

**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) **DOCKET NO. C-4709**
)
T&M Protection Resources, LLC,) **DECISION AND ORDER**
a limited liability corporation.)
)
)
_____)

DECISION

Findings

1. Respondent T&M Protection Resources, LLC is a Delaware limited liability corporation with its principal office or place of business at 230 Park Avenue, Suite 440, New York, New York 10169.
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 definition applies:

1. “Respondent” means T&M Protection Resources, LLC, a limited liability corporation, and its successors and assigns.

Provisions

I. Prohibition against Misrepresentations about Participation

1. continue to apply the EU-U.S. Privacy Shield framework principles to the personal information it received while it participated in the Privacy Shield; or
 2. protect the information by another means authorized under EU law, including by using a binding corporate rule or a contract that fully reflects the requirements of the relevant standard contractual clauses adopted by the European Commission; or
- B. return or delete the information within ten (10) days after the effective date of this Order.

III. Acknowledgments of the Order

IT IS FURTHER ORDERED that Respondent obtain acknowledgments of receipt of this Order:

- A. Respondent, within ten (10) days after the effective date of this Order, must submit to the Commission an acknowledgment of receipt of this Order.
- B. For five (5) years after the issuance date of this Order, Respondent must deliver a copy of this Order to: (1) all principals, officers, directors, and LLC managers and members; (2) all employees having managerial responsibilities or conduct related to the subject matter of the Order and all agents and representatives who participate in conduct related to the subject matter of the Order; and (3) any business entity resulting from any change in structure as set forth in the Provision titled Compliance Report and Notices. Delivery must occur within ten (10) days after the effective date of this Order for current personnel. For all others, delivery must occur before they assume their responsibilities.
- C. From each individual or entity to which Respondent delivered a copy of this Order, Respondent must obtain, within thirty (30) days, a signed and dated acknowledgment of receipt of this Order.

IV. Compliance Report and Notices

IT IS FURTHER ORDERED that Respondent make timely submissions to the

Respondent is in compliance with each Provision of this Order; and (e) provide a
Best Available Control Technology (BACT) plan for the Respondent pursuant to this Order, un-1 (dgrd s(dgrd

Provided that if such complaint is dismissed or a federal court judgment is either not appealed or upheld on appeal, then the case will terminate according to this Pass-through the complaint had never been filed, except that the case will terminate between the date such complaint is filed and the later deadline for appealing such dismissal or ruling and the date such dismissal or ruling is upheld on appeal.

By the Commission.

April J. Tabor
Acting Secretary

SEAL:
ISSUED March 16, 2020