

**UNITED STATES OF AMERICA  
BEFORE THE FEDERAL TRADE COMMISSION**

**COMMISSIONERS:**      **Edith Ramirez, Chairwoman**  
                                 **Maureen K. Ohlhausen**  
                                 **Terrell McSweeney**

2. Respondent Ali Moiz is a founder and officer of General Workings. His principal office or place of business is the same as that of General Workings.
3. Respondent Murtaza Hussain is a founder and officer of General Workings. His principal office or place of business is the same as that of General Workings.
4. The Federal Trade Commission has jurisdiction of the subject matter of this proceeding and of the Respondents, and the proceeding is in the public interest.

## **ORDER**

### **DEFINITIONS**

For purposes of this order, the following definitions shall apply:

1. Unless otherwise specified, “Respondents” shall mean General Workings Inc., a corporation, also doing business as General Workings, its successors and assigns; and Ali Moiz and Murtaza Hussain, individually and as officers of the corporation.
2. “Affected Consumers” shall mean all persons who, prior to December 1, 2014, had Running Fred, Weekly Android Apps or other related applications present on their web browser; or (b) had applications installed on any mobile device or computer through Weekly Android Apps or another related application.
3. “Clearly and conspicuously” means that a required disclosure is difficult to miss (i.e., easily noticeable) and easily understandable by ordinary consumers, including in all of the following ways:
  - A. In any communication that is solely visual or solely audible, the disclosure must be made through the same means through which the communication is presented. In any communication made through both visual and audible means, such as a television advertisement, the disclosure must be presented simultaneously in both the visual and audible portions of the communication, even if the representation requiring the disclosure is made in only one means.
  - B. A visual disclosure, by its size, contrast, location, the length of time it appears, and other characteristics, must stand out from any accompanying text or other visual elements so that it is easily noticed, read, and understood.
  - C. An audible disclosure, including by telephone or streaming video, must be delivered in a volume, speed, and cadence sufficient for ordinary consumers to easily hear and understand it.
  - D. In any communication using an interactive electronic medium, such as the Internet or software, the disclosure must be unavoidable.



4. The nature of press coverage received by such Covered Products or Services;
5. The extent to which Covered Information is collected, used, disclosed, or shared;
6. The extent to which users may exercise control over the collection, use, disclosure, or sharing of Covered Information;
7. The purpose(s) for which any Covered Information will be collected, used, disclosed, or shared; or
8. The extent to which any Respondent uses, maintains, and protects the privacy, confidentiality, security, or integrity of covered information collected from or about consumers.

## II.

**IT IS FURTHER ORDERED** that Respondents and their officers, agents, representatives, and employees, directly or through any corporation, subsidiary, division, or other device, in connection with the advertising, promotion, offering for sale, sale, or distribution of any Covered Product or Service, shall not offer a product or service or materially change a Covered Product or Service unless prior to the consumer downloading or installing it, Respondents:

1. Disclose, clearly and conspicuously, the following:
  - A. The types of information the Covered Product or Service will access and how that information will be used to perform any services related to the Covered Product or Service; and
  - B. The nature of any material change to a Covered Product or Service;

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#### IV.

**IT IS FURTHER ORDERED** that Respondents shall, for five (5) years from the entry of this order or after the last date of dissemination of any representation covered by this order, whichever is later, maintain and upon request make available to the Federal Trade Commission for inspection and copying:

1. All advertisements and promotional materials containing the representation, including but not limited to Respondents' terms of use, end-user license agreements, frequently asked questions, privacy policies, and other documents publicly disseminated relating to: (a) the collection of data; (b) the use, disclosure or sharing of such data; and (c) opt-out practices and other mechanisms to limit or prevent such collection of data or the use, disclosure, or sharing of data;
2. All materials that were relied upon in disseminating the representation;

**VII.**

**IT IS FURTHER ORDERED** that Respondents Ali Moiz and Murtaza Hussain, for a period of five (5

Provided, further that if such complaint is dismissed or a federal court rules that the Respondent did not violate any provision of the order, and the dismissal or ruling is either not appealed or upheld on appeal, then the order will terminate according to this Part as though the complaint had never been filed, except that the order will not terminate between the date such complaint is filed and the later of the deadline for appealing such dismissal or ruling and the date such dismissal or ruling is upheld on appeal.

By the Commission.

Donald S. Clark  
Secretary

SEAL:  
ISSUED: April 18, 2016