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UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA – SAN JOSE DIVISION

IN RE: YAHOO! CUSTOMER DATA
SECURITY BREACH LITIGATION

CASE NO.: 16-MD-02752-LHK

**DECLARATION OF ALLCLEAR ID
IN SUPPORT OF PLAINTIFFS’
MOTION FOR PRELIMINARY
APPROVAL OF CLASS ACTION
SETTLEMENT**

DECLARATION OF [ALLCLEAR]

I, Jamie May, do hereby declare as follows:

1. I am an Executive and Chief Operating Officer with the company AllClear ID (“AllClear”).

2. I submit this declaration in support of PLAINTIFFS’ MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT. I have personal knowledge of the matter stated herein and, if called upon to do so, I could and would testify competently thereto.

3. AllClear is an industry leader and trusted partner with more than 10 years of specialized experience in data breach response. AllClear also offers identity theft services to consumers who have been the victim of a data breach or who have natural concerns regarding the security of their personal data.

4. AllClear ID reassures consumers affected in a data event that if they have questions or concerns about the security of their identities, AllClear ID will provide informative, expert support. Whether a consumer’s identity has been stolen or the consumer is worried about potential risks, AllClear ID will be an advocate in helping to answer the consumer’s questions and fears or helping to resolve any resulting issue for the consumer.

5. The AllClear ID services have a retail price of \$14.95 per month or \$358.80 for twenty-four months and are available for purchase by U.S. residents. More information on the AllClear ID services available to individuals can be found at www.allclearid.com/personal.

6. AllClear has helped thousands of businesses prepare for, respond to, and recover from data breaches. It has successfully managing some of the largest data breaches in history and has been utilized to notify more than two hundred million people in other breaches.

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1 7. Because of the services and assurances offered by AllClear ID, companies
2 and business entities often hire AllClear to protect their customers, employees, or
3 consumers after a data event.

4 8. The Credit Services to be provided by AllClear ID in this Settlement will
5 consist of:

- 6 • Credit monitoring of the Settlement Class Members’ credit file for
7 U.S. residents at all three (3) major credit reporting agencies
8 (Experian, Equifax & TransUnion) (Single bureau monitoring with
9 TransUnion is activated at the time of enrollment. Members will have
10 to login to their online customer portal or call the support center to
11 accept the filtering policy to activate triple bureau credit monitoring)
12 during the duration of the Credit Services Period;
- 13 • VantageScore® 3.0 Credit Score and Credit Report from
14 TransUnion® for U.S. residents;
- 15 • Fraud Alerts for U.S. residents, which Settlement Class Members can
16 set, renew, and remove in their online customer portal, for additional
17 protection against identity theft;
- 18 • ID Theft Insurance for U.S. residents, which covers certain identity
19 theft related expenses incurred by Settlement Class Members up to a
20 limit of \$1 million;
- 21 • Identity Theft Monitoring for U.S. residents to notify Settlement Class
22 Members when stolen identity information has been detected and
23 reported through the Internet Fraud Alert system and a partnership
24 with the National Cyber-Forensics & Training Alliance (NCFTA)
25 which runs a clearinghouse for stolen credentials;
- 26 • Identity Restoration Services that provide professional fraud
27 resolution assistance to Settlement Class Members who experience
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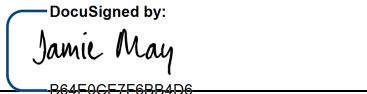
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identity theft or fraud, helping them with identity recovery and restoration;

- Identity theft scan of Settlement Class Members’ minor children identities, up to the age of 18 for U.S. residents; and
- Assistance with canceling and replacing credit and debit cards if a wallet is lost or stolen.

I declare under the penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge.

Executed this 22nd day of October, 2018 at 3:00 p.m. in Austin, Texas.

By: 
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 Jamie May
 AllClear ID, Inc.