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UNITED STATES OF AMERICA BEFORE THE FEDERAL TRADE COMMISSION

COMMISSIONERS: Edith Ramirez, Chairwod2

6. To satisfy the EU adequacy standard for certain commercial transfers, the U.S. Department of Commerce ("Commerce") and the EC negotiated the EUSSafe Harbor Framework, which went into effect in 2000. The U-BU Safe HarboFrameworkallows U.S. companies to transfer personal datafully from the EU. To join the U.SEU Safe Harbor

- 13. In truth and in fact, since Ma 2010, respondent has not been aurrent participant the U.S.-EU Safe Harbo Framework Therefore, the representation forth in Paragraph 12 is and was false and misleading.
- 14. The acts and practices of responderallaged in this complaint constitute deceptive acts or practices, in or affecting commerce, in violation of Section 5(a) of the Federal Trade Commission Act.

THEREFORE, the Federal Trade Commission this twentiethay of May2015, has issued this complatragainst respondent

By the Commission.

Donald S. Clark Secretary

SEAL: