

UNITED STATES OF AMERICA
BEFORE THE FEDERAL TRADE COMMISSION

COMMISSIONERS: Joseph J. Simons, Chairman
Noah Joshua Phillips
Rohit Chopra
Rebecca Kelly Slaughter
Christine S. Wilson

In the Matter of)

Thru , Inc.)

DOCKET NO. C-4702

the EU-U.S. or the Swiss-U.S. Privacy Shield frameworks and continued to make the statements described in Paragraph 11 in its privacy policy. Therefore, the representation set forth in Paragraph 11 is false and misleading.

Count 1-Privacy Misrepresentation

13. As described in Paragraph 11, Respondent represents, directly or indirectly, expressly or by implication, that it is a participant in the EU-U.S. and the Swiss-U.S. Privacy Shield frameworks.
14. In fact, as described in Paragraph 11, Respondent was never certified to participate in either the EU-U.S. or the Swiss-U.S. Privacy Shield frameworks. Therefore, the representation set forth in Paragraph 11 is false and misleading.

Violations of Section 5 of the FTC Act

15. The acts and practices of Respondent as alleged in this complaint constitute deceptive acts or practices, in or affecting commerce, in violation of Section 5(a) of the Federal Trade Commission Act.

THEREFORE, the Federal Trade Commission this thirteenth day of January 2020, has issued this complaint against Respondent.

By the Commission.

April J. Tabor
Acting Secretary

SEAL
ISSUED: January 13, 2020