

UNITED STATES OF AMERICA  
FEDERAL TRADE COMMISSION

COMMISSIONERS: Jon Leibowitz, Chairman  
William E. Kovacic  
J. Thomas Rosb  
Edith Ramirez  
Julie Brill

\_\_\_\_\_)  
In the Matter of )  
T eh a d e d e e r F T C ) DOCKET NO. C-  
or one h m a a i v t d i o s n a o n e )

("respondent") has violated the provisions of the Federal Trade Commission Act, and it appearing to the Commission that this proceeding is in the public interest, alleges:

1. Respondent Ceridian Corporation ("Ceridian") is a Delaware corporation with its principal office or place of business at 3311 East Old Shakopee Road, Minneapolis, Minnesota 55425.
2. 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 Federal Trade Commission Act.
3. Respondent is a service provider that, among other things, provides payroll processing, payroll-related tax filing, benefits administration, and other human resource services to business customers.
4. Among other things, respondent operates Powerpay, a web-based payroll processing service in the United States under the name "Powerpay." Respondent's small business customers enter their employees' personal information on to the Powerpay website, which they use as a repository to collect, track, and store employee payroll data and to automate payroll processing for their employees.

5. When customers enter their employees' personal information on to the Powerpa website, the information is sent to computers on responsive computer network for the purpose of computing payroll amounts and processing payroll checks and direct deposits. This personal in

10. Through the means described in Paragraphs 6 and 7, respondent represented, expressly or by implication, that it implemented reasonable and appropriate measures to protect personal information against unauthorized access.
11. In truth and in fact, respondent did not implement reasonable and appropriate measures to protect personal information against unauthorized access. Therefore, the representations set forth in Paragraphs 6 and 7 were, and are, false or misleading.
12. As set forth in Paragraph 8, respondent failed to employ reasonable and appropriate measures to prevent unauthorized access to personal information. Respondents' practices caused, or are likely to cause, substantial injury to consumers that is not offset by countervailing benefits to consumers or competition and is not reasonably avoidable by consumers. This practice was, and is, an unfair act or practice.
13. The acts and practices of respondent as alleged in this complaint constitute unfair or deceptive acts or practices in or affecting commerce in violation of Section 5(a) of the Federal Trade Commission Act, 15 U.S.C. § 45(a).

THEREFORE, the Federal Trade Commission this \_\_\_ day of \_\_\_, 2011, has issued this complaint against respondent.

By the Commission.

Donald S. Clark  
Secretary