

**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**  
**TAPPLOCK, INC., a corporation.**

**DECISION AND ORDER**

**DOCKET NO. C-4718**

**DECISION**

## **Findings**

1. The Respondent is Tapplock, Inc., a company, with its principal office or place of business at 121 Richmond Street West, Toronto, Ontario M5H 2K1, Canada.
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. “Covered Device” means (a) any computing device sold by Respondent that operates using an operating system, including any smart lock, smartphone, tablet, wearable, sensor, or any peripheral of any portable computing device; and (b) the software used to access, operate, manage, or configure a device subject to part (a) of this definition, including, but not limited to, the firmware, web or mobile applications, and any related online services, that are advertised, developed, branded, or sold by Respondent, directly or indirectly.
2. “Covered Incident” means any instance in which (a) any United States federal, state, or local law or regulation requires Respondent to notify any U.S. federal, state, or local government entity that information collected or received, directly or indirectly, by Respondent from or about an individual consumer was, or is reasonably believed to have been, accessed or acquired without authorization; or (b) Respondent discovers that Covered Devices or Personal Information necessary to access such Covered Devices (such as a key code) were, or are reasonably believed to have been, accessed without authorization.
3. “Personal Information” means individually identifiable information from or about an individual consumer, including: (a) a first and last name; (b) a home or other physical address, including street name and name of city or town, or other information about the location of the individual, including but not limited to fine or coarse location or GPS coordinates; (c) an email address; (d) a persistent identifier for computers or mobile devices, such as a customer number held in a “cookie,” a static Internet Protocol (“IP”) address, or a processor serial number; (e) a date of birth; (f) photograph; and (g) key code used to control access to a Covered Device.
4. “Respondent” means Tapplock, Inc., and its successors and assigns.

## Provisions

### I. Prohibition against Misrepresentations about Privacy and Security

**IT IS ORDERED** that Respondent, Respondent's 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 any product or service, must not misrepresent in any manner, expressly or by implication, the extent to which Respondent maintains and protects: (1) the security of a Covered Device; or (2) the privacy, security, confidentiality, or integrity of Personal Information.

### II. Mandated Device Security and Information Security Program

**IT IS FURTHER ORDERED** that Respondent must not transfer, sell, share, collect, maintain, or store Personal Information or manufacture or sell Covered Devices unless it establishesTj 0.4 0 17 DnceTTc 0 T(w)9Hc )EurtyDSIdz•[(a)Dw [(P)NBUw 4 (r4E)EPT(E D)2z(0;LRUUn





E. Each Assessment must be completed within 60 days after the end of the reporting period

B. Unless otherwise directed by a Commission representative in writing, submit all annual certifications to the Commission pursuant to this Order via email to [DEbrief@ftc.gov](mailto:DEbrief@ftc.gov) or by overnight courier (not the U.S. Postal Service) to Associate Director for Enforcement, Bureau of Consumer Protection, Federal Trade Commission, 600 Pennsylvania Avenue NW, Washington, DC 20580. The subject line must begin, “



D. A copy of each unique advertisement or other marketing material making a representation

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 in this Order limits the Commission's lawful use of compulsory process, pursuant to Sections 9 and 20 of the FTC Act, 15 U.S.C. §§ 49, 57b-1.

#### **X. Order Effective Dates**