

If you were notified of a Data Incident involving Startek, Inc. on June 26, 2021, you may be entitled to benefits from a settlement.

A federal state court has authorized this Notice. This is not a solicitation from a lawyer.

- A settlement has been reached in a class action lawsuit against Startek, Inc. (“Startek” or “Defendant”), arising out of a Data Incident on June 26, 2021, where Startek was targeted by cybercriminals who may have obtained access to the personally identifiable information (“PII”) of Startek’s current and former employees.
- You are a “Settlement Class Member” if you were mailed a notification that your PII may have been impacted in the Data Incident experienced by Startek on June 26, 2021. The Settlement provides the following settlement benefits to Settlement Class Members:

Compensation for Documented Ordinary Losses: If you have documentation showing that you spent money or incurred losses incurred as a result of the Data Incident, you may be eligible for reimbursement up to \$500. Documented ordinary losses include reimbursement for: (i) ordinary out-of-pocket expenses; and (ii) fees for credit reports, credit monitoring, or other identity theft insurance product purchased between June 26, 2021 through and including the end of the Claims Deadline as of **February 21, 2023**; and (iii) up to four (4) hours (at \$15 per hour) of lost time spent dealing with the Data Incident, if at least one (1) full hour was spent addressing the Data Incident. You must submit a Claim Form to receive these benefits.

Compensation for Documented Extraordinary Losses: For certain documented extraordinary losses, you may be eligible for reimbursement up to \$4,500.

Credit Monitoring and Identity Theft Protection Services: Settlement Class Members who previously claimed the 12-month, 1-Bureau (“1B”) credit monitoring and identity theft protection services, with \$1 million in insurance coverage, through Experian, which was offered by Startek in connection with the Data Incident response, will be automatically provided with an additional two (2) years of these services without the need to make an affirmative claim. Settlement Class Members who did not previously enroll in the 12-month, Experian 1B credit monitoring and identity theft protection services, with \$1 million in insurance coverage, may submit a claim for two (2) years of 1B credit monitoring and identity theft protection services, with \$1 million in insurance coverage.

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

Your Legal Rights and Options		Deadline
SUBMIT A CLAIM FORM	The only way to get Settlement benefits for compensation for documented ordinary losses and/or compensation for documented extraordinary losses is to submit a Claim Form.	February 21, 2023
OBTAIN IDENTITY THEFT PROTECTIONS	<p>If you previously claimed the 12-month Experian credit monitoring and identity theft protection services offered by Startek, you will be automatically provided with two (2) additional years of these services through Experian. You do <u>not</u> need to submit a Claim Form to receive this benefit.</p> <p>If you did not previously enroll in the 12-month Experian credit monitoring and identity theft protection services offered by Startek, you may submit a claim for two (2) years of credit monitoring and identity theft protection services. You must submit a Claim Form to receive this benefit.</p>	February 21, 2023
EXCLUDE YOURSELF	Get no Settlement benefits. Keep your right to file your own lawsuit against Startek about the legal claims in this case.	January 23, 2023
OBJECT	<p>Tell the Court why you do not like the Settlement. You will still be bound by the Settlement if the Court approves it.</p> <p>You may still file a Claim Form and receive Settlement benefits.</p>	January 23, 2023
DO NOTHING	Get no Settlement benefits. Be bound by the Settlement.	

- These rights and options—**and the deadlines to exercise them**—are explained in this Notice.
- The Court in charge of this case must still decide whether to approve the Settlement and the requested attorneys’ fees and expenses. No Settlement benefits or payments will be provided, unless the Court approves the Settlement, and it becomes final.

Questions? Go to www.startekclassactionsettlement.com or call 1-888-200-7034

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BASIC INFORMATION

1. Why is this Notice being provided?

The United States District Court, District of Colorado authorized this Notice because you have the right to know about the proposed Settlement of this class action lawsuit and about all of your rights and options before the Court decides whether to grant final approval to the Settlement. This Notice explains the lawsuit, the Settlement, your legal rights, what benefits are available, who is eligible for the benefits, and how to get them.

Judge Regina M. Rodriguez is overseeing this class action. The case is known as *Hawkins et al. v. Startek*, Case No. 1:22-cv-00258-RMR-NRN (the “Litigation”). The people who filed this lawsuit are called the “Plaintiffs” or “Class Representatives” and the company they sued, Startek, Inc., is called “Startek” or the “Defendant.”

2. What is this lawsuit about?

Plaintiffs allege that on June 26, 2021, cybercriminals obtained unauthorized access to Startek’s network and may have acquired the personally identifiable information (“PII”) of Startek’s current and former employees. This information may include names, dates of birth, and Social Security numbers.

Startek denies any wrongdoing, and no court or other entity has made any judgment or other determination of any wrongdoing, or that any law has been violated. Startek denies these and all other claims made in the Litigation. By entering the Settlement, Startek is not admitting any wrongdoing.

3. Why is the lawsuit a class action?

In a class action, one or more people called Class Representatives sue on behalf of all people who have similar claims. Together all these people are called a Settlement Class or Settlement Class Members. One court resolves the issues for all Settlement Class Members, except for those Settlement Class Members who timely exclude themselves from the Settlement Class.

The proposed Class Representatives in this case are the Plaintiffs: Ryan Hawkins and Tamara Kirtley.

4. Why is there a Settlement?

Plaintiffs and Startek do not agree about the claims made in this Litigation. The Litigation has not gone to trial, and the Court has not decided in favor of Plaintiffs or Startek. Instead, Plaintiffs and Startek have agreed to settle the Litigation. Plaintiffs and the attorneys for the Settlement Class (“Class Counsel”) believe the Settlement is best for all Settlement Class Members because of the Settlement benefits and the risks and uncertainty associated with continued litigation and the nature of the defenses raised by Startek.

WHO IS INCLUDED IN THE SETTLEMENT?

5. How do I know if I am part of the Settlement?

You are a Settlement Class Member if you were one of the approximately 24,819 individuals who were mailed a notification that your PII may have been impacted in the Data Incident on June 26, 2021. If you were mailed a notification, you are a Settlement Class Member.

Questions? Go to www.startekclassactionsettlement.com or call 1-888-200-7034

6. Are there exceptions to being included in the Settlement?

Yes. Excluded from the Settlement Class are: (i) Startek, and its officers and directors; (ii) all Settlement Class Members who timely and validly request exclusion from the Settlement Class; (iii) Judge Regina M. Rodriguez and Magistrate Judge N. Reid Neureiter and his/her staff and family; and (iv) any other Person found by a court of competent jurisdiction to be guilty under criminal law of initiating, causing, aiding, or abetting the criminal activity occurrence of the Data Incident or who pleads *nolo contendere* (a legal term that means, “I do not wish to contend”) to any such charge.

7. What if I am still not sure whether I am part of the Settlement?

If you are still not sure whether you are a Settlement Class Member, you may go to the Settlement Website at www.startekclassactionsettlement.com or call the Claims Administrator’s toll-free number at 1-888-200-7034.

THE SETTLEMENT BENEFITS—WHAT YOU GET IF YOU QUALIFY

8. What does the Settlement provide?

If you are a Settlement Class Member and you file a valid and timely Claim Form with the necessary supporting documentation, you may be eligible for reimbursement of the following reimbursable expenses:

Compensation for Documented Ordinary Out-of-Pocket Expenses

Startek will provide compensation for documented ordinary out-of-pocket expenses that were incurred as a result of the Data Incident (“Docketed Ordinary Out-of-Pocket Expenses”), up to a total of \$500 per person, for Settlement Class Members who submit a Claim Form and submit documentation of the unreimbursed losses supporting their claims. In submitting a Claim Form, a Settlement Class Member must affirm under the laws of the United States that information and documents submitted are true and correct.

Compensation for Documented Fees for Credit Reports, Credit Monitoring, or Other Identity Theft Insurance Product

Startek will provide compensation for documented fees for credit reports, credit monitoring, or other theft insurance product purchased between June 26, 2021 through and including the Claims Deadline of **February 21, 2023** incurred as a result of the Data Incident (“Documented Fees for Credit reports, Credit Monitoring, or Other Theft Insurance Product”), up to a total of \$500 per person, for Settlement Class Members who submit a Claim Form and submit documentation of the unreimbursed losses supporting their claims. In submitting a Claim Form, a Settlement Class Member must affirm under the laws of the United States that information and documents submitted are true and correct.

Compensation for Documented Lost Time

Startek will provide compensation for up to four (4) hours of lost time, at \$15 per hour, if at least one (1) full hour was spent dealing with the Data Incident, up to a total of \$500 per person (“Lost Time”). Settlement Class Members must provide an attestation that they spent the claimed time responding to issues raised by the Data Incident. Settlement Class Members must also provide a brief description of the activity/activities engaged in to address the Data Incident and an approximation of the time spent on each activity.

Claims made for Documented Ordinary Out-of-Pocket Expenses, Documented Fees for Credit reports, Credit Monitoring, or Other Theft Insurance Product, and Lost Time can be combined with each other and are subject to the same \$500 cap for all Settlement Class Members.

Questions? Go to www.startekclassactionsettlement.com or call 1-888-200-7034

Compensation for Documented Extraordinary Losses

Startek will provide up to \$4,500 in compensation to each Settlement Class Member for documented extraordinary losses (“Documented Extraordinary Losses”) if:

- (1) The loss is an actual, documented, and unreimbursed monetary loss, with documented proof of loss to be submitted with the claim;
- (2) The loss was more likely than not caused by the Data Incident;
- (3) The loss occurred between June 26, 2021 through and including the end of Claims Deadline of **February 21, 2023**;
- (4) The loss is not already covered by one or more of the reimbursement categories listed above; and the Settlement Class Member made reasonable efforts to avoid, or seek reimbursement for, the loss, including but not limited to exhaustion of all available credit monitoring insurance and identity theft insurance.

Credit Monitoring and Identity Theft Protection Services

Settlement Class Members who previously claimed the 12-month, 1B credit monitoring and identity theft protection services, with \$1 million in insurance coverage, through Experian, which was offered by Startek in connection with the Data Incident response, will be automatically provided two (2) years additional years of these services, without the need to make a claim.

Settlement Class Members who did not previously enroll in the 12-month, 1B credit monitoring and identity theft protection services, with \$1 million in insurance coverage, through Experian, which was offered by Startek in connection with the Data Incident response, may submit a claim for two (2) years of 1B credit monitoring and identity protection services, with \$1 million in insurance coverage.

9. Is there additional information available regarding reimbursement of Documented Ordinary Out-of-Pocket Expenses, Documented Fees for Credit Reports, Credit Monitoring, or Other Identity Theft Insurance Product, Lost time, Documented Extraordinary Losses, and credit monitoring and identity theft protection services?

Yes. Settlement Class Members seeking reimbursement for Documented Ordinary Out-of-Pocket Expenses, Documented Fees for Credit Reports, Credit Monitoring, or Other Identity Theft Insurance Product, Lost Time, Documented Extraordinary Losses, **and credit monitoring** and identity theft protection services (if they did not previously claim the Experian credit monitoring and identity theft insurance protection services offered by Startek in connection with its Data Incident response) must complete and submit a Claim Form to the Claims Administrator by **February 21, 2023**. Claim Forms can be submitted online at www.startekclassactionsettlement.com or by mail at Startek Claims Administrator, c/o Atticus Administration, PO Box 64053, St. Paul, MN 55164. If by mail, the Claim Form must be postmarked by **February 21, 2023**.

10. What am I giving up to receive Settlement benefits or stay in the Settlement Class?

Unless you exclude yourself, you are choosing to remain in the Settlement Class. If the Settlement is approved and becomes final, all of the Court’s orders will apply to you and legally bind you. You will not be able to sue, continue to sue, or be part of any other lawsuit against Startek and Released Parties about the legal issues in this Litigation that are released by this Settlement. The specific rights you are giving up are called “Released Claims.”

Questions? Go to www.startekclassactionsettlement.com or call 1-888-200-7034

11. What are the Released Claims?

The Settlement Agreement in Section I, paragraph 1.20–1.21 and Section 6, paragraphs 6.1–6.3 describes the Release, Released Claims and the Released Parties in necessary legal terminology, so please read these sections carefully. The Settlement Agreement is available at www.startekclassactionsettlement.com or in the public court records on file in this lawsuit. For questions regarding Releases and what they mean, you can also contact one of the lawyers listed in Question 15 for free, or you can talk to your own lawyer at your own expense.

HOW TO GET BENEFITS FROM THE SETTLEMENT

12. How do I make a claim for Settlement benefits?

To submit a claim for reimbursement for Documented Out-of-Pocket Expenses, Documented Fees for Credit Reports, Credit Monitoring, or Other Identity Theft Insurance Product, Lost Time, and/or Documented Extraordinary Losses, you must submit a valid Claim Form.

Settlement Class Members who previously claimed the 12-month Experian 1B credit monitoring and identity theft protection services, with \$1 million in insurance coverage, offered by Startek in connection with the Data Incident response will automatically be provided two (2) additional years of these services **without the need to submit a claim**. Settlement Class Members who did not previously claim the Experian 1B credit monitoring and identity theft protection services offered by Startek in connection with the Data Incident response **may submit a claim** for two (2) years of 1B credit monitoring and identity theft protection services, with \$1 million in insurance coverage.

Settlement Class Members seeking reimbursement under the Settlement must complete and submit a Claim Form to the Claims Administrator, postmarked or submitted online on or before **February 21, 2023**. Claim Forms may be submitted online at www.startekclassactionsettlement.com or printed from the website and mailed to the Claims Administrator at the address on the form. The quickest way to submit a claim is online. Claim Forms are also available by calling 1-888-200-7034 or by writing to:

Startek Claims Administrator
c/o Atticus Administration
PO Box 64053
St. Paul, MN 55164
Email: Starteksettlement@atticusadmin.com

13. What happens if my contact information changes after I submit a claim?

If you change your mailing address or email address after you submit a Claim Form, it is your responsibility to inform the Claims Administrator of your updated information. You may notify the Claims Administrator of any changes by calling 1-888-200-7034 or by writing to:

Startek Claims Administrator
c/o Atticus Administration
PO Box 64053
St. Paul, MN 55164
Email: Starteksettlement@atticusadmin.com

Questions? Go to www.startekclassactionsettlement.com or call 1-888-200-7034

14. When will I receive my Settlement benefits?

If you make a Valid Claim, payment will be provided by the Claims Administrator after the Settlement is approved by the Court and becomes final.

It may take time for the Settlement to be approved and become final. Please be patient and check www.startekclassactionsettlement.com for updates.

THE LAWYERS REPRESENTING YOU

15. Do I have a lawyer in this case?

Yes, the Court has appointed Attorneys Gary M. Klinger and David K. Lietz of the law firm of Milberg Coleman Bryson Phillips Grossman, PLLC, 5335 Wisconsin Avenue NW, Suite 440, Washington, D.C. 20015, as Class Counsel to represent you and the Settlement Class for the purposes of this Settlement. You may hire your own lawyer at your own cost and expense if you want someone other than Class Counsel to represent you in this Litigation.

16. How will Class Counsel be paid?

Class Counsel will file a motion asking the Court to award them attorneys' fees and costs not to exceed \$210,000 to be paid by Startek. They will also ask the Court to approve \$2,500 service awards to each of the named Plaintiffs (totaling \$5,000) for participating in this Litigation and for their efforts in achieving the Settlement. If awarded by the Court, Startek will pay fees, costs, expenses, and service awards directly. The Court may award less than these amounts.

Class Counsel's application for attorneys' fees, costs, expenses, and service awards will be made available on the Settlement Website at www.startekclassactionsettlement.com before the deadline for you to comment or object to the Settlement.

OPTING-OUT FROM THE SETTLEMENT

If you are a Settlement Class Member and want to keep any right you may have to sue or continue to sue the Defendant on your own based on the claims raised in this Litigation or released by the Released Claims, then you must take steps to get out of the Settlement. This is called excluding yourself from – or “opting out” of – the Settlement.

17. How do I get out of the Settlement?

To opt-out of the Settlement, you must mail written notice of a request for exclusion. The written notice must be signed and clearly state that you wish to be excluded from the Settlement Class.

The exclusion request must be **postmarked** and sent to the Claims Administrator at the following address by **January 23, 2023**:

Startek Claims Administrator: Exclusions
c/o Atticus Administration
PO Box 64053
St. Paul, MN 55164

You cannot exclude yourself by telephone or by email.

Questions? Go to www.startekclassactionsettlement.com or call 1-888-200-7034

18. If I opt-out can I still get anything from the Settlement?

No. If you exclude yourself, you are telling the Court you do not want to be part of the Settlement. You can only get Settlement benefits if you stay in the Settlement and submit a valid Claim Form.

19. If I do not exclude myself, can I sue Startek for the same thing later?

No. Unless you exclude yourself, you give up any right to sue Startek and Released Parties for the claims this Settlement resolves relating to the Data Incident. You must exclude yourself from this Litigation to start or continue with your own lawsuit or be part of any other lawsuit against Startek or any of the Released Parties. If you have a pending lawsuit, speak to your lawyer in that case immediately.

OBJECT TO THE SETTLEMENT

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

If you are a Settlement Class Member, you can tell the Court you do not agree with all or any part of the Settlement or requested attorneys' fees, costs, and expenses. You can also give reasons why you think the Court should not approve the Settlement or attorneys' fees and expenses. To object, you must file timely written notice as provided below no later than **January 23, 2023**, stating you object to the Settlement in *Hawkins et al. v. Startek*, Case No. 1:22-cv-00258-RMR-NRN. The objection must also include all of the following additional information:

- (1) Your full name, address, telephone number, and e-mail address (if any);
- (2) Information identifying you as a Settlement Class Member, including proof that you are a member of the Settlement Class (e.g., copy of notice, copy of original notice of the Data Incident);
- (3) A written statement of all grounds for the objection, accompanied by any legal support for the objection you believe applicable;
- (4) A statement as to whether the objection applies only to you, to a specific subset of the class, or to the entire class
- (5) The identity of any and all counsel representing you in connection with the objection;
- (6) A statement as to whether you and/or your counsel will appear at the Final Fairness Hearing; and
- (7) Your signature and the signature of your duly authorized attorney or other duly authorized representative (along with documentation setting forth such representation).

To be timely, written notice of an objection in the appropriate form containing the case name and docket number (*Hawkins et al. v. Startek*, Case No. 1:22-cv-00258-RMR-NRN) must be filed by **January 23, 2023** with the Clerk of the Court located at:

Clerk of the Court
Alfred A. Arraj United States Courthouse
901 19th Street, Room A-105
Denver, Colorado 80294-3589

You must also concurrently serve your objection upon Class Counsel, David K. Lietz, Milberg Coleman Bryson Phillips Grossman, PLLC, 5335 Wisconsin Avenue NW, Suite 440, Washington, D.C. 20015 and counsel for Startek, Inc., Christopher H. Wood, Lewis Brisbois Bisgaard & Smith LLP, 1700 Lincoln Street, Suite 4000, Denver, CO 80203.

Questions? Go to www.startekclassactionsettlement.com or call 1-888-200-7034

Any Settlement Class Member who fails to comply with the requirements for objecting in Section IV of the Settlement Agreement shall waive and forfeit any and all rights he or she may have to appear separately and/or to object to the Settlement Agreement and shall be bound by all the terms of the Settlement Agreement and by all proceedings, orders and judgments in the Litigation.

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

Objecting is simply telling the Court you do not like something about the Settlement or requested attorneys' fees, costs, and expenses. You can object only if you stay in the Settlement Class (that is, do not exclude yourself). Requesting exclusion is telling the Court you do not want to be part of the Settlement Class or the Settlement. If you exclude yourself, you cannot object to the Settlement.

THE FINAL FAIRNESS HEARING

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

The Court will hold a Final Fairness Hearing on **April 13, 2023, at 10:00 a.m.** before Judge Regina M. Rodriguez, Alfred A. Arraj United States Courthouse, 901 19th Street, Room A702, Denver, Colorado 80294-3589.

At this hearing, the Court will consider whether the Settlement is fair, reasonable, and adequate and decide whether to approve: the Settlement, Class Counsel's application for attorneys' fees, costs and expenses, and the service awards to Plaintiffs. If there are objections, the Court will consider them. The Court will also listen to people who have asked to speak at the hearing.

Note: The date and time of the Final Fairness Hearing are subject to change. The Court may also decide to hold the hearing via Zoom or by phone. Any change will be posted at www.startekclassactionsettlement.com.

23. Do I have to attend the Final Fairness Hearing?

No. Class Counsel will answer any questions the Court may have. However, you are welcome to attend at your own expense. If you send an objection, you do not have to come to Court to speak about it. As long as you file or mail your written objection on time the Court will consider it.

24. May I speak at the Final Fairness Hearing?

Yes, as long as you do not exclude yourself, you can (but do not have to) participate and speak for yourself in this Litigation and Settlement. This is called making an appearance. You also can have your own lawyer speak for you, but you will have to pay for the lawyer yourself.

If you want to appear, or if you want your own lawyer instead of Class Counsel to speak for you in this Litigation, you must follow all of the procedures for objecting to the Settlement listed in Section 20 above – and specifically include a statement whether you and your counsel will appear at the Final Fairness Hearing.

IF YOU DO NOTHING

25. What happens if I do nothing at all?

If you are a Settlement Class Member and you do nothing, you will not receive any Settlement benefits. You will give up rights explained in the “Excluding Yourself from the Settlement” section of this Notice, including your right to start a lawsuit, continue with a lawsuit, or be part of any other lawsuit against Startek or any of the Released Parties about the legal issues in this Litigation that are released by the Settlement Agreement relating to the Data Incident.

GETTING MORE INFORMATION

26. How do I get more information?

This Notice summarizes the proposed Settlement. Complete details are provided in the Settlement Agreement. The Settlement Agreement and other related documents are available at www.startekclassactionsettlement.com, by calling 1-888-200-7034 or by writing to:

Startek Claims Administrator
c/o Atticus Administration
PO Box 64053
St. Paul, MN 55164
Email: Starteksettlement@atticusadmin.com

**PLEASE DO NOT TELEPHONE THE COURT OR THE COURT’S CLERK OFFICE
REGARDING THIS NOTICE.**

Questions? Go to www.startekclassactionsettlement.com or call 1-888-200-7034