

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

In re Morgan Stanley Data Security Litigation

Civil Action No. 1:20-cv-05914-PAE

AFFIDAVIT OF GERALD W. THOMPSON

Gerald W. Thompson states under oath as follows:

1. My name is Jerry Thompson. I am over the age of 21 years and competent to testify in the matters set forth herein. I have personal knowledge of the matters stated herein.
2. I am the current Executive President at Pango Group. Aura, a technology company dedicated to simplifying digital security for consumers, acquired Pango Group, a privacy and security company in 2020. Our Company has protected more than 47 million US citizens and 2 million families since its founding in 1995.
3. Aura is an A+ Better Business Bureau accredited company with a 4.5 rating on the App store, 4.7 stars on Trustpilot, and is rated the #1 Identity Theft Protection solution on Security.org.
4. I understand that a Settlement has been reached with Morgan Stanley in a class action lawsuit regarding the decommissioning or retiring of IT equipment. I understand that Plaintiffs allege that Morgan Stanley failed to properly dispose of certain IT assets and that, as a result, unauthorized third parties may have gained access to Morgan Stanley's clients' private information, including, but not limited to, names, work and home addresses, Social Security numbers, driver's license numbers, income, asset value, asset holding information, passport information, telephone numbers, dates of birth and other personal information.

5. As part of the Settlement Agreement, Pango will be offering our Financial Shield service to those who enroll for a period of at least twenty-four months from the Effective Date of the Settlement, and enrollment can occur at any time during the twenty-four month coverage period.

6. With the combination of multiple advanced tools, Financial Shield is able to closely monitor and alert subscribers to potential fraud up to 4x faster than competitors.

7. Financial Shield is a cloud-based security service that works with all browsers for both PCs and MacBooks. The service also works on the iPhone and Android operating systems.

8. Financial Shield works to protect subscribers from fraud and identity theft. Those who enroll in Financial Shield will receive protection and assistance from fraud and identity theft regardless of the source. Financial Shield coverage and services are not limited to fraud and identity theft connected to the Morgan Stanley Data Security Incidents.

9. I understand that Morgan Stanley initially provided Class Members with Experian IdentityWorks credit monitoring when the Data Security Incidents were first announced. Financial Shield is different and far more robust than the Experian services offered by Morgan Stanley. Financial Shield is not simply a credit monitoring service.

10. Financial Shield offers monitoring and protection services not present in typical credit monitoring or identity theft services (and specifically Experian IdentityWorks), including:

- **transaction monitoring** of all registered financial accounts including spending, deposits, withdrawals, transfers and transfer requests;
- **bank and financial account monitoring** around any changes requested like new username and password, new signatory added or deleted, change of address of

principal signatory, wire transfer requests to third parties, new accounts being set up using the person's SSN and DOB;

- **home title and property title monitoring** which monitors most families' largest asset to make sure that a house or property title cannot be hijacked and resold or mortgaged by a criminal 3rd party;
- **security freeze capability** with not only the 3 major credit bureaus but also 6 other bureaus which can act as an early warning for fraud events;
- **monthly spending graphs** showing how much is being spent, deposited, transferred; identity authentication alerts which will alert a member in near real-time if someone is trying to open up an account using the members SSN at everywhere other than a bank;
- **\$1 million in Insurance backed by AIG to replace any otherwise unreimbursed money lost by any identity theft**;
- **identity & financial fraud restoration services** with 24/7 customer support;
- dark web monitoring of **17 unique data points**.

11. Financial Shield is integrated with Early Warning Services to provide real-time monitoring of financial accounts. This service will notify consumers in near real-time if there is any change in a registered financial account (such as a credit card account, checking or savings account, or investment account), new signatory request, new account opening, wire transfer requests, and other events targeted by hackers and online thieves. Attached hereto as Exhibit 1 is a dashboard view of the Financial Shield service.

12. The \$1,000,000 insurance policy underwritten by AIG provides protection by replacing any money lost by theft. Again, the theft or fraud covered by this policy is not limited to that associated with the Morgan Stanley Data Security Incidents.

13. I am aware that at least one objection in this Class Action raised a question regarding an affiliation between AIG and Aura. Aura is a completely independent company with no ties to AIG other than AIG underwriting the insurance for the Financial Shield service and the Identity Theft insurance for Aura's Identity Guard members. AIG does not have any ownership interest in Aura nor any representation on Aura's parent company's Board of Directors. No person at Aura is on AIG's Board of Directors or has any link to the company, directly or indirectly.

14. Neither Aura nor Pango Group have any affiliation with Morgan Stanley. Morgan Stanley does not have any ownership interest in Aura/Intersections llc, or vice versa.

15. I am aware that one objector raised a question whether Financial Shield would work with her internet browser and criticized Financial Shield for not providing anti-virus software. Financial Shield is not a software application which requires a download; it is a cloud-based security service that is accessed via an internet browser. The service works with all browsers for both PCs and MacBooks, including Google Chrome. The service also works on the iPhone and Android operating systems. In terms of virus protection services, antivirus software is not a hedge against financial threats and would not be effective for remedying a data security incident.

16. The services provided by Aura Financial Shield retail for approximately \$135 per year per enrollee.

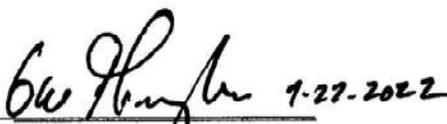
17. I understand that more than 88,300 individuals have registered to receive a reminder email from the Settlement Administrator when it is time to subscribe. The reminder email is merely

a convenience provided by Pango and the Settlement Administrator and others can enroll at any time during the pendency of the Aura coverage.

18. Individuals can feel secure subscribing to Aura's Financial Shield as all personally identifiable information provided to Aura for the purposes of enrolling in the Financial Shield is secured with 254-AES (Advanced Encryption Standard), the same encryption technology generally used by major banks and the military.

Further Affiant sayeth not.

Executed on July 22, 2022



Gerald W Thompson