

**UNITED STATES OF AMERICA
FEDERAL TRADE COMMISSION**

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

In the Matter of

13. Since at least April 2014, Golf Connect, LLC has disseminated or caused to be disseminated privacy policies and statements on the <http://www.golfhub.com/Customerservice/PrivacyPolicy?lang=en> website, including, but not limited to, the following statements:

This Privacy Statement covers the website <http://www.golfhub.com>, which is operated by GolfSwitch, Inc. (“we” or “us”). Your data will be maintained by GolfSwitch in accordance with this Privacy Statement...

The company complies with U.S.-EU Safe Harbor Framework and the U.S.-Swiss Safe Harbor Framework as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal information from European Union member countries and Switzerland. The company has certified that it adheres to the Safe Harbor Privacy Principles of notice, choice, onward transfer, security, data integrity, access, and enforcement. To learn more about the Safe Harbor program, and to view the company’s certification, please visit <http://www.export.gov/safeharbor/>

14. Through the means described in Paragraph 13, respondent represents, expressly or by implication, that it is a “current” participant in the U.S.-EU Safe Harbor and U.S.-Swiss Safe Harbor Frameworks.

15. In truth and in fact, from April 2014 through April 2015, respondent was not a “current” participant in the U.S.-EU Safe Harbor and U.S.-Swiss Safe Harbor Frameworks. Therefore, the representation set forth in Paragraph 14 was false and misleading.

16. The acts and practices of respondent as alleged 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 ___ day of ____ 2015, has issued this complaint against respondent.

By the Commission.

Donald S. Clark
Secretary

SEAL
ISSUED: