



Fwd: Citizen Lab research report

Ronald Deibert

Wed, Apr 8, 2026 at 4:30 PM

To: [Redacted]

Begin forwarded message:

From: Info <Info@penlink.com>

Subject: Re: Citizen Lab research report

Date: April 8, 2026 at 11:00:59 AM EDT

To: [Redacted]

Thank you for the opportunity to respond to the information you provided us in connection with your report. Regrettably, what you sent us contains erroneous “findings” that appear to rely on either inaccurate information or a misunderstanding about how we operate, including practices that Penlink does not engage in following our acquisition of Cobwebs Technologies in 2023. For instance, you identify companies and products that no longer exist, you list countries we do not do business in, you describe products incorrectly, and you list data characteristics that we do not collect, process or share. You have also listed organizations who do not currently use our products, and some who have never used them. We encourage you to go back to your sources to request accurate information.

We firmly dispute that Webloc is a “global geolocation surveillance system,” or that it “covertly monitors hundreds of millions of people based on data purchased from consumer apps and digital advertising.” Companies that operate covertly do not register as data brokers, describe their practices in a public privacy policy, nor offer consumer opt-outs.

Penlink is an American company headquartered in Lincoln, Nebraska. Penlink offers two product platforms. The longstanding evidence platform anchored by our flagship product, PLX and the intelligence platform delivered to our customers as our product, Tangles. Webloc is delivered as a separate Tangles module; it is not made available to commercial customers and contains only location data (sometimes precise, and sometimes non-precise location data) tied to device identifiers. It does not include age, gender, parenthood, interest categories, or website visited. Your suggestion that this additional information is available through Webloc indicates a significant misunderstanding about our products and services. Penlink obtains its location data from providers who obtain user consent for location data sharing through SDKs and who filter out sensitive locations from their datasets, consistent with FTC mandates.

Penlink is committed to delivering tools for law enforcement to rapidly search, analyze, and identify threats to keep our communities safe. Our customers use these tools and capabilities to locate kidnapped children, combat human and drug trafficking, and identify potential terror threats, among other critical uses.

Penlink understands the sensitivity and complexity of data privacy and operates under thoughtful compliance, due diligence, and responsible-use standards. Our

customers are required to follow their respective legal requirements and internal procedures, including determining which services to purchase and how they use the tools. We are committed to complying with applicable laws and regulations, as our customers are required to do, and we update our practices as those laws change.

Penlink complies with U.S. state privacy laws, including by offering U.S. users the ability to opt-out of sale or sharing of their data, and by allowing consumers to submit access and deletion requests among other state law requirements. Penlink is also compliant with data broker laws, and is registered in multiple jurisdictions as a data broker, which you can confirm through state data broker registries.

From: Ronald Deibert <[REDACTED]>

Sent: Friday, April 3, 2026 5:49 pm

To: Paul Miller [REDACTED]

[REDACTED]; Info

Cc: Siena Anstis [REDACTED]

Subject: [EXTERNAL] Citizen Lab research report

To whom it may concern

Please find attached a letter with questions regarding a forthcoming Citizen Lab publication. We plan to publish a report reflecting our research. Provided we receive your response by 5pm CET on April 8, 2026, we will publish any response you provide us in full along with our research report. All correspondence with Penlink will be considered public and included with the final research report.

Ronald Deibert, O.C., O.Ont
Director, the Citizen Lab, Professor, Political Science
Munk School of Global Affairs & Public Policy
University of Toronto
<https://citizenlab.ca/>
<https://deibert.citizenlab.ca/>

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Ronald Deibert, O.C., O.Ont
Director, the Citizen Lab, Professor, Political Science
Munk School of Global Affairs & Public Policy
University of Toronto
<https://citizenlab.ca/>
<https://deibert.citizenlab.ca/>