

Analysis of Proposed Consent Order to Aid Public Comment
In the Matter of General Workings Inc., File No. 152 3159

The Federal Trade Commission (“FTC” or “Commission”) has accepted, subject to final approval, an agreement containing consent order from General Workings Inc., Ali Moiz, and Murtaza Hussain (collectively “Respondents”).

The proposed consent order has been placed on the public record for thirty (30) days for receipt of comments by interested persons. Comments received during this period will become part of the public record. After thirty (30) days, the Commission will again review the agreement and the comments received, and will decide whether it should withdraw from the agreement and take appropriate action or make final the agreement’s proposed order.

Respondent General Workings Inc., also doing business as Vulcun, is a Delaware corporation with its principal office or place of business in San Francisco, California. Respondents Ali Moiz and Murtaza Hussain are founders and officers of Vulcun. The Commission’s complaint alleges that Respondents installed software, including Chrome browser extensions and mobile apps, onto users’ desktops and mobile devices without adequately disclosing to users that the software would be installed. Google offers a web browser, Chrome, as a free download for desktop computer and mobile operating systems. The desktop-computer version of Chrome allows users to install “browser extensions,” which are software programs that can modify and extend Chrome’s functionality. Respondents’ conduct had two parts. First, Respondents acquired a popular browser-based game called *Running Fred* and replaced it entirely with their own software program, called *Weekly Android Apps*, on users’ desktops. Users of *Running Fred* were not informed that the game had been replaced. Second, *Weekly Android Apps* contained code that would install, again without adequate disclosure to users, apps on user’s mobile devices.

The proposed consent order contains provisions designed to prevent Respondents from engaging in similar acts or practices in the future.

Part I of the proposed order prohibits Respondents from misrepresenting certain aspects of any browser extension, website, web service, mobile app, or any other product or service they offer or operate. Specifically, Respondents are prohibited from misrepresenting: the existence of certain endorsements; the nature of their products and services; the installation, download, usage, review, or endorsement statistics associated with their products and services; the press coverage of their products and services; their information collection, usage, disclosure, and sharing practices; the extent of user control over information about individual consumers; the purpose of collecting, using, disclosing, or sharing information about individual consumers; and the extent to which Respondents protect the privacy, confidentiality, security, and integrity of information collected from or about consumers.

Part II of the proposed order requires Respondents to clearly and conspicuously disclose the types of information their products and services will access, how that information will be used, and the nature of any changes to Respondents' products and services. The order also requires Respondents to display built-in permission notices or approvals, and to obtain consumer's express affirmative consent prior to installation or material changes of any product or service.

Part III of the proposed order requires Respondents to delete certain information collected about individual consumers within ten days of entry of the order.

Part IV of the proposed order contains recordkeeping requirements for advertisements and substantiation relevant to representations covered by Parts I through III of the order.

Parts V, VI, VII, and VIII of the proposed order require Respondents to: deliver a copy of the order to certain personnel who have responsibilities with respect to the subject matter of the order; notify the Commission of changes in corporate structure that might affect compliance obligations under the order; notify the Commission of changes in the employment of Respondents Moiz and Hussain; and file compliance reports with the Commission.

Part IX of the proposed order provides that the order will terminate after twenty (20) years, with certain exceptions.

The purpose of this analysis is to facilitate public comment on the proposed order, and it is not intended to constitute an official interpretation of the complaint or proposed order, or to modify the proposed order's terms in any way.