

UNITED STATES OF AMERICA  
FEDERAL TRADE COMMISSION

COMMISSIONERS: Edith Ramirez, Chairwoman  
Julie Brill  
Maureen K. Ohlhausen  
Joshua D. Wright

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In the Matter of )  
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Reynolds Consumer Products Inc., )  
a corporation. )  
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DOCKET NO.

COMPLAINT

The Federal Trade Commission, having reason to believe that Reynolds Consumer Products Inc. has violated the Federal Trade Commission Act ("FTC Act"), and it appearing to the Commission that this proceeding is in the public interest, alleges:

1. Respondent Reynolds Consumer Products ("Reynolds") is a Delaware corporation with its principal office or place of business at 1200 West Field Court, Lake Forest, Illinois 60045.
2. Respondent

European Union (“EU”) requirements for privacy and the protection of personal data. Among other things, it requires EU Member States to implement legislation that prohibits the transfer of personal data outside the EU, with exceptions, unless the European Commission (“EC”) has made a determination that the recipient jurisdiction’s laws ensure the protection of such personal data. This determination is referred to commonly as meeting the EU’s “adequacy” standard.

6. To satisfy the EU adequacy standard for certain commercial transfers, the U.S. Department of Commerce (“Commerce”) and the EC negotiated the EU Safe Harbor Framework, which went into effect in 2000. The EU Safe Harbor Framework allows U.S. companies to transfer personal data fully from the EU. To join the EU Safe Harbor Framework, a company must self-certify to Commerce that it complies with seven principles and related requirements that have been deemed to meet the EU’s adequacy standard.

7. Companies under the jurisdiction of the U.S. Federal Trade Commission (“FTC”), as well as the U.S. Department of Transportation, are eligible to join the EU Safe Harbor Framework. A company under the jurisdiction of the FTC or DOT may also be eligible to join the EU Safe Harbor Framework if it is a U.S. company that has a significant presence in the EU.

