

Exhibit B

Sender Email: DoNotReply@PlaidSettlement.com

Sender Name: Settlement Administrator

Subject Line: Notice of Class Action Settlement – In re Plaid Inc. Privacy Litigation

Notice ID: [Notice ID number]

Confirmation Code: [Confirmation code number]

Notice of Class Action Settlement - In re Plaid Inc. Privacy Litigation

If you connected your financial account to a mobile or web-based app that has used Plaid between January 1, 2013 and [] in the United States, you may be eligible for a payment from a class action settlement.

This is a Court-approved Legal Notice. This is not an advertisement.

A Settlement has been proposed in class action litigation against Plaid Inc. (“Plaid”). Plaid enables connections between a user’s financial account(s) and approximately 5,000 mobile and web-based applications (“apps”). This class action alleges Plaid took certain improper actions in connection with this process. The allegations include that Plaid: (1) obtained more financial data than was needed by a user's app, and (2) obtained log-in credentials (username and password) through its interface, known as Plaid Link, which the litigation alleges had the look and feel of the user’s own bank account login screen, when users were actually providing their login credentials directly to Plaid. Plaid denies these allegations and any wrongdoing and maintains that it adequately disclosed and maintained transparency about its practices to consumers.

Who is Included? You are a Class Member, and you are affected by this Settlement, if you own or owned one or more “Financial Accounts” between January 1, 2013 and []. A “Financial Account” is any checking, savings, loan, or other account at a financial institution (1) that Plaid accessed using the user’s login credentials and connected to a mobile or web-based fintech application that enables payments (including ACH payments) or other money transfers or (2) for which a user provided financial account login credentials to Plaid through Plaid Link, and you were a United States resident at the time.

What does the settlement provide? Under the Settlement, Plaid will pay \$58 million to establish a Settlement Fund.

After deducting any court-approved attorneys’ fees and expenses and Service Awards for the Class Representatives, and the costs of the settlement administration, the Settlement Fund will be distributed to Class Members on a pro rata basis. The amount of the payments to individual Class Members will depend on the number of valid claims that are filed.

The Settlement also requires Plaid to:

- Delete certain data from Plaid systems;

- Inform Class Members of their ability to use Plaid Portal to manage the connections made between their financial accounts and chosen applications using Plaid and delete data stored in Plaid's systems;
- Continue to include certain disclosures and features in Plaid's standard Link flow;
- Enhance disclosures about Plaid's data collection practices, how Plaid uses data, and privacy controls Plaid has made available to uses in Plaid's End User Privacy Policy;
- Minimize the data that Plaid stores; and
- Continue to host a dedicated webpage with detailed information about Plaid's security practices.

How do I get a payment? You must submit a valid Claim Form by [DATE]. Claim Forms may be submitted online at www.PlaidSettlement.com or printed from the website and mailed to the address on the Claim Form. Claim Forms are also available by calling XXX-XXX-XXXX or emailing [EMAIL ADDRESS].

Do I have a lawyer in the case? If you are a Class Member, you have a lawyer in this case. The Court appointed as "Class Counsel" the law firms Burns Charest LLP; Herrera Kennedy LLP; and Lieff Cabraser Heimann & Bernstein LLP to represent the Class Members. If you want to be represented by your own lawyer, you may hire one at your own expense.

Your other options. If you are included in the settlement and do nothing, your rights will be affected and you won't get a payment. If you don't want to be legally bound by the settlement, you must exclude yourself from it by [DATE]. Unless you exclude yourself, you won't be able to sue or continue to sue Plaid for any claim made in this lawsuit or released by the Settlement Agreement. If you stay in the settlement (i.e., don't exclude yourself), you may object to it or ask for permission for you or your lawyer to appear and speak at the Final Approval Hearing – at your own cost – but you don't have to. Objections and requests to appear are due by [DATE]. More information about these options is available at www.PlaidSettlement.com.

The Court's hearing. The Court will hold the Final Approval Hearing at [] on [Month] [Day], 2021 in Courtroom 4 (3rd Floor) of the United States Courthouse, 1301 Clay Street, Oakland, CA 94612. At the Final Approval Hearing, the Court will consider whether the Settlement is fair, reasonable, and adequate. If there are objections, the Court will consider them. The Court may listen to people who appear at the hearing and who have provided notice of their intent to appear at the hearing. The Court may also consider Class Counsel's application for attorneys' fees, expenses and for Service Awards. At or after the hearing, the Court will decide whether to approve the Settlement and to approve Class Counsel's application for attorneys' fees, expenses and Service Awards.

This notice is only a summary.

For more information visit www.PlaidSettlement.com or call XXX-XXX-XXXX.