

14 August 2019



**Novalpina Capital**

1 Brewer's Green  
Westminster, London  
SW1H 0RH  
UK

C/C  
NSO Group

**Subject: NSO Group activities in Cyprus**

Dear Mr. Peel,

We write in light of recent correspondence with Cyprus export authorities regarding NSO Group's activities in the EU.

Three months ago, [we wrote to both Bulgaria and Cyprus](#) to clarify [your statement](#) that "some of NSO's products are exported from the EU (either Bulgaria or Cyprus), where the relevant authorities apply the EU control list (which is based on the Wassenaar control list)" (8). This week, Cypriot authorities responded explaining that they had "not identified the NSO Group to be present in Cyprus and [had] not issued any export licences for NSO Group products." Considering this is fundamentally a question of Novalpina's activity in the EU, we ask you for your transparency and cooperation in reconciling these two findings.

As we have previously stated, we welcome Novalpina Capital's affirmation of the UN Guiding Principles on Business and Human Rights (UNGPs) and the UN-supported Principles for Responsible Investment. We are encouraged about your commitment to ensure NSO Group operates in accordance with the UNGPs, including through "robust transparency in line with those Principles," and we urge you to respect and deliver on that commitment. Surveillance technology firms should robustly embrace the UNGPs and its provisions on transparency, accountability, and remedy. In light of these commitments and obligations, transparency about specifically Novalpina and NSO Group's export activities in the EU is crucial in upholding these principles.

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**Specifically we ask that you:**

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1. Clarify whether any, and which, NSO Group products, or products of NSO Group subsidiaries, partners, or affiliates, have applied for or been issued export licenses of any kind in Cyprus.
2. Whether and which NSO Group products, research facilities, subsidiaries, partners, or affiliates are present in Cyprus.

Signed,  
Access Now



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