

Paolo Lezzi, chairman of Memento Labs, emailed the following response to CPJ Senior Africa Researcher Jonathan Rozen on November 20, 2020, in response to questions about the companies' acquisition of Hacking Team, spyware sales and journalist targets.

Dear Jonathan

I'm Paolo Lezzi, the Chairman of the Company . Thank you for the opportunity to comment Memento Labs position about the points raised in your mail.

As you find out, as it is a public information, Memento Labs took over Hacking Team in March 2019 and during this period we did a lot of activities to clarify the position of Memento Labs about any possible misuse of its name and technology.

I cannot comment on what done by Hacking Team, as before the acquisition, we had no relationship or any kind of contact with HT, neither as company or personally. All the information is from public source and I cannot go in depth in aspect that are not under my responsibility.

What I can say is about Memento Labs and what done since April 2019.

I underline the fact that Memento Labs has a brand-new management and that the procedures followed in the past have been replaced by fully transparent new ones.

Aiming to such a transparency objective, and minimizing the possibility of misuse of our solutions, we have set up, for example, a scientific committee that also includes academics and geopolitical experts, to be an ethical compass for our business decisions.

Most important I ensure that, as Memento Labs, we strictly respect Relevant Laws and Regulations. In particular pursuant to the European Community Regulation, the Italian regulations on dual-use items, the Swiss Confederation on exporting the Lawful Interception and the Wassenaar Arrangement on Export Controls for Conventional Arms and Dual-Use Goods and Technologies.

In addition, the list of Human and Political Rights observant Countries is continuously monitored by us.

We underline once again our position in condemning any misuse of Memento Labs technologies and capabilities against any person or entities, having always acted in the market in compliance with all the relevant international laws.

In compliance with privacy and confidentiality I cannot share information about customer or specific technical details about our solutions; however, I can confirm that: all our customers are LEA and Governments and we do not sell our solutions to private companies as End User of our solutions; as required by government regulations about dual-use products, we apply for the Export Authorization Licenses for each and every single Extra-EU contract; we limit the number of installed agent per customer to avoid mass surveillance and introducing a max period of months for each installation, so that if in the period there is a violation of human and/or political rights by the country or, more specifically, the exact customer, the authorization commission will not authorize the eventual request for renewal and the new license token will not be delivered to the customer.

Moreover, each installation is isolated inside customer premises who is responsible for the active phase. As Memento Labs we never perform any kind of field operation, we have no access to customer data and we clearly acknowledge our customer on our commitment to respect all the law and Regulation as well as Human and Political Rights, as also mentioned in our End User License Agreement and Code of Conduct.

As per our mission, our aim is the development of advanced tools and solutions to outperform in the Hybrid Warfare era, offering products able to fulfill LEA's and Security Agencies' highest expectations to always be ready for the next challenges.

We strongly believe that in a world that is abandoning old technologies for social environments where organized crime and terrorism are constantly lurking, the investigative activity must have elements that present a capacity to perceive the threat instantaneously, respecting laws, human rights, privacy and the Right to Liberty and Security.

If any further request let me know, you can share additional questions or we can fix an official appointment.

Best regards

Paolo