

**UNITED STATES OF AMERICA  
FEDERAL TRADE COMMISSION  
Maureen K. Ohlhausen  
Terrell McSweeney**

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## **The Safe Harbor Framework**

5. The U.S.-EU Safe Harbor Framework provides a method for U.S. companies to transfer personal data outside of Europe that is consistent with the requirements of the European Union Directive on Data

11. In July 2012, Contract Logix, Inc. did not renew its self-certification to the U.S.-EU Safe Harbor Framework, and Commerce subsequently updated respondent's status to "not current" on its public website.
12. In August 2012, Contract Logix, LLC acquired the assets of Contract Logix, Inc., including the website [www.contractlogix.com](http://www.contractlogix.com).
13. Since at least August 2012 until May 2015, respondent disseminated or caused to be disseminated privacy policies and statements on the Contract Logix website, [www.contractlogix.com](http://www.contractlogix.com), including but not limited to, the following statements:

E.U. Safe Harbor Privacy Policy

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 twenty-ninth day of September 2015, has issued this complaint against respondent.

By the Commission.

Donald S. Clark  
Secretary

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