

Exhibit E

NOTICE OF PROPOSED CLASS ACTION SETTLEMENT

United States District Court for the Northern District of Illinois

In re: Trionfo Solutions, LLC Data Breach Litigation

Case No. 1:24-CV-04547

A Court has authorized this Notice. This is not a solicitation from a lawyer.

If your personal information was compromised as a result of a data incident involving Trionfo Solutions, LLC, or Gallagher Benefit Services, Inc., that occurred in December 2023, you may be entitled to benefits from a class action settlement.

- A Court authorized this Notice, to those that are eligible to participate in a class action settlement and submit a Claim to receive a Cash Payment and/or Credit Monitoring. The Action is titled *In re: Trionfo Solutions, LLC Data Breach Litigation*, Case No. 1:24-CV-04547 and is pending in the United States District Court for the Northern District of Illinois. The persons that filed the class action lawsuit are called Plaintiffs or Class Representatives and the companies they sued are Gallagher Benefit Services Inc. and Trionfo Solutions, LLC (or Defendants). Defendants deny any wrongdoing whatsoever.

- **Who is a Settlement Class member?**

All persons in the United States whose personal information was compromised as a result of the data incident and who were sent notice of the data incident.

Excluded from the Settlement Class are (a) all persons who are governing board members of the Defendant; (b) governmental entities; (c) the Court, the Court's immediate family, and Court staff; and (d) Settlement Class Members that have opted out of the Settlement Class.

- Settlement Class Members under the Settlement Agreement will be eligible to receive:
 - ❖ **Cash Payment A – Documented Losses:** Cash Payment from the Settlement Fund, up to a total of \$5,000 per Settlement Class member, upon submission of a Valid Claim and supporting documentation, for documented losses incurred as a result of the data incident;
 - ❖ **Cash Payment B:** In addition to Cash Payment A, each Settlement Class member that submits a Valid Claim may also receive an estimated Cash Payment of \$100 (that may increase or decrease based on the number of Valid Claims received);
AND
 - ❖ **Credit Monitoring:** Settlement Class members may also make a Claim to elect up to three years of three-bureau Credit Monitoring.
- To submit a Claim or obtain more information visit www.website.com or call (XXX) XXX-XXXX to request a Claim Form no later than <<Claim Deadline>>.

Please read this Notice carefully. Your legal rights will be affected, and you have a choice to make at this time.

	Summary of Legal Rights	Deadline(s)
Submit a Claim Form	The only way to receive the Settlement Class Member Benefits from the Settlement.	Submitted online or postmarked on or before <<Claim Deadline>> .
Opt out of the Settlement	Receive no Settlement Class Member Benefits. This is the only option that allows you to keep your right to bring any other lawsuit against Defendants relating to the data incident.	Mailed and postmarked on or before <<Opt-Out Period>> .
Object to the Settlement and/or Attend the Final Approval Hearing	You can write the Court about why you agree or disagree with the Settlement. The Court cannot order a different Settlement. You can also ask to speak at the Final Approval Hearing on <<Final Approval Hearing date>> , about the fairness of the Settlement, with or without your own attorney.	Mailed and postmarked on or before <<Objection Period>> .
Do Nothing	You will not receive any of the Settlement Class Member Benefits from this class action Settlement.	N/A

- Your rights and options as a Settlement Class member – **and the deadlines to exercise your rights** – are explained in this Notice.
- The Court still will have to decide whether to approve the Settlement. Payments to Settlement Class Members or issuance of Credit Monitoring activation codes will be made only if the Court approves the Settlement and after any possible appeals are resolved.

TO RECEIVE AN ELECTRONIC OR ACH PAYMENT FOR YOUR VALID CLAIM, YOU MUST FILE A CLAIM FORM ONLINE AT WWW.WEBSITE.COM

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BASIC INFORMATION

1. Why is there a Notice?

The Court authorized this Notice because you have a right to know about the Settlement and all of your options, before the Court decides whether to grant Final Approval to the Settlement. This Notice explains the nature of the lawsuit that is the subject of the Settlement, the general terms of the Settlement, and your legal rights and options.

The Honorable Judge Mary M. Rowland of the United States District Court for the Northern District of Illinois is overseeing this case captioned as *In re: Trionfo Solutions, LLC Data Breach Litigation*, Case No. 1:24-CV-04547. The people who brought the lawsuit are called the Class Representatives. The companies being sued, Trionfo Solutions, LLC and Gallagher Benefit Services Inc., are called the Defendants.

2. What is the Action about?

The Action alleges that in the middle of December 2023, a data incident was discovered in which an unauthorized third party potentially gained access to the Private Information of approximately 90,000 individuals between December 4, 2023, and December 6, 2023. Following an extensive review, Defendant Trionfo determined that some information which may have been involved included Private Information related to Defendant Gallagher's customers' clients and provided to Defendant Trionfo by Defendant Gallagher. In or about May 22, 2024, Defendant Trionfo began notifying by letter individuals who may have had their personal information impacted in the Data Incident.

Defendants deny any wrongdoing whatsoever. No court or other judicial body has made any judgment or other determination that Defendants did anything wrong.

3. Why is this a class action?

In a class action, one or more people called "Class Representatives" or "Plaintiffs" sue on behalf of all people who have similar claims. Together, all of these people are called a "Settlement Class," and the individuals are called "Settlement Class members." One court resolves the issues for all Settlement Class Members, except for those who opt-out of the Settlement Class.

4. Why is there a Settlement?

The Court has not decided in favor of the Plaintiffs or Defendants. Instead, both sides agreed to the Settlement. The Settlement avoids the cost and risk of a trial and related appeals, while providing benefits to Settlement Class Members. The Class Representatives appointed to represent the Settlement Class, and the attorneys for the Settlement Class, Class Counsel think the Settlement is best for all Settlement Class Members.

WHO IS IN THE SETTLEMENT?

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

You are affected by the Settlement and potentially a Settlement Class member if you are a person in the United States whose Private Information was compromised as a result of the Data Incident and who were sent notice of the Data Incident.

Only Settlement Class Members are eligible to receive benefits under the Settlement. Excluded from the Settlement Class are: (a) all persons who are governing board members of the Defendant; (b) governmental entities; (c) the Court, the Court's immediate family, and Court staff and (d) Settlement Class Members who submit a valid request for exclusion prior to <<the end the Opt-Out Period>>.

6. What if I am not sure whether I am included in the Settlement?

If you are not sure whether you are included in the Settlement, you may call (XXX) XXX-XXXX with questions. You may also write with questions to:

In re Trionfo Solutions Data Breach Litigation
c/o Kroll Settlement Administration LLC
PO Box XXXX
New York, NY 10150-XXXX

THE SETTLEMENT BENEFITS—WHAT YOU GET IF YOU QUALIFY

7. What does the Settlement provide?

The Settlement provides the following Settlement Class Member Benefits available to Settlement Class Members who submit Valid Claims: (a) Cash Payment A – up to \$5,000 to those who incurred documented losses related to the Data Incident; (b) Cash Payment B – an estimated \$100 cash payment (that may increase or decrease based on Valid Claims received); and (c) Credit Monitoring for three years. If a Settlement Class member does not submit a Valid Claim and does not opt-out, the Settlement Class Member will release his or her claims against Defendants without receiving a Settlement Class Member Benefit.

To receive a Cash A Payment for documented losses, a Settlement Class member must select Cash Payment A on the Claim Form attesting under penalty of perjury to incurring documented losses. Settlement Class members will be required to submit reasonable documentation showing the losses. Settlement Class Members shall not be reimbursed for expenses if they have been reimbursed for the same expenses by another source, including credit monitoring and identity theft protection products offered in the notification letter provided by Defendants or otherwise. If a Settlement Class member does not submit reasonable documentation showing a loss, or if their Claim is rejected by the Settlement Administrator for any reason, and the Settlement Class Member does not cure his or her Claim, the Claim will be rejected and the Settlement Class Member's Claim will not receive Cash Payment A compensation.

Defendants have undertaken reasonable steps to further secure their systems and environments.

8. What payments are available for reimbursement under the Settlement?

Settlement Class Members who submit Valid Claims may select one or all of the following:

- a) **Cash Payment A – Documented Losses:** Cash Payment of up to \$5,000 per Settlement Class Member, who submits supporting documentation.
 - These documented losses may NOT include:
 - *Reimbursement for expenses*, if the same expenses have been reimbursed by another source, including compensation for credit monitoring and identity theft protection product offered as part of the notification letter provided by Defendants or otherwise.

In addition to Cash Payment A, Settlement Class Members may select the following:

- b) **Cash Payment B:** A flat cash payment estimated to be \$100 (that may increase or decrease by the number of Valid Claims received); AND
- c) **Credit Monitoring:** In addition to electing Cash Payment A and Cash Payment B, Settlement Class Members may elect up to three years of three-bureau Credit Monitoring that will provide the following benefits: three-bureau credit monitoring, dark web monitoring, identity theft insurance coverage for up to \$1,000,000, and fully managed identity recovery services.

HOW DO YOU SUBMIT A CLAIM?

9. How do I get Settlement Class Member Benefits?

To receive Settlement Class Member Benefits, you must complete and submit a Claim Form online at www.website.com or send it by mail to *In re Trionfo Solutions Data Breach Litigation*, c/o Kroll Settlement Administration LLC, PO Box XXXX, New York, NY 10150-XXXX. Read the Claim Form instructions carefully, fill out the Claim Form, provide the required documentation, and submit online by <<Claim Deadline>> or by mail postmarked by <<Claim Deadline>>.

10. How will Claims be decided?

The Settlement Administrator will decide whether and to what extent any claim made on each Claim Form is a Valid Claim. The Settlement Administrator may require additional information from you. If you do not provide the additional information in a timely manner, the Claim will be considered invalid and will not be paid.

For invalid Claims, the Settlement administrator will send Settlement Class members submitting such claims a deficiency notice giving the Settlement Class members 15 days to cure any

deficiencies.

11. When will I get my Cash Payment?

The Court will hold a Final Approval Hearing on <<Date>>, at <<Time>> a.m. CT to decide whether to approve the Settlement. If the Court approves the Settlement, there may be appeals from that decision and resolving them can take time. It also takes time for all of the Claim Forms to be processed. Please be patient. Payments will begin after the Settlement has obtained Court approval and the time for all appeals has expired.

12. What am I giving up as part of the Settlement?

Defendants and its affiliates will receive a release from all claims that could have been or that were brought against Defendants relating to the Data Incident. Thus, if the Settlement becomes final and you do not exclude yourself from the Settlement, you will be a Settlement Class Member and you will give up your right to sue Defendants and its past, present, and future directors, officers, executives, officials, principals, stockholders, heirs, agents, insurers, reinsurers, members, attorneys, accountants, actuaries, fiduciaries, advisors, consultants, representatives, partners, joint venturers, licensees, licensors, independent contractors, subrogees, trustees, executors, administrators, clients, customers, data owners, associated third parties, predecessors, successors and assigns, and any other person acting on Defendants' behalf. This Release is described in the Settlement Agreement, known as Released Claims, which is available at www.website.com. If you have any questions, you can talk to the law firms listed in Question 18 for free or you can talk to your own lawyer.

OPTING-OUT OF THE SETTLEMENT

If you do not want to be part of the Settlement, then you must take steps to exclude yourself from the Settlement Class. This is sometimes referred to as "opting out" of the Settlement Class.

13. If I opt-out, can I get a Cash Payment or Credit Monitoring from this Settlement?

No. If you opt-out, you will not be entitled to receive any benefits from the Settlement.

14. If I do not opt-out, can I sue the Released Parties for the same thing later?

No. Unless you opt-out, you give up any right to sue Defendants and any other Released Party for any claim that could have been or was brought relating to the Data Incident. You must opt-out from the Settlement to start your own lawsuit or to be part of any different lawsuit relating to the claims in this case.

15. How do I opt-out from the Settlement?

To opt-out, send a request for exclusion or written notice of intent to opt-out that says you want to be excluded from the Settlement in *In re: Trionfo Solutions, LLC Data Breach Litigation*, Case No. 1:24-CV-04547. The request to opt-out must include: (1) name, (2) address, (3) telephone number, and email address (if any), and (4) include a statement indicating a request to be excluded from the Settlement Class. You must mail your request for exclusion to the Settlement Administrator postmarked by **<<Opt-Out Period>>**, to:

In re Trionfo Solutions Data Breach Litigation
 c/o Kroll Settlement Administration LLC
 PO Box **XXXX**
 New York, NY 10150-**XXXX**

OBJECTING TO THE SETTLEMENT

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

You can tell the Court that you do not agree with the Settlement or some part of it by objecting to the Settlement. For an objection to be a valid objection under the Settlement, it must be in writing, mailed to the to the Clerk of the Court, Class Counsel, Defendants Counsel, and the Settlement Administrator at the addresses listed below, postmarked by **no later than <<Objection Period>>**.

Clerk of the Court	Settlement Administrator
<<Court Address>>	In re Trionfo Solutions Data Breach Litigation c/o Kroll Settlement Administration LLC PO Box XXXX New York, NY 10150- XXXX
Class Counsel	Defendant Gallagher's Counsel
Gary Klinger Milberg Coleman Bryson Phillips Grossman PLLC 227 W. Monroe St., Ste. 2100 Chicago, IL 60606 gklinger@milberg.com Jeff Ostrow Kopelowitz Ostrow P.A. 1 W. Las Olas Blvd., Ste. 500 Fort Lauderdale, FL 33301 ostrow@kolawyers.com Jason Rathod Migliaccio & Rathod LLP 412 H Street NE, Ste. 302	Mark A. Olthoff Polsinelli PC 900 W. 48 th Place Kansas City, MO 64112 molthoff@polsinelli.com

Washington, D.C. 20002 jrathod@classlawdc.com	
Defendant Trionfo's Counsel	
Mark A. Olthoff Polsinelli PC 900 W. 48 th Place Kansas City, MO 64112 molthoff@polsinelli.com	

Your objection must be written and must include all of the following:

- i) the objector's full name, mailing address, telephone number, and email address (if any);
- ii) all grounds for the objection, accompanied by any legal support for the objection known to the objector or objector's counsel;
- iii) the identity of all counsel who represent the objector, including the identity of all counsel (if any) representing the objector who will appear at the Final Approval Hearing;
- iv) a list of all persons who will be called to testify at the Final Approval Hearing in support of the objection (if any);
- v) a statement confirming whether the objector intends to personally appear and/or testify at the Final Approval Hearing; and
- vi) the objector's signature (an attorney's signature is not sufficient).

17. What is the difference between objecting and asking to opt-out?

Objecting is telling the Court that you do not like the Settlement or parts of it and why you do not think it should be approved. You can object only if you are a Settlement Class Member. Opting-out is telling the Court that you do not want to be part of the Settlement Class and do not want to receive any payment from the Settlement. If you opt-out, you have no basis to object because you are no longer a Settlement Class Member, and the case no longer affects you. If you submit both a valid objection and a valid request to opt-out, you will be deemed to have only submitted the request to opt-out.

THE LAWYERS REPRESENTING YOU

18. Do I have a lawyer in this case?

Yes. The Court appointed Gary M. Klinger of Milberg Coleman Bryson Phillips Grossman PLLC, Jason S. Rathod of Migliaccio & Rathod LLP and Jeff Ostrow of Kopelowitz Ostrow P.A. as Class Counsel to represent the Settlement Class in settlement negotiations. If you want to be represented by your own lawyer, you may hire one at your own expense.

19. How will the lawyers be paid?

Class Counsel will file an Application for Attorneys' Fees, Costs, and Service Awards to the Court for an award of attorneys' fees of up to 33.33% of the Settlement Fund, plus reimbursement of costs. Any such award would compensate Class Counsel for investigating the facts, litigating the case, and negotiating the settlement and will be the only payment to them for their efforts in achieving this Settlement and for their risk in undertaking this representation on a wholly contingent basis.

Class Counsel will also ask the Court for Service Awards up to \$2,500 for each of the Class Representatives, from the Settlement Fund, in recognition of their contributions to this Action.

THE COURT'S FINAL APPROVAL HEARING

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

The Court will hold a Final Approval Hearing at <<Time>> CT on <<Date>>, at the <<Court Address>>, Room [] as ordered by the Court. At this hearing, the Court will consider whether the Settlement is fair, reasonable, and adequate. If there are timely and valid objections, the Court will consider them and will listen to people who have asked to speak at the hearing if such a request has been properly made. The Court will also rule on the Application for Attorneys' Fees, Costs, and Service Awards. After the hearing, the Court will decide whether to approve the Settlement. We do not know how long these decisions will take. The hearing may be moved to a different date or time without additional notice, so Class Counsel recommends checking the Settlement Website www.website.com, or calling (XXX) XXX-XXXX.

21. Do I have to attend the hearing?

No. Class Counsel will present the Settlement Class to the Court. You or your own lawyer are welcome to attend at your expense, but you are not required to do so. If you send an objection, you do not have to visit the Court to talk about it. As long as you filed your written objection on time with the Court and mailed it according to the instructions provided in Question 16, the Court will consider it.

22. May I speak at the hearing?

You may ask the Court for permission to speak at the Final Approval Hearing. To do so, you must file an objection according to the instructions in Question 16, including all the information required. Your objection must be **mailed** to the Clerk of the Court, Class Counsel, Defendants' Counsel and Settlement Administrator, at the mailing addresses listed above, postmarked by no later than the <<end of the Objection Period>>.

IF YOU DO NOTHING

23. What happens if I do nothing?

If you do nothing, you will not receive any benefits from this Settlement. If the Settlement is granted Final Approval and becomes final, you will not be able to start a lawsuit, continue with a lawsuit, or be part of any other lawsuit against Defendants or the other Released Parties based on any claim that could have been or that was brought relating to the Data Incident.

ADDITIONAL INFORMATION

24. How do I get more information?

This Notice summarizes the Settlement. More details are in the Settlement Agreement itself. A copy of the Settlement Agreement is available at www.website.com. You may also call the Settlement Administrator with questions or to receive a Claim Form at (XXX) XXX-XXXX.

25. What if my contact information changes or I no longer live at my address?

It is your responsibility to inform the Settlement Administrator of your updated information. You may do so at the address below:

In re Trionfo Solutions Data Breach Litigation
c/o Kroll Settlement Administration LLC
PO Box XXXX
New York, NY 10150-XXXX

PLEASE DO NOT CONTACT THE COURT, CLERK OF THE COURT OR CLASS COUNSEL FOR INFORMATION ABOUT THE CLASS ACTION SE