

**BY REGISTERED POST AND EMAIL:****Avast Software s.r.o.**

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BY REGULAR AND REGISTERED POST:**Gen Digital Inc.**

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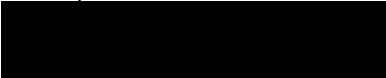
3821 AL Amersfoort

AVG Ecommerce CY B.V.

Databankweg 26

3821 AL Amersfoort

Also by e-mail:





Re **Stichting CUIC/Avast**
Date 20 July 2023
Place Amsterdam

Dear Board Members, dear colleagues,

As you know we represent Stichting CUIC--Privacy Foundation for Collective Redress (the "**Foundation**").

In our letter of 29 August 2022 (the "**First Letter**") we explained that Avast has committed various serious privacy violations, announced the Foundation's intention to file a collective claim on behalf of the users of Avast products in the Netherlands and invited Avast to enter into negotiations to resolve this matter amicably.

Subsequently, a meeting between Avast Software s.r.o. and the Foundation within the meaning of a consultation as meant in article 3:305a Dutch Civil Code took place on 23 November 2022 (the "**Meeting**"). The Meeting was followed up by a letter of 7 December 2022 from De Brauw Blackstone Westbroek N.V. on behalf of Avast Software s.r.o. (the "**Response**"). De Brauw Blackstone Westbroek N.V. emphasized during the Meeting and in the Response that they only act on behalf of Avast Software s.r.o., and thus not on behalf of the other addressees. This means that the Response was sent only on behalf of Avast Software s.r.o. and that the other addressees have not responded at all, except for an e-mail of 20 September 2022 from Ms. Millonis only confirming receipt on behalf of NortonLifeLock Inc.

The Foundation regrets that Avast Software s.r.o. indicated in the Response that it was not interested in entering into settlement discussions with the Foundation at that time. The Foundation also regrets that the other Avast entities did not respond to its invitation to enter into settlement discussions at all. Given the unwillingness of the addressed Avast entities, the Foundation is entitled to commence legal proceedings without further notice.

The Foundation's factual and legal grounds for taking legal action against Avast are set out in our First Letter and must be considered to be repeated and incorporated here. This First Letter is **attached** for your convenience.

The Foundation notes that in the meantime it has registered a large number of victims of the unlawful conduct of Avast who expressly support the claims to be brought by the Foundation.

Despite the fact that the Foundation is entitled to initiate proceedings without further notice, the Foundation invites Avast to reconsider its position and reiterates its continued willingness to discuss an out-of-court settlement



at any time before the issuance of a writ. If Avast is willing to engage in settlement discussions, please let us know on or before 10 August 2023 and confirm your availability for a meeting on one of the following dates:

- **22 August 2023, between 11:00 and 15:00 CEST**
- **23 August 2023, between 10:00 and 16:00 CEST**
- **30 August 2023, between 11:00 and 12:00 CEST**

If Avast insists on its decision not to enter into good faith negotiations with the Foundation, the Foundation will commence collective proceedings on the basis of art. 3:305a DCC and/or pursue any other legal action against the addressees of this letter and any additional Avast-related entities without any further notice.

The Foundation reserves all rights and interrupts any applicable statute of limitations.

Sincerely yours,
Lemstra Van der Korst N.V.


J.H. Lemstra M.N. van Dam

