

UNITED STATES OF AMERICA
BEFORE THE FEDERAL TRADE COMMISSION

COMMISSIONERS: Maureen K. Ohlhausen, Acting Chairman
Terrell McSweeney

In the Matter of)
)
Sentinel Labs, Inc.,)
a corporation dba SentinelOne and)
SentinelOne.com.)
)
_____)

DOCKET NO. C-4608

COMPLAINT

The Federal Trade Commission (“Commission” or “FTC”), having reason to believe that Sentinel Labs, Inc., a corporation, has violated the Federal Trade Commission Act (“FTC Act”), and it appearing to the Commission that this proceeding is in the public interest, alleges:

1. Respondent Sentinel Labs, Inc. is a Delaware corporation also doing business as SentinelOne and SentinelOne.com with a principal office or place of business at 2513 E. Charleston Road, Suite 100, Mountain View, CA 94043.
2. Respondent provides endpoint protection software to enterprise customers.
3. The acts and practices of Respondent as alleged in this complaint have been in or affecting commerce, as “commerce” is defined in Section 4 of the FTC Act.
4. Respondent has set forth on its website, <https://sentinelone.com/privacy-policy/>, privacy policies and statements about its practices, including (1) statements related to its participation in the Asia-Pacific Economic Cooperation (“APEC”) Cross-Border Privacy Rules (“CBPR”) system, and (2) statements related to its TRUSTe privacy certification.

APEC Cross-Border Privacy Rules

5. The APEC CBPR system is a self-regulatory initiative designed to facilitate the free flow of information and protect consumer privacy. The CBPR system requires participating companies to abide by the APEC Privacy Framework's nine information privacy principles: purpose limitation, collection limitation, use limitation, data security, integrity, retention, access, and accountability. In the United States, the FTC enforces the CBPR system.
6. Companies that seek to participate in the CBPR system must undergo a review by an APEC-recognized privacy agent to establish compliance with the CBPR principles. Annual reviews are required for participating companies. For more information on the CBPR system, visit www.apec.org.

T

Count 1

9. Through the means described in Paragraph 8, Respondent represented, directly or indirectly, expressly or by implication, that it is certified to participate in the APEC CBPR system.
10. In fact, Respondent is not and never has been certified to participate in the APEC CBPR system. Therefore, the representation set forth in Paragraph 9 is false or misleading.

Count 2

11. Through the means described in Paragraph 8, Respondent represented, directly or indirectly, expressly or by implication, that a third party, TRUSTe, reviewed its privacy policy and privacy practices and verified that Respondent complies with its requirements relating to the privacy of personal information.
12. In fact, the third party did not review Respondent's privacy policy and privacy practices, and did not verify that Respondent complies with its requirements relating to the privacy of personal information. Therefore, the representation set forth in Paragraph 11 is false or misleading.
13. The acts and practices <<>>tct