





...  
FCS conducts its data security and privacy practices with the Safely Under Direction commitment and  
assessment procedures in place to ensure its compliance. FCS adheres to the U.S.-EU Safe  
Harbor Framework. FCS does not use customer data for any other purpose than that for which it was

...  
commerce as being in full compliance with the privacy statement, and will annually self certify with the US Department of C  
ommerce. Any employee that FCS is in compliance with. FCS will conduct compliance audits to verify adherence to this

**Count 1**

- 13. Through the means described in Paragraph 12, respondent represented, expressly or by implication, that it was a current participant in the U.S.-EU Safe Harbor Framework.
- 14. In truth and in fact, beginning in 2012, respondent was not a current participant in the U.S.-EU Safe Harbor Framework. Therefore