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UNITED STATES OF AMERICA
FEDERAL TRADE COMMISSION

COMMISSIONERS: Edith Ramirez, Chairwoman
Julie Brill
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10. Through the means described in Paragraph 9, respondent represented, expressly or by implication, that it is a current participant in the U.S.-EU Safe Harbor Framework.
11. In truth and in fact, respondent is and never has been a participant in the U.S.-EU Safe Harbor Framework. Therefore, the representation set forth in Paragraph 10 is false and misleading.
12. 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 twentieth day of September 2015, has issued this complaint against respondent

By the Commission.

Donald S. Clark
Secretary

SEAL: