



CERTIGNA

Services de confiance numérique

CERTIFICATION STATEMENT POLICY

CERTIGNA ENTITY CA

Edité le : 10/11/19
Version : 1.7
OID : 1.2.250.1.177.2.6.2
Classification : Public

tessi

Document history

Version	Date	Authors	Document Change
1.0	10/19/15	R. DELVAL	Creation
1.1	01/08/16	V. WYON	Precisions about: - Email address verification (cf. 3.2), Devices qualification requirements (cf. 11.2).
1.2	12/16/16	J. ALLEMANDOU	Revision of the graphic chart et precisions about: - The level of conformity with ESTI specifications (cf. 1.1), - The withdrawal of « Certifié conforme » (cf. 3.2.3), - The terms of a current renewal (cf. 3.3.1), - The terms of acceptance of the certificate (cf. 4.4.1), - The role of Registration officer (cf. 5.2.1), - The minimum delay for archival (cf. 5.5.2), - The issuance of the cryptographic device (cf. 6.1.2), - The activation data transmission (cf. 6.4.1), - The CA signed by 2 Root CA (cf. 7.1), - The QCstatement Extension used (cf. 7.2), The qualification requirement of the device (Cf. 11.2).
1.3	09/01/17	J. ALLEMANDOU	Addition of « ExpiredCertsOnCRL » extension (7.3.2)
1.4	01/25/18	J. ALLEMANDOU	Precisions about: - The Certigna email contact (cf. 1.6.2), - The form to report a certificate (cf. 2.3), - Proofs regarding device and third-party TSP (cf. 3.2.1), - The periodicity of ARL and CRL update (cf. 2.4), - The possible causes for revocation (Cf. 4.9.1), - The physical access (cf. 5.1.2), - The diagram of the CA hierarchy (cf. 7), - The maximum longer of serial number (cf. 7), - The qualification of CA cryptographic module (cf. 10.2), The type of QSCD (cf. 11.2).
1.5	11/13/18	J. ALLEMANDOU	Precisions about: - Addition of 2 new OIDs: 1 dedicated RGS, 1 dedicated eIDAS Certificate preparation timeframe at 30 days (cf. 4.2.3).
1.6	02/26/19	J. ALLEMANDOU	Precisions about the protection of personal data (see 9.4.1).
1.7	10/11/2019	J. ALLEMANDOU	Precisions about: - Addition of 3 new OIDs; - The extension to 5 years of the duration of the seal of timestamping tokens. - Reimbursement policy (see 9.1.5), - Insurance coverage (see 9.2.1), - Termination (see 9.6.6), - Delivery and Guarantee (see 9.7), - Limitations of liability (see 9.8), - Dispute resolution procedure (see 9.13), - Renunciation and force majeure (see 9.16).

CONTENTS

1	INTRODUCTION.....	6
1.1	General presentation	6
1.2	Document identification	6
1.3	Definitions and abbreviations	7
1.4	Entities involved in PKI	11
1.5	Use of the certificates	14
1.6	Management of the CP.....	15
2	RESPONSIBILITIES REGARDING THE PROVISION OF INFORMATION HAVING TO BE PUBLISHED	17
2.1	Entity in charge of providing information	17
2.2	Information having to be published	17
2.3	Report a malicious or dangerous certificate	18
2.4	Publication timeframes and frequencies	18
2.5	Published information access control.....	19
3	IDENTIFICATION AND AUTHENTICATION	20
3.1	Naming	20
3.2	Initial identity validation.....	21
3.3	Identification and validation of a key renewal request.....	35
3.4	Identification and validation of a revocation request	35
4	OPERATIONAL REQUIREMENTS ON THE LIFECYCLE OF CERTIFICATES	37
4.1	Certificate request	37
4.2	Processing of a certificate request	37
4.3	Delivery of the certificate	39
4.4	Acceptance of the certificate	39
4.5	Uses of the key pair and of the certificate	40
4.6	Certificate renewal.....	40
4.7	Delivery of a new certificate after change of the key pair.....	40
4.8	Certificate modification	41
4.9	Revocation and suspension of certificates	41
4.10	Certificate status service	46
4.11	End of the relations between the certificate manager and the CA	47
4.12	Key escrow and recovery	47
5	NON-TECHNICAL SECURITY MEASURES	48

5.1	Physical security measures	48
5.2	Procedural security measures	50
5.3	Security measures relative to the personnel	51
5.4	Audit logging procedures	53
5.5	Records archival	56
5.6	Change of the CA key	57
5.7	Compromise and disaster recovery	58
5.8	End-of-life of the PKI	59
6	TECHNICAL SECURITY MEASURES	61
6.1	Generation and installation of key pairs	61
6.2	Security measures for the protection of private keys and for cryptographic modules.....	64
6.3	Other aspects of the management of key paire	67
6.4	Activation data	67
6.5	Security measures for IT systems	68
6.6	Security measures for the systems during their lifecycle	69
6.7	Network security measures	70
6.8	Timestamping/dating system	70
7	PROFILES OF THE CERTIFICATES AND THE CRL	71
7.1	Trusted hierarchy.....	71
7.2	Profiles of Root Authorities certificates.....	71
7.3	Profiles of the server certificates	71
8	COMPLIANCE AUDIT AND OTHER EVALUATIONS	72
8.1	Frequency and/or circumstances of the evaluations	72
8.2	Identities/qualifications of the evaluators.....	72
8.3	Relations between evaluators and the evaluated entities	72
8.4	Topics covered by the evaluations	73
8.5	Actions taken after the conclusions of the evaluations	73
8.6	Communication of the results	73
9	OTHER BUSINESS LINE AND LEGAL ISSUES	74
9.1	Rates	74
9.2	Financial liability	74
9.3	Confidentiality of personal data	75
9.4	Protection of personnel data.....	76
9.5	Intellectual and industrial property rights.....	77
9.6	Contractual interpretations and guarantees	77



9.7	Delivery and Guarantee.....	79
9.8	Limitations of liability.....	80
9.9	Compensation.....	80
9.10	Duration and early end of validity of the CP	80
9.11	Individual notifications and communications between participants	81
9.12	Amendments to the CP	81
9.13	Dispute resolution procedure.....	82
9.14	Competent jurisdictions	82
9.15	Compliance with legislation and regulations	82
9.16	Miscellaneous provisions.....	82
9.17	Other provisions	83
10	APPENDIX 1: SECURITY REQUIREMENTS FOR THE CA'S CRYPTOGRAPHIC MODULE.....	84
10.1	Security objectives requirements.....	84
10.2	Qualification requirements.....	84
11	ANNEXE 2: SECURITY REQUIREMENTS FOR THE DEVISE USED BY THE SERVICE	85
11.1	Security objectives requirements.....	85
11.2	Qualification requirements.....	85

1 INTRODUCTION

1.1 General presentation

Dhimyotis has a Certification Authority (CA) named “Certigna Entity CA” to provide “Seal” certificates to application services.

This Certification Practice Statement (CPS) outlines the practices that CA applies in the delivery of its electronic certification services to users in accordance with its Certification Policy (CP) which it has committed to respect. The Certificate Policy (CP) describes the practices that the CA applies and agrees to respect as part of the provision of the digital signature services. The CP also identifies obligations and requirements on certificate users.

The reader's attention is drawn to the fact that the understanding of this CPS guesses he is familiar with the concepts related to the technology of Public Key Infrastructure (PKI).

This CPS meets the requirements of

- the CP « *Certificats électroniques de Services Applicatifs* » for a seal usage at the levels * and ** of the « *Référentiel Général de Sécurité* » (RGS) developed by the National Agency for the information systems security (ANSSI);
- the eIDAS Regulation (EU) N°910/2014 and the ETSI specifications at the levels :
 - o LCP (EN 319 411-1);
 - o QCP-I and QCP-I-qscd (EN 319 411-2).
- the requirements of ETSI TS 119 495 and the Regulatory Technical Standard (RTS) for the European Directive on Payment Services 2015/2366.

In the event of any inconsistency between this CPS and those Requirements, those Requirements take precedence over this CPS.

1.2 Document identification

This CPS can be identified by the name of the « Certigna Entity CA » and by its OID: 1.2.250.1.177.2.6.2. It describes the provisions implemented to meet the commitments made in the Certification Policy (CP) with the following OID: 1.2.250.1.177.2.6.1.

Usage(s)	RGS	ETSI	OID
Seal for emails and documents	*	LCP	1.2.250.1.177.2.6.1.1.1
Seal for emails and documents		QCP-I	1.2.250.1.177.2.6.1.7.1
Seal for emails and documents		QCP-I-psd2	1.2.250.1.177.2.6.1.8.1
Seal for emails and documents	**	QCP-I-qscd	1.2.250.1.177.2.6.1.4.1
Seal for emails and documents		QCP-I-qscd	1.2.250.1.177.2.6.1.41.1
Seal for emails and documents	**		1.2.250.1.177.2.6.1.42.1
Seal for emails and documents		QCP-I-qscd	1.2.250.1.177.2.6.1.43.1
Seal for timestamping tokens	*	LCP	1.2.250.1.177.2.6.1.3.1
Seal for timestamping tokens		QCP-I	1.2.250.1.177.2.6.1.9.1
Seal for timestamping tokens	**	QCP-I-qscd	1.2.250.1.177.2.6.1.6.1

1.3 Definitions and abbreviations

1.3.1 Abbreviations

Useful abbreviations for the understanding of this CPS are the followings:

AA	Administrative Authority
ANSSI	National Agency for information systems security
ARL	Authority Revocation List
BCP	Business Continuity Plan
CA	Certification Authority
CAA	Certification Authority Authorization
CAG	Certification Agent
CGU	Conditions of General Use
CNIL	National Commission for Computing and Liberties
CP	Certification Policy
CPS	Certification Practice Statement
CRL	Certificate revocation list
CSP	Certification Service Provider
CSR	Certificate Signature Request
DN	Distinguished Name
DNS	Domain Name System
DRA	Delegate Registration Authority
EBA	European Banking Authority
ETSI	European Telecommunications Standards Institute
EV	Extended Validation
FQDN	Fully Qualified Domain Name
ICD	International Code Designator
INPI	National Institute of Industrial Property
ISS	Information systems security
NCA	National Competent Authority
OC	Certification Operator
OCSP	Online Certificate Status Protocol
OID	Object Identifier
PP	Protection Profile
PAA	Policy Approval Authority
PKCS	Public Key Cryptographic Standards
PKI	Public Key Infrastructure
PSD2	Payment Services Directive 2
PSP	Payment Service Provider
RA	Registration Authority
SCM	Server Certificate Manager
RSA	Rivest Shamir Adleman
RTS	Regulatory Technical Standard for PSD2
SCT	Signed Certificate Timestamp
SSL	Secure Sockets Layer
TLS	Transport Layer Security
TSP	Trust Service Provider
URL	Uniform Resource Locator
UTC	Universal Time Coordinated

1.3.2 Definitions

Useful terms to the understanding of the CP are the followings:

Administrative authorities - This term refers to government departments, local authorities, public administrative institutions, the bodies administering social protection systems and other bodies responsible for the management of an administrative public service.

Agent – Individual acting on behalf of an administrative authority.

Application Developer - A manager of a service of the public sphere electronically accessible.

Authorities Revocation List - List including the serial numbers of the certificates of intermediate authorities which have been revoked, and signed by the root CA.

Business Entity: Any entity that is not a Private Organization, Government Entity, or Non-Commercial Entity as defined herein. Examples include, but are not limited to, general partnerships, unincorporated associations, sole proprietorships, etc.

Certificate Manager - Person in charge and responsible of the electronic certificate used by an application service.

Certificate revocation list - List including serial numbers of certificates that have been revoked, and signed by the issuing CA.

Certificate subject - Person identified in the certificate and is the holder of the private key corresponding to the public key.

Certificate user - Entity or natural person who uses a certificate which it relies to verify an electronic signature or an authentication value from a certificate holder or encrypt data to a certificate holder.

Note - An agent of an administrative authority which conducts electronic exchange with another administrative authority is, for the latter, a user.

Certification Authority - In a CSP, a Certification Authority is responsible, on behalf and under the responsibility of this CSP, applying at least one certification policy and is identified as such, as an issuer («issuer" field of the certificate).

Certification Authority Authorization - From RFC 6844, the Certification Authority Authorization (CAA) DNS Resource Record allows a DNS domain name holder to specify the Certification Authorities (CAs) authorized to issue certificates for that domain. Publication of CAA Resource Records allows a public Certification Authority to implement additional controls to reduce the risk of unintended certificate mis-issue.

Certification Policy - A set of rules, identified by a name (OID), defining the requirements that a CA comply in the implementation and delivery of its services and indicating the applicability of a certificate to a specific community and / or a class of applications with common security requirements. A CP can also, if necessary, identify the obligations and requirements on other stakeholders including ESCM and certificate users.

Certification Practice Statement - A CPS identifies practices (organization, operational procedures, technical and human resources) that the CA applies under the provision of its certification services to users and in accordance with the policies or certification that it has committed.

Certification service provider - Any person or entity who is responsible for the management of electronic certificates throughout their life cycle, towards the ESCM and users of these certificates.

Component - Platform operated by an entity and comprised of at least one computer station, an application and, where applicable, cryptographic means. Component play a specific role in the operational implementation of at least one function of PKI. The entity may be the CSP itself or an external entity related to CSP contractual, regulatory or hierarchical.

European Banking Authority PSD2 Register - Register of payment institutions and e-money institutions developed, operated and maintained by the EBA under article 15 of Directive (EU) 2015/2366.

Electronic Seal - Digital Seal done by an application server with data to be used either as part of an authentication service data origin, either as part of a service non-repudiation.

Electronic Certificate - Electronic file certifying the link between a public key and the identity of its owner (natural or legal person or system). This certificate takes the form of an electronic signature made by a CSP. It is issued by a CA. The certificate is valid for a given period specified therein.

Entity - Means an administrative authority or a company in the broadest sense, namely also legal persons of private law type associations. It can be a Private Organization, Government Entity, Business Entity, or Non-Commercial Entity.

FQDN - Fully qualified domain name indicating the absolute position of a node in the DNS tree and specifying the top-level domains to the root.

Information System - Any set of means to develop, process, store or transmit information subject to electronic exchange between users and administrative authorities and between administrative authorities.

Jurisdiction of Incorporation - In the context of a Private Organization, the country and (where applicable) the state or province or locality where the organization's legal existence was established by a filing with (or an act of) an appropriate government agency or entity (e.g., where it was incorporated). In the context of a Government Entity, the country and (where applicable) the state or province where the Entity's legal existence was created by law.

Jurisdiction of Registration - In the case of a Business Entity, the state, province, or locality where the organization has registered its business presence by means of filings by a Principal Individual involved in the business.

Legal Existence - A Private Organization, Government Entity, Business Entity or Non-Commercial Entity has Legal Existence if it has been validly formed and not otherwise terminated, dissolved, or abandoned.

Legal representative (principal individual) - An individual of a Private Organization, Government Entity, or Business Entity who is either an owner, partner, managing member, director, or officer, as identified by their title of employment, or an employee, contractor or agent authorized by such entity or organization to conduct business related to the request, issuance, and use of certificates.

Payment Service Provider (PSP) – Provider authorized by its national competent authority (NCA) to act in one or more of the following roles:

- account servicing (PSP_AS);
- payment initiation (PSP_PI);
- account information (PSP_AI);
- issuing of card-based payment instruments (PSP_IC).

Private Organization - A non-governmental legal entity (whether ownership interests are privately held or publicly traded) whose existence was created by a filing with (or an act of) the Incorporating Agency or equivalent in its Jurisdiction of Incorporation. In France, incorporation is done with Business and Society Register.

Protection device secret elements - Refers to a storage device of secret evidence submitted to ESCM (eg private key, PIN,). It can take the form of a smart card, USB key with cryptographic capability or report to software format (ex. PKCS # 12 file).

Public Key Infrastructure - Components, functions and procedures dedicated to the management of cryptographic keys and certificates used for trusted services. PKI can be composed of a CA, a certification operator, a centralized registration authority and / or local certification agents, an archiving entity, a publishing entity, ...

Qualified Independent Information Source (QIIS) - A regularly-updated and publicly available database that is generally recognized as a reliable source for certain information.

Qualified Government Information Source (QGIS) - A regularly-updated and current, publicly available, database designed for the purpose of accurately providing the information for which it is consulted, and which is generally recognized as a dependable source of such information provided that it is maintained by a Government Entity, the reporting of data is required by law, and false or misleading reporting is punishable with criminal or civil penalties.

Qualified Government Tax Information Source (QTIS) - An Information Source that specifically contains tax information relating to Private Organizations, Business Entities or Individuals.

Qualification of electronic certification service provider - The RGS Decree and eIDAS Regulation describes the CSP qualification procedure. A CSP being a specific Trust Service Provider, the qualification of a CSP is an act by which a certification body certifies the compliance of all or part of the electronic certification service provided by a CSP (family of

certificates) to certain requirements of a CP for a given level of security and for the service covered by the certificates.

Qualification of a security product - Act by which ANSSI attests to the ability of a product to ensure with a given level of robustness, security features purpose of qualification. The qualification certificate states in the ability of the product to participate in the realization at some level of security of one or more functions covered in the RGS. The qualification procedure for security products is described in the decree RGS. The RGS specifies three qualification process: basic level qualification, standard level qualification and level strengthened qualification.

RSA - Public key algorithm (Rivest, Shamir and Adleman).

Regulatory Technical Standard for PSD2 - Regulatory Technical Standard for PSD2 strong customer authentication and common and secure open standards of communication.

Seal verification application - This is the application implemented by the user to check the seal of the data received from the server's public key contained in the certificate.

Security product - a software or hardware that implements security features necessary for securing information or system.

Timestamping Authority - Authority responsible for the management of a timestamp service.

User - Individuals acting for its own account or on behalf of a corporation and making electronic communications with administrative authorities.

User applications - Application services operating certificates issued for the Certification Authority seal service needs which the certificate is associated.

1.4 Entities involved in PKI

1.4.1 Certification authority

The CA is responsible for the provision of certificate management services throughout their life cycle (generation, distribution, renewal, revocation, ...) and relies on a technical infrastructure: a PKI. The CA is responsible for the implementation of the CP to the PKI set in place.

For certificates signed in its name, the CA has the following functions:

- Registration and renewal functions;
- Certificate generation function;
- Secret generation function;
- Publication function of the general conditions of the CP, CA certificates and certificate application forms;
- Revocation management function;
- Information function on the status of certificates via the Certificate Revocation List (CRL) updated at regular intervals and in a query mode / real-time response (OCSP).

The CA provides these functions directly or outsourcing them, some or all. In all cases, the CA retains responsibility.

CA is committed to respecting the obligations described in this CPS.

It is also committed that the components of the PKI, internal or external to the CA, which they incumbent also respect them.

Finally, the parties of the CA concerned with certificate generation and revocation management are independent from other organizations regarding their decisions on the establishment, supply, maintenance and suspension of services; managers, support personnel and personnel with trusted roles are free from any pressure from commercial, financial or otherwise, could adversely affect the confidence in the services provided by the CA. The parties of the CA concerned with certificate generation and revocation management have a documented structure, which safeguards impartiality of operations.

1.4.2 Registration authority

Registration authority provides the following functions, delegated by the CA under this CPS:

- The acquisition and verification of future information of Certificate Manager, of application service, and of business entity and the constitution of the corresponding registration files;
- The acquisition and verification of information, if applicable, of the future certification agent (*) and its business entity and the constitution of the corresponding registration files;
- The establishment and transmission of the certificate request to the CA;
- The archiving of the certificate request files;
- Conservation and protection of confidentiality and integrity of the Certificate Manager's or of the Certification Agent's personal authentication data;
- Verification of certificate revocation requests.

The RA performs these functions directly or with the contribution of Delegate Registration Authorities. In all cases, the RA remains responsible.

Unless stated otherwise, in this document, "RA" covers the Registration Authority and Delegate Registration Authorities.

(*): The RA offers the possibility to the client entity to use a designated certification agent who is under its responsibility to carry out all or part of the information verification. In this case, the RA ensures that applications are complete and carried out by an authorized certification agent.

In all cases archiving of the registration files (electronic and / or paper) is the responsibility of the RA.

1.4.3 Server certificate managers

As part of this CPS, Certificate Managers can only be a natural person. It is responsible for the use of the certificate (and associated private key) in which the application service concerned is identified and the entity for which he uses the certificate and with which it maintains a contractual / reporting relationship / regulatory.

The Certificate Managers must meet the conditions and obligations that are set in the CP and in the Terms and conditions of use.

The certificate is attached to the application service and not to the Certificate Manager. In case of change of Certificate Manager, the entity shall report it to the CA and appoint a successor. The CA revokes certificates for which there is no more Certificate Manager explicitly identified.

1.4.4 Certificate users

An electronic seal certificate user can be:

- A user recipient of signed data by a seal application service that uses the electronic seal certificate and a seal verification module to authenticate the origin of the transmitted data.
- An application service recipient of data from another application service and which uses the electronic seal certificate and a seal verification module to authenticate the origin of the transmitted data.
- An application service which signs electronic data.

The certificate users must take all precautions described in this CPS and in the Terms and Conditions.

1.4.5 Other participants

1.4.5.1 Delegated Registration Authority

CA also relies on DRA to outsource a part of RA's functions. An operator of DRA has the power to:

- request a certificate generation or renewal;
- request a certificate revocation;
- record, if appropriate, the Certification Agents belonging to the entities which request certificates.

He or she performs for the authority, in the context of issuance of the certificate, the verification of future Certificate Manager's identity under the same conditions and with the same level of safety as those required for the operator of RA. For this it is directly related to RA.

The commitments of the DRA operator against CA are specified in a written agreement with the responsible entity of the operator and in the commitment letter to be signed by the latter. Both documents include state that the operator must perform impartial and scrupulous verification of the identity and of the possible future Certificate Manager attributes and application services. He/she must also respect the parts of the CP and CPS incumbent on him.

1.4.5.2 Certification Agent

CA offers the opportunity for the client's entity to designate one or more Certification Agents. The Certification agent has, by law or by delegation, the power to:

- request a certificate generation or renewal certificate on behalf of the entity;
- request a certificate revocation on behalf of the entity.

The certification agent can be a legal representative of the entity or any person that the latter has formally designated. He or she provides for the CA, in the context of the issuance of certificates, the identity verification of future Certificate Managers under the same conditions and with the same level of safety as those required for the operator of RA. For this it is directly in contact with the Registration Authority.

The commitments of the Certification Agent in respect of the CA are specified in a written agreement with the entity responsible of the Certification Agent and in the commitment letter to be signed by the Certification Agent. Both documents specify that the Certification Agent must perform impartial and scrupulous verification of the identity and of the possible future Certificate Manager attributes and application services. He/she must also respect the parts of the CP and CPS incumbent on him.

The entity shall promptly report to CA, the Certification Agent's departure from office and possibly appoint a successor. The Certification Agent must not have access to the private key activation data associated with the certificate issued to Certificate Manager.

1.4.5.3 National Competent Authority

According to PSD2 and Capital Requirements Directive (UE) 2015/2366, the competent authority (NCA) responsible for payment services approves or rejects authorization of PSPs in their own country. If authorization is granted, the NCA lists the respective PSP in the national public register, together with an identification number, which could be, but is not necessarily, an authorization number.

Subject to NCA approval PSPs can exercise the right of establishment and freedom to provide services in other Member States. This is called passporting. Information about passporting is published in the public register in the home country of the PSP or the EBA PSD2 Register.

Certificates issued according to the requirements laid down in the present document do not include any attributes regarding passporting.

1.5 Use of the certificates

1.5.1 Applicable usage domains

1.5.1.1 Key pairs and certificates of the service

Seal for emails and documents signing

The uses are the electronic signature of data and the electronic signature verification. This data can be, for example, an acknowledgment following the transmission of information by a user to an application service, an automatic response to a request by a user, an email, a document or an archive.

Seal for timestamp token signing

The uses are the electronic signature of timestamp tokens and the electronic signature verification.

RGS ** / QCP-I-qscd qualified

The electronic certificates are used for applications where security needs are strong given the high risks that threaten them.

RGS * / LCP

The electronic certificates are used for applications where security needs are moderate given the high risks that threaten them.

1.5.1.2 Key pairs and certificates of CA and of components

CA has one key pair and the corresponding certificate is linked to a higher-level CA (Root CA).

The key pair of the CA used to sign different types of objects it generates: application service certificates, OCSP certificate, LCR.

PKI operators have certificates to authenticate to the PKI. For RA operators (operators of DRA which are not involved), this certificate is used to sign the certificate requests and revocation before transmission to CA. These certificates are issued by a separate PKI, internal to CA, whose security level is adapted to that required for the AC.

1.5.2 Forbidden usage domains

Uses other than those mentioned in the previous paragraph are prohibited.

The CA agrees to comply with these restrictions and to enforce compliance by Certificate Managers and certificate users. To this end, it publishes to the Certificate Managers, Certification Agent and potential users the Terms of use that can be found on the site <https://www.certigna.fr> before any request or use of a certificate.

1.6 Management of the CP

1.6.1 Entity managing the CP

CA has a Security Committee chaired by the Security Officer.

This committee is responsible for developing, monitoring, modification and validation of this CPS. It shall act on any necessary changes to be made to the CP at regular intervals.

1.6.2 Contact point

CERTIGNA
20 allée de la Râperie
Zone de la plaine
59650 Villeneuve d'Ascq
FRANCE
Contact by email: contact@certigna.fr

1.6.3 Entity determining the compliance of the CPS with the CP

The Security Committee ensures the compliance of the CPS with the CP. IT can optionally be assisted by external experts to ensure compliance.

1.6.4 CPS compliance approval procedures

The CPS translated into technical terms, organizational and procedural requirements of the CP based on the company's security policy. The Security Committee shall ensure that the means used and described in the CPS meet these requirements as the approval process in place. A compliance check of the CPS compared to the CP is made through the internal and external audits for the CA qualification.

Any update request of the CPS also follows this process.

Any new approved version of the CPS is published without delay.

2 RESPONSIBILITIES REGARDING THE PROVISION OF INFORMATION HAVING TO BE PUBLISHED

2.1 Entity in charge of providing information

CA provides to users and applications using certificates it issues, information about the revocation status of valid certificates issued by the CA. This information is published through several servers:

- Web Servers:
 - o <http://crl.certigna.fr/entityca.crl>
 - o <http://crl.dhimyotis.com/entityca.crl>
- OCSP Servers:
 - o <http://entityca.ocsp.certigna.fr>
 - o <http://entityca.ocsp.dhimyotis.com>

All publication services are hosted by the CA on several information systems to ensure a high availability.

2.2 Information having to be published

The CA issues to the Certificate Managers and certificate users:

- The CP;
- The Terms and Conditions of CA certification services;
- The various forms required for certificate management (certificate request, revocation request, ...);
- The Certigna Root CA certificate and valid intermediate CA certificate;
- The Certificate Revocation List (ARL / CRL);
- The CPS on specific request to CA.

Note: Due to the complexity of reading a CP for Certificate Managers or certificate users not experts in the field, the CA publishes outside the CP, the CPS and Terms and conditions that the future Certificate Managers is obliged to read and to accept in all certificate request (initial and subsequent requests, in case of renewal) to the RA.

2.2.1 Publication of documentation

2.2.1.1 Publication of CP, Terms and conditions, and forms

The CP, the terms and conditions of the CA certification services and the various forms required for certificate management are published in electronic format at <https://www.certigna.fr>. The CP is also published at <https://www.dhimyotis.com>.

2.2.1.2 Publication of CPS

The CA issues, to the Certificate Managers and certificate users, the CPS to make possible the assessment of compliance with its certification policy. Details on its practices are however not made public.

2.2.1.3 Publication of CA certificate

The Certificate Managers and certificate users can access the CA certificates that are issued at the following addresses:

- <https://www.certigna.fr/autorites>,
- <https://www.dhimyotis.com/autorites>.

2.2.2 Publication of CRL

The certificate revocation list is published electronically at the addresses described in Section 2.1 above. These addresses are also indicated in the certificates issued by the CA.

2.2.3 Publication of ARL

The authority revocation list is published electronically at the address described in Section 2.1 above. This address is also indicated in the certificates issued by the Certigna Root CA.

2.3 Report a malicious or dangerous certificate

For reporting a malicious or dangerous certificate (suspected Private Key compromise, certificate misuse, or other types of fraud, compromise, misuse, inappropriate conduct, etc.) or any other matter related to certificates, use the contact form available at <https://www.certigna.fr/contact.xhtml> by selecting "Certificate considered malicious or dangerous".

2.4 Publication timeframes and frequencies

2.4.1 Publication of documentation

The CP, the Terms and Conditions of CA certification services and the various forms required for certificate management are updated if necessary, aim of securing at any time consistency between published information and commitments, means and procedures of the CA. The publication function based on this information (excluding certificate status information) is available on working days.

2.4.2 Publication of CA certificates

CA certificates are first broadcast on any broadcasting certificates issued by the CA and corresponding CRL. Availability of systems publishing CA certificates is guaranteed 24/7.

To ensure this availability and a quick recovery in case of disaster, several replicated sites have been implemented.

To detect and correct as soon as possible any incident occurring during the operation of one of these sites, the following measures have been deployed:

- Installation and operation of a monitoring software to monitor all the components of the technical platform (servers, equipment, processes) and to send real-time alerts in case of detection of an incident;
- Development and implementation of scripts to automate and simplify load balancing from one site to another;
- Introduction of on-call during non-business hours;
- Subscription to a security monitoring service (24 hours a day).

2.4.3 Publication of CRL

The CRL is updated at least every 24 hours, and at each new revocation.

2.4.4 Publication of ARL

The ARL is updated at least once every year, and at each new revocation.

2.5 Published information access control

Access to information published to users is free.

Access to change the publishing systems (add, delete, change the information published) is strictly limited to authorized internal functions of the PKI, through a strong access control, based on a two-factor authentication.

Access to the publishing system requires a double authentication: user session and the use of a user certificate stored in a dedicated device.

3 IDENTIFICATION AND AUTHENTICATION

3.1 Naming

3.1.1 Types of names

In each certificate conform with X.509 Standard, the issuing CA (corresponding to the "issuer" field) and application service ("subject" field) are identified by a "Distinguished Name" conform with the requirements of the X.501 Standard.

3.1.2 Necessary usage of explicit names

The certificate DN identifies the application service and is built from the server's identity.

The certificate DN is defined at chapter "7.2 Profiles of certificates and LCR" of this CPS.

QCP-I PSD2

For PSD2 certificates, the OrganizationIdentifier (OI) field is used to provide the registration number of the entity attached to the certificate. In the case where this number is issued by the NCA, this field will be composed as follows:

- "PSD" as 3 character legal person identity type reference;
- 2 character country code representing the NCA country;
- hyphen-minus "-":
- 2-8 character NCA identifier without country code;
- hyphen-minus "-"; and
- PSP identifier (authorization number as specified by the NCA. There are no restrictions on the characters used).

Example: the "OI" field containing this character series "PSDFR-APCR-123456789" means a certificate issued to a PSP whose registration number is 123456789 and whose authorization is provided by a French NCA which is the Prudential Supervisory and resolution Authority whose identifier is "FR-APCR". Other examples can include use of non-alphanumeric characters such as "PSDBE-NBB-1234.567.890" and "PSDFI-FINFSA-1234567-8" and "PSDMT-MFSA-A 12345" (note space character after "A").

Note: PSP Identifier can contain prefix, followed by colon ":", including type of institution, as listed in PSD2 where needed to ensure uniqueness (i.e. where there are numbering schemes for different types of institutions with the possibility of the same number being allocated to different institutions). This prefix would then consist of one of the following strings, followed by the ":" character:

- Credit institution - CI
- Payment institution - PI
- Electronic money institution (or e-money institution) - EMI
- Account information service provider exempted under Article 33 of PSD2 - RAISP

3.1.3 Anonymisation or pseudonymisation

The CA does not issue certificates with an anonymous identity.

3.1.4 Rules for interpreting the various types of names

No interpretation is made on the name inside the certificates.

3.1.5 Uniqueness of the names

The combination of the country of the entity and identity of seal creation service uniquely identifies the certificate holder.

Throughout the lifetime of the CA, the name of the character creation service attached to an entity can not be assigned to another entity.

The serialNumber attribute, unique value assigned to each certificate issued by the CA and present in the DN, also ensures the uniqueness of the DN. This field is made up from a unique random number generated by the CA and begin with a letter which indicates certificate's usage(s) and its storage mode:

- "T" for « Seal for timetamping token »,
- "TT" for « Seal for timetamping token » on hardware device,
- "S" for « Seal for documents/e-mails »,
- "ST" for « Seal for documents/e-mails » on hardware device.

3.1.6 Identification, authentication and roles of registered trademarks

The CA is responsible for the uniqueness of the names of the servers used in its certificates and the resolution of disputes over the demand for use of a name. This commitment of responsibility rests on the assured level of control when processing license applications. The CA may possibly check the membership of the trademark with the INPI.

3.2 Initial identity validation

Registering a Certificate Manager can be done either directly from the RA (RA or DRA) or via a Certification Agent of the entity. In the latter case, the Certification Agent must first be registered with the RA.

During the certificate request, the email address of the Certificate Manager is verified through sending multiple emails that allow the Certificate Manager to access to his Certigna Customer account and certain activation data enabling him to recover and to use the certificate of the server.

A strict control of the application files transmitted by a third person makes it possible to ensure that the latter is registered as delegated RA operator, or as a certification agent on behalf the entity to which the future CM belongs.

In both cases (request through a delegated RA or a certification agent), a control of the individual is carried out based on the transmitted informations.

3.2.1 Method for proving possession of the private key

CA ensures the detention of the private key by the Certificate Manager before certifying the public key. For this, the RA or the certificate manager itself generates the key pair in a device compliant with the requirements of the chapter 11, and provides to the CA the proof of possession of the private key by signing his certificate request (Certificate signing request with the PKCS # 10 format).

The RA verifies beforehand the validity of the signature during the processing of the certificate requests received. This treatment is automated and therefore requires no human intervention. Any signature error, due in particular to the non-possession of the private key associated with the public key to be certified, is systematically detected and causes the rejection of the request.

Evidence that the device complies with the requirements of Chapter 11 (At a minimum, the device's purchase invoice and the screen shots / prints of the hardware and software features of the device and the associated serial number) must be provided, when the application, by the Certificate Manager to attest to the possession of the device. The CA reserves the right to refuse the certificate application if it is found that this device does not meet these requirements.

The CA records the characteristics of the device, whether or not it is provided by the CA and checks monthly until the end of the validity period of the entity's certificate, maintaining the certification status of the device. In case of loss of the certification of the device, the CA will ask the Certificate Manager for proof that the key pair is stored in a device that meets the requirements of Chapter 11. The Certificate Manager undertakes to provide these evidences (E.g: Invoice of purchase of a new device certified QSCD, Minutes of ceremony of the keys in case of key migration, Minutes of update of the device for the maintenance of the certification, etc.) within a deadline 15 days following the request. In the event that no evidence is provided or that the latter do not make it possible to determine if the storage conditions of the key pair, and transfer in another device if any, meet the requirements of this CPS, the CA gives himself the right to revoke the certificate.

QCP-I-qscd qualified

In the event that the device is managed by a Trust Service Provider other than Certigna, the Certificate Manager must provide at the certificate request, the evidences (E.g: Certificate of qualification as a Certification Operator, certificate of qualification in as PSCE for the QCP-I-QSCD level and associated signed contractual agreement between the entity and that service provider, etc.) certifying that the provider is able to meet the requirements of this CPS and in particular Chapter 11.

3.2.2 Validation of an entity's identity

The validation of the entity's identity relies on the following verifications:

- Verification of entity's legal and identity;
- Verification of entity's operational existence;
- Verification of authorization number for PSD2 certificates.

3.2.2.1 Verification of entity's legal and operational existence and identity

Verification that the entity has the exclusive legal use of the name specified in the "Organization" field of the certificate is performed by reconciliation with information retrieved from official database (QIIS, QGIS, QTIS) confirming the existence of the entity.

These databases contain reliable information provided by a trusted source that registered the entity. The information that is checked during the authentication of the entity's identity includes the SIREN or SIRET number, the VAT return number, the D-U-N-S number (Dun & Bradstreet). The controls applied are as follows:

For private organizations, checks are carried out in the QIIS or the QGIS (ex: directory of companies of France, registries of commercial courts, Dun & Bradstreet) in order to check:

- Legal existence: the RA checks that the entity's legal existence is established by the political subdivision in which the entity operates and is not designated on the records of the Incorporating or Registration Agency by labels such as "inactive", "invalid," "not current," or the equivalent;
- The name of the entity: the RA checks that the formal name as registered with the incorporating or registration agency of the entity's jurisdiction corresponds to that specified in the certificate request;
- The registration number: a registration number assigned by the incorporating or registration agency must be provided by the entity. In case of non-attribution of registration number by this organization the date of registration must be provided.
- The legal representative: the RA must obtain the name and address of a legal representative designated by the incorporating or registration agency of its jurisdiction.

For public entities, checks are carried out in the QIIS or the QGIS in order to verify:

- Legal existence: the RA checks that the entity is a legally recognized Government Entity, in existence in the political subdivision in which such Government Entity operates;
- The name of the entity: the RA checks that the entity's formal legal name as recognized by the Registration Agency in the entity's Jurisdiction of Registration matches the entity's name in the certificate request;
- The registration number: Attempt to obtain the specific unique Registration Number assigned to the entity by the registration agency in its Jurisdiction of registration. Where the registration agency does not assign a registration number, the CA integrates in the DN of the certificate that the entity is a public entity.

For business entities, checks are carried out in the QIIS or the QGIS in order to check:

- Legal existence: the RA checks that the applicant is engaged in business under the name submitted in the request.

- The name of the entity: the RA checks that the formal name as registered with the incorporating or registration agency of the entity's jurisdiction corresponds to that specified in the certificate request;
- The registration number: a registration number assigned by the incorporating or registration agency must be provided by the entity. In case of non-attribution of registration number by this organization the date of registration must be provided.
- The legal representative: the RA verifies the identity of the identified Principal Individual.

For non-commercial entities, checks are carried out in the QIIS or the QGIS in order to check:

- Legal existence: the RA checks that the entity is a legally recognized International Organization Entity.
- The name of the entity: the RA checks that the entity's formal legal name as recognized by the Registration Agency in the entity's Jurisdiction of Registration matches the entity's name in the certificate request;
- The registration number: the RA must obtain the Applicant's date of formation, or the identifier for the legislative act that created the International Organization Entity. In circumstances where this information is not available, the CA integrates in the DN of the certificate that the entity is an international organization entity.

3.2.2.2 Verification of entity's operational existence

The RA checks that the entity's operational existence verifying that it's listed in either a current QIIS or QTIS.

3.2.2.3 Verification of PSD2 Authorization Number

For PSD2 certificates, the identification of the PSP by the RA operator is achieved also with the authorization number of the PSP available in the NCA public register. In case there is no PSD2 Authorization Number, other form of registration number recognized by the NCA can be used in place of the PSD2 Authorization Number. If necessary, to ensure uniqueness, the authorization or registration number can contain a prefix including the type of the institution.

The information on the PSP and the NCA to be placed in the certificate is verified by the RA by checking the official information published on one of the following registers:

- the register of the national NCA in connection with the PSP. For example, in France, the NCA which is the APCR provides a Register of Financial Agents (REGAFI) to verify this information at the following address: <https://www.regafi.fr>;
- the register of the EBA, named "Payment Institutions Register" accessible at the following address <https://euclid.eba.europa.eu/register/pir/disclaimer>.

3.2.3 Validation of an individual's identity

Registration of a server to which a certificate should be issued is performed via the registration of the corresponding Certificate Manager.

A Certificate Manager may have to change valid corresponding server certificate.

In this case, any new Certificate Manager shall also be subject to a registration procedure.

The Certificate Manager is either the legal representative of the entity or a natural person formally designated by the legal representative.

The registration of a Certificate Manager, and the corresponding server can be done either directly from the RA or via a Certification Agent of the entity. In this last case, the Certification Agent must have been registered by the RA.

RA and DRA operators are made aware of the frauds that may occur on the issue of documents or copies of official documents (falsified documents). Particular attention is given to the validity checks of the pieces supplied (date of validity of identity documents, date of requests, etc.). These aspects are developed during the initial training planned for the RA operators and detailed in the training program defined in the document "Personnel monitoring".

Periodic checks take into account sampling checks of processed files to ensure compliance with procedures. These controls are conducted by people in the roles of Controllers or Security Officers.

3.2.3.1 Registration of Certificate Manager without Certification Agent for a certificate to be issued

The registration of the future Certificate Manager requires the "legal person" identity verification (the entity attached to the future Certificate Manager), and the "natural person" identity verification (the future Certificate Manager), its authorization must be considered for the server and the entity in question.

The certificate request files shall be completed with the forms available on Certigna website. The files sent to RA shall include the following elements:

Certificate request form	
<i>Subject</i>	Designation of the service identity to use in the certificate
	Designation of a legal representative of the entity and its contact informations
	Designation of the future Certificate Manager and its contact informations
	Designation of the identification informations of the entity
	Designation of applicable Terms and conditions
<i>Date</i>	Signed less than 3 months ago
<i>Signature</i>	Signed by a legal representative to mandate the future Certificate Manager Signed by the future Certificate Manager to accept this role and the Terms and conditions

Official identification document of the Certificate Manager	
<i>Subject</i>	A photocopy of an identity official document valid of the Certificate Manager or a professional card issued by an administrative authority (if that authority maintaining a register of identities ensuring the link between the agent and the professional card) with an ID photo (including national identity card, passport or residence permit) or a reference to the administrative file of the agent.
<i>Date</i>	Piece valid at the time of registration

Official identification document of the legal representative	
<i>Subject</i>	A photocopy of an identity official document valid of the legal representative or a professional card issued by an administrative authority (if that authority maintaining a register of identities ensuring the link between the agent and the professional card) with an ID photo (including national identity card, passport or residence permit) or a reference to the administrative file of the agent.
<i>Date</i>	Piece valid at the time of registration

Document attesting to the quality of legal representative

<i>Subject</i>	For a company , a document attesting to the quality of legal representative known nationally. <i>eg a copy of the articles of the company, valid, bearing the signature of its representatives.</i> For an administrative authority , one piece, support of delegation or sub-delegation of responsible authority of the administrative structure known nationally.
<i>Date</i>	Document or piece valid at the time of registration

Document bearing the SIREN number of the company

<i>Subject</i>	For a company , any document, valid at the time of registration, bearing the SIREN number of the company (<i>KBIS extract or Certificate of Identification at the National Directory of Companies and of their Establishments</i>) or, failing that, another valid document certifying the unique identification of the company to be included in the certificate.
<i>Date</i>	Document valid at the time of registration

Evidence for PSP information

<i>Subject</i>	For a PSD2 certificate, a document listing the characteristics of the PSP and referencing it in the NCA or EBA register if applicable.
----------------	--

RGS ** / QCP-I-qscd qualified

Authentication of the Certificate Manager by the RA is performed during a physical face-to-face or in a dematerialized form at the condition that the request is signed by the Certificate Manager with an electronic signature process complies with the minimum ** level requirements, the signature is verified and valid at the time of registration, and the certificate used for the signature is qualified as specified by eIDAS regulation.

RGS * / LCP

Authentication of the Certificate Manager by the RA (RA or DRA operator) is performed by sending the files by mail or in a dematerialized form (scanned files which are sent by email)

The Certificate Manager is informed that personal identity information can be used as authentication data during a possible revocation request.

3.2.3.2 Registration of Certificate Manager without Certification Agent for an already issued certificate

In the event of a Certificate Manager change for a valid certificate, the new Certificate Manager is subject to a registration procedure. The certificate request files shall be completed with the forms available on Certigna website. The files sent to RA shall include the following elements:

New Certificate Manager Registration form	
<i>Subject</i>	Designation of a legal representative of the entity and its contact informations
	Designation of the future Certificate Manager and its contact informations
	Designation of applicable Terms and conditions
<i>Date</i>	Signed less than 3 months ago
<i>Signature</i>	Signed by a legal representative to mandate the future Certificate Manager
	Signed by the future Certificate Manager to accept this role and the Terms and conditions

Official identification document of the Certificate Manager	
<i>Subject</i>	A photocopy of an identity official document valid of the Certificate Manager or a professional card issued by an administrative authority (if that authority maintaining a register of identities ensuring the link between the agent and the professional card) with an ID photo (including national identity card, passport or residence permit) or a reference to the administrative file of the agent.
<i>Date</i>	Piece valid at the time of registration

Official identification document of the legal representative	
<i>Subject</i>	A photocopy of an identity official document valid of the legal representative or a professional card issued by an administrative authority (if that authority maintaining a register of identities ensuring the link between the agent and the professional card) with an ID photo (including national identity card, passport or residence permit) or a reference to the administrative file of the agent.
<i>Date</i>	Piece valid at the time of registration

Document attesting to the quality of legal representative	
<i>Subject</i>	<p>For a company, a document attesting to the quality of legal representative known nationally. <i>eg a copy of the articles of the company, valid, bearing the signature of its representatives.</i></p> <p>For an administrative authority, one piece, support of delegation or sub-delegation of responsible authority of the administrative structure known nationally.</p>
<i>Date</i>	Document or piece valid at the time of registration

Evidence for PSP information

Subject

For a PSD2 certificate, a document listing the characteristics of the PSP and referencing it in the NCA or EBA register if applicable.

RGS ** / QCP-I-qscd qualified

Authentication of the Certificate Manager by the RA is performed during a physical face-to-face or in a dematerialized form at the condition that the request is signed by the Certificate Manager with an electronic signature process complies with the minimum ** level requirements , the signature is verified and valid at the time of registration, and the certificate used for the signature is qualified as specified by eIDAS regulation.

RGS * / LCP

Authentication of the Certificate Manager by the RA (RA or DRA operator) is performed by sending the files by mail or in a dematerialized form (scanned files which are sent by email)

The Certificate Manager is informed that personal identity information can be used as authentication data during a possible revocation request.

3.2.3.3 Registration of a Certification Agent

The Certification Agent must register with the RA to substitute for RA in the process of registration of certificate requests. The registration of a Certification Agent requires the verification of the "legal person" identity of the entity for which the Certification Agent is attached, the verification of the "natural person» identity of the future Certification Agent, and the relation between the future Certification Agent and this entity. The certificate request files shall be completed with the forms available on Certigna website. The files sent to RA shall include the following elements:

Certification Agent registration form	
<i>Subject</i>	Designation of a legal representative of the entity and its contact informations
	Designation of the future Certification Agent and its contact informations
	Designation of applicable Terms and conditions
<i>Date</i>	Signed less than 3 months ago
<i>Signature</i>	Signed by a legal representative to mandate the future Certification Agent Signed by the future Certification Agent to accept this role

Letter of commitment from the Certification Agent	
<i>Subject</i>	Designation of the future Certification Agent and its contact informations
	Designation of the role and responsibilities of the Certification Agent with: - Conduct an impartial and scrupulous identity checks of the future Certificate Managers as defined in the CP; - Notify the RA on leaving the entity.
<i>Date</i>	Signed less than 3 months ago
<i>Signature</i>	Signed by the future Certification Agent to accept these responsibilities

Official identification document of the Certification Agent	
<i>Subject</i>	A photocopy of an identity official document valid of the Certification Agent or a professional card issued by an administrative authority (if that authority maintaining a register of identities ensuring the link between the agent and the professional card) with an ID photo (including national identity card, passport or residence permit) or a reference to the administrative file of the agent.
<i>Date</i>	Piece valid at the time of registration

Document attesting to the quality of legal representative	
<i>Subject</i>	For a company , a document attesting to the quality of legal representative known nationally. <i>eg a copy of the articles of the company, valid, bearing the signature of its representatives.</i> For an administrative authority , one piece, support of delegation or sub-delegation of responsible authority of the administrative structure known nationally.
<i>Date</i>	Document or piece valid at the time of registration

Document bearing the SIREN number of the company

<i>Subject</i>	For a company , any document, valid at the time of registration, bearing the SIREN number of the company (<i>KBIS extract or Certificate of Identification at the National Directory of Companies and of their Establishments</i>) or, failing that, another valid document certifying the unique identification of the company to be included in the certificate.
<i>Date</i>	Document valid at the time of registration

Evidence for PSP information

<i>Subject</i>	For a PSD2 certificate, a document listing the characteristics of the PSP and referencing it in the NCA or EBA register if applicable.
----------------	--

RGS ** / QCP-I-qscd qualified

Authentication of the Certification Agent by the RA is performed during a physical face-to-face or in a dematerialized form at the condition that the request is signed by the Certificate Manager with an electronic signature process complies with the minimum ** level requirements, the signature is verified and valid at the time of registration, and the certificate used for the signature is qualified as specified by eIDAS regulation.

RGS * / LCP

Authentication of the Certification Agent by the RA (RA or DRA operator) is performed by sending the files by mail or in a dematerialized form at the condition that the request is signed by the Certification Agent with an electronic signature process complies with the minimum * level requirements and the signature is verified and valid at the time of registration.

The certification agent is informed that the personal identifying information may be used as the authentication data during a possible revocation request.

3.2.3.4 Registration of a Certificate Manager via a Certification Agent

Registration of a Certificate Manager via a Certification Agent requires validation by the Certification Agent of "natural person" identity of the future Certificate Manager and its attachment to the entity for which the Certification Agent is involved.

The certificate request files shall be completed with the forms available on Certigna website. The files sent to RA shall include the following elements:

Certificate request form	
<i>Subject</i>	Designation of the service identity to use in the certificate
	Designation of a legal representative of the entity and its contact informations
	Designation of the future Certificate Manager and its contact informations
	Designation of the identification informations of the entity
	Designation of applicable Terms and conditions
<i>Date</i>	Signed less than 3 months ago
<i>Signature</i>	Signed by a legal representative to mandate the future Certificate Manager Signed by the future Certificate Manager to accept this role and the Terms and conditions

Official identification document of the Certificate Manager	
<i>Subject</i>	A photocopy of an identity official document valid of the Certificate Manager or a professional card issued by an administrative authority (if that authority maintaining a register of identities ensuring the link between the agent and the professional card) with an ID photo (including national identity card, passport or residence permit) or a reference to the administrative file of the agent.
<i>Date</i>	Piece valid at the time of registration

Official identification document of the Certification Agent	
<i>Subject</i>	A photocopy of an identity official document valid of the Certification Agent or a professional card issued by an administrative authority (if that authority maintaining a register of identities ensuring the link between the agent and the professional card) with an ID photo (including national identity card, passport or residence permit) or a reference to the administrative file of the agent.
<i>Date</i>	Piece valid at the time of registration

Evidence for PSP information	
<i>Subject</i>	For a PSD2 certificate, a document listing the characteristics of the PSP and referencing it in the NCA or EBA register if applicable.

RGS ** / QCP-I-qscd qualified

Authentication of the Certificate Manager by the Certification Agent is performed during a physical face-to-face or in a dematerialized form at the condition that the request is signed by the Certificate Manager with an electronic signature process complies with the minimum ** level requirements, the signature is verified and valid at the time of registration, and the certificate used for the signature is qualified as specified by eIDAS regulation.

RGS * / LCP

Authentication of the Certificate Manager by the Certification Agent is performed by sending the files by mail or in a dematerialized form (scanned files which are sent by email)

The Certificate Manager is informed that personal identity information can be used as authentication data during a possible revocation request.

3.2.3.5 Registration of a new Certificate Manager via a Certification Agent to a previously issued certificate

In case of change of Certificate Manager to a valid server certificate, the new Certificate Manager must be registered to the RA for the replacement of the old Certificate Manager. The registration files filed with a Certification Agent must include at least:

New Certificate Manager Registration form	
<i>Subject</i>	Designation of a Certification Agent of the entity and its contact information
	Designation of the future Certificate Manager and its contact information
	Designation of applicable Terms and conditions
<i>Date</i>	Signed less than 3 months ago
<i>Signature</i>	Signed by a Certification Agent to mandate the future Certificate Manager Signed by the future Certificate Manager to accept this role and the Terms and conditions

Official identification document of the Certificate Manager	
<i>Subject</i>	A photocopy of an identity official document valid of the Certificate Manager or a professional card issued by an administrative authority (if that authority maintaining a register of identities ensuring the link between the agent and the professional card) with an ID photo (including national identity card, passport or residence permit) or a reference to the administrative file of the agent.
<i>Date</i>	Piece valid at the time of registration

Evidence for PSP information	
<i>Subject</i>	For a PSD2 certificate, a document listing the characteristics of the PSP and referencing it in the NCA or EBA register if applicable.

RGS ** / QCP-I-qscd qualified	
Authentication of the Certificate Manager by the Certification Agent is performed during a physical face-to-face or in a dematerialized form at the condition that the request is signed by the Certificate Manager with an electronic signature process complies with the minimum ** level requirements , the signature is verified and valid at the time of registration, and the certificate used for the signature is qualified as specified by eIDAS regulation.	

RGS * / LCP	
Authentication of the Certificate Manager by the Certification Agent is performed by sending the files by mail or in a dematerialized form (scanned files which are sent by email)	

3.2.4 Unverified informations

Not applicable.

3.2.5 Validation of the requester's authority

This step is performed simultaneously with the validation of the identity of the natural person (directly by the RA or the Certification Agent).

3.3 Identification and validation of a key renewal request

The CA does not issue a new certificate for previously issued key pair. Renewal involves through the generation of a new key pair and a new certificate request.

3.3.1 Identification and validation of a current renewal

RGS ** / QCP-I-qscd qualified

At the first renewal, the CA at a minimum ensures that the information in the initial registration request is still valid and that the certificate to be renewed exists, and is still valid.

RGS * / LCP

At the time of the first renewal, the verification of the identity of the Certificate Manager and the service is optional. It is left to the discretion of the CA who assumes responsibility for the validity of the information contained in the renewed certificate.

At the next renewal, the RA identifies the Certificate Manager and the application service according to the same procedure as for the initial registration

3.3.2 Identification and validation of a renewal after revocation

The verification of the Certificate Manager's identity is identical to the original request.

3.4 Identification and validation of a revocation request

3.4.1 Current request

The certificate revocation request sent by the Certificate Manager, legal representative of the entity, a DRA operator, or if appropriate a Certification Manager can be done by one of the following means:

- Mail: request completed and signed from the form of revocation of a certificate available on the website of Certigna <https://www.certigna.fr>;
- From the customer area of the Certigna website <https://www.certigna.fr> selecting the certificate to be revoked.

The mailing address of the revocation service is available on the website of Certigna <https://www.certigna.fr>

The paper request must include the following:

- The first and last name of the Certificate Manager;
- The email address of the Certificate Manager;

- The identity and function of the server;
- The reason for the revocation.

If the Certificate Manager is not the subscriber:

- The first and last name of the subscriber;
- The quality of the subscriber (legal representative, DRA operator, Certification Agent);
- The subscriber's phone number.

The paper form can also be transmitted electronically.

The electronic application can be performed by an authorized person with a certificate of the same level or higher (an DRA operator or if appropriate a Certification Agent). The application will be electronically signed with this certificate of the same level or higher.

The revocation request processing by the RA is detailed in the "[Operational Revocation Request Procedure](#)".

As with certificate applications, periodic audits may consider sample checks of revocation requests processed by the RA to ensure compliance with procedures.

3.4.2 Request from a CNA

An authenticated NCA is authorized to request the revocation of the certificate of a PSP present in its registry. This request must be made by email to security@certigna.com by enclosing a request for revocation in French or in English language. This revocation request must be electronically signed using an advanced signature or an advanced seal process based on a qualified certificate as defined in eIDAS regulation and whose organization designated as the subject in the certificate is the NCA.

The certificate revocation request must specify the following information:

- NCA identifier;
- Contact details of the applicant;
- Identifier of the PSP subject of the revocation request;
- Reason for which the certificate must be revoked:
 - o The authorization of the PSP has been revoked;
 - o Any PSP included in the certificate has been revoked.

Upon CNA's request and confirmation by Certigna, the CA will be able to provide a certificate in accordance with its issuance process and to authenticate CNA requests.

One of the following cases may lead the CA to reject the revocation request or to request additional information:

- If the authenticity of the request is not verifiable;
- If the request does not clearly indicate the reason for revocation of the certificate;
- If the reason for the revocation of the certificate is not the responsibility of the requesting CNA.

4 OPERATIONAL REQUIREMENTS ON THE LIFECYCLE OF CERTIFICATES

4.1 Certificate request

4.1.1 Origin of a certificate request

The certificate request must come from a legal representative of the entity, a Certification Agent duly mandated for this entity, with prior consent of the future Certificate Manager.

4.1.2 Process and responsibilities for submitting a certificate request

The registration files are established directly by the future Certificate Manager from the evidence provided by his entity, or by the entity and signed by the Certificate Manager. The files are transmitted directly to the RA if the entity has not implemented the use of Certification Agent. The files are delivered to it otherwise. When recording of the future Certificate Manager, it must provide an email address that allows the RA to contact for any questions regarding registration. The Certification Agent must also provide an email address when registering for allows the RA to contact him on any matter relating to the registration of Certificate Manager.

The email address of the Certificate Manager, and where applicable the Certification Agent, is stored in the RA databases. These addresses are used to transmit service messages when processing certificate or revocation requests, or for additional requests made by RA operators processing these requests.

The certificate application must contain the elements described in section 3.2.3.

4.2 Processing of a certificate request

4.2.1 Performance of the identification and request validation processes

The RA does the following operations when processing a certificate request:

- Validation of the server's identity (identity of the entity and function of the server);
- Validation of the identity of the entity;
- Validation of the identity of the signatory of the request (Certificate Manager, legal representative);
- Validation of the files and the consistency of evidence presented;
- Assurance that the future Certificate Manager is informed of the applicable requirements to the use of the certificate.

The identity of the future Certificate Manager and the legal representative is approved if the supporting documents provided are valid at the date of receipt.

For PSD2 certificates, the CA verifies information from the PSP and the associated NCA (PSP identifier and its roles, identifier and country of the NCA) through information officially provided

by NCA on its register or on the register of the EBA. In the case where the associated NCA recommends specific validations to be carried out, these will be carried out by the CA if necessary.

In the case of a request with a DRA operator, he forwards the files to the RA after performing the above operations. The RA then ensures that the request corresponds to the mandate of the DRA operator.

In the case of request with a Certification Agent, he forwards the files to the RA after performing some of the above operations (validating the identity of the future Certificate Manager, validation of the files, insurance about the knowledge of Terms and Conditions). The RA then ensures that the request corresponds to the mandate of the Certification Agent.

In all cases, the registration files are archived by the RA.

4.2.2 Request acceptance or rejection

The certificate request is made, to reminder, in two separate stages:

- Sending electronic request (CSR);
- Acquisition of the request (receipt of the forms and evidences).

After processing the request (control of the record, reconciliation and consistency check with the CSR), in case of rejection, the RA notifies the Certificate Manager, if applicable the operator of DRA, or the Certification Agent.

The justification for any refusal is made by the RA specifying the cause:

- The request files are incomplete (missing document);
- One of the documents is invalid (signature date more than 3 months, the date of validity of a document is exceeded, etc.);
- The request does not match with the mandate of the DRA operator or the Certification Agent;
- Electronic Request (CSR) is not consistent with the request files (information such as identity, function of the server or the name of the organization are different).

If accepted by the RA, after generation of the certificate by the CA, the RA sends a mail to the Certificate Manager to complete the certificate import.

4.2.3 Certificate preparation timeframe

As from the receipt of the full registration files and electronic request (CSR), the certificate is issued within 30 days.

4.3 Delivery of the certificate

4.3.1 Actions of the CA regarding the delivery of the certificate

After validation by the RA, the CA initiate the certificate generation process for the Certificate Manager.

The conditions for generating keys and certificates and security measures to meet are described in Chapters 5 and 6 below, including the separation of trusted roles. (See section 5.2).

Request validation on the RA component and certificate generation on the CA component are detailed in the "[Certificate request operating procedure](#)".

4.3.2 Notification by the CA of the certificate's delivery to the certificate manager

Complete and accurate certificate is made available to the Certificate Manager (on the customer area). The Certificate Manager authenticates on the customer area to accept the certificate or complete a paper form.

4.4 Acceptance of the certificate

4.4.1 Certificate acceptance procedure

Acceptance may be achieved in two ways:

- Either during the installation of the certificate, the Certificate Manager chooses to accept or not the certificate from the customer area. Notification of acceptance or rejection is automatically transmitted to CA.
- Either the Certificate Manager notifies the acceptance or rejection of the certificate by completing a paper form that will be sent by mail or delivered in a face to face.

In case of detection of inconsistency between the information in the contractual agreement and the content of the certificate, the Certificate Manager must refuse the certificate, which will result in its revocation.

4.4.2 Publication of the certificate

The server certificates are not published by CA.

4.4.3 CA notification to the other entities of the delivery of the certificate

Registration Authority is informed of the generation of the certificate by the CA which is responsible for issuing the certificate generated to the Certificate Manager.

4.5 Uses of the key pair and of the certificate

4.5.1 Usage of the private key and certificate by the certificate manager

The Certificate Manager must strictly respect the permitted uses of key pairs and certificates described at chapter 1.5.1. In the opposite case, they could be held liable.

The authorised use of the key pair and of the associated certificate is also described in the certificate itself, via the extensions relating to the key usage.

As part of the registration files, the Terms and condition are made known to the Certificate Manager or to the Certification Agent by the CA before entering in a contractual relationship. They are consulted prior to any online certificate request. They are available on the <https://www.certigna.fr> website. The conditions accepted by the Certificate Manager during the certificate request shall remain valid for the entire life of the certificate, or if necessary to the acceptance and signature by the Certificate Manager of new Terms and Conditions issued and made available to it by CA via <https://www.certigna.fr> website. Signed new Terms and Conditions must be provided by the Certificate Manager to the CA to be applicable.

4.5.2 Usage of the public key and certificate by the certificate user

Certificate users must strictly respect the permitted uses of certificates.

In the opposite case, they could be held liable.

4.6 Certificate renewal

The CA does not issue a new certificate for previously issued key pair. Renewal involves the generation of a new key pair and a new certificate request (see section 4.1).

The Certificate Manager is committed, accepting the Terms and Conditions, to generate a new key pair for each request.

The PKI automatically detects a certificate request with a public key that has already been certified. Any request for certification of a public key that has already been signed results in a failure with an explicit message at the level of the management module of the certificate requests of the RA.

4.7 Delivery of a new certificate after change of the key pair

4.7.1 Possible causes for changing a key pair

The key pairs must be periodically renewed to minimize the possibilities of cryptographic attacks. Thus, the servers' key pairs, and corresponding certificates are renewed at least every three years (see chapter 6.3.2 validity period).

Moreover, a key pair and a certificate can be renewed early, following the revocation of the application service.

4.7.2 Origin of a new certificate request

The triggering of the provision of a new certificate is initiated by the Certificate Manager (no existence of automated process). The entity, through its Certification Agent if necessary, can also be at the initiative of a new certificate request for an application service attached to it.

The generation of CSR remains under the responsibility of the Certificate Manager, the operator of RA or the operator of DRA. Import the new certificate is also carried out under the responsibility of the Certificate Manager.

4.8 Certificate modification

Changing server certificates is not allowed. In case of need to change information in the certificate (mainly DN), a new certificate must be issued after revocation of the old.

4.9 Revocation and suspension of certificates

4.9.1 Possible causes for a certificate's revocation

4.9.1.1 Server certificate

The following circumstances may cause the revocation of a server certificate:

- The Certificate Manager, the legal representative of the entity to which it belongs, if any Certification Agent or DRA operator request the revocation of the certificate (especially in the case of destruction or alteration of the server's private key and / or its support);
- The legal representative of the entity to which the seal service belongs notifies the CA that the original certificate request was not authorized and does not retroactively grant authorization;
- The CA obtains evidence that the private key corresponding to the public key in the certificate is suspected of being compromised, is compromised, lost or stolen (or possibly the activation data associated with the private key);
- The CA obtains evidence that the validation of domain authorization or control for any Fully-Qualified Domain Name or IP address in the Certificate should not be relied upon.

The CA will revoke a Certificate within 5 days if one or more of the following occurs:

- The Certificate no longer complies with the requirements of Sections 6.1.5 and 6.1.6;
- The CA obtains evidence that the Certificate of the server was misused;
- The CA is made aware that a Subscriber has violated one or more of its material obligations under the Subscriber Agreement or Terms of Use;
- The CA is made aware of any circumstance indicating that use of a Fully-Qualified Domain Name or IP address in the Certificate is no longer legally permitted (e.g. a court or arbitrator has revoked a Domain Name Registrant's right to use the Domain Name,

a relevant licensing or services agreement between the Domain Name Registrant and the Applicant has terminated, or the Domain Name Registrant has failed to renew the Domain Name);

- The seal service information contained in its certificate is not in accordance with the identity or purpose in the certificate (eg, change in the identity or function of the service), this before the normal expiry of certificate;
- The CA is made aware that the Certificate was not issued in accordance with these Requirements or the CA's Certificate Policy or Certification Practice Statement;
- The CA determines or is made aware that any of the information appearing in the Certificate is inaccurate or misleading;
- The CA's right to issue Certificates under these Requirements expires or is revoked or terminated, unless the CA has made arrangements to continue maintaining the CRL/OCSP Repository;
- Revocation is required by the CA's Certificate Policy and/or Certification Practice Statement;
- The CA is made aware of a demonstrated or proven method that exposes the Certificate Manager's Private Key to compromise, methods have been developed that can easily calculate it based on the Public Key (such as a Debian weak key, see <http://wiki.debian.org/SSLkeys>), or if there is clear evidence that the specific method used to generate the Private Key was flawed.
- The Certificate Manager, the entity, if any Certification Agent or DRA operator, has not fulfilled its obligations under the CP or the CPS;
- The CA ceases operations for any reason and has not made arrangements for another CA to provide revocation support for the Certificate;
- The CA's right to issue Certificates under these Requirements expires or is revoked or terminated, unless the CA has made arrangements to continue maintaining the CRL/OCSP Repository;
- The CA signing the certificates is revoked (which results in the revocation of all valid certificates signed by the corresponding private key);
- The technical content or format of the Certificate presents an unacceptable risk to Application Software Suppliers or Relying Parties (e.g. the CA/Browser Forum might determine that a deprecated cryptographic/signature algorithm or key size presents an unacceptable risk and that such Certificates should be revoked and replaced by CA within a given period of time).
- The seal service stop or the cessation of activity of the entity attached to the server and the Certificate Manager;
- An error (intentional or not) was detected in the registration files;
- For PSD2 certificate, Information in the Public Register has changed to substantially affect the validity of the PSD2 attributes in the certificate;
- For PSD2 certificate, the authorization status granted by that NCA has changed (e.g. that PSP is no longer authorized or one of its roles has been revoked).
- For technical reasons (failure to send the certificate ...).

When the above circumstances occurring, and the CA has knowledge about that, the relevant certificate is revoked.

4.9.1.2 Certificate of a component of the PKI

The following circumstances may cause the revocation of a certificate of a component of the PKI:

- Suspicion of compromise, compromise, loss or theft of the private key;
- Feature change the PKI decision following the detection of non-compliance of the procedures applied within the component with those announced in this CPS (eg, following an audit qualification or negative Compliance);
- Cessation of activity of the entity operating the component.

4.9.2 Origin of a revocation request

4.9.2.1 Server certificate

Individuals or entities may request revocation of a server certificate are:

- The Certificate Manager;
- A legal representative of the entity to which is attached the server;
- If appropriate, a Certification Agent;
- A NCA in case of a PSD2 certificate;
- The CA;
- The RA or DRA operators.

The Certificate Manager is informed, particularly through the Terms and conditions accepted by him, persons or entities that may request a revocation of the certificate for which he is responsible.

4.9.2.2 Certificate of a component of the PKI

The revocation of a CA certificate can only be decided by the responsible entity of the CA, or by the judicial authorities via a court order.

The revocation of the other components of certificates is decided by the entity operating the component concerned, which must inform the CA immediately.

4.9.2.3 PSD2 certificates

Cf. chapter 3.4.2.

4.9.3 Processing procedure for a revocation request

4.9.3.1 Server certificate

The revocation request is made by the RA, a Certification Agent or the CA.

To a request made from the customer area, the user authenticates with his account and select the certificate to be revoked.

For a request by mail, the following information must be included in the certificate revocation request (form to download on the website):

- The identity of the Certificate Manager;
- The email address of the Certificate Manager;
- The identity and function of the server;
- The reason of the revocation;

If the Certificate Manager is not the subscriber:

- The first and last name of the subscriber;
- The quality of the subscriber (legal representative, if appropriate DRA operator or Certification Agent);
- The subscriber's phone number.

If the application is sent by mail, it must be signed by the subscriber (the signature is verified by the RA with that of the certificate request files).

If the request is made online, the empowerment of the person to perform this request is checked (authentication with the user account). In this case the person making the request can be:

- The Certificate Manager;
- If appropriate, a Certification Agent;
- The CA;
- The RA or DRA operators.

The steps are:

- The applicant for revocation sends its request to the RA by mail or online;
- The RA authenticates and validates the revocation request to the requirements described in Chapter 3.4;
- The certificate serial number is registered in the CRL;
- In all cases, the Certificate Manager is notified of the revocation by email;
- The transaction is recorded in the event logs with, if necessary, sufficient information on the underlying causes that led to the revocation of the certificate;
- The CA does not publish in the CRL the causes of revocation.

The revocation mechanism is described in the "[Operational revocation request procedure](#)".

4.9.3.2 Certificate of a component of the PKI

In case the CA decides to revoke the intermediate CA certificate (following the compromise of the private key of the CA), the latter informed by email all Certificate Managers that their certificates are no longer valid because one of the certificates in the certificate chain is no longer valid. This information will also be relayed directly from the entities and where appropriate their Certification Agent.

The contact identified on the site of ANSSI (<https://www.ssi.gouv.fr>) is immediately informed in case of revocation of a certificate of the certificate chain.

The process is detailed in the "[Cryptographic key management procedure](#)" and in the "[Component certificate management procedure](#)".

4.9.4 Timeframe granted to the certificate manager to formulate the revocation request

As soon as the Certificate Manager or an authorized person has knowledge that a possible cause for revocation is effective, it must make its revocation request without delay.

4.9.5 Timeframe for the CA to process a revocation request

4.9.5.1 Certificate of the server

The revocation management function is available 24h/24 7D/7 for revocations online.

In all cases, the maximum period for processing revocation request is 24 hours. This delay means between the receipt of the authenticated revocation request and the provision of revocation information from users.

The maximum downtime per interruption (failure or maintenance) of the revocation management function is 2 hours.

The maximum total duration of downtime per month for the revocation management function is 8 hours.

4.9.5.2 Certificate of a component of the PKI

The revocation of a certificate of a PKI component is performed upon detection of an event described in the possible causes of revocation for this type of certificate.

The revocation of the signing CA certificate (signing certificates / CRL / OCSP responses) is performed immediately, particularly in the case of compromise of the key.

The organization and the means implemented in the event of revocation of a certificate of a component of the PKI are described in the "[Cryptographic key management procedure](#)" and in the "[Component certificate management procedure](#)".

4.9.6 Revocation verification requirements applicable to the certificate users

The user of a server certificate must check before its use, the status of certificates of all the relevant certificate chain. The method used (CRL or OCSP) is at the discretion of the user based on their availability and constraints in its implementation.

4.9.7 CRL preparation frequency

A CRL is issued at least every 24 hours. In addition, a new CRL is published systematically and immediately after the revocation of a certificate.

4.9.8 Maximum timeframe for the publication of a CRL

A CRL is issued within a maximum of 30 minutes after its generation.

4.9.9 Availability of an online system for verifying the revocation and status of certificates

In addition to the CRL publication on the online websites, CA make available an OCSP responder at the following addresses:

- <http://entityca.ocsp.certigna.fr>
- <http://enitiyca.ocsp.dhimyotis.com>

The OCSP responder meets the requirements of integrity, availability and deadline for the publication described in this CPS.

4.9.10 Other available information means regarding revocations

Not applicable.

4.9.11 Specific requirements in case of compromise of the private key

The Certificates Manager must request the certificate revocation promptly after becoming aware of the compromise of the private key. For CA certificates, in addition to the requirements of Section 4.9.3 above, the revocation following a compromise of the private key is being clear information distributed at least on the website of the CA and possibly relayed by other means (other institutional websites, newspapers, etc.).

In case of compromise of its private key or knowledge of the compromise of the private key of the CA that issued the certificate, the Certificates Manager is obligated to immediately and permanently stop the use of the server certificate and private key that it is associated. Remember, this commitment is made upon acceptance of the Terms and Conditions.

The implemented measures are defined in the "[Cryptographic key management procedure](#)" and in the "[Component certificate management procedure](#)".

4.9.12 Suspension of certificate

The certificates issued by the CA cannot be suspended.

4.10 Certificate status service

4.10.1 Operational characteristics

The CA provides to certificate users the information needed to verify and validate, prior to their use, the status of their certificates and all the corresponding certificate chain (up to and including Root CA), ie to also check the signatures of the certificates in the chain, signatures

guaranteeing the origin and integrity of the CRL/LAR and the state of the certificate of Root CA.

The information based on the status of certificates makes available to certificates users a free consultation mechanism CRL/ARL. These CRL/ARL are in CRL V2 format published on the publication website (available with the HTTP protocol).

The publishing service activities are defined in the "[Publishing Service Management Procedure](#)".

4.10.2 Availability of the function

The information function on the status of certificates is available 24/7. This function has a maximum downtime per outage (failure or maintenance) of 4 hours and a maximum total duration of downtime per month 16 hours.

If check online of the status of a certificate, the OCSP server response time to the received request is a maximum of 10 seconds. This is the time measured at the server (request received by the server response from the latter).

The replication of services on several information systems ensures automatic continuity of services in the event of a disaster. The CA also relies on its staff on-call during non-working hours to supervise the availability alerts for these functions.

4.11 End of the relations between the certificate manager and the CA

In case of termination of the contractual or the statutory relationship between the CA and the entity attached to the service before the end of validity of the certificate, the certificate is revoked.

4.12 Key escrow and recovery

The escrow of private keys is prohibited.

5 NON-TECHNICAL SECURITY MEASURES

REMINDER - CA conducted a risk analysis to determine the specific security objectives, to cover the business risks of the entire PKI, and technical and non-technical security measures to implement. Its CPS was developed based on this analysis. This CPS is established based on this risk analysis. The management of information security risks is described in the "[IS Risk Management Procedure](#)" and in the "[IS Risk Management Form](#)".

5.1 Physical security measures

5.1.1 Geographical location and construction of the sites

The information systems used for CA functions are hosted in several production centers with the same security features. The location of the sites does not present major risks.

The risks are identified in the document "[Risk Management IS](#)".

5.1.2 Physical access

A strict control of physical access to the components of PKI is performed, with access logging and video surveillance: the defined security perimeter around the systems hosting the PKI components is limited to people within a trusted role on this PKI.

Outside working hours, the implementation of physical and logical intrusion detection means strengthening the security of the PKI. In addition, any person (external service provider, etc.) entering in this physically secure area cannot be left without the supervision of an authorized person.

Physical access to production centers is restricted through physical access control measures. The measures implemented are described in the "[Safety Policy](#)".

5.1.3 Power supply and air conditioning

Measures concerning the supply of electricity and air conditioning are taken to meet the commitments of the CA described in this CPS on ensuring the level of availability of its functions, including revocations management features and information functions on the status of certificates.

The production centers are equipped with inverters and generators. The measures implemented are described in the "[Safety Policy](#)".

5.1.4 Vulnerability to water damage

Measures for protection against water damage are taken to address the CA commitments described in this CPS on ensuring the level of availability of its functions, including revocations management functions and information functions on the status of certificates.

Means for the detection of water leaks are positioned in the production centers. The measures implemented are described in the "[Safety Policy](#)".

5.1.5 Fire prevention and protection

Measures for prevention and protection against fire are taken to address the CA commitments described in this CPS on ensuring the level of availability of its functions, including revocations management functions and information functions on the status of certificates.

The computer rooms of the production centers are equipped with inert gas extinguishing systems. The measures implemented are described in the "[Safety Policy](#)".

5.1.6 Safekeeping of media

The information and their supporting assets involved in the activities of the IGC are identified, inventoried and their security needs defined in terms of availability, integrity and confidentiality.

The assets are listed in the "[Asset Inventory](#)" document, and the security requirements in the "[IS Risk Management Form](#)".

Specific measures are implemented to avoid compromise or theft of information. The assets corresponding to this information are managed according to procedures conforming to these security needs. They are handled in a secure manner to protect the assets from damage, theft and unauthorized access.

Management procedures protect media against obsolescence and deterioration during the period during which the CA agrees to keep the information contained therein.

The "[Security Policy](#)", the "[Asset Management Procedure](#)" and the "[Materiel Management Procedure](#)" describe the measures implemented.

5.1.7 Disposal of media

The measures taken for the disposal of media are compliant with the level of confidentiality of the corresponding information.

The "[Security Policy](#)", the "[Asset Management Procedure](#)" and the "[Materiel Management Procedure](#)" describe the measures implemented.

5.1.8 Off-site backups

Outsourced backups are implemented and organized in such a way as to ensure that the IGC functions are available as soon as possible after an incident, and in accordance with the commitments of this PC, in particular regarding the availability and protection of the confidentiality and integrity of saved informations.

The "[Backup Procedure](#)", the "[Asset Management Procedure](#)" and the "[Materiel Management Procedure](#)" describe the measures implemented.

5.2 Procedural security measures

5.2.1 Trusted roles

Each PKI component distinguishes at least the seven following functional trust roles:

- **Security officer:** The security officer is responsible of implementing the component's security policy. He manages the controls on the physical access to the component's system hardware. He is authorised to review the archives and is responsible of analysing the event logs to detect any incident, anomaly, attempted compromise, etc.
- **Application manager:** Within the component to which he is attached, the application manager is responsible of implementing the certification policy and the declaration of the PKI's certification practices on the level of the application for which he is responsible. His responsibility includes all the functions provided by this application and the corresponding performances.
- **System administrator:** He is responsible of the start-up, configuration and technical maintenance of the component's IT hardware. He provides the technical administration of the component's systems and networks.
- **Operator:** Within a PKI component, based on his duties, an operator runs applications for the functions implemented by the component.
- **Controller:** Designated by a competent authority, this person's role is to regularly perform verifications on the compliance of the implementation of the functions provided by the component relative to the certification policies, to the PKI's declarations of certification practices, and to the component's security policies.
- **Registration Officer:** Responsible for approving end entity Certificate generation and revocation.
- **Secret share holder:** It has the responsibility to ensure the confidentiality, integrity and availability of the secrets assigned to him.

The different roles are defined in the description of functions specific to any entity operating a component of the PKI on the principles of separation of duties and least privilege. These roles determine the sensitivity of the functions, depending on responsibilities and access levels, background checks and employee training and awareness.

The document "[Roles, Responsibilities and Authorities](#)", the "[Personnel Management Procedure](#)" and the "[Staff Monitoring](#)" document describe the measures implemented.

Measures are in place to prevent equipment, information, media and software relating to CA services are removed from the site without permission.

The "[Security Policy](#)", the "[Asset Management Procedure](#)" and the "[Materiel Management Procedure](#)" describe the measures implemented.

5.2.2 Number of persons required per task

For reasons of availability, each task must be performed by at least two people.

At a minimum, each task is assigned to two different people:

- System administrator ;
- Operator.

For some sensitive tasks (e.g. key ceremony), many people are required for security reasons and "dual control".

The document "[Roles, Responsibilities and Authorities](#)", the "[Personnel Management Procedure](#)" and the "[Staff Monitoring](#)" document describe the measures implemented.

5.2.3 Identification et authentication for each role

Each role assignment to a member of the PKI staff is attributed and accepted formally. This role is clearly mentioned and described in his job description. CA fact verify the identity and permissions of any member of his staff before assigning privileges to its functions. Assigning a role to a member of staff following the PKI particularly strict procedure with signing of the minutes for the allocation of all elements necessary for the performance of this role in the PKI (keys, access codes, cryptographic keys, etc.).

The document "[Roles, Responsibilities and Authorities](#)", the "[Personnel Management Procedure](#)" and the "[Staff Monitoring](#)" document describe the measures implemented.

5.2.4 Role requiring a separation of duties

About trusted roles, the following rollups are prohibited within the PKI:

- Security officer and system administrator / operator;
- Controller and any other role;
- System operator and administrator.

The document "[Roles, Responsibilities and Authorities](#)", the "[Personnel Management Procedure](#)" and the "[Staff Monitoring](#)" document describe the measures implemented.

5.3 Security measures relative to the personnel

5.3.1 Required qualifications, skills and authorizations

All staff must work within the PKI components must sign the internal security charter. This charter contains a confidentiality clause which applies both in respect of third parties and users. It lists the roles of each employee within the PKI. She is co-signed by the employee and the security officer. Matching skills of personnel involved in the PKI is checked in compliance with its duties on the components.

The management personnel, the security officer, system administrators, have the expertise necessary for the performance of their respective roles and are familiar with the security procedures applied to the operation of the PKI.

AC inform any employee involved in the PKI trusted roles of its responsibilities for PKI services and procedures related to system security and monitoring staff.

Professional skills are determined during recruitment and each year by Security Officers.

The document "[Roles, Responsibilities and Authorities](#)", the "[Personnel Management](#)

[Procedure](#)" and the "[Staff Monitoring](#)" document describe the measures implemented.

5.3.2 Background verification procedures

The CA ensures that all employees involved on the PKI suffered no contradiction in justice conviction with their functions. The employees provide a copy of the bulletin No before their Assignment. 3 of his criminal record. This check is renewed periodically (at least every 3 years).

In addition, the CA ensures that the employees do not suffer from conflict of interests detrimental to the impartiality of their tasks.

The document "[Roles, Responsibilities and Authorities](#)", the "[Personnel Management Procedure](#)" and the "[Staff Monitoring](#)" document describe the measures implemented.

5.3.3 Initial training requirements

Initial training to software, hardware and internal operating and safety procedures is provided to employees, in line with the role that the CA assigns.

An awareness on the implications of the operations whose they are responsible is also achieved.

The document "[Roles, Responsibilities and Authorities](#)", the "[Personnel Management Procedure](#)" and the "[Staff Monitoring](#)" document describe the measures implemented.

5.3.4 Continuity training requirements and frequency

The staff concerned receives adequate information and training prior to any changes in systems, procedures in the organization.

The document "[Roles, Responsibilities and Authorities](#)", the "[Personnel Management Procedure](#)" and the "[Staff Monitoring](#)" document describe the measures implemented.

5.3.5 Rotation frequency and sequence between the various duties

Not applicable.

5.3.6 Penalties in case of unauthorized actions

Any member of the CA staff acting in contradiction with established policies and procedures of this CPS and internal processes and procedures of the PKI, or negligently or maliciously, will see its privileges revoked and will be subject to administrative sanctions or judicial proceedings.

5.3.7 Requirements relative to the personnel of external providers

The staff of external providers involved in local and / or components of the PKI must also meet the requirements of this Section 5.3. This is translated into appropriate clauses in contracts with those providers. If so, whether the level of intervention requires, it may be asked to the provider to sign the internal security charter and / or provide background check elements.

External staff are monitored through the "[Third Party Management Procedure](#)". An assessment of the IS risks related to the third parties is carried out and the security needs/requirements are mapped in order to be followed through the document "[Third party monitoring](#)" and the associated contractual agreements.

5.3.8 Documentation provided to the personnel

Each employee has the adequate documentation of operational procedures and specific tools that implements and general policies and practices of the component within which he works. The CA gives him the impacting security policies. Operators have the operator manuals corresponding to the components on which they are involved.

The document "[Roles, Responsibilities and Authorities](#)", the "[Personnel Management Procedure](#)" and the "[Staff Monitoring](#)" document describe the measures implemented for awareness and training, and the "[Document Management Procedure](#)" defined the management of these documents.

5.4 Audit logging procedures

Relevant events involved in the management and operation of the PKI are recorded in manuscript or electronically form (by seizure or by automatic generation) and, for purposes of audit.

5.4.1 Types of events to log

The operating systems of the PKI servers will log the following events automatically on startup and in electronic form (non-exhaustive list):

- Create / modify / delete user accounts (access rights) and corresponding authentication data;
- Start and stop IT systems and applications;
- Events related to logging: actions taken following a failure of the logging function;
- Connecting / disconnecting users with trusted roles, and corresponding unsuccessful attempts.

Other events are also collected. It is those concerning safety and not automatically generated by computer systems:

- Physical access (recorded electronically);
- The logical access to systems;
- The actions of maintenance and configuration changes in manually registered systems;
- Changes in personnel ;
- Operation of disposal and reset of media containing confidential information (keys,

activation data, personal information on Subscribers and Certificate Managers).

Specific events to different functions of the PKI are also logged:

- Events related to signing keys and CA certificates or activation data (generation, backup and recovery, revocation, destruction, disposal of media, ...);
- Receiving a certificate request (initial and renewal);
- Validation / reject a certificate request;
- Certificate generation;
- Transmission certificates to Certificate Managers and, if appropriate, acceptances / explicit releases by Certificate Managers;
- Publish and update information related to the CA (CP / CPS, CA certificates, Terms and Conditions, etc.)
- Receipt of requests for revocation;
- Validation / reject a request for revocation;
- CRL generation and publication;
- Disposal of media containing personal information on Subscribers and Certificate Managers.

Each record of an event in a journal contains at least the following fields:

- The type of event;
- The date and time of the event (the exact time of the significant CA events on the environment, key management and certificate management is recorded);
- The name of the executant or the reference of the system that triggered the event;
- The result of the event (success or failure).

Depending on the type of event, there are also the following fields:

- The recipient of the operation;
- the name of the applicant of the operation or the reference of the system which request;
- The names of those present (for operations requiring several persons);
- The cause of the event;
- All the information characterizing the event (e.g. serial number of the certificate issued or revoked).

The logging process allows real-time recording of transactions. In case of manual input, writing is made exceptions the same business day as the event.

In case of manual entry, the writing is done, except exception, the same working day as the event.

The events and specific data to be logged are documented by the CA.

The measures implemented are described in the « [Logging Procedure](#) » and the « [Archive Procedure](#) ».

5.4.2 Processing frequency for event logs

Cf. chapter 5.4.8

5.4.3 Retention period for event logs

The retention period for event logs on site is 1 month. Archiving of event logs is made no later than 1 month after their generation.

5.4.4 Protection of event logs

Only members dedicated CA can process these files.

Write access to the logs is protected through the logical and physical access controls described in the "[Logging Procedure](#)", the "[Logical Access Control Policy](#)" and the "[Safety Policy](#)".

The systems generate event logs (except for physical access control systems) are synchronized to a reliable source of UTC time (cf. 6.8. Timestamp / dating system).

The "[Clocks Synchronization Procedure](#)" describes the measures implemented.

5.4.5 Backup procedure of event logs

Security measures are implemented by any entity operating a PKI component to ensure the integrity and availability of event logs for the component considered, in accordance with the requirements of this CPS. A backup is performed at high frequency to ensure the availability of such information.

5.4.6 Collection system for event logs

Event logs are centralized in a hub. The consolidation obtained is accessible by Certigna staff. The protection of the confidentiality and integrity of event logs is ensured by logical access control and the use of file sealing tools.

5.4.7 Notification of an event to the person responsible for this event

Not applicable.

5.4.8 Evaluation of vulnerabilities

The event logs are monitored once per work day to identify abnormalities related to failed attempts (access or instruction).

Event logs are analyzed in their entirety to the frequency of at least every week and upon detection of an abnormality. A summary analysis is produced for the occasion.

A reconciliation between the various logs of functions that interact with each other is made at the rate of at least 1 time per month to verify the correlation between dependent events and to reveal any abnormality. The auditor is assisted by a person with skills related to the different environments used. The measures implemented are described in the « [Logging Procedure](#) ».

5.5 Records archival

5.5.1 Types of records to be archived

The CA is archiving:

- The software (executable) constituent of the PKI;
- IT equipment configuration files;
- Event Logs of various components of the PKI;
- The CP;
- The CPS;
- The digital Certificate requests ;
- The records of Certification Agent registration;
- The records of DRA operator registration;
- The certificate request files with credentials;
- The certificates issued ;
- The requests for revocation ;
- The CRL issued ;
- The OCSP responses.

5.5.2 Retention period of the archives

5.5.2.1 Certificates request files

All accepted certificate registration files are archived seven years minimum and as long as necessary for supply needs of the proof of certification in legal proceedings in accordance with applicable law, in particular Article 6-II of the implementing decree n ° 2001-272 of 30 March 2001. In this context, it is archived for at least seven years, as maximum from the acceptance of the certificate by the Certificate Manager. During this period of enforceability of documents, the certificate request files can be submitted by the CA in any solicitation by the competent authorities. The files, completed by the words recorded by the RA or Certification Agents, is traceable to find the real identity of Certificate Managers at an instant "t" on the designated server in the certificate issued by the CA in the certificate.

5.5.2.2 Certificates, CRL / ARL and OCSP responses issued by the CA

Certificates of servers and of CA and the CRL / ARL produced (respectively by the CA and Certigna Root CA), are archived for at least seven years after their expiration.

OCSP responses produced are archived for at least three months after their expiration.

5.5.2.3 Event logs

Event logs specified in Chapter 5.4 are archived for seven years after their generation.

5.5.3 Protection of archives

During the time of their conservation, the archives are protected in integrity. They can be played back and used by the dedicated members of the CA. Write access to these files is

protected (rights management). Access to read the logs (stored on NetApp servers) is only possible from a machine identified and authorized in the internal networks.

5.5.4 Backup procedure of archives

The mirroring process (automatic or manual in case of recovery) guarantees the existence of a backup of the entire archive. To compensate for the impossibility of replication between the production sites, daily backups are carried out in order to guarantee the existence of a copy of the recorded data.

5.5.5 Data timestamping requirements

The data are dated according to Chapter 6.8.

5.5.6 Collection system of archives

Archiving is achieved with archiving servers which ensure the availability, integrity and confidentiality of archives. The "[Backup Procedure](#)" and the "[Archive Procedure](#)" describe the measures implemented.

5.5.7 Archive recovery and verification procedures

Archives can be recovered only by the dedicated members of the CA allowed to process these files within a maximum of two working days.

Data about contractors can be retrieved on their request.

5.6 Change of the CA key

5.6.1 CA key

The CA can not generate a certificate for which the end date is later than the expiration date of the certificate corresponding to the CA. For this, the validity period of the CA certificate must be higher than the certificate that it signs. Knowing the date of expiry of the certificate, renewal must be requested within a delay at least equal to the lifespan of the certificates signed by the corresponding private key.

When a new CA key pair is generated, only the new private key is used to sign certificates. The previous certificate can still be used to validate certificates issued under this key until that all certificates signed with the corresponding private key have expired.

The Certigna PKI communicate on its website in case of generation of a new certificate for the CA or Certigna Root CA, inviting users to download the new certificate chain.

The "[Cryptographic Key Management Procedure](#)" and the "[Key monitoring](#)" document describe the measures implemented.

5.6.2 Keys of the other components

The associated key pairs and certificates of the PKI components are renewed in the three months before their expiry or after revocation of the certificate valid.

5.7 Compromise and disaster recovery

The CA establishes procedures to maintain activities, wherever possible, and described in these procedures, the steps provided in case of corruption or loss of computing resources, softwares and data.

These procedures are formalized as part of the implementation of Business Continuity Plans. In particular for the major risks identified, these plans address the immediate treatment in the case of strong constraints of service availability required by the PC. The operation of a supervisory monitor ensures that incidents are detected and taken into account in real time at both production sites.

5.7.1 Procedure for reporting and processing incidents and compromising

In the event of a major incident, such as loss, suspicion of compromise, compromise, theft of the private key of the CA, the triggering event is the finding of this incident in the component concerned, which must inform the CA immediately.

The case of major incidents is imperative treated when detected, and the publication of the certificate revocation information, if any, will be made in the most urgent, if not immediately, by all appropriate and available means (press, website, receipt, etc.).

Similarly, if one of the algorithms, or associated parameters, used by the CA or its promoters / servers becomes insufficient for its intended use remaining, then the CA:

- Inform all Certificate Managers and third certificate users with whom the CA has agreements or other forms of established relationships. In addition, this information must be made available to other users of certificates;
- Revoke any certificate concerned.

The "[Incident Management Procedure](#)" and the "[Business Continuity Plans](#)" describe the measures implemented.

5.7.2 Recovery procedure in case of corruption of IT resources

Each component of the PKI is integrated into the business continuity plan (BCP) of the company to meet the availability requirements of the various functions of the PKI under the CA commitments and results of the analysis risk of PKI, especially regarding the functions related to the publication and / or related to the revocation. This plan is tested at least once every two years. The "[Incident Management Procedure](#)" and the "[Business Continuity Plans](#)" describe the measures implemented.

5.7.3 Recovery procedure in case of compromise of a component's private key

The case of compromise of a key infrastructure or control of a component is treated in the business continuity plan of the component as a disaster (see Section 5.7.2).

In the case of compromise of a CA key, the corresponding certificate will be immediately revoked (see section 4.9).

Similarly, all valid server certificates issued by this CA will be revoked. In addition, the CA meets at least the following commitments:

- It shall inform the following entities of the compromise: all Certificate Managers, Certification Agent and other entities with which the CA has agreements or other forms of established relationships, including third-party users and others CA. In addition, this information is made available to other third-party users;
- It shall inform especially that certificates and revocation status information issued using this CA key may no longer be valid.

Note: In the case of Certigna Root CA, the signing certificate is not revoked, it is the intermediate certificate authorities that are revoked in case of compromise of the private key of the Certigna Root CA. The "[Cryptographic Key Management Procedure](#)", the "[Incident Management Procedure](#)" and the "Business Continuity Plans" describe the measures implemented.

5.7.4 Business continuity capacities after a disaster

The various components of the PKI have the necessary means to ensure the continuity of their activities in accordance with the requirements of the CP (see chapter 5.7.2).

CA use the redundancy of its information systems into several sites and its Business continuity plans to ensure the services continuity. The measures are described in the "[Business Continuity Plans](#)".

5.8 End-of-life of the PKI

One or more components of the PKI may have to stop working or to transfer it to another entity. The transfer of activity is defined as:

- The End of the activity of a PKI component having no effect on the validity of certificates issued prior to the transfer in question;
- The resumption of this activity organized by the CA in collaboration with the new entity.

The cessation of activity is defined as the end of the activity of a PKI component influencing the validity of certificates issued prior to the relevant termination.

5.8.1 Transfer of activity or cessation of activity affecting a component of the PKI

One or more components of the PKI may have to stop working or to transfer it to another entity. To ensure a constant level of confidence during and after such events, the CA takes the following actions:

- It ensures the continuity of the archive service, especially certificates and registration records;
- It ensures the continuity of the revocation service, in accordance with the availability requirements for its functions under this CPS;
- It informs Certificate Managers if the proposed changes may affect the commitments and that, at least in the period of 1 month;
- It informs application managers listed in Chapter 1.4.1 the principles of the action plan for dealing with the cessation of business or to organize the transfer of activities;
- It carries information to the administrative authorities. In particular, contact of the ANSSI is warned (<https://www.ssi.gouv.fr>). The CA will inform him including any obstacles or additional delay encountered during the process of transfer or retirement.

The "[Incident Management Procedure](#)" and the "[Business Continuity Plans](#)" describe the measures implemented.

5.8.2 Cessation of activity affecting the CA

In the event of termination of total activity, before the CA stops its services, it does the following:

- It informs all the Certificate Managers, the other components of the PKI and third-parties by email of the cessation of activity. This information will also be relayed directly to the entities and if appropriate their Certification Agent;
- It revokes all certificates it has signed and which are still valid;
- It revokes its certificate;
- It destroys the private key stored in the cryptographic module and the context of the module. Holders of secret (private key and context) are summoned and destroy their secrets. It also prohibits transmitting the key to third parties.

If the CA is bankrupt, it is the commercial court which decides on the follow-up to the company's operations. Nevertheless, if any, CA is committed to supporting the commercial court under the following conditions: before bankruptcy, there is a prior period, generated most of time by several alert procedures or by a legal redress; during this period, CA is committed to preparing for the commercial court, if appropriate, a proposal to transfer digital certificates to another authority with the same level of certification.

The contact identified on the website of the ANSSI (<https://www.ssi.gouv.fr>) is immediately informed in case of cessation of trading of the CA.

The "[Incident Management Procedure](#)", the "[Business Continuity Plans](#)", and the "[Transfer and Cessation Procedure](#)" describe the measures implemented.

6 TECHNICAL SECURITY MEASURES

6.1 Generation and installation of key pairs

6.1.1 Generation of key pairs

6.1.1.1 CA key

This chapter describes the key pair generation context of the CA.

The generation of CA signing key is performed in a secure environment (see Chapter 5). The CA signing keys are generated and implemented in a cryptographic module complies with the requirements of Chapter 10.

The generation of CA signing key is performed under perfectly controlled circumstances by people in trusted roles (see Section 5.2.1), as part of "key ceremony".

The ceremony took place following a predefined script:

- It takes place under the control of at least two persons with a trusted role within the PKI and in the presence of several witnesses whom at least two are external to the CA and are impartial;
- Witnesses testify in an objective and factual manner, the order of the key ceremony in relation to previously defined script.

The generation of CA signing key is accompanied by the generation of secret share. PKI's secrets are data to manage and manipulate, subsequently to the key ceremony, the private signing keys of the CA to later initiate new cryptographic modules with the signing key of the CA. These secrets are parts of the private key of the CA decomposed per a Shamir's threshold scheme.

After their generation, the secrets are issued to their holders designated in advance and skills to this trusted role by CA. One carrier can hold only one secret of the same CA. Secrets are placed in sealed envelopes, placed in vaults.

Key ceremony scripts and the distribution of secret shares are monitored and documented. The "[Cryptographic Key Management Procedure](#)" and the "[HSM Management Procedure](#)" describe the measures implemented.

6.1.1.2 Keys generated by the Certificate Manager

The Certificate Manager is committed by contract, accepting the terms of use, to:

- generate the private key in a device which meets the requirements of Chapter 11.
- comply with requirements for the device he uses to generate and store the private key, if it is not provided by the RA.

The CA will take any necessary measures to obtain technical information about the device of the server and reserves the right to reject the certificate request if it is found that this device does not meet these requirements.

6.1.1.3 Keys generated by CA

Key generation of servers takes place in a device compliant with the requirements of the chapter 11.

6.1.2 Transmission of the private key to the certificate manager

RGS ** / QCP-I-qscd qualified

In the case where the private key is generated by the CA, the authentication of the Certificate Manager is achieved by the RA in compliance with chapter 3.2.3 requirements and previously the key pair transmission. After request validation and RC authentication, the key pair is transmitted to the Certificate Manager through the send of the device compliant with chapter 11 by secured mail. Activation data of the device are not transmitted in this mail.

QCP-I / RGS * / LCP

In the case where the private key is generated by the RA, it is transmitted securely.

The private key is protected by an activation data transmitted to the Certificate Manager that will change it when accepting the certificate.

After the certificate issued, CA doesn't store and copy the private key.

6.1.3 Transmission of the public key to the CA

If the key pair is not generated by the CA, the certificate request (PKCS # 10 format) containing the server's key, is sent to the CA. This request is signed with the private key of the server, which enables the RA to verify its integrity and ensure that the server has the private key associated with the public key transmitted in this request. Once these checks are complete, the RA signs the request and sends it to the CA.

6.1.4 Transmission of the CA's public key to the certificate users

The issuance of public key of the CA, which allows all those who need to validate a certificate issued by the CA under the CP, is made by means ensuring integrity and authentication of the public key.

The public key of CA is broadcast in a certificate signed by the Certigna Root CA. The public key of the Certigna Root CA is distributed in a self-signed certificate.

These public CA keys and their control values are disseminated and retrieved by the information systems of all certificates acceptors through the Certigna website at <https://www.certigna.fr>.

6.1.5 Size of the keys

6.1.5.1 CA key

- Root CA: Key pair RSA 4096 bits / Hash algorithm de hachage SHA-256 (256 bits)
- Intermediate CA: Key pair RSA 4096 bits / Hash algorithm de hachage SHA-256 (256 bits)

6.1.5.2 Service key

Key pair RSA 2048 bits / Hash algorithm de hachage SHA-256 (256 bits)

6.1.6 Verification of the generation and quality of the parameters of the key pairs

The parameters and signature algorithms implemented in cryptographic boxes, physical media and software are documented by CA.

6.1.6.1 CA key

The key pair generation equipment uses parameters respecting the safety standards corresponding to the key pair.

6.1.6.2 Service key

The key pair generation equipment used by the Certificate Manager uses parameters respecting the safety standards corresponding to the key pair.

6.1.7 Key usage objectives

6.1.7.1 CA key

The use of the private key of the CA and associated certificate is exclusively limited to signing certificates and CRL (see Chapter 1.5.1).

6.1.7.2 Service key

The use of the server's private key and the associated certificate is exclusively limited to the services described at chapter 1.5.1.

6.2 Security measures for the protection of private keys and for cryptographic modules

6.2.1 Security standards and measures for cryptographic modules

6.2.1.1 Cryptographic modules of CA

The cryptographic module used by the Root CA and CA for the generation and the implementation of their signing keys are compliant with the requirements of the chapter 10.

These devices are resources exclusively available for CA's servers through a dedicated VLAN.

6.2.1.2 Devices for protecting server's private key

The device used by the CA or the Certificate Manager to protect the private key is compliant with the requirements of the chapter 11. The cryptographic modules used are BULL Trustway Protecchio. The "[HSM Management Procedure](#)" describes the measures implemented.

In the case where the CA provides the device to the Certificate Manager, directly or indirectly, CA ensure that:

- The device preparation is controlled securely;
- The device is stored and provided securely;
- The deactivation and reactivation of the device is controlled securely.

6.2.2 Control of the private key by several persons

Control of CA signature private key is provided by trusted personnel and with a tool implementing sharing secrets (systems where n operators of m must authenticate, with n at least equal to 2).

The "[HSM Management Procedure](#)" and the "[Cryptographic Key Management Procedure](#)" describe the measures implemented.

6.2.3 Private key escrow

6.2.3.1 CA key

The CA private keys are never escrowed.

6.2.3.2 Service key

Private keys of servers are never escrowed.

6.2.4 Backup copy of the private key

6.2.4.1 CA key

The private key of the CA is saved:

- Inside a second cryptographic module compliant with the requirements of the chapter 10.
- Outside the cryptographic module enciphered by the module and dispatched to several persons in trusted roles.

6.2.4.2 Service key

Private keys of the servers are not the subject of any backup copy of the CA.

6.2.5 Private key archival

6.2.5.1 CA key

The private key of the CA is never archived.

6.2.5.2 Service key

Private service keys are archived in no case.

For private keys generated on cryptographic module, it is technically impossible to make a copy of these keys outside the HSM.

6.2.6 Transfer of the private key with the cryptographic module

For reminder, the service private keys are generated under the responsibility of the operator of RA, DRA, Certification Agent or Certificate manager.

The CA private keys are generated in the cryptographic module. As described in 6.2.4, the CA private keys are exportable / importable from the cryptographic module in encrypted form.

6.2.7 Private key storage in the cryptographic module

The CA private keys are generated and stored in a cryptographic module described in section 6.2.1 in accordance with the requirements of Section 6.2.4.

The "[HSM Management Procedure](#)" and the "[Cryptographic Key Management Procedure](#)" describe the measures implemented.

6.2.8 Private key activation method

6.2.8.1 CA key

Activation of CA private key in the cryptographic module (corresponds to the generation or restoration of keys) is controlled via activation data (see section 6.4) and involves two people

with a trusted role within PKI (security manager, and operator authorized to administer the cryptographic module).

The "[HSM Management Procedure](#)" and the "[Cryptographic Key Management Procedure](#)" describe the measures implemented.

6.2.8.2 Service key

Activation of key pairs is controlled by activation data (cf. chapter 6.4) which are used by the key pair hardware or software container.

6.2.9 Private key deactivation method

6.2.9.1 CA key

The cryptographic module resists physical attacks by erasing the CA private keys. The module can detect the following physical attacks: Opening the device, removing or forcing.

6.2.9.2 Service key

The method of disabling the private key depends on the cryptographic module used by the server.

6.2.10 Private keys destruction method

6.2.10.1 CA key

End of life of a private key of CA, normal or early (revocation), the key and the secrets of shares to reconstruct are systematically destroyed. A record of destruction of the key and of the secret share is established at the end of this procedure.

The measures implemented are described in the "[Cryptographic Key Management Procedure](#)".

6.2.10.2 Service key

The Certificate Manager is the sole owner of the private key; it is the only one who can destroy (delete of the key or physical destruction of the device).

6.2.11 Cryptographic module security evaluation level

The level of assessment of the cryptographic module of the CA is specified in Chapter 10.

Server key pair protection devices are evaluated at a specified level in chapter 11.

6.3 Other aspects of the management of key pairs

6.3.1 Public key archival

The public keys of the CA and servers are stored within the archiving of relevant certificates.

6.3.2 Lifespan of the key pairs and certificates

The key pairs and certificates of servers covered have a term of 3 years maximum depending on the policy purchased.

For Certigna PKI, the validity period of the Certigna Root CA certificate is 20 years, and that of the CA certificate is 18 years. The end of validity of a CA certificate is later than the end of life of the certificates it issues.

6.4 Activation data

6.4.1 Generation and installation of activation data

6.4.1.1 Generation and installation of activation data corresponding to the private key of the CA

Generation and installation of activation data of the cryptographic module of the CA are performed during the initialization and customization phase of the module (see chapter 6.1.1).

The activation data match the PIN of the administration smart cards for the cryptographic module. The "[HSM Management Procedure](#)" and the "[Cryptographic Key Management Procedure](#)" describe the measures implemented.

6.4.1.2 Generation and installation of activation data corresponding to the private key of the server

RGS ** / QCP-I-qscd qualified

In the case where the key pair is generated by the CA, activation data are transmitted:

- If the device is a token, through the client space after authentication of the Certificate Manager;
- If the device is an cryptographic module with different form of activation data (cards, secrets, etc.) through different communication channels (email, mail, phone/SMS) and at different periods of time.

QCP-I / RGS * / LCP

The Certificate Manager defines from the "customer area" the data that will directly encrypt the generated key pair. This activation data is not retained by the CA.

6.4.2 Activation data protection

6.4.2.1 Protection of activation data corresponding to the CA private key

Activation data are directly provided to secret holders during the key ceremonies. Their storage conditions ensure their availability, integrity and confidentiality.

The secrets are stored in devices with limited access, in secure envelopes to detect any unauthorized opening and traced.

The "[HSM Management Procedure](#)" and the "[Materiel Management Procedure](#)" describe the measures implemented.

6.4.2.2 Protection of activation data corresponding to the server private key

If the key pair is generated by the RA, it also generates the activation data that are sent as described at chapter 6.4.1. These activation data are not backed up by RA and are modified by the Certificate Manager when accepting the certificate or in case of a cryptographic module, after hardware reception.

Once the activation data has been transmitted to the Certificate Manager, the RA can not send them back. If the Certificate Manager itself generates its key pair, it generates autonomously and under its sole responsibility its activation data.

6.4.3 Other aspects related to activation data

Not applicable.

6.5 Security measures for IT systems

6.5.1 Technical security requirements specific to IT systems

A minimum level of safety assurance on the computer systems of persons in trusted role is ensured by:

- Strong identification and authentication of user for system access (physical access control to enter in the room + logic control by id / password or certificate to access the system);
- Management of user sessions (logoff after idle time, file access controlled by role and user name);
- User rights management (to implement the access control policy defined by the CA, to implement the principles of least privilege, multiple controls and separation of roles);
- Protection against computer viruses and other forms of compromise or unauthorized software and software updates using the firewall;
- Manage user accounts, including changes and the rapid removal of access rights;
- Network protection against intrusion of an unauthorized person using the firewall;
- Secure inter-site communication (tunnel IPsec VPN) ;
- Audit Functions (non-repudiation and nature of the actions performed).

Monitoring devices and audit procedures of the system settings, including routing elements, are in place. The "[Safety Policy](#)", the "[Logical Access Control Policy](#)", the "[Security Charter](#)", the "[Firewall Management Procedure](#)" describe the measures implemented.

6.5.2 IT systems security evaluation level

Not applicable.

6.6 Security measures for the systems during their lifecycle

6.6.1 Security measures linked to the development of the systems

According to the risk analysis conducted, during the design of any new development project, an analysis of security is achieved and approved by the CA Security Committee.

The configuration of CA systems and any changes and upgrades are documented. The development is done in a controlled and secured environment requiring a high level of authorization.

To enable its prospects or future customers to test some of their dematerialized trading applications, CA has set up a test CA issuing certificates identical in all respects to the production certificates (only the certificate issuer is different). This test CA has its own private key. The public key certificate is self-signed. These certificates are used for testing purposes only.

The Certigna solutions are tested in a development/test environment before being used in the production environment. Production and development environments are separated.

The description of the evolution context of the PKI is defined in the "[Procedure for updating the technical platform](#)".

Developments of the modules related to the exploitation of the components of the PKI are carried out in accordance with the rules and instructions enacted in the "[Development Guide](#)".

6.6.2 Measures related to security management

Any significant change to a system or a component of the PKI is documented and reported to the CA for validation.

6.6.3 Security evaluation level of the systems lifecycle

Not applicable.

6.7 Network security measures

Interconnection to public networks is protected by security gateways configured to accept only the necessary protocols to the desired operation by CA.

The CA guarantees that the components of the local network are kept in a physically secure environment and their configurations are periodically audited for compliance with the requirements specified by the CA.

The "[Firewall Management Procedure](#)", the "[Monitoring Management Procedure](#)" and the "[Logical Access Control Policy](#)" describe the measures implemented.

6.8 Timestamping/dating system

To ensure synchronization between different dating of events, the various components of the PKI synchronize their clocks with respect to a reliable source of UTC.

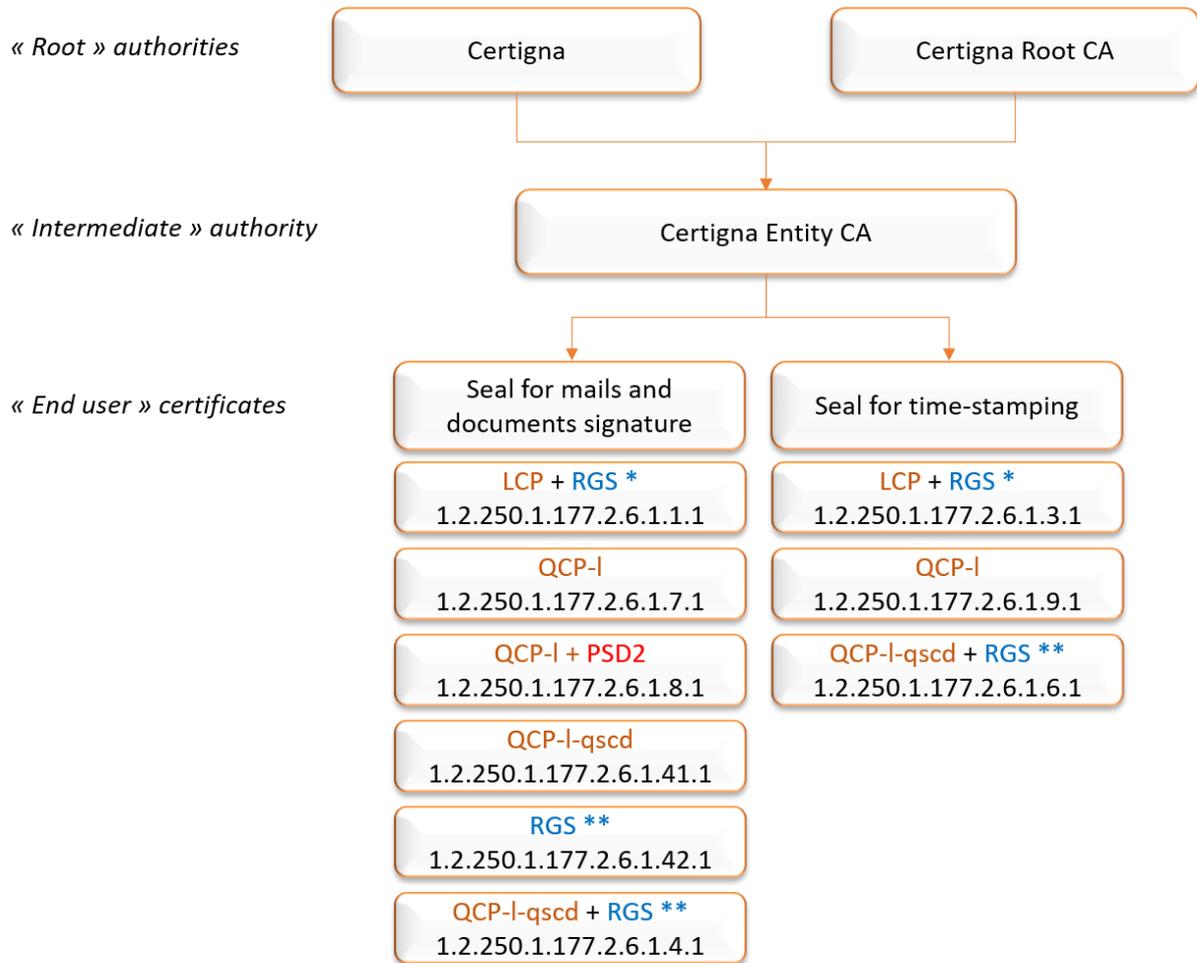
The "[Clocks Synchronization Procedure](#)" describes the measures implemented.

7 PROFILES OF THE CERTIFICATES AND THE CRL

The certificates and CRLs generated by the CA comply with ITU-T Recommendation X.509 v3 standard.

7.1 Trusted hierarchy

The trusted hierarchy is composed with following certificates and authorities:



7.2 Profiles of Root Authorities certificates

These profiles are described by Certification Policies associated to Root Authorities and available at the following address: <https://www.certigna.fr/autorites/>.

7.3 Profiles of the server certificates

These profiles are described by Certification Policies associated and available at the following address: <https://www.certigna.fr/autorites/>.

8 COMPLIANCE AUDIT AND OTHER EVALUATIONS

Audits and assessments concern, firstly, those made for the issuance of a qualification attestation based on the Ordinance No. 2005-1516 of 8 December 2005 and eIDAS European Regulation and, secondly, those that are carried by the CA or outsourced to ensure that all its PKI is compliant with its commitments stated in its CP and practices identified in its CPS.

The following chapters are for audits and evaluations of the responsibility of the CA to ensure the efficiency of its PKI.

The CA may carry out audits of its DRAs's operators as well as the staff of its PKI. It ensures among others that DRA operators respect the requirements defined in its CP and the practices identified in its CPS. To this end, the CP and the CPS are given to them.

8.1 Frequency and/or circumstances of the evaluations

A CA compliance check was performed before the deployment of certification services relative to means and rules mentioned in the CP and in the CPS.

This control is conducted once every two years by the CA. Qualification audits are performed every year. Qualification audits are performed every year.

The « [Audit management procedure](#) » and « [Audit program](#) » describe in detail the measures implemented.

8.2 Identities/qualifications of the evaluators

Control is assigned by the CA to a team of competent auditors in computer security and in activity of the controlled component.

Internal audits are achieved by persons in the « controller » trusted role. Periodical controls are also achieved by Security Officers.

8.3 Relations between evaluators and the evaluated entities

The audit team do not belong to the component of the controlled PKI, whatever that component, and must be duly authorized to practice the targeted controls.

For certification / qualification audits, the intervening entity is external and independent.

For internal audits, the selection of auditors and trusted roles is described in the document "[Roles, Responsibilities and Authorities](#)" and in the "[Audit Management Procedure](#)".

8.4 Topics covered by the evaluations

The compliance checks are implemented to verify compliance with the commitments and practices defined in the CA's CP and the CPS, and elements thereunder (operational procedures, resources used, ...). The "[Audit Program](#)" describes the measures implemented.

8.5 Actions taken after the conclusions of the evaluations

Following a compliance check, the audit team provide to the CA, a notice from the following:

"Improvement", "remark", "minor nonconformity", "major nonconformity".

According to the results, the consequences of control are:

- In case of 'improvement', and according to the importance of the improvement, the audit team makes recommendations to CA to improve its functioning. Improvements are left to the discretion of the CA that decides whether or not to implement them.
- In case of "remark" or "minor nonconformity", the CA sends to the component a notice specifying in what timeframe nonconformities shall be lifted. Then, a control for confirmation will verify that all critical points have been resolved.
- In case of a "major nonconformity", and according to the importance of non-conformities, the audit team makes recommendations to the CA that can be business termination (temporary or permanent), revocation of certificate of component, revocation of all certificates issued since the last positive control, etc. The choice of measurement to be used is made by the CA and must respect the internal security policies.

Each session of audit permits to consult the opinion of the audit team. A control for confirmation will verify that all critical points have been resolved on time.

8.6 Communication of the results

The results of the compliance audits by the audit team are made available to the organization in charge of the qualification of the CA.

9 OTHER BUSINESS LINE AND LEGAL ISSUES

9.1 Rates

9.1.1 Rates for the delivery or renewal of certificates

The issue of certificates to certificate managers is charged according to the rates on the website or on the order form.

9.1.2 Rates for accessing the certificates

Not applicable.

9.1.3 Rates for accessing information on the status and revocation of certificates

The access to certificate status information and revocation is free.

9.1.4 Rates for other services

Other costs may be charged. In this case, charges will be brought to the attention of those to whom they apply and are available from CA.

9.1.5 Reimbursement policy

The certificate order cannot be cancelled once the certificate request has been made. Then, So, each certificate issued cannot be the subject of a request for reimbursement due to implementation difficulties related in particular to the technical operating environment of the certificate (Eg: non-compliance of software or hardware storing and using the certificate with the standards and norms in force). However, in the event that the certificate does not correspond to the certificate request, following an error exclusively attributable to the CA, the CA undertakes to provide a certificate compliant, or if it is unable to do so, to proceed with the reimbursement amounts already paid under the present CP and the GCSU associated.

9.2 Financial liability

9.2.1 Insurance coverage

The CA holds an insurance policy in the field of professional civil liability, guaranteeing direct material or immaterial consequential damages caused in the exercise of his professional activity

9.2.2 Other resources

Not applicable.

9.2.3 Coverage and guarantee regarding the user entities

Cf. chapter 9.9.

9.3 Confidentiality of personal data

9.3.1 Protection of personal data

The information considered confidential are:

- The non-public part of the CPS of the CA;
- The private keys of the CA, of components and of servers;
- Activation Data associated with CA private key and of server;
- All the PKI secrets;
- Event logs of components of the PKI;
- The server registration records;
- The causes of revocation.

9.3.2 Information outside of the perimeter of confidential information

Not applicable.

9.3.3 Responsibilities in terms of the protection of confidential information

Generally, confidential information is accessible only to persons concerned by such information or who have the obligation to preserve and / or treat such information.

Once confidential information is subject to a special regime governed by a legislative and regulatory text, processing, access, modification of this information is made in accordance with the applicable legislation.

The CA implements security procedures to ensure confidentiality of the information identified in chapter 9.3.1, about the final erasure or destruction of media used for their storage. In addition, when data is exchanged, the CA guarantees their integrity.

The CA is particularly obliged to respect the laws and regulations in force on the French territory. It may need to provide the registration records of certificate managers to third parties in connection with legal proceedings. It also provides access to this information at certificate managers, certification agents and possibly DRA's operators in connection with the certificate managers.

The "[Classification and Information Handling Policy](#)", the "[Material Management Procedure](#)" and the "[Archive Procedure](#)" describe the measures implemented.

9.4 Protection of personnel data

9.4.1 Personal data protection policy

Electronic certificate application files containing personal data are archived for at least seven years and as long as necessary for the purposes of providing proof of certification in legal proceedings, in accordance with applicable law. The personal identity information can be used as authentication data in the event of a request for revocation or information.

In addition, DHIMYOTIS retains the personal data for a period of three years from the end of the commercial relationship with the customer and 3 years from the last contact with the prospect. The delay starts from the last connection to the customer account or the last sending of an email to customer service, or from a click on a hypertext link of an email sent by DHIMYOTIS, a positive response to an email requesting if the client wishes to continue to receive commercial prospecting at the end of the three-year period.

In order to monitor the quality of our services, calls made to our customer service are likely to be registered and kept for a period of 30 days.

In accordance with the law n ° 78-17 of January 6, 1978 relating to data, files and freedoms, modified and the European regulation "2016/679 / EU of April 27, 2016" relating to the protection of natural persons to the processing of personal data and the free movement of such data, you have the right to access, oppose, rectify, delete and portability of your personal data. You can exercise your right by sending an email to: privacy@certigna.com, or by mail to the following address:

DHIMYOTIS, Service du DPO,

20 Allée de Râperie, 59 650 Villeneuve d'Ascq, France

Your request must indicate your surname and first name, e-mail or postal address, be signed and accompanied by a valid proof of identity.

9.4.2 Personal identifiable information

The information considered as personal are:

- The causes of revocation of certificates;
- The registration files of RC, of DRA's operators and of certification agents.

9.4.3 Information of non-personal nature

Not applicable.

9.4.4 Responsibilities in terms of the protection of personal data

Cf. legislation and regulations on French territory.

9.4.5 Notification et consent to use personal data

Accordance with the laws and regulations on French territory, personal information submitted by certificate manager to CA must not be disclosed or transferred to third parties except in the following circumstances: prior consent of the certificate manager, court order or other legal authorization.

9.4.6 Conditions for the disclosure of personal information to legal or administrative authorities

The disclosure of confidential information is only made to the authorities empowered officially and exclusively on their specific request in accordance with French law.

Through this judicial requisition, the investigator is allowed to ask:

- The contact informations of the Certificates Manager (surname, first name, email address, etc.);
- The sites or e-mail addresses related to the entity concerned;
- The data relating to the certificate (s);
- Any element that may facilitate the decryption by the investigator of data encrypted by the Certificate Manager: information on the format used by the CA encryption utilities, etc.

9.4.7 Other circumstances for the disclosure of personal information

Not applicable.

9.5 Intellectual and industrial property rights

The brand "Certigna" is protected by the Code of Industrial Property. The use of this trademark by the entity is allowed only in the framework of the subscription contract.

9.6 Contractual interpretations and guarantees

Obligations common to the PKI components are:

- To protect and ensure the integrity and confidentiality of their secret keys and / or private;
- Only use their cryptographic keys (public, private and / or secret) for the purposes specified when issued and with the equipment as specified in the conditions set by the CA's PC and documents arising therefrom;
- Respect and implement the part of the CPS incumbent upon them (this part shall be communicated to the corresponding component);
- Submit to compliance checks by the audit team mandated by the CA (See Chapter 8) and the qualifying body;
- Respect the agreements or contracts between them or with the entity;
- To document their internal operating procedures;
- Implement the means (human and technical) necessary to achieve the benefits to which they are committed under conditions that ensure quality and safety.

9.6.1 Certification authorities

The CA will:

- can demonstrate to certificate users; it has issued a certificate to a server and the corresponding certificate manager accepted the certificate in accordance with the requirements of Section 4.4;
- Ensure and maintain the consistency of its CPS with its CP;
- Take all reasonable steps to ensure that certificate managers are aware of their rights and obligations regarding the use and management of keys, certificates or equipment and software used for PKI. The relationship between certificate managers and the CA is formalized in a contractual relationship / regulation specifying the rights and obligations of the parties including the guarantees provided by the CA.

CA assumes any harmful consequences resulting from non-compliance of its CP by itself or one of its components. CA planned to meet its responsibilities in its operations and / or activities and have the financial stability and resources required to operate in accordance with this policy. In addition, the CA recognizes its liability in case of fault or negligence of itself or one of its components, regardless of the nature and gravity, which would result in reading, alteration or misuse of personal data of certificate managers for fraudulent purposes, these data are contained in transit or in the certificate management applications of the CA.

Furthermore, the CA recognizes having to bear a general duty of supervision for the safety and integrity of certificates issued by itself or one of its components. She is responsible for maintaining the security level of technical infrastructure on which it relies to provide its services. Any changes affecting the level of security provided shall be approved by the high-level bodies of the CA.

9.6.2 Registration authority

The registration authority is committed to verify and validate the certificate requests and certificate revocation.

9.6.3 Certificate manager

The Certificate manager has the duty to:

- Communicate accurate and updated information at the request or renewal of the certificate;
- Protect the server private key under its responsibility by means appropriate to its environment;
- Protect his activation data and, where appropriate, implement them;
- Protect access to server certificates;
- Respect the conditions of use of the server private key and certificate;
- Inform Registration Authority of any changes to the information contained in the server certificate;
- Make, without delay, a request for server certificate revocation which it is responsible to the Registration Authority, or if any of the Certificate Agent of its entity, in case of compromise or of the corresponding private key compromise.

The relationship between the Certificate Manager and the CA or its components is formalized by a commitment from the Certificate Manager to certify the accuracy of information and documents provided.

This information also applies to DRA's operators and Certification Agents.

9.6.4 Certificate user

Third party users must:

- Check and maintain the use for which a certificate was issued;
- For each certificate of the certification chain, from the server certificate to the Certigna Root CA, verify the digital signature of the issuing CA on the certificate and check the validity of the certificate (validity date, revocation status);
- Check and respect the obligations of certificate users expressed in this CPS.

9.6.5 Other participants

Not applicable.

9.6.6 Termination

In the event of a breach by the CA or the CM to one of its obligations hereunder, the other party shall be authorized thirty (30) days after formal notice sent by registered letter with acknowledgment of receipt. had no effect, to terminate these by operation of law by registered letter with acknowledgment of receipt without prejudice to any damages and interests to which it could claim due to the deficiencies invoked.

9.7 Delivery and Guarantee

Any certificate ordered must be accepted by the CM on the customer space created from the CA website or from one of its DRA. Before generating the certificate, the CM must verify that the information stated in his certificate request is accurate. Failing this, the CM must contact a member of the staff of the CA either by telephone at 0 806 115 115 (free service cost of a local call), or by email at the following address: contact@certigna.fr. Telephone support is available from Monday to Friday, except holidays, from 9 AM to 6 PM without interruption. The CM is aware that in case of error during the order in the nature of the certificate, no modification can be made by the CA and the CM will have to make a new certificate request. If a payment had already been made, the CA would not be required to pay any refund.

Once the certificate request validated, the certificate is generated. The CM is then brought to confirm the accuracy of said information, which means acceptance of the certificate. otherwise, the CM will have to make a new certificate request and the certificate generated will not give rise to any refund.

Once the certificate accepted, the certificate is available to the CM either on his customer area or on a cryptographic device. the installation of the certificate is done under the sole responsibility of the CM. In case of any difficulty during this last phase, the CM can contact the

CA at the telephone number and the email address indicated above or via contact details available on the DRA website. The CA does not guarantee the operation of the certificate in the case of use outside the uses provided for in chapter 1.5 hereof.

The warranty is valid for the worldwide outside the USA and Canada.

9.8 Limitations of liability

The CA is subject to a general obligation of means. The CA cannot be held liable for the CM for direct damage that may be attributed to it for the services entrusted to it under these GCSU.

The CA's responsibility cannot be sought for any indirect loss, such as, in particular, loss of turnover, loss of profit, loss of orders, loss of data, loss of opportunity, disturbance to the image or any other special damage or events beyond its control or any fact not attributable to it.

The CA is only responsible for the tasks specifically assigned to it under this CPS.

The CA cannot be held responsible in any way for the use made by the CM of the certificates, nor the contents of the documents and the data which are given to it by the CM or the applicant.

In any case, the responsibility of the CA cannot be sought in case of:

- Fault, negligence, omission or default of the CA, which would constitute the exclusive cause of the occurrence of the damage,
- Malfunction or unavailability of tangible or intangible property in the case where it has been provided by the CM,
- Delay in providing the data to be processed due to the CM;
- Loss of the qualification of a third-party provider that is beyond the control of CERTIGNA (ex: the supplier of cryptographic support).

By express agreement between the CA and the CM, the liability of the CA is limited, by certificate request, all damages, to the sum of two (2) times the amount paid under the certificate request.

9.9 Compensation

CA signed a contract of "liability insurance".

9.10 Duration and early end of validity of the CP

9.10.1 Duration of validity

CA's CP remain in effect at least until the end of life of the last certificate issued under this CPS.

9.10.2 Early end of validity

The publication of a new version of the documents mentioned at chapter 1.1 may result, depending on the changes made, the need for the CA to evolve its corresponding CP. In this case, such compliance will not impose the early renewal of licenses already issued, except in exceptional cases linked to security.

Finally, the validity of the CP can happen prematurely in case of cessation of trading of the CA (see section 5.8).

9.10.3 Effects of the end of validity and clauses remaining in effect

The end of validity of the CP also terminates all clauses within it.

9.11 Individual notifications and communications between participants

In case of change of any kind involved in the composition of the PKI, the CA will:

- Validate later than one month before the start of the operation, this change through technical expertise to assess the impacts on the quality and safety functions of the CA and its various components;
- Inform, within one month after the end of the operation, the evaluation body.

9.12 Amendments to the CP

9.12.1 Amendment procedures

The CA conducts any change in the specifications stipulated in the CP and CPS and / or components of the CA that appears necessary to improve the quality of certification services and the security of processes, remaining however meets the requirements of RGS and additional documents to the latter.

The CA also conducts any changes to the specifications stipulated in the CP and CPS and / or components of the CA that is made necessary by legislation, regulations or by the results of checks.

9.12.2 Mechanism and information period for amendments

The CA communicates via its website <https://www.certigna.fr> the evolution of the CP based on its amendments.

9.12.3 Circumstances in which the OID must be changed

The OID of the CA's CP being registered in the certificates it issues, evolution in this CPS has a major impact on the certificates already issued (e.g., increase in registration requirements of subjects, which cannot be applied to certificates already issued) must result in a change of the OID, so that users can clearly distinguish which certificates correspond to which requirements.

When the change of the CP is typographical or it does not impact the quality and safety of the functions of the CA and the RA, the OID of the CP and the corresponding CPS are not changed.

9.13 Dispute resolution procedure

The validity of this CPS and any other question or dispute relating to its interpretation, execution or termination will be governed by French law.

The CA and the CM commit themselves to devote their best efforts to the amicable resolution of all the questions or the litigation which could divide them, before the seizure of the jurisdiction hereinafter designated.

The CA and the CM agree, in the event that an amicable agreement is impossible to stop, that the courts of Lille will have exclusive jurisdiction to hear any dispute resulting from the validity, interpretation, execution or termination hereof, and more generally from any dispute arising herein that could divide them, notwithstanding pluralities of defendants or warranty claim.

9.14 Competent jurisdictions

Any dispute concerning the validity, interpretation, execution of this CPS will be submitted to the courts of Lille.

9.15 Compliance with legislation and regulations

This CP is subject to French law and applicable legislative texts for this CPS.

9.16 Miscellaneous provisions

9.16.1 Overall agreement

This document contains all the provisions governing the PKI.

9.16.2 Transfer of activities

Cf. chapter 5.8.

9.16.3 Consequences of an invalid clause

In case of an invalid clause, the other clauses are not questioned.

9.16.4 Application and renunciation

No renunciation of any of his rights shall be allowed to take place tacitly. To be opposable to the AC a renunciation must have been made in writing. Such waiver shall not constitute a renunciation of future rights audits.

9.16.5 Force majeure

The CA will not be held responsible for any delay or failure in the performance of any of its obligations under this CPS, if the delay or failure is due to the occurrence of a case of force majeure usually recognized by the jurisprudence of French courts and tribunals.

9.17 Other provisions

Not applicable.

10 APPENDIX 1: SECURITY REQUIREMENTS FOR THE CA'S CRYPTOGRAPHIC MODULE

10.1 Security objectives requirements

The cryptographic module used by the CA to generate and implement its signature keys (for the generation of electronic certificates, CRL, and OCSP responses), must meet the following security requirements:

- Ensuring the confidentiality and integrity of the CA's signature private keys throughout their lifecycle, and ensuring their secure destruction at their end-of-life;
- Being able to identify and authenticate its users;
- Limiting access to its services per the user and role assigned;
- Ability to carry out a series of tests to verify that it is running correctly and enter in a secure status if an error is detected;
- Create a secure electronic signature to sign the certificates generated by the CA, that does not reveal the CA's private keys and that cannot be falsified without knowing these private keys;
- Creating audit records for each modification relating to security;
- If a backup and restoration function for the CA's private keys is offered, guaranteeing the confidentiality and integrity of the backed-up data and demanding at least a double control of the backup and restoration operations.
- The CA's cryptographic module must detect attempted physical alterations and enter in a secure status when an attempted alteration is detected.

10.2 Qualification requirements

The cryptographic module used by the CA is:

- qualified at "Renforced" level by ANSSI according the process described by the RGS;
- Common Criteria at EAL 4+ level or FIPS 140-2 Level 3.

11 ANNEXE 2: SECURITY REQUIREMENTS FOR THE DEVICE USED BY THE SERVICE

11.1 Security objectives requirements

The device used by the server to store and implement its private key, and, where appropriate, generate its key pair, must meet the following security requirements:

- If the server key pair is generated by the device, guaranteeing that this generation is implemented exclusively by authorized users and guaranteeing the cryptographic sturdiness of the generated key pair;
- Ensuring the correspondence between the private key and the public key;
- Generating a seal which cannot be falsified without knowing the private key;
- Detecting defects during the initialisation, customisation and operation phases, and ensuring secure techniques for the destruction of the private key in case of re-generation of the private key;
- Guaranteeing the private key's confidentiality and integrity;
- Ensuring the public key's authenticity and integrity when exported outside of the device;
- Ensuring for the legitimate server only, the electronic seals generation function, and protecting the private key against any usage by third parties.

11.2 Qualification requirements

QCP-I-qscd qualified

The Key pair protection device provided by CA or used by the Certificate Manager is qualified as a « Qualified Seal Cryptographic Device » (QSCD) by the ANSSI.

RGS ** / RGS *

The key pair protection device used by the CA or the Certificate Manager is:

- Either a hardware device as a smart card or a cryptographic module qualified by ANSSI;
- Or a software solution complying with the requirements of chapter 11.1 via the implementation of additional security measures specific to the environment in which the private key is deployed. This environment in which the private key is deployed must have undergone a security audit.



www.certigna.com | www.dhimyotis.com
© 2019 Certigna, Services de confiance numérique

tessi