

## Human Rights Impact Assessment

**Resolved:** Shareholders request the Board of Directors publish a report, at reasonable cost and omitting proprietary information, with the results of a Human Rights Impact Assessment (HRIA), examining actual and potential human rights impacts associated with the use of Palantir's products and services.

**Whereas:** The UN Guiding Principles on Business and Human Rights (UNGPs) expects companies to take all reasonable steps to ensure their products and services are not used to violate human rights. The UNGPs specify businesses should conduct ongoing human rights due diligence, of which HRIAs are a key tool,<sup>1</sup> to "identify, prevent, mitigate and account for ... adverse human rights impacts from their activities or as a result of their business relationships."<sup>2</sup>

Palantir's Human Rights policy states it is aligned with the UNGPs,<sup>3</sup> but it does not disclose whether it conducts HRIAs, without which stakeholders cannot be assured Palantir's products and services are not violating human rights. Recent allegations of Palantir's technologies being used to violate human rights suggest the Company is not meeting its human rights responsibilities.

Palantir's technology has been utilized by the US, other governments, and corporations to analyze massive amounts of personal data, enabling individuals to be tracked on numerous datapoints and authorities to monitor people with unprecedented precision. The following examples highlight human rights concerns:

- Immigration and Customs Enforcement (ICE) and other US agencies use Palantir's artificial intelligence (AI) to combine social media activity with other private data to track and target migrants for detention and deportation, and to revoke people's immigration status.<sup>4</sup> Palantir's ImmigrationOS uses "personal data that DOGE has siphoned from federal agencies,"<sup>5</sup> violating its responsibility to protect human rights of refugees, asylum-seekers, and migrants.<sup>6</sup>
- The Department of Health and Human Services, several of its agencies,<sup>7</sup> and the Centers for Disease Control and Prevention use Palantir software, raising concerns about privacy, states' willingness to report disease data, and health data being used to locate undocumented individuals.<sup>8</sup>

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<sup>1</sup> [https://www.humanrights.dk/files/media/document/A%20HRIA%20of%20Digital%20Activities%20-%20Introduction\\_ENG\\_accessible.pdf](https://www.humanrights.dk/files/media/document/A%20HRIA%20of%20Digital%20Activities%20-%20Introduction_ENG_accessible.pdf)

<sup>2</sup> [https://www.ohchr.org/sites/default/files/Documents/Publications/GuidingPrinciplesBusinessHR\\_EN.pdf](https://www.ohchr.org/sites/default/files/Documents/Publications/GuidingPrinciplesBusinessHR_EN.pdf)

<sup>3</sup> [https://www.palantir.com/assets/xrfr7uokpv1b/29IHCTisO8v2pofVMrxtnX/7e91f4f393074f69ae047d01eababce/Palantir\\_Human\\_Rights\\_Policy.pdf](https://www.palantir.com/assets/xrfr7uokpv1b/29IHCTisO8v2pofVMrxtnX/7e91f4f393074f69ae047d01eababce/Palantir_Human_Rights_Policy.pdf)

<sup>4</sup> <https://www.washingtonpost.com/technology/2025/12/03/palantir-immigration-ice/>;

<https://www.npr.org/2025/05/01/nx-s1-5372776/palantir-tech-contracts-trump>

<sup>5</sup> [https://static1.squarespace.com/static/62c3198c117dd661bd99eb3a/t/682f27817f8ce231daa5c949/1747920769727/FINAL\\_TRUMP+2.0+DHS+FIRST+100+DAYS+BRIEF-compressed.pdf](https://static1.squarespace.com/static/62c3198c117dd661bd99eb3a/t/682f27817f8ce231daa5c949/1747920769727/FINAL_TRUMP+2.0+DHS+FIRST+100+DAYS+BRIEF-compressed.pdf)

<sup>6</sup> <https://www.aclu.org/news/privacy-technology/surveillance-human-rights>

<sup>7</sup> <https://www.hhs.gov/about/agencies/hhs-agencies-and-offices/index.html>

<sup>8</sup> <https://www.nytimes.com/2025/06/06/health/cdc-data-privacy-palantir.html>

<https://www.nytimes.com/interactive/2020/10/21/magazine/palantir-alex-karp.html>

- Despite criticism and lawsuits that Palantir's predictive policing programs violate presumption of innocence, non-discrimination, and privacy,<sup>9</sup> it is still in use.<sup>10</sup> In England, Palantir established a "real-time data-sharing network" that includes the personal details of victims, children and witnesses" as well as "union membership, sexual orientation and race."<sup>11</sup>
- Palantir was recently solicited to merge data on Americans from multiple agencies into a centralized system,<sup>12</sup> creating a de facto surveillance infrastructure with significant profiling, security, legal, and data integrity risks.<sup>13</sup>

Insufficient human rights due diligence exposes Palantir to material legal, financial, and reputational risks, and HRIAs can help mitigate such risks. Guidance from the Danish Institute for Human Rights explains how HRIAs can help companies fulfill their human rights responsibilities, especially in contexts where people "face severe risks and impacts in connection to businesses' digital projects, products or services."<sup>14</sup>

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<sup>9</sup> <https://www.techpolicy.press/politicians-move-to-limit-predictive-policing-after-years-of-controversial-failures/>

[https://www.bundesverfassungsgericht.de/SharedDocs/Entscheidungen/EN/2023/02/rs20230216\\_1bvr154719en.html](https://www.bundesverfassungsgericht.de/SharedDocs/Entscheidungen/EN/2023/02/rs20230216_1bvr154719en.html)

<https://freiheitsrechte.org/en/themen/digitale-grundrechte/palantir-bayern>

<sup>10</sup> <https://file.lacounty.gov/SDSInter/bos/supdocs/185799.pdf>; <https://www.vice.com/en/article/300-californian-cities-secretly-have-access-to-palantir/>; <https://journals.law.harvard.edu/crcl/minority-report-why-we-should-question-predictive-policing/>; <https://www.dw.com/en/german-police-expands-use-of-palantir-surveillance-software/a-73497117>

<sup>11</sup> <https://libertyinvestigates.org.uk/articles/uk-police-working-with-controversial-tech-giant-palantir-on-real-time-surveillance-network/>

<sup>12</sup> <https://www.nytimes.com/2025/05/30/technology/trump-palantir-data-americans.html>

<sup>13</sup> <https://www.npr.org/2025/06/29/nx-s1-5409608/citizenship-trump-privacy-voting-database>

<sup>14</sup> [https://www.humanrights.dk/files/media/document/A%20HRIA%20of%20Digital%20Activities%20-%20Introduction\\_ENG\\_accessible.pdf](https://www.humanrights.dk/files/media/document/A%20HRIA%20of%20Digital%20Activities%20-%20Introduction_ENG_accessible.pdf)