

**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

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Miniclip S.A., a corporation. **DOCKET NO. C-4722**)
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COMPLAINT

The Federal Trade Commission (“FTC” or “Commission”), having reason to believe that Miniclip S.A., a corporation (“Respondent”), has violated the Federal Trade Commission Act (“FTC Act”), and it appearing to the Commission that this proceeding is in the public interest, alleges:

1. Respondent Miniclip S.A. is a Swiss corporation with its principal office or place of business at 18 Faubourg de l’Hôpital, 2000 Neuchâtel, Switzerland.
2. Respondent develops, publishes, and distributes mobile and online digital games. As of August 2019, Respondent had approximately 100 applications (“apps”) available for download through Apple’s App Store and Google Play. Consumers can also play online games via Respondent’s website, www.miniclip.com, and through Facebook.
3. The acts and practices of Respondent as alleged in this complaint have been in or affecting commerce, as “commerce” is defined in Section 4 of the FTC Act.

COPPA Safe Harbor Programs

4. Congress enacted the Children’s Online Privacy Protection Act of 1998 (“COPPA”) to protect the safety and privacy of children online by prohibiting the unauthorized or unnecessary collection of children’s personal information online by operators of Internet Web sites and online services (“operators”). COPPA directed the Commission to promulgate a rule implementing COPPA. The Commission promulgated the COPPA Rule on November 3, 1999, under Section 1303(b) of COPPA, 15 U.S.C. § 6502(b), and Section 553 of the

12. Respondent remained