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UNITED STATES OF AMERICA

BEFE30 (7C m0038osB0L038os T038osB0m0038os CAT)-5 SSSOATTJ 0 Tc 0 Tw 1 Noah Joshua Phillips Rohit Chopra Rebecca Kelly Slaughter

n the Matter of

ncentive Services, Inc.,
corporation.

DOCKET NO. C-4703

Christine S. Wilson

COMPLAINT

The Federal Trade Commission ("FTC"), having reason to believe that Incentive Services, Inc., a corporation, 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 Incentive Services, Inc. is a Minnesota corporation with its principal office or place of business at 7667 Cahill Road, Edina, Minnesota 55439.
- 2. Respondent works with organizations to improve performance of individual employees through service award programs (for work anniversaries, retirement, onboarding, etc.), performance incentives, and loyalty programs.
- 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.
- 4. Respondent has set forth on its website, https://www.incentiveservices.com/, privacy policies and statements about its practices, including statements related to its participation in the EU-U.S. and the Swiss-U.S. Privacy Shield frameworks.
- 5. In fact, Respondent has not been certified to participate in either the EU-U.S. or the Swiss-U.S. Privacy Shield frameworks.

We regularly review our compliance with our Privacy Policy. We also adhere to seve