

April 3, 2026

Sent by email to: [REDACTED]

To Whom It May Concern at Penlink

The Citizen Lab, an interdisciplinary laboratory based at the Munk School of Global Affairs & Public Policy, University of Toronto, is currently researching your company's products, with a focus on Webloc, its capabilities and its sale to governments across the world.

Our research confirms the following:

- Webloc, a global geolocation surveillance system developed by Cobwebs Technologies and now sold by Penlink, covertly monitors hundreds of millions of people based on data purchased from consumer apps and digital advertising.
- Webloc users include various government agencies in Hungary and national police in El Salvador.
- Webloc users in the US include ICE, the US Navy, Texas Department of Public Safety, DHS West Virginia, NYC district attorneys and several police departments in Los Angeles, Dallas, Baltimore, Tucson, Durham, City of Elk Grove and Pinal County.
- Cobwebs Technologies has links to the surveillance firm Quadream through Cobwebs Technologies founder, Omri Timianker, who now oversees the international operations of Penlink.
- The social media and web intelligence system Tangles and other products developed by Cobwebs Technologies are used in many countries across the globe.
- Servers we consider to be affiliated with Cobwebs Technologies and products developed by it are located in many countries including the US, UK, Israel, Netherlands, Germany, Sweden, Norway, Italy, France, Ireland, Hungary, Poland, Cyprus, Mexico, Colombia, Brazil, Australia, Japan, Singapore, Hong Kong, India, Indonesia, United Arab Emirates, Iraq and Kenya.

- We also briefly investigate other products developed by Cobwebs Technologies. Lynx helps to carry out undercover operations on the web and manage fake accounts on social media platforms. Trapdoor appears to help trick victims into revealing information. Our analysis leads us to believe that Trapdoor can help facilitate the deployment of malware on devices.

In addition to seeking a response on our findings described above, we also ask that you confirm:

- Penlink still sells the products Tangles and Webloc. What other products developed by Cobwebs Technologies (Weaver, Lynx, Trapdoor, Threat Intelligence Platform) have been directly or indirectly sold by Penlink since 2023? Which of these products are directly or indirectly sold by Penlink today? Which of the products are used by non-government customers?
- In which countries is Webloc deployed today? Which customers and organizations use it? In which countries has Webloc been deployed in the past?
- What are the data sources for the Webloc product? Does Webloc ingest data obtained via a) mobile applications b) third-party software embedded in mobile applications, i.e. mobile app SDKs c) bid requests in digital advertising, i.e. RTB and/or d) other sources? Does Penlink obtain Webloc data directly from mobile app vendors, mobile app SDK vendors or advertising firms? Does it obtain Webloc data via intermediaries?
- Which data attributes are included in records ingested and processed by Webloc? a) mobile advertising IDs such as GAID and IDFA b) GPS geolocation c) Wi-Fi geolocation d) IP geolocation e) age f) gender g) parenthood h) interest categories i) mobile app used j) website visited?
- From how many devices does Webloc ingest data at least once a month globally and per country? How many months or years of historical data on devices can be accessed by Webloc users?
- How does Penlink ensure that Webloc and its data sources do not violate privacy and data protection laws?
- What is the legal basis for Penlink to obtain and share personal data on European data subjects under the GDPR?
- What is the legal basis for Penlink to obtain and share data that includes advertising IDs and geolocation coordinates in the US? How does it ensure that Webloc's data providers do not violate federal law in the US?

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.

A handwritten signature in black ink, appearing to read 'R. Deibert', with a stylized, cursive script.

Ronald J. Deibert, O.C., O.Ont.
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