



April 7, 2023

Send to Vibeke Dank: vibeke@vibekedank.com

To Whom It May Concern:

The Citizen Lab is an interdisciplinary laboratory based at the Munk School of Global Affairs & Public Policy, University of Toronto. We have done extensive analysis of and reporting on the mercenary spyware industry.

We are writing with respect to a forthcoming report on QuaDream.

Our report suggests that QuaDream's spyware is or has been operated by government clients in several countries that have a history of spyware abuse and well-documented issues with human rights violations, corruption, and / or rule of law and public accountability problems. We believe current and past operators of QuaDream's spyware are in countries including:

- Bulgaria
- Czech Republic
- Hungary
- Ghana
- Israel
- Mexico
- Romania
- Singapore
- United Arab Emirates (UAE)
- Uzbekistan

As part of our investigation, we are reaching out with the following questions:

1. Do QuaDream or its partner companies undertake any human rights due diligence prior to making sales to government clients (or private companies that act as intermediaries for government clients) to ensure that its spyware will not be abused?







- 2. Is there any documentation that you can share about due diligence processes employed by QuaDream or its partner companies?
- 3. Have QuaDream or its partner companies ever received or discovered evidence of possible abuse? If so, were those reports ever investigated? If so, what steps were taken?
- 4. What type of due diligence did QuaDream or its partner companies undertake in light of the extensive reporting on abuse of NSO Group's spyware and other surveillance technology in Mexico before making sales in that country?
- 5. What type of due diligence did QuaDream or its partner companies undertake in light of the extensive reporting on abuse of NSO Group's spyware and other surveillance technology in the United Arab Emirates before making sales in that country?
- 6. Are QuaDream and/or its partner companies required to obtain export licenses in accordance with export regulations prior to exporting technology, technical assistance, or services falling within the scope of such regulations, and if so, have these licenses been obtained and from which country?
- 7. In what ways do QuaDream and its partner companies adhere to principles respecting human rights as detailed in the *United Nations Guiding Principles on Business and Human Rights*? Please provide specific details of the measures your company implements to prevent any negative impacts on human rights stemming from your operations, including those of your suppliers and business partners. Please explain how your company establishes and maintains effective grievance mechanisms to address any adverse human rights impacts that may occur.

We will include any response we receive from you in full alongside our publication.

All the best

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