

27 April 2021

Mr. Chaim Gelfand
Vice-President, Compliance
NSO Group

Dear Mr. Gelfand,

The Citizen Lab is in receipt of [your letter dated 18 February 2021](#). We believe that a number of claims made in this letter are best addressed through [this response](#) from a coalition of human rights organizations including Access Now, Amnesty International, the Committee to Protect Journalists, Human Rights Watch, Paradigm Initiative, Privacy International, R3D: Red en Defensa de los Derechos Digitales, and Reporters Without Borders.

The Citizen Lab’s mission is to conduct research at the intersection of information and communication technologies, human rights, and global security. Digital surveillance technologies deployed in ways that facilitate serious violations of human rights or international humanitarian law are a prime focus. In particular, the Citizen Lab has [published](#) voluminous research documenting the use of NSO Group products in a manner that violates international human rights law through the targeting of journalists, dissidents, and other members of civil society.

The information already publicly available in “The Great iPwn” [report](#) is more than sufficient to enable NSO Group to—as your letter describes—activate its “investigative protocol.” Further, as indicated in our reply of 11 January 2021, if you seek additional information regarding specific targets identified in this recent [report](#), the appropriate approach would be to reach out to the victims identified in the report directly. It is unclear from your recent correspondence if you have attempted to do so.

Moreover, given the ample information that the Citizen Lab has already published, your general request to “cooperate” is vague, not actionable, and disingenuous. What is clear and



munkschool.utoronto.ca

At Trinity College
1 Devonshire Place
Toronto, ON
Canada M5S 3K7
T: 416.946.8900 F: 416.946.8915

At the Observatory
315 Bloor Street West
Toronto, ON
Canada M5S 0A7
T: 416.946.8929 F: 416.946.8877

At the Canadiana Gallery
14 Queen’s Park Crescent West
Toronto, ON
Canada M5S 3K9
T: 416.978.5120 F: 416.978.5079

specific is NSO Group's historical and ongoing failure to act on evidence of documented human rights abuses. It is also my opinion that your corporate social responsibility pledges are little more than theatre. The spectacle might be a mildly entertaining farce were it not for the very real and gruesome way in which your company's spyware is abused by the world's worst autocrats behind the curtains. Time and again, your company's irresponsible actions have proven your words are nothing more than hand-waving distractions from the harsh reality of the poorly regulated marketplace in which NSO Group, and its shareholders, thrive and profit. Until that approach changes, we see no particular value in participating in this charade.

Regards,



Professor Ronald J. Deibert, OOnt

Professor of Political Science, University of Toronto

Director, the Citizen Lab at the Munk School of Global Affairs & Public Policy, University of Toronto