

**Analysis of Proposed Consent Order to Aid Public Comment**  
***In the Matter of Unrollme Inc., File No. 1723139***

The Federal Trade Commission (“Commission”) has accepted, subject to final approval, an agreement containing a consent order from Unrollme Inc. (“Unrollme”).

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 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.

This matter involves Unrollme’s email management service, which Unrollme has offered to consumers since at least June 2012. Unrollme provides services to consumers to help them manage subscription emails, such as newsletters or marketing emails from retailers. During the sign-up process, Unrollme requires consumers to grant Unrollme full access to the email accounts that they wish to enroll in its services. This permission allows Unrollme to access and scan users’ inboxes for subscription emails to provide its services. Unrollme also provides access to its users’ email accounts to its parent company, Slice Technologies, Inc. (“Slice”). Slice, a market research company, accesses Unrollme users’ inboxes in order to collect information from the users’ e-receipts, *i.e.*, emailed receipts from businesses following an order or purchase. Slice retains this information, and creates a separate database of anonymous purchase information that it uses in its market research analytics products.

After learning that Unrollme requires access to their email account(s) during the sign-up process, some consumers declined to grant that permission. The proposed complaint alleges that when consumers initially declined to grant permission to their email account(s), Unrollme violated Section 5 of the FTC Act by making false and deceptive statements designed to encourage the consumer to change his or her mind and grant Unrollme access to his or her email account(s) and continue the sign-up process.

Count I of the proposed complaint alleges that Unrollme represented, directly or indirectly, expressly or by implication, that it would not touch users’ “personal emails.” From at least January 2015 through November 2015, Unrollme’s message to consumers who declined to grant Unrollme access to their email stated, “It looks like you clicked No thanks. In order to use Unroll.me, you need to tell [your email service provider] to allow us to monitor your emails. ***Don’t worry, we won’t touch your personal stuff.***” (Emphasis added). From November 2015 through October 26, 2016, Unrollme’s message to consumers who declined to grant Unrollme access to their email stated, “Authorization Declined In order to use Unroll.me, you need to authorize us to access your emails. ***Don’t worry, this is just to watch for those pesky newsletters, we’ll never touch your personal stuff.***” (Emphasis added). The proposed complaint alleges that these representations were false or misleading because Unrollme grants Slice access to its users’ inboxes, including personal emails in the form of e-receipts, which is then used to collect and sell purchase information contained therein to third parties.

Count II of the proposed complaint alleges that Unrollme represented, directly or indirectly, expressly or by implication, that Unrollme required access to users' inboxes in order to scan for subscription emails. From October 27, 2016 through at least September 2018, Unrollme's message to consumers who declined to grant Unrollme access to their email has stated, "Oops! Looks like you declined access" "Unroll.Me requires access to your inbox so we can scan for subscriptions and allow you to begin clearing out your inbox." The complaint alleges that Unrollme failed to disclose, or failed to disclose adequately, that Unrollme also grants Slice access to its users' inboxes, which Slice then used to collect and sell purchase information contained in users' personal emails in the form of e-receipts and that this fact would be material to consumers in their decision to use Unrollme's services.

The proposed order contains injunctive provisions addressing the alleged deceptive conduct. Part I of the proposed order prohibits misrepresentations about the extent to which Unrollme accesses, collects, uses, stores or shares covered information in connection with any product, service or software operated, owned or distributed by Unrollme that requires access to consumer emails.

Part II of the proposed order requires Unrollme to send an email notification to all known current users who enrolled in Unrollme's services after viewing the challenged statements that explains that Unrollme or its parent access or collect email purchase receipts for use in market research products that are sold to third parties. The required notification is contained in Exhibit A of the proposed order. Part III of the proposed order requires Unrollme to delete within 10 days of the entry of the Order all stored email purchase receipts, and all personally identifiable information obtained from those receipts, for all known users who enrolled in Unrollme's services after viewing the challenged statements.

Parts IV through VII of the proposed order are reporting and compliance provisions, which include recordkeeping requirements and provisions requiring Unrollme to provide information or documents necessary for the Commission to monitor compliance.

Part VIII states that the proposed order will remain in effect for 20 years, with certain exceptions.

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