

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 the Federal Trade Commission Act

("FTC Act"), and it appearing to the Commission that this proceeding is in the public interest,
In the Matter of _____)

T&M Protection Resources, LLC, a Delaware limited liability corporation with
a limited liability corporation place of business at 280 Park Avenue, Suite 440, New York, New York
10169.)

2. Respondent provides background check, security and investigative services. In connection
with providing services related to COMPLAINT background checks, Respondent obtained data
about individuals in the EU.

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

4. Respondent has set forth on its website <https://www.tmprotection.com/privacy-policy>,
privacy policies and statements about its practices, including statements related to its
participation in the EU-U.S. Privacy Shield framework agreed upon by the U.S. government
and the European Commission.

Privacy Shield

5. The EU-U.S. Privacy Shield framework ("Privacy Shield") was designed by the U.S.
Department of Commerce ("Commerce") and the European Commission to provide
mechanism for U.S. companies to transfer personal data outside of the EU that is consistent

Count 2-Misrepresentation Regarding Verification

17. As described in Paragraph 9, Respondent represented that it complied with the EU-U.S. Privacy Shield principles.

18. In fact, as described in Paragraphs 13-14, Respondent