

1823100

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

**COMMISSIONERS:**                    **Joseph J. Simons, Chairman**  
   **Maureen K. Ohlhausen**  
   **Noah Joshua Phillips**  
   **Rohit Chopra**  
   **Rebecca Kelly Slaughter**

*In the Matter of*

transfer of personal dat

ReadyTech has further committed to refer unresolved privacy complaints under the US-EU Privacy Shield to an independent dispute resolution mechanism, JAMS. If you do not receive timely acknowledgment of your complaint, or if your complaint is not satisfactorily addressed by ReadyTech, please visit the JAMS web site at <https://www.jamsadr.com/about/submit-a-case> for more information and to file a complaint.

10. Although Respondent initiated an application to Commerce in October 2016 for Privacy Shield certification, it did not complete the steps necessary to participate in the EU-U.S. Privacy Shield framework.

### **Count 1-Privacy Misrepresentation**

11. As described in Paragraph 9, Respondent represents, directly or indirectly, expressly or by implication, that it is actively in the process of certifying compliance with the EU-U.S. Privacy Shield framework.

12. In fact, as described in Paragraph 10, Respondent is not actively in the process of certifying compliance with the ntrfedscvandia (t)-2 S2 (f)hi Comdd [(7-2 (n P)-4 (o C1)-3 (om)w )-10 (n Pk. onde)4 (