

# Federal Trade Commission Enforcement of Safe Harbor Commitments

Matter/Organization	Date	Enforcement Action	Link
<p><i>In the Matter of Myspace LLC,</i>  <i>FTC File No. 102 3058</i></p>	<p>2012</p>	<p>The proposed settlement order bars Myspace from misrepresenting the extent to which it protects the privacy of users' personal information or the extent to which it belongs to or complies with any privacy, security or other compliance program, including the U.S.-EU Safe Harbor Framework. The order also requires that Myspace establish a comprehensive privacy program designed to protect consumers' information, and to obtain biennial assessments of its privacy program by independent, third-party auditors for 20 years.</p> <p>The final consent order carries the force of law with respect to future actions. Each violation of such an order may result in a civil penalty of up to \$16,000.</p>	<p><a href="http://www.ftc.gov/os/caselist/1023058/index.shtm">http://www.ftc.gov/os/caselist/1023058/index.shtm</a></p>
<p><i>In the Matter of Facebook, Inc.,</i>  <i>FTC File No. 092 3184</i></p>	<p>2011</p>	<p>Under the settlement, Facebook is: barred from making misrepresentations about the privacy or security of consumers' personal information; required to obtain consumers' affirmative express consent before enacting changes that override their privacy preferences; required to prevent anyone from accessing a user's material more than 30 days after the user has deleted his or her account; required to establish and maintain a comprehensive privacy program designed to address privacy risks associated with the development and management of new and existing products and services, and to protect the privacy and confidentiality of consumers' information; and required, within 180 days, and every two years after that for the next 20 years, to obtain independent, third-party audits certifying that it has a privacy program in place that meets or exceeds the requirements of the FTC order, and to ensure that the privacy of consumers' information is protected.</p>	<p><a href="http://www.ftc.gov/os/caselist/0923184/index.shtm">http://www.ftc.gov/os/caselist/0923184/index.shtm</a></p>

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<p><b><i>In the Matter of Google Inc.,</i></b> <i>FTC File No. 102 3136</i></p>	2011	<p>The settlement bars Google from misrepresenting the privacy or confidentiality of individuals' information or misrepresenting compliance with the U.S.-EU Safe Harbor or other privacy, security, or compliance programs. The settlement requires the company to obtain users' consent before sharing their information with third parties if Google changes its products or services in a way that results in information sharing that is contrary to any privacy promises made when the user's information was collected. The settlement further requires Google to establish and maintain a comprehensive privacy program, and it requires that for the next 20 years, the company have audits conducted by independent third parties every two years to assess its privacy and data protection practices.</p> <p>The final consent order carries the force of law with respect to future actions. Each violation of such an order may result in a civil penalty of up to \$16,000.</p>	<p><a href="http://www.ftc.gov/os/caselist/1023136/index.shtm">http://www.ftc.gov/os/caselist/1023136/index.shtm</a></p>
<p><b><i>In the Matter of Collectify LLC,</i></b> <i>FTC File No. 092 3142</i></p>	2009	<p>Under the settlement agreement, the company, which claimed or indicated participation in the Safe Harbor Framework, is prohibited from misrepresenting the extent to which it participates in any privacy, security, or other compliance program sponsored by a government or any third party.</p> <p>The final consent order carries the force of law with respect to future actions. Each violation of such an order may result in a civil penalty of up to \$16,000.</p>	<p><a href="http://www.ftc.gov/os/caselist/0923142/index.shtm">http://www.ftc.gov/os/caselist/0923142/index.shtm</a></p>

<p><b><i>In the Matter of Progressive Gaitways LLC,</i></b>  <i>FTC File No. 092 3141</i></p>	<p>2009</p>	<p>Under the settlement agreement, the company, which claimed or indicated participation in the Safe Harbor Framework, is prohibited from misrepresenting the extent to which it participates in any privacy, security, or other compliance program sponsored by a government or any third party.</p> <p>The final consent order carries the force of law with respect to future actions. Each violation of such an order may result in a civil penalty of up to \$16,000.</p>	<p><a href="http://www.ftc.gov/os/caselist/0923141/index.shtm">http://www.ftc.gov/os/caselist/0923141/index.shtm</a></p>
<p><b><i>In the Matter of Directors Desk LLC,</i></b>  <i>FTC File No. 092 3140</i></p>	<p>2009</p>	<p>Under the settlement agreement, the company, which claimed or indicated participation in the Safe Harbor Framework, is prohibited from misrepresenting the extent to which it participates in any privacy, security, or other compliance program sponsored by a government or any third party.</p> <p>The final consent order carries the force of law with respect to future actions. Each violation of such an order may result in a civil penalty of up to \$16,000.</p>	<p><a href="http://www.ftc.gov/os/caselist/0923140/index.shtm">http://www.ftc.gov/os/caselist/0923140/index.shtm</a></p>
<p><b><i>In the Matter of Onyx Graphics, Inc.,</i></b>  <i>FTC File No. 092 3139</i></p>	<p>2009</p>	<p>Under the settlement agreement, the company, which claimed or indicated participation in the Safe Harbor Framework, is prohibited from misrepresenting the extent to which it participates in any privacy, security, or other compliance program sponsored by a government or any third party.</p> <p>The final consent order carries the force of law with respect to future actions. Each violation of such an order may result in a civil penalty of up to \$16,000.</p>	<p><a href="http://www.ftc.gov/os/caselist/0923139/index.shtm">http://www.ftc.gov/os/caselist/0923139/index.shtm</a></p>
<p><b><i>In the Matter of ExpatEdge Partners, LLC,</i></b>  <i>FTC File No. 092 3138</i></p>	<p>2009</p>	<p>Under the settlement agreement, the company, which claimed or indicated participation in the Safe Harbor Framework, is prohibited from misrepresenting the extent to which it participates in any privacy, security, or other compliance program sponsored by a government or any third party.</p> <p>The final consent order carries the force of law with</p>	<p><a href="http://www.ftc.gov/os/caselist/0923138/index.shtm">http://www.ftc.gov/os/caselist/0923138/index.shtm</a></p>

		respect to future actions. Each violation of such an order may result in a civil penalty of up to \$16,000.	
<b><i>In the Matter of World Innovators, Inc.,</i></b> <i>FTC File No. 092 3137</i>	2009	<p>Under the settlement agreement, the company, which claimed or indicated participation in the Safe Harbor Framework, is prohibited from misrepresenting the extent to which it participates in any privacy, security, or other compliance program sponsored by a government or any third party.</p> <p>The final consent order carries the force of law with respect to future actions. Each violation of such an order may result in a civil penalty of up to \$16,000.</p>	<a href="http://www.ftc.gov/os/caselist/0923137/index.shtm">http://www.ftc.gov/os/caselist/0923137/index.shtm</a>
<b><i>FTC v. Javian Karnani, and Balls of Kryptonite, LLC,</i></b> <i>Civil Action No. 09-CV-5276</i> <i>FTC File No. 092 3081</i>	2009	<p>The settlement order prohibits the defendants from misrepresenting: the location, quality, quantity, characteristics, and model numbers of products they sell; their compliance with or certification by government-sponsored information security programs; their policies regarding cancellation, exchange, or return; the existence of product warranties; and the total cost of the products sold.</p> <p>The final consent order carries the force of law with respect to future actions. Each violation of such an order may result in a civil penalty of up to \$16,000.</p>	<a href="http://www.ftc.gov/os/caselist/0923081/index.shtm">http://www.ftc.gov/os/caselist/0923081/index.shtm</a>