

UNITED STATES OF AMERICA  
BEFORE THE FEDERAL TRADE COMMISSION

COMMISSIONERS: Maureen K. Ohlhausen, Acting Chairman  
Terrell McSweeney

---

In the Matter of	)	DOCKET NO. C-4608
	)	
Sentinel Labs, Inc., a corporation	)	
dba SentinelOne and SentinelOne.com	)	
	)	DECISION AND ORDER
	)	

---

DECISION

## Findings

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. The Commission has jurisdiction over the subject matter of this proceeding and over Respondent, and the proceeding is in the public interest.

## ORDER

### Definitions

For purposes of this Order, the following definitions apply:

1. "Respondent" means Sentinel Labs, Inc., a corporation also dba as SentinelOne and SentinelOne.com, and its successors and assigns.
2. "APEC CBPR" means the Asia Pacific Economic Cooperation ("APEC") Cross-Border Privacy Rules ("CBPR") system

### Provisions

#### I. Prohibition against Misrepresentations about Participation in Privacy or Security Programs

IT IS ORDERED that Respondent and its officers, agents, employees, and attorneys, and all other persons in active concert or participation with any of them, who receive actual notice of this order, whether acting directly or indirectly, in connection with the advertising, marketing, promotion, offering for sale, or sale of any product or service must not misrepresent in any manner, expressly or by implication, the extent to which Respondent is a member of, adheres to, complies with, is certified by, is endorsed by, or otherwise participates in any privacy or security program sponsored by a government or any self-regulatory or standard-setting organization, including, but not limited to APEC CBPR and the TRUSTe privacy programs

#### II. Acknowledgments of the Order

IT IS FURTHER ORDERED that Respondent obtain acknowledgments of receipt of this Order:

- A. Respondent, within 10 days after the effective date of this Order, must submit to the Commission an acknowledgment of receipt of this Order.

B. For five (5) years after the issuance date of this Order, Respondent must deliver a copy of this Order to: (1) all principals, officers, directors, and LLC managers and members; (2) all employees, agents, and representatives with responsibilities related to the subject matter of the Order and (3) any business entity resulting from any change in structure as set forth in the Provision

D. Any submission to the Commission required by this Order to be sworn under penalty of perjury must be true and accurate and comply with 28 U.S.C. § 1746, such as by concluding: "I declare under penalty of perjury under the laws of the United States of

- B. For matters concerning this Order, representatives of the Commission are authorized to communicate directly with Respondent. Respondent ~~must~~ permit representatives of the Commission to interview anyone affiliated with Respondent who has agreed to such an interview. The interviewee may have counsel present.
- C. The Commission may use all other lawful means, including posing through its representatives as consumers, suppliers, or other individuals or entities, to Respondent or any individual or entity affiliated with Respondent without the necessity of identification or prior notice. ~~Nothing~~ Nothing in this Order limits the Commission's lawful use of ~~complaint~~ ~~also~~ process, pursuant to Sections 9 and 20 of the FTC Act, 15 U.S.C. §§ 40, 57b-

## VI. Order Effective Dates

IT IS FURTHER ORDERED that this Order is final and effective upon the date of its publication on the Commission's website (ftc.gov) as a final order. ~~It~~ ~~will~~ terminate on March 29, 2037, or twenty (20) years from the most recent date that the United States or the Commission files a complaint (with or without an accompanying settlement in federal court alleging any violation of the Order, whichever comes later; *provided, however, that* the filing of such a complaint will not affect the duration of:

- A. any Provision in this Order that terminates in ~~less~~ twenty (20) years;
- B. this Order's application to any Respondent that is not named as a defendant in such complaint; and
- C. this Order if such complaint is filed after the order has terminated ~~up to~~ this Provision. If such complaint is dismissed or a federal court rules ~~that~~ 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 as to Respondent will terminate according to this Provision 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 March 29, 2017