

October 8, 2026

To Whom It May Concern at FreeWheel:

The Citizen Lab, an interdisciplinary laboratory based at the Munk School of Global Affairs & Public Policy, University of Toronto, is currently researching the Israeli advertising company Discover-Tech Ltd.

Background

We found that Discover-Tech Ltd. facilitates the delivery of mercenary spyware via targeted advertisements. Our research establishes that Discover-Tech operates a platform called Controlium that enables multiple mercenary spyware partners to de-anonymize, fingerprint, and automatically infect devices the moment an advertisement is rendered.

Mercenary spyware refers to surveillance products that are developed by private companies and sold to governments for the purpose of undertaking surveillance operations by deploying spyware on the devices of victims.

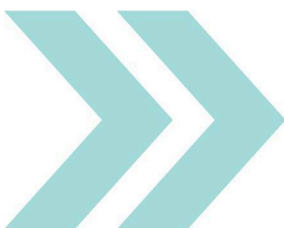
We found that Discover-Tech Ltd. delivers both malicious and benign ads via several advertising vendors including Google, Yandex, FreeWheel, Eskimi, Liftoff, and Sunteng. We also found that Discover-Tech Ltd. works closely with mercenary hacking company Candiru.

Research findings with respect to FreeWheel

Specifically, with respect to your company, our research confirms the following:

- Discover-Tech Ltd. used FreeWheel's Beeswax DSP to deliver ads and appeared to use the Beeswax user identifier for targeting, according to URL telemetry data and source code of several systems operated by Discover-Tech Ltd. reviewed by us.
- Discover-Tech Ltd. retrieved Beeswax user identifiers and engaged in ID syncing with Beeswax, according to browser testing, source code analysis and records archived on the web investigation platform urlscan.

Request for further information



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

munkschool.utoronto.ca

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

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

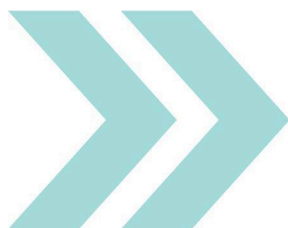
- What is or was the nature of the business relationship between Discover-Tech Ltd. and FreeWheel, and since when did it exist?
- Does FreeWheel have evidence that Discover-Tech Ltd. used its ad systems to distribute spyware?
- How does FreeWheel prevent its ad systems from distributing malicious ads, including spyware? Does FreeWheel have any terms or policies in place that prohibit customers and partners from distributing malicious ads, including spyware? How are these terms or policies monitored and enforced?
- How does FreeWheel screen its customers and partners?
- How will FreeWheel act upon our findings?

We plan to publish a report reflecting our research. Provided we receive your response by 10 am ET on October 13, 2026, we will publish any response you provide us in full along with our research report. All correspondence with your company will be considered public and included with the final research report.

Sincerely,



Ronald J. Deibert, O.C., O.Ont.
Professor of Political Science
Director, the Citizen Lab at the Munk School of Global Affairs & Public Policy,
University of Toronto



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