Settlement Agreement, you can submit an objection or comments to the Court in writing. After submitting your objection, you may also present it in person at the hearing, though this is not mandatory.

The Court will consider all written objections before deciding whether to approve the Settlement Agreement. However, even if you object, you will remain a class member and will be bound by the Court's final decision regarding the settlement.

### **16. How can I object to the Settlement Agreement or comment on it?**

If you want your objection or comments to be considered by the Superior Court, you must send an email or document to class counsel no later than **February 7, 2025**:

- by email (attach your document to the email): [info@tjl.quebec](mailto:info@tjl.quebec);
- or by fax at 514-871-8800.

Your objection or comment must include:

- Your name, address, email address, and telephone number,
- A brief statement explaining your reasons for the objection or comments, and
- Whether you plan to attend the hearing in person or through a lawyer (if you will be represented by a lawyer, include their name, address, email address, and telephone number).

If you have **already submitted an objection or comment** with all the required information, there is **no need to send it again**.



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*Class counsel's fees*

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**17. How are class counsel's fees calculated?**

At the start of the class action, class counsel entered into a fee agreement with the representative plaintiff, Mr. Stuart Thiel. Under this agreement, the lawyers agreed to be compensated only at the end of the case, based on a progressive percentage of the amount recovered.

Since the class action was settled after authorization but before Meta filed its defense, class counsel is entitled to 25% of the total settlement amount of CAD 9,000,000. This means the lawyers' fees amount to CAD 2,250,000, plus disbursements of CAD 18,604.60 and applicable taxes, as per the agreement with Mr. Thiel.

Class counsel has filed an Application for Approval of Fees, which will be heard by the Superior Court of Montreal on **February 11, 2025**, at **9:15 a.m.**, in room **17.09**, at 1 Notre-Dame Street East, Montreal, Quebec, H2Y 1B6. The Court will assess the application and ensure that the fees are fair and reasonable before making a decision.

If you wish to attend the hearing, you can do so virtually using the following link: [Join the Microsoft Teams meeting.](#)

**18. What work has class counsel done in this class action?**

Class counsel have dedicated significant efforts in advancing the case. They developed a legal strategy focused exclusively on punitive damages—an innovative approach for a privacy-related class action in Quebec that required extensive research and drafting.

The lawyers successfully argued for the authorization of the class action, using creative and groundbreaking legal arguments. They also negotiated the Settlement Agreement with Meta's experienced counsel, ensuring that it aligns with the class action's objectives and provides collective benefits to class members.

To date, the class action has been almost entirely funded by class counsel, with limited financial assistance from the Fonds d'aide aux actions collectives, which covered only a small portion of the efforts invested.

Lastly, class counsel confirmed that Meta has ceased the practice targeted by the class action, representing a significant victory for all group members.