

If You Were Notified By the NSHA That Your Personal Health Information Was Accessed (2018-2020)

This Proposed Class Action May Affect Your Rights.

Please read this notice carefully.

The Supreme Court of Nova Scotia has authorized this notice. You are not being sued.

You are receiving this notice because you were sent a letter from the Nova Scotia Health Authority (“**NSHA**”) between 2018 and 2020 stating that an NSHA employee accessed your personal health information without a valid hospital or medical purpose. NSHA has identified you as a member of an included subclass.

As a result, you may be a Class Member in a proposed class action. If you qualify, you are automatically included and do **not** need to take any action to participate.

A settlement has been reached with NSHA regarding this proposed class action. If the settlement is approved by the Supreme Court of Nova Scotia (“**Court**”), you may be entitled to compensation.

A Court hearing to determine whether this proposed class action should be certified for settlement purposes and whether the proposed settlement is fair, reasonable, and in the best interests of the Class Members is scheduled to take place at the Law Courts in Halifax (1815 Upper Water Street) on November 13, 2026.

If the Court certifies the class action and approves the settlement, you will have the right to opt out before the settlement becomes binding on you. If you do not opt out, you will be legally bound by its terms.

A copy of the Settlement Agreement can be found on Class Counsel’s websites: <https://mdwlaw.ca/> and <http://valentlegal.ca/>. You can also request a copy by emailing info@mdwlaw.ca or calling 902-422-5881.

BASIC INFORMATION

1. Why was this notice issued?

The Plaintiff and NSHA have reached a proposed settlement. They are asking the Court to certify the Action as a class proceeding for settlement purposes, and to approve the settlement.

2. What is this lawsuit about?

The lawsuit is known as *Munroe v Nova Scotia Health Authority*, Hfx No. 502113. The Plaintiff, Carla Munroe, filed the claim on behalf of all affected individuals. NSHA is the Defendant.

The lawsuit alleges that, between 2018 and 2020, certain NSHA employees improperly accessed patients' personal health information, and that the NSHA is liable for these privacy breaches.

Each Class Member received a letter from the NSHA advising them of the incidents.

The allegations have not been proven in Court. The NSHA denies liability.

3. Why is this a class action?

In a class action, one or more individuals – called “representative plaintiffs” – bring a lawsuit on behalf of a larger group of people with similar legal claims. In this case, Carla Munroe is the proposed representative plaintiff. Every person with a similar claim is considered part of the “class” and is known as a “class member.”

4. Who is a member of the Class?

The Class includes all living persons who were sent letters from NSHA between 2018 and 2020 advising that their personal health information was accessed without a hospital or medical purpose by an NSHA employee, and who fit into one of four groups or “Subclasses” based on the employee who accessed their personal health information and based on the nature of the access:

1. The “**Aberdeen Subclass**” means the Class Members whose records were accessed by a particular employee at Aberdeen Hospital.
2. The “**Central Zone Subclass**” means the Class Members whose records were accessed by a particular employee within the Central Zone of NSHA.
3. The “**Valley (EMR) Subclass**” means the Class Members whose records, including EMR records, were accessed by a particular employee at the Valley Regional Hospital.
4. The “**Valley (Non-EMR) Subclass**” means the Class Members whose records, not including EMR records, were accessed by an employee at the Valley Regional Hospital.

If the class action is certified, Class Members will be automatically included – unless they choose to opt out. The procedure for opting out is explained in the Settlement Agreement

and will also be detailed in a future notice if the Court certifies the class action and approves the settlement.

If the class action is certified and the settlement is approved by the Court, all Class Members who do not opt out will be legally bound by its terms.

If you are unsure whether you are a Class Member, please contact Class Counsel using the details provided below.

5. Will there be a settlement?

Yes, subject to Court approval.

The NSHA has agreed to a \$500,000 all-inclusive settlement, which includes payments to Class Members as well as administration costs and Class Counsel's legal fees.

Guaranteed Payments

If the Court approves the settlement, each Class Member will be entitled to receive a Guaranteed Payment. The amount of the Guaranteed Payments will vary based on the location and nature of the access:

- **\$700** – Aberdeen Subclass
- **\$1,400** – Central Zone Subclass
- **\$1,400** – Valley (EMR) Subclass
- **\$700** – Valley (Non-EMR) Subclass

If the Court approves the settlement (and the settlement is not overturned on appeal), your Guaranteed Payment will be sent to your confirmed address. Cheques must be deposited within six months of mailing.

If the settlement is approved and you do not opt out, you will release your claims related to the access of your personal health information as described in this class action.

Arbitration Fund

Class Members seeking additional compensation due to exceptional impact can apply in writing to an independent Arbitrator, who may award up to **\$8,000** inclusive of any Guaranteed Payment. Participation in the arbitration process does not affect eligibility for the Guaranteed Payment, and higher awards are not guaranteed.

A full copy of the Settlement Agreement can be found online: <https://mdwlaw.ca/> and <http://valentlegal.ca/>.

YOUR RIGHTS AND OPTIONS

6. How do I participate in the class action?

If you meet the definition of a Class Member, you will be automatically included in the class action. You do **not** need to do anything to participate.

7. What if I disagree with the settlement?

The Court will hold a hearing on November 13, 2026, to decide whether to certify the action for settlement purposes, approve the settlement, and approve the administration expenses and the legal fees of Class Counsel. You may attend this hearing but are not required to. If the settlement is approved, payments will be made according to the settlement terms.

If you want to **object** to the settlement:

- Complete the attached Notice of Objection form (also available on <https://mdwlaw.ca/> and <http://valentlegal.ca/> or by emailing info@mdwlaw.ca) and
- Submit it to MDW Law by October 23, 2026.

Your Notice of Objection will be filed with the Court.

THE LAWYERS REPRESENTING YOU

8. Do I have a lawyer in the case?

Valent Legal and MDW Law are Class Counsel and they will represent you and all other Class Members.

You do **not** have to pay these lawyers directly. Class Counsel will only be paid if the settlement is approved and they obtain compensation for the Class. All legal fees must be approved by the Court.

For more information, please email info@mdwlaw.ca or call 902-422-5881.