

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

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In the Matter of )  
)  
)

DOCKET NO.

3, 1999, under Section 1303(b) of COPPA, 15 U.S.C. § 6502(b), and Section 553 of the Administrative Procedure Act, 5 U.S.C. § 553. The Rule went into effect on April 21, 2000. The Commission promulgated revisions to the Rule that went into effect on July 1, 2013.

5. COPPA includes a provision enabling industry groups or others to submit for Commission approval self-regulatory safe harbor programs that implement the protections of the Commission's final Rule
6. The COPPA safe harbor programs approved by the Commission review member operators' compliance with the safe harbor programs' guidelines. An operator who complies with the Commission approved safe harbor program guidelines will be deemed in compliance with COPPA.

### **Relevant Business Practices**

7. In 2001, the Commission approved the Children's Advertising Review Unit ("CARU") as a COPPA safe harbor program
8. In July 2009, Respondent joined CARU's COPPA safe harbor program. Thereafter, Respondent began disseminating statements regarding its participation in CARU's COPPA safe harbor program.
9. From at least 2012 through June 2019, Respondent disseminated or caused to be disseminated the following statement on its Small Print website page (<https://corporate.miniclip.com/advertising/smallprint>):

In recognition of our focus on the quality and safety of our content,

12. Respondent remained a member of CARU's COPPA safe harbor program until July 6, 2015, when CARU terminated Respondent's participation in the COPPA safe harbor program

13. After CARU terminated Respondent from CARU's COPPA safe harbor program, Respondent continued to make claims, as indicated in Paragraphs 9-1, that it participates in the COPPA safe harbor program