



UNITED STATES OF AMERICA
FEDERAL TRADE COMMISSION
WASHINGTON, D.C. 20580

Office of the Secretary

October 25, 2018

Ms. Yenny Solares Bravo
State of Florida

Re: *In the Matter of ReadyTech Corporation, Matter No. 1823100, C-4659*

Dear Ms. Bravo:

We would like to thank you for commenting on the Federal Trade Commission's ("Coms6 C.F.R. §4.9(b)(6)(ii).

The complaint in this matter alleges that ReadyTech, which provides online services, deceptively claimed on its website that it was actively in the process of certifying compliance with the EU-U.S Privacy Shield framework, when in fact, the company was not actively in the process of certifying compliance. ReadyTech initiated an application to the U.S. Department of Justice in October 2016, but did not complete the steps necessary to participate in the Privacy Shield framework.

The proposed order prohibits ReadyTech from misrepresenting the extent to which it 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 the EU-U.S. Privacy Shield framework and the Swiss-Swiss framework. The remaining Parts of the proposed order contain standard reporting and recordkeeping provisions.

Your comment indicates that you strongly support the proposed order prohibiting ReadyTech from misrepresenting its membership in any privacy or security program. The Commission appreciates your support for the proposed order.



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Mr. Jonah Kaplan
State of Illinois

Re: In the Matter of



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individual case to determine whether to seek relief. Based on our evidence and allegations, we have determined that the proposed consent order's injunctive relief will serve to remedy the alleged violations of the FTC Act and deter future violations. In addition, if ReadyTech violates this order in the future, it could be liable for civil penalties of up to \$41,484 per violation. As is the case with all Commission orders, Commission staff will closely monitor ReadyTech's activities to determine whether any violations occur.

Having considered all the facts of this case and all of the comments submitted in response to the proposed consent order, the Commission has now determined that the public interest would best be served by issuing the Complaint and the Decision and Order in final form without any modifications. The final Decision and Order and other relevant materials are available from the Commission's website at <http://www.ftc.gov>. The Commission thanks you again for your comment.

By direction of the Commission.

Donald S. Clark
Secretary

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Donald S. Clark
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