



Office of the Secretary

UNITED STATES OF AMERICA  
FEDERAL TRADE COMMISSION  
WASHINGTON, D.C. 20580

December 20, 2017

Anonymous

*Re: In the Matter of Lenovo (United States) Inc., Matter No. 152-3134*

Dear Anonymous:

Thank you for your comment regarding the Federal Trade Commission's ("Commission" or "FTC") consent agreement in the above-entitled proceeding. Your comment indicates that you would like to receive a settlement from Lenovo.

The Commission's proposed settlement with Lenovo is not a consumer class action lawsuit. The consent agreement in this matter settles alleged violations of federal law prohibiting unfair or deceptive acts or practices. The Commission issues an administrative complaint when it has "reason to believe" that the law has been or is being violated, and it appears to the Commission that a proceeding is in the public interest. When the Commission issues a final decision and order, it carries the force of law with respect to future actions.

The complaint in this matter alleges, among other things, that from August 2014 through June 2015, Lenovo, Inc. ("Lenovo") sold certain consumer laptops preinstalled with VisualDiscovery, an ad-injecting software developed by Superfish, Inc. According to the complaint, VisualDiscovery created security vulnerabilities that put people's personal information at risk. However, because VisualDiscovery's security vulnerabilities have been public since February 2015, most antivirus companies updated their software to remove the VisualDiscovery software (and the security vulnerability). Consumers can check if they have one of the affected Lenovo laptop models on Lenovo's website at [https://support.lenovo.com/us/en/product\\_security/ps500035](https://support.lenovo.com/us/en/product_security/ps500035). If you own a Lenovo laptop with VisualDiscovery installed, you can uninstall the program using these directions and automated tool [https://support.lenovo.com/us/en/product\\_security/superfish\\_uninstall](https://support.lenovo.com/us/en/product_security/superfish_uninstall). Additional information is available on the Commission's consumer blog at <https://www.consumer.ftc.gov/blog/2017/09/lenovo-adware-created-security-holes>.

The proposed consent order requires Lenovo to implement a comprehensive security program and to obtain a biennial assessment from an independent third party for the duration of the 20-year order. The proposed consent order also prohibits Lenovo from making misrepresentations about certain preinstalled software on its personal computers. In addition, the proposed consent order requires Lenovo to obtain a consumer's affirmative express consent, with certain limited exceptions, prior to any preinstalled software a) injecting advertisements into a consumer's Internet browsing session, or b) transmitting, or causing to transmit, the consumer's

personal information to any person or entity other than the consumer. Lenovo must also provide instructions for how consumers can revoke their consent to the software's operation by providing a reasonable and effective means for consumers to opt out, disable or remove the software. These requirements will help ensure that consumers' personal information is protected in the future.

The Commission has placed your comment on the public record pursuant to rule 4.9(b)(6)(ii) of the Commission's Rules of Practice, 16 C.F.R. §4.9(b)(6)(ii). Having considered all the facts of this case and all of the comments submitted in response to the proposed order, the Commission has now determined that the public interest would best be served by issuing the Complaint and the Decision and Order in final form without any modifications. The final Decision and Order and other relevant materials are available from the Commission's website at <http://www.ftc.gov>. The Commission thanks you again for your comment.

By direction of the Commission.

Donald S. Clark  
Secretary



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UNITED STATES OF AMERICA  
FEDERAL TRADE COMMISSION  
WASHINGTON, D.C. 20580

December 20, 2017

Anonymous  
State of Arizona

*Re: In the Matter of Lenovo (United States) Inc., Matter No. 152-3134*

Dear Anonymous:

Thank you for your comment regarding the Federal Trade Commission's ("Commission" or "FTC") consent agreement in the above-entitled proceeding. Your comment indicates that you are concerned that your Lenovo laptop may have been affected by preinstalled software that compromised security.

The complaint in this matter alleges, among other things, that from August 2014 through June 2015, Lenovo, Inc. ("Lenovo") sold certain consumer laptops preinstalled with VisualDiscovery, an ad-injecting software developed by Superfish, Inc. According to the complaint, VisualDiscovery created security vulnerabilities that put people's personal information at risk. Based on the date you purchased your Lenovo laptop, it does not appear that it was preinstalled with the VisualDiscovery software. In addition, because VisualDiscovery's security vulnerabilities have been public since February 2015, most antivirus companies updated their software to remove the VisualDiscovery software (and the security vulnerability). Additional information is available on the Commission's consumer blog at <https://www.consumer.ftc.gov/blog/2017/09/lenovo-adware-created-security-holes>.

The Commission understands that security is very important to consumers. The proposed consent order requires Lenovo to implement a comprehensive security program and to obtain a biennial assessment from an independent third party for the duration of the 20-year order. The proposed consent order also prohibits Lenovo from making misrepresentations about certain preinstalled software on its personal computers. In addition, the proposed consent order requires Lenovo to obtain a consumer's affirmative express consent, with certain limited exceptions, prior to any preinstalled software a) injecting advertisements into a consumer's Internet browsing session, or b) transmitting, or causing to transmit, the consumer's personal information to any person or entity other than the consumer. Lenovo must also provide instructions for how consumers can revoke their consent to the software's operation by providing a reasonable and effective means for consumers to opt out, disable or remove the software. These requirements will help ensure that consumers' personal information is protected in the future.

The Commission has placed your comment on the public record pursuant to rule 4.9(b)(6)(ii) of the Commission's Rules of Practice, 16 C.F.R. §4.9(b)(6)(ii). Having considered all the facts of this case and all of the comments submitted in response to the proposed order, the

Commission has now determined that the public interest would best be served by issuing the Complaint and the Decision and Order in final form without any modifications. The final Decision and Order and other relevant materials are available from the Commission's website at <http://www.ftc.gov>. The Commission thanks you again for your comment.

By direction of the Commission.

Donald S. Clark  
Secretary



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UNITED STATES OF AMERICA  
FEDERAL TRADE COMMISSION  
WASHINGTON, D.C. 20580

December 20, 2017

Rachel Black  
State of Pennsylvania

*Re: In the Matter of Lenovo (United States) Inc., Matter No. 152-3134*

Dear Ms. Black:

Thank you for your comment regarding the Federal Trade Commission's ("Commission" or "FTC") consent agreement in the above-entitled proceeding. Your comment indicates that you are concerned that your Lenovo laptop may have been affected by preinstalled software that compromised security.

The complaint in this matter alleges, among other things, that from August 2014 through June 2015, Lenovo, Inc. ("Lenovo") sold certain consumer laptops preinstalled with VisualDiscovery, an ad-injecting software developed by Superfish, Inc. According to the complaint, VisualDiscovery created security vulnerabilities that put people's personal information at risk. VisualDiscovery's security vulnerabilities have been public since February 2015, therefore most antivirus companies updated their software to remove the VisualDiscovery software (and the security vulnerability). Consumers can check if they have one of the affected Lenovo laptop models on Lenovo's website at [https://support.lenovo.com/us/en/product\\_security/ps500035](https://support.lenovo.com/us/en/product_security/ps500035). If you own a Lenovo laptop with VisualDiscovery installed, you can uninstall the program using these directions and automated tool [https://support.lenovo.com/us/en/product\\_security/superfish\\_uninstall](https://support.lenovo.com/us/en/product_security/superfish_uninstall). Additional information is available on the Commission's consumer blog at <https://www.consumer.ftc.gov/blog/2017/09/lenovo-adware-created-security-holes>.

The proposed consent order requires Lenovo to implement a comprehensive security program and to obtain a biennial assessment from an independent third party for the duration of the 20-year order. The proposed consent order also prohibits Lenovo from making misrepresentations about certain preinstalled software on its personal computers. In addition, the proposed consent order requires Lenovo to obtain a consumer's affirmative express consent, with certain limited exceptions, prior to any preinstalled software a) injecting advertisements into a consumer's Internet browsing session, or b) transmitting, or causing to transmit, the consumer's personal information to any person or entity other than the consumer. Lenovo must also provide instructions for how consumers can revoke their consent to the software's operation by providing a reasonable and effective means for consumers to opt out, disable or remove the software. These requirements will help ensure that consumers' personal information is protected in the future.

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Donald S. Clark  
Secretary



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WASHINGTON, D.C. 20580

December 20, 2017

Glenn Engel  
State of Indiana

*Re: In the Matter of Lenovo (United States) Inc., Matter No. 152-3134*

Dear Mr. Engel:

Thank you for your comment regarding the Federal Trade Commission's ("Commission" or "FTC") consent agreement in the above-entitled proceeding. Your comment asks how you can learn if you "have this security vulnerability on [your] machine" and how to remediate the vulnerability.

The complaint in this matter alleges, among other things, that from August 2014 through June 2015, Lenovo, Inc. ("Lenovo") sold certain consumer laptops preinstalled with VisualDiscovery, an ad-injecting software developed by Superfish, Inc. According to the complaint, VisualDiscovery created security vulnerabilities that put people's personal information at risk. VisualDiscovery's security vulnerabilities have been public since February 2015, therefore most antivirus companies updated their software to remove the VisualDiscovery software (and the security vulnerability). Consumers can check if they have one of the affected Lenovo laptop models on Lenovo's website at [https://support.lenovo.com/us/en/product\\_security/ps500035](https://support.lenovo.com/us/en/product_security/ps500035). If you own a Lenovo laptop with VisualDiscovery installed, you can uninstall the program using these directions and automated tool [https://support.lenovo.com/us/en/product\\_security/superfish\\_uninstall](https://support.lenovo.com/us/en/product_security/superfish_uninstall). Additional information is available on the Commission's consumer blog at <https://www.consumer.ftc.gov/blog/2017/09/lenovo-adware-created-security-holes>.

The Commission understands that security is very important to consumers. The proposed consent order requires Lenovo to implement a comprehensive security program and to obtain a biennial assessment from an independent third party for the duration of the 20-year order. The proposed consent order also prohibits Lenovo from making misrepresentations about certain preinstalled software on its personal computers. In addition, the proposed consent order requires Lenovo to obtain a consumer's affirmative express consent, with certain limited exceptions, prior to any preinstalled software a) injecting advertisements into a consumer's Internet browsing session, or b) transmitting, or causing to transmit, the consumer's personal information to any person or entity other than the consumer. Lenovo must also provide instructions for how consumers can revoke their consent to the software's operation by providing a reasonable and effective means for consumers to opt out, disable or remove the software. These requirements will help ensure that consumers' personal information is protected in the future.

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Donald S. Clark  
Secretary



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WASHINGTON, D.C. 20580

December 20, 2017

Maria Flores  
State of California

*Re: In the Matter of Lenovo (United States) Inc., Matter No. 152-3134*

Dear Ms. Flores:

Thank you for your comment regarding the Federal Trade Commission's ("Commission" or "FTC") consent agreement in the above-entitled proceeding. Your comment indicates that you are concerned that your Lenovo laptop may have been affected by preinstalled software that compromised security.

The complaint in this matter alleges, among other things, that from August 2014 through June 2015, Lenovo, Inc. ("Lenovo") sold certain consumer laptops preinstalled with VisualDiscovery, an ad-injecting software developed by Superfish, Inc. According to the complaint, VisualDiscovery created security vulnerabilities that put people's personal information at risk. VisualDiscovery's security vulnerabilities have been public since February 2015, therefore most antivirus companies updated their software to remove the VisualDiscovery software (and the security vulnerability). Consumers can check if they have one of the affected Lenovo laptop models on Lenovo's website at [https://support.lenovo.com/us/en/product\\_security/ps500035](https://support.lenovo.com/us/en/product_security/ps500035). If you own a Lenovo laptop with VisualDiscovery installed, you can uninstall the program using these directions and automated tool [https://support.lenovo.com/us/en/product\\_security/superfish\\_uninstall](https://support.lenovo.com/us/en/product_security/superfish_uninstall). Additional information is available on the Commission's consumer blog at <https://www.consumer.ftc.gov/blog/2017/09/lenovo-adware-created-security-holes>.

The proposed consent order requires Lenovo to implement a comprehensive security program and to obtain a biennial assessment from an independent third party for the duration of the 20-year order. The proposed consent order also prohibits Lenovo from making misrepresentations about certain preinstalled software on its personal computers. In addition, the proposed consent order requires Lenovo to obtain a consumer's affirmative express consent, with certain limited exceptions, prior to any preinstalled software a) injecting advertisements into a consumer's Internet browsing session, or b) transmitting, or causing to transmit, the consumer's personal information to any person or entity other than the consumer. Lenovo must also provide instructions for how consumers can revoke their consent to the software's operation by providing a reasonable and effective means for consumers to opt out, disable or remove the software. These requirements will help ensure that consumers' personal information is protected in the future.

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Secretary



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WASHINGTON, D.C. 20580

December 20, 2017

Pamela Marler  
State of Missouri

*Re: In the Matter of Lenovo (United States) Inc., Matter No. 152-3134*

Dear Ms. Marler:

Thank you for your comment regarding the Federal Trade Commission's ("Commission" or "FTC") consent agreement in the above-entitled proceeding. Your comment indicates that you are concerned about security of personal information.

The Commission understands that security is very important to consumers. The complaint in this matter alleges, among other things, that from August 2014 through June 2015, Lenovo, Inc. ("Lenovo") sold certain consumer laptops preinstalled with VisualDiscovery, an ad-injecting software developed by Superfish, Inc. According to the complaint, VisualDiscovery created security vulnerabilities that put people's personal information at risk. VisualDiscovery's security vulnerabilities have been public since February 2015, therefore most antivirus companies updated their software to remove the VisualDiscovery software (and the security vulnerability). Additional information is available on the Commission's consumer blog at <https://www.consumer.ftc.gov/blog/2017/09/lenovo-adware-created-security-holes>. In addition, you can learn more about privacy and security on our website at <https://www.consumer.ftc.gov/topics/privacy-identity-online-security>.

The proposed consent order requires Lenovo to implement a comprehensive security program and to obtain biennial assessments from an independent third party for the duration of the 20-year order. The proposed consent order also prohibits Lenovo from making misrepresentations about certain preinstalled software on its personal computers. In addition, the proposed consent order requires Lenovo to obtain a consumer's affirmative express consent, with certain limited exceptions, prior to any preinstalled software a) injecting advertisements into a consumer's Internet browsing session, or b) transmitting, or causing to transmit, the consumer's personal information to any person or entity other than the consumer. Lenovo must also provide instructions for how consumers can revoke their consent to the software's operation by providing a reasonable and effective means for consumers to opt out, disable or remove the software. These requirements will help ensure that consumers' personal information is protected in the future.

The Commission has placed your comment on the public record pursuant to rule 4.9(b)(6)(ii) of the Commission's Rules of Practice, 16 C.F.R. §4.9(b)(6)(ii). Having considered all the facts of this case and all of the comments submitted in response to the proposed order, the

Commission has now determined that the public interest would best be served by issuing the Complaint and the Decision and Order in final form without any modifications. The final Decision and Order and other relevant materials are available from the Commission's website at <http://www.ftc.gov>. The Commission thanks you again for your comment.

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WASHINGTON, D.C. 20580

December 20, 2017

Martha Marquez  
State of California

*Re: In the Matter of Lenovo (United States) Inc., Matter No. 152-3134*

Dear Ms. Marquez:

Thank you for your comment regarding the Federal Trade Commission's ("Commission" or "FTC") consent agreement in the above-entitled proceeding. Your comment indicates that you are concerned that your Lenovo laptop may have been affected by preinstalled software that compromised security and would like to take part in a class action lawsuit against Lenovo.

The complaint in this matter alleges, among other things, that from August 2014 through June 2015, Lenovo, Inc. ("Lenovo") sold certain consumer laptops preinstalled with VisualDiscovery, an ad-injecting software developed by Superfish, Inc. According to the complaint, VisualDiscovery created security vulnerabilities that put people's personal information at risk. VisualDiscovery's security vulnerabilities have been public since February 2015, therefore most antivirus companies updated their software to remove the VisualDiscovery software (and the security vulnerability). Consumers can check if they have one of the affected Lenovo laptop models on Lenovo's website at [https://support.lenovo.com/us/en/product\\_security/ps500035](https://support.lenovo.com/us/en/product_security/ps500035). If you own a Lenovo laptop with VisualDiscovery installed, you can uninstall the program using these directions and automated tool [https://support.lenovo.com/us/en/product\\_security/superfish\\_uninstall](https://support.lenovo.com/us/en/product_security/superfish_uninstall). Additional information is available on the Commission's consumer blog at <https://www.consumer.ftc.gov/blog/2017/09/lenovo-adware-created-security-holes>.

The Commission's proposed settlement with Lenovo is not a consumer class action lawsuit. The consent agreement in this matter settles alleged violations of federal law prohibiting unfair or deceptive acts or practices. The Commission issues an administrative complaint when it has "reason to believe" that the law has been or is being violated, and it appears to the Commission that a proceeding is in the public interest. When the Commission issues a final decision and order, it carries the force of law with respect to future actions.

The Commission understands that security is very important to consumers. The proposed consent order requires Lenovo to implement a comprehensive security program and to obtain a biennial assessment from an independent third party for the duration of the 20-year order. The proposed consent order also prohibits Lenovo from making misrepresentations about certain preinstalled software on its personal computers. In addition, the proposed consent order requires Lenovo to obtain a consumer's affirmative express consent, with certain limited exceptions, prior

to any preinstalled software a) injecting advertisements into a consumer's Internet browsing session, or b) transmitting, or causing to transmit, the consumer's personal information to any person or entity other than the consumer. Lenovo must also provide instructions for how consumers can revoke their consent to the software's operation by providing a reasonable and effective means for consumers to opt out, disable or remove the software. These requirements will help ensure that consumers' personal information is protected in the future.

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Donald S. Clark  
Secretary



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WASHINGTON, D.C. 20580

December 20, 2017

Terry Mertz  
State of Florida

*Re: In the Matter of Lenovo (United States) Inc., Matter No. 152-3134*

Dear Mr. Mertz:

Thank you for your comment regarding the Federal Trade Commission's ("Commission" or "FTC") consent agreement in the above-entitled proceeding. Your comment indicates that you are concerned that your Lenovo laptop may have been affected by preinstalled software that compromised security.

The complaint in this matter alleges, among other things, that from August 2014 through June 2015, Lenovo, Inc. ("Lenovo") sold certain consumer laptops preinstalled with VisualDiscovery, an ad-injecting software developed by Superfish, Inc. According to the complaint, VisualDiscovery created security vulnerabilities that put people's personal information at risk. VisualDiscovery's security vulnerabilities have been public since February 2015, therefore most antivirus companies updated their software to remove the VisualDiscovery software (and the security vulnerability). Consumers can check if they have one of the affected Lenovo laptop models on Lenovo's website at [https://support.lenovo.com/us/en/product\\_security/ps500035](https://support.lenovo.com/us/en/product_security/ps500035). If you own a Lenovo laptop with VisualDiscovery installed, you can uninstall the program using these directions and automated tool [https://support.lenovo.com/us/en/product\\_security/superfish\\_uninstall](https://support.lenovo.com/us/en/product_security/superfish_uninstall). Additional information is available on the Commission's consumer blog at <https://www.consumer.ftc.gov/blog/2017/09/lenovo-adware-created-security-holes>.

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Donald S. Clark  
Secretary



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UNITED STATES OF AMERICA  
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WASHINGTON, D.C. 20580

December 20, 2017

Angela Tordahl  
State of South Carolina

*Re: In the Matter of Lenovo (United States) Inc., Matter No. 152-3134*

Dear Ms. Tordahl:

Thank you for your comment regarding the Federal Trade Commission's ("Commission" or "FTC") consent agreement in the above-entitled proceeding. Your comment indicates that you would like to take part in a class action lawsuit against Lenovo.

The Commission's proposed settlement with Lenovo is not a consumer class action lawsuit. The consent agreement in this matter settles alleged violations of federal law prohibiting unfair or deceptive acts or practices. The Commission issues an administrative complaint when it has "reason to believe" that the law has been or is being violated, and it appears to the Commission that a proceeding is in the public interest. When the Commission issues a final decision and order, it carries the force of law with respect to future actions.

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personal information to any person or entity other than the consumer. Lenovo must also provide instructions for how consumers can revoke their consent to the software's operation by providing a reasonable and effective means for consumers to opt out, disable or remove the software. These requirements will help ensure that consumers' personal information is protected in the future.

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Donald S. Clark  
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UNITED STATES OF AMERICA  
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WASHINGTON, D.C. 20580

December 20, 2017

Sally Welsh  
State of Florida

*Re: In the Matter of Lenovo (United States) Inc., Matter No. 152-3134*

Dear Ms. Welsh:

Thank you for your comment regarding the Federal Trade Commission's ("Commission" or "FTC") consent agreement in the above-entitled proceeding. Your comment indicates that you believe the Commission should investigate all of the software that comes prebundled with a computer purchase. We will consider your request carefully.

To the extent you have specific concerns regarding security or other issues in other companies' products or services, you should file a complaint through the Commission's Consumer Response Center at (877) 282-4357 or online at [www.ftc.gov/complaint](http://www.ftc.gov/complaint).

The complaint in this matter alleges, among other things, that from August 2014 through June 2015, Lenovo, Inc. ("Lenovo") sold certain consumer laptops preinstalled with VisualDiscovery, an ad-injecting software developed by Superfish, Inc. According to the complaint, VisualDiscovery created security vulnerabilities that put people's personal information at risk. VisualDiscovery's security vulnerabilities have been public since February 2015, therefore most antivirus companies updated their software to remove the VisualDiscovery software (and the security vulnerability). Consumers can check if they have one of the affected Lenovo laptop models on Lenovo's website at [https://support.lenovo.com/us/en/product\\_security/ps500035](https://support.lenovo.com/us/en/product_security/ps500035). If you own a Lenovo laptop with VisualDiscovery installed, you can uninstall the program using these directions and automated tool [https://support.lenovo.com/us/en/product\\_security/superfish\\_uninstall](https://support.lenovo.com/us/en/product_security/superfish_uninstall). Additional information is available on the Commission's consumer blog at <https://www.consumer.ftc.gov/blog/2017/09/lenovo-adware-created-security-holes>.

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Donald S. Clark  
Secretary