

Multicert Certificate Policy

Policies

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Related Documents

Document ID	Details	Author(s)
MULTICERT_PJ.ECRAIZ_427_en	Certification Practices Statement	Multicert S.A

MULTICERT_PJ.ECRAIZ_428_en	Certificate Profiles List	Multicert S.A.
MULTICERT_PJ.ECRAIZ_621_en	List of Approved Incorporating Agencies	Multicert S.A.

Summary

Multicert Certificate Policy	1
Summary	4
1 Introduction	11
1.1 Overview	11
1.2 Document Name and Identification	11
1.3 PKI Participants	13
1.3.1 Certification Authorities.....	13
1.3.1.1 External Certification Authorities	14
1.3.2 Registration Authorities	14
1.3.3 Subscribers.....	14
1.3.4 Relying Parties	14
1.3.5 Other Participants.....	14
1.4 Certificate Usage	14
1.4.1 Appropriate Certificate Uses	15
1.4.2 Prohibited Certificate Uses	15
1.5 Policy Administration	15
1.5.1 Organization Administering the Document.....	15
1.5.2 Contact Person.....	15
1.5.3 Person Determining CP Suitability for the Policy	16
1.5.4 CP Approval Procedures	16
1.6 Definitions and Acronyms	16
1.6.1 Definitions	16
1.6.2 Acronyms.....	20
1.6.3 Bibliography	21
2 Publication and Repository Responsibilities	24
2.1 Repositories	24
2.2 Publication of Certification Information	24
2.3 Time or Frequency of Publication	24
2.4 Access Controls on Repositories.....	24
3 Identification and Authentication	25
3.1 Naming.....	25
3.1.1 Types of Names	25
3.1.2 Need for Names to be Meaningful.....	25
3.1.3 Anonymity or Pseudonymity of Subscribers.....	25
3.1.4 Rules for Interpreting Various Name Forms.....	25
3.1.5 Uniqueness of Names	25
3.1.6 Recognition, Authentication and Role of Trademarks	25
3.2 Initial Identity Validation	26
3.2.1 Method to Prove Possession of Private Key	26
3.2.2 Authentication of Organization Identity.....	26

- 3.2.2.1 Method to Prove Email Address Control 26
- 3.2.2.2 Method to Validate Domain Name / IP Address Control 26
- 3.2.3 Authentication of Individual Identity 26
- 3.2.4 Non-Verified Subscriber Information 26
- 3.2.5 Validation of Authority 27
- 3.2.6 Criteria for Interoperation 27
- 3.3 Identification and Authentication for Re-Key Requests 27
 - 3.3.1 Identification and Authentication for Routine Re-Key 27
 - 3.3.2 Identification and Authentication for Re-Key after Revocation 27
- 3.4 Identification and Authentication for Revocation Request 27
- 4 Certificate Life-Cycle Operational Requirements 28
 - 4.1 Certificate Application 28
 - 4.1.1 Who Can Submit a Certificate Application 28
 - 4.1.2 Enrollment Process and Responsibilities 28
 - 4.2 Certificate Application Processing 28
 - 4.2.1 Performing Identification and Authentication Functions 28
 - 4.2.2 Approval or Rejection of Certificate Applications 28
 - 4.2.3 Time to Process Certificate Applications 28
 - 4.3 Certificate issuance 29
 - 4.3.1 CA Actions during Certificate Issuance 29
 - 4.3.2 Notification to Subscriber by the CA of Issuance of Certificate 29
 - 4.4 Certification Acceptance 29
 - 4.4.1 Conduct Constituting Certificate Acceptance 29
 - 4.4.2 Publication of the Certificate by the CA 29
 - 4.4.3 Notification of Certificate Issuance by the CA to Other Entities 29
 - 4.5 Key Pair and Certificate Usage 29
 - 4.5.1 Subscriber Private Key and Certificate Usage 29
 - 4.5.2 Relying Party Public Key and Certificate Usage 30
 - 4.6 Certificate Renewal 30
 - 4.6.1 Circumstance for Certificate Renewal 30
 - 4.6.2 Who may Request Renewal 30
 - 4.6.3 Processing Certificate Renewal Requests 30
 - 4.6.4 Notification of New Certificate Issuance to Subscriber 30
 - 4.6.5 Conduct Constituting Acceptance of a Renewal Certificate 30
 - 4.6.6 Publication of the Renewal Certificate by the CA 31
 - 4.6.7 Notification of Certificate Issuance by the CA to Other Entities 31
 - 4.7 Certificate Re-Key 31
 - 4.7.1 Circumstance for Certificate Re-Key 31
 - 4.7.2 Who may Request Certification of a New Public Key 31
 - 4.7.3 Processing Certificate Re-Keying Requests 31
 - 4.7.4 Notification of New Certificate Issuance to Subscriber 31
 - 4.7.5 Conduct Constituting Acceptance of a Re-Keyed Certificate 31
 - 4.7.6 Publication of the Re-Keyed Certificate by the CA 31
 - 4.7.7 Notification of Certificate Issuance by the CA to Other Entities 32
 - 4.8 Certificate Modification 32

4.8.1	Circumstance for Certificate Modification	32
4.8.2	Who may Request Certificate Modification	32
4.8.3	Processing Certificate Modification Requests	32
4.8.4	Notification of New Certificate Issuance to Subscriber	32
4.8.5	Conduct Constituting Acceptance of Modified Certificate	32
4.8.6	Publication of the Modified Certificate by the CA	32
4.8.7	Notification of Certificate Issuance by the CA to Other Entities	33
4.9	Certificate Revocation and Suspension.....	33
4.9.1	Circumstances for Revocation	33
4.9.2	Who Can Request Revocation	34
4.9.3	Procedure for Revocation Request	35
4.9.4	Revocation Request Grace Period.....	35
4.9.5	Time within which CA must Process the Revocation Request.....	35
4.9.6	Revocation Checking Requirement for Relying Parties	35
4.9.7	CRL Issuance Frequency	35
4.9.8	Maximum Latency for CRLs	35
4.9.9	On-Line Revocation/Status Checking Availability	35
4.9.10	On-Line Revocation Checking Requirements	36
4.9.11	Other Forms of Revocation Advertisements Available.....	36
4.9.12	Special Requirements Related to Key Compromise	36
4.9.13	Circumstances for Suspension.....	36
4.9.14	Who Can Request Suspension	36
4.9.15	Procedure for Suspension Request	36
4.9.16	Limits on Suspension Period.....	36
4.10	Certificate Status Services	36
4.10.1	Operational Characteristics	36
4.10.2	Service Availability.....	37
4.10.3	Optional Features	37
4.11	End of Subscription	37
4.12	Key Escrow and Recovery	37
4.12.1	Key Escrow and Recovery Policy and Practices.....	37
4.12.2	Session Key Encapsulation and Recovery Policy and Practices	37
5	Facility, Management and Operational Controls.....	38
5.1	Physical Controls	38
5.1.1	Site Location and Construction	38
5.1.2	Physical Access.....	39
5.1.3	Power and Air Conditioning	39
5.1.4	Water Exposures	39
5.1.5	Fire Prevention and Protection	39
5.1.6	Media Storage	40
5.1.7	Waste Disposal.....	40
5.1.8	Off-Site Backup	40
5.2	Procedural Controls	40
5.2.1	Trusted Roles	41
5.2.1.1	Setup Working Group.....	41

- 5.2.1.2 Operation Working Group 41
- 5.2.1.3 Authentication Working Group 41
- 5.2.1.4 Audit Working Group 41
- 5.2.1.5 Custody Working Group 41
- 5.2.1.6 Registration Operation Working Group 42
- 5.2.1.7 Monitoring and Control Working Group 42
- 5.2.1.8 Management Working Group 42
- 5.2.2 Number of Persons Required per Task 42
- 5.2.3 Identification and Authentication for each Role 43
- 5.2.4 Roles Requiring Separation of Duties 43
- 5.3 Personnel Controls 43
 - 5.3.1 Qualifications, Experience and Clearance Requirements 44
 - 5.3.2 Background Check Procedures 44
 - 5.3.3 Training Requirements 44
 - 5.3.4 Retraining Frequency and Requirements 44
 - 5.3.5 Job Rotation Frequency and Sequence 45
 - 5.3.6 Sanctions for Unauthorized Actions 45
 - 5.3.7 Independent Contractor Requirements 45
 - 5.3.8 Documentation Supplied to Personnel 45
- 5.4 Audit Logging Procedures 45
 - 5.4.1 Types of Events Recorded 45
 - 5.4.2 Frequency of Processing Log 46
 - 5.4.3 Retention Period for Audit Log 46
 - 5.4.4 Protection of Audit Log 46
 - 5.4.5 Audit Log Backup Procedures 46
 - 5.4.6 Audit Collection System (Internal vs. External) 46
 - 5.4.7 Notification to Event-Causing Subject 46
 - 5.4.8 Vulnerability Assessments 46
- 5.5 Records Archival 46
 - 5.5.1 Types of Records Archived 46
 - 5.5.2 Retention Period for Archive 47
 - 5.5.3 Protection of Archive 47
 - 5.5.4 Archive Backup Procedures 47
 - 5.5.5 Requirements for Time-Stamping of Records 47
 - 5.5.6 Archive Collection System (Internal or External) 47
 - 5.5.7 Procedures to Obtain and Verify Archive Information 47
- 5.6 Key Changeover 47
- 5.7 Compromise and Disaster Recovery 47
 - 5.7.1 Incident and Compromise Handling Procedures 48
 - 5.7.2 Computing Resources, Software, and/or Data are Corrupted 48
 - 5.7.3 Entity Private Key Compromise Procedures 48
 - 5.7.4 Business Continuity Capabilities after a Disaster 48
- 5.8 CA or RA Termination 48
- 6 Technical Security Controls 50
 - 6.1 Key Pair Generation and Installation 50

- 6.1.1 Key Pair Generation 50
- 6.1.2 Private Key Delivery to Subscriber 50
- 6.1.3 Public Key Delivery to Certificate Issuer 50
- 6.1.4 CA Public Key Delivery to Relying Parties 50
- 6.1.5 Key Sizes 51
- 6.1.6 Public Key Parameters Generation and Quality Checking 51
- 6.1.7 Key Usage Purposes (as per X.509 v3 key usage field) 51
- 6.2 Private Key Protection and Cryptographic Module Engineering Controls 51
 - 6.2.1 Cryptographic Module Standards and Controls 51
 - 6.2.2 Private Key (n out of m) Multi-Person Control 51
 - 6.2.3 Private Key Escrow 52
 - 6.2.4 Private Key Backup 52
 - 6.2.5 Private Key Archival 52
 - 6.2.6 Private Key Transfer into or from a Cryptographic Module 52
 - 6.2.7 Private Key Storage on Cryptographic Module 52
 - 6.2.8 Method of Activating Private Key 52
 - 6.2.9 Method of Deactivating Private Key 53
 - 6.2.10 Method of Destroying Private Key 53
 - 6.2.11 Cryptographic Module Rating 53
- 6.3 Other Aspects of Key Pair Management 53
 - 6.3.1 Public Key Archival 53
 - 6.3.2 Certificate Operational Periods and Key Pair Usage Periods 53
- 6.4 Activation Data 53
 - 6.4.1 Activation Data Generation and Installation 53
 - 6.4.2 Activation Data Protection 54
 - 6.4.3 Other Aspects of Activation Data 54
- 6.5 Computer Security Controls 54
 - 6.5.1 Specific Computer Security Technical Requirements 54
 - 6.5.2 Computer Security Rating 54
- 6.6 Life Cycle Technical Controls 54
 - 6.6.1 System Development Controls 54
 - 6.6.2 Security Management Controls 55
 - 6.6.3 Life Cycle Security Controls 55
- 6.7 Network Security Controls 55
- 6.8 Time-Stamping 55
- 7 Certificate, CRL and OCSP Profiles 56
 - 7.1 Certificate Profile 56
 - 7.1.1 Version Number(s) 56
 - 7.1.2 Certificates Extensions 56
 - 7.1.3 Algorithm Object Identifiers 57
 - 7.1.4 Name Forms 57
 - 7.1.5 Name Constraints 57
 - 7.1.6 Certificate Policy Object Identifier 57
 - 7.1.7 Usage of Policy Constraints Extension 57
 - 7.1.8 Policy Qualifier Syntax and Semantics 57

7.1.9	Processing Semantics for the Critical Certificate Policies Extension	57
7.2	CRL Profile.....	57
7.2.1	Version Number(s)	58
7.2.2	CRL and CRL Entry Extensions	58
7.3	OCSP Profile.....	58
7.3.1	Version Number(s)	58
7.3.2	OCSP Extensions	58
8	Compliance Audit and Other Assessments	59
8.1	Frequency or Circumstances of Assessment	59
8.2	Identity/Qualifications of Assessor.....	59
8.3	Assessor's Relationship to Assessed Entity	59
8.4	Topics Covered by Assessment	59
8.5	Actions Taken as a Result of Deficiency	60
8.6	Communication of Results.....	60
9	Other Business and Legal Matters	61
9.1	Fees	61
9.1.1	Certificate Issuance or Renewal Fees.....	61
9.1.2	Certificate Access Fees.....	61
9.1.3	Revocation or Status Information Access Fees	61
9.1.4	Fees for Other Services.....	61
9.1.5	Refund Policy	61
9.2	Financial Responsibility	61
9.2.1	Insurance Coverage	61
9.2.2	Other Assets.....	61
9.2.3	Insurance or Warranty Coverage for End-Entities	61
9.3	Confidentiality of Business Information	62
9.3.1	Scope of Confidential Information	62
9.3.2	Information not within the Scope of Confidential Information.....	62
9.3.3	Responsibility to Protect Confidential Information.....	62
9.4	Privacy of Personal Information.....	63
9.4.1	Privacy Plan.....	63
9.4.2	Information Treated as Private	63
9.4.3	Information not Deemed Private.....	63
9.4.4	Responsibility to Protect Private Information.....	63
9.4.5	Notice and Consent to Use Private Information	63
9.4.6	Disclosure Pursuant to Judicial or Administrative Process	63
9.4.7	Other Information Disclosure Circumstances.....	63
9.5	Intellectual Property Rights.....	63
9.6	Representations and Warranties	64
9.6.1	CA Representations and Warranties.....	64
9.6.2	RA Representations and Warranties.....	65
9.6.3	Subscriber Representations and Warranties.....	65
9.6.4	Relying Party Representations and Warranties	66
9.6.5	Representations and Warranties of other Participants.....	66

9.7	Disclaimers of Warranties.....	66
9.8	Limitations of Liability.....	66
9.9	Indemnities.....	67
9.10	Term and Termination.....	67
9.10.1	Term	67
9.10.2	Termination.....	67
9.10.3	Effect of Termination and Survival	67
9.11	Individual Notices and Communications with Participants.....	68
9.12	Amendments	68
9.12.1	Procedure for Amendment	68
9.12.2	Notification Mechanism and Period	68
9.12.3	Circumstances under which OID must be Changed	68
9.13	Dispute Resolution Provisions	68
9.14	Governing Law	69
9.15	Compliance with Applicable Law	69
9.16	Miscellaneous Provisions.....	69
9.16.1	Entire Agreement.....	69
9.16.2	Assignment.....	69
9.16.3	Severability	69
9.16.4	Enforcement (Attorneys' Fees and Waiver of Rights)	69
9.16.5	Force Majeure	69
9.17	Other Provisions.....	69
	Approval	70

1 Introduction

1.1 Overview

This document has the purpose of defining a set of technical, organizational and procedural requirements applicable to the digital certificates issued by Multicert's Certification Authorities.

This document is managed by the Authentication Working Group and adopts the regulation and standards listed in section 1.6.3. Multicert PKI conforms to the current version of the baseline requirements for Issuance and Management of Publicly-Trusted Certificates as published by the CA/Browser Forum in document "Baseline Requirements for the Issuance and Management of Publicly-Trusted Certificates", version identified in section 1.6.3 of this document, available at <https://www.cabforum.org>. In the event of any discrepancy between this document and that described in the Baseline document, what is established in the document issued by the CA/Browser Forum supersedes what is described in this document.

1.2 Document Name and Identification

This document is a Certificate Policy (CP). The CP is represented in a certificate by a unique number called "object identifier" (OID).

This document is identified by the data included in the following table:

DOCUMENT INFORMATION	
Document Version	Version 9.0
Document State	Approved
OID	1.3.6.1.4.1.25070.1.1.1.0.1
Issuing Date	14/01/2023
Validity	1 Year
Location	https://pki.multicert.com/

In order to standardize the information corresponding to the Multicert PKI, this CP will incorporate the CP's so far managed and made available by certificate type. In this sense, the OIDs corresponding to each of these CPs are discontinued but remain valid for the lifetime of the certificates already issued. The following OIDs are to be discontinued but the information is now present in this document:

- 1.3.6.1.4.1.25070.1.1.1.0.1.1: CP of Multicert Root Certification Authority 01;
- 1.3.6.1.4.1.25070.1.1.1.0.1.2: CP for Qualified Digital Certificate and Qualified Electronic Seal;
- 1.3.6.1.4.1.25070.1.1.1.0.1.3: CP for Authentication Certificate;
- 1.3.6.1.4.1.25070.1.1.1.0.1.5: PC for SSL Certificates;

- 1.3.6.1.4.1.25070.1.1.1.2.0.1.1: PC for Timestamp Certificates.

1.3.6.1.4.1.25070.1.1.1.0.1.5: CP for SSL Certificate. Multicert PKI issues the certificates with the following OID's:

Type of Certificate	Multicert OID
Qualified Digital Signature	1.3.6.1.4.1.25070.1.1.1.0.1.2
Qualified Digital Signature for Electronic Invoice	1.3.6.1.4.1.25070.1.1.1.0.1.22
Qualified Electronic Seal	1.3.6.1.4.1.25070.1.1.1.0.1.14
Qualified Electronic Seal for Electronic Invoice	1.3.6.1.4.1.25070.1.1.1.0.1.19
PSD2 Qualified Electronic Seal	1.3.6.1.4.1.25070.1.1.1.0.1.14 (until 18/10/2019) 1.3.6.1.4.1.25070.1.1.1.0.1.18 (after 18/10/2019)
Authentication	1.3.6.1.4.1.25070.1.1.1.0.1.3
Advanced Digital Signature	1.3.6.1.4.1.25070.1.1.1.0.1.4
Web Server Certificate (OV¹ and Wildcard)	1.3.6.1.4.1.25070.1.1.1.0.1.17
Qualified Website Authentication Certificate	1.3.6.1.4.1.25070.1.1.1.0.1.15
PSD2 Qualified Website Authentication Certificate	1.3.6.1.4.1.25070.1.1.1.0.1.12
Advanced Seal	1.3.6.1.4.1.25070.1.1.1.0.1.13
Confidentiality	1.3.6.1.4.1.25070.1.1.1.0.1.16
CIV (Commercial Identity Verification)	1.3.6.1.4.1.25070.1.1.1.0.1.9

Besides Multicert OID, the following certificates are duly compliant with the following normative Certificate Policies:

¹ Organizational Validation

Type of Certificate	Object Identifier (OID)	Description
Qualified Digital Signature	0.4.0.194112.1.2	QCP-n-qscd: certificate policy for EU qualified certificates issued to natural persons with private key related to the certified public key in a QSCD
Qualified Electronic Seal	0.4.0.194112.1.3	QCP-l-qscd: certificate policy for EU qualified certificates issued to legal persons with private key related to the certified public key in a QSCD
PSD2 Qualified Electronic Seal	0.4.0.194112.1.1	QCP-l: certificate policy for EU qualified certificates issued to legal persons
Qualified Website Authentication Certificate and PSD2 Qualified Website Authentication Certificate	0.4.0.194112.1.4	QEVCP-w: certificate policy for EU qualified website authentication certificates based on EVCP
Web Server Certificate (OV)	0.4.0.2042.1.7 2.23.140.1.2.2	OVCP: Organizational Validation Certificate Policy ca-browser-forum certificate-policies organization-validated
Timestamping Certificate	0.4.0.2023.1.1	BTSP: a best practices policy for time-stamp

1.3 PKI Participants

1.3.1 Certification Authorities

All public CA's managed by Multicert are accredited by the National Security Office (<https://esignature.ec.europa.eu/efda/tl-browser/#/screen/tl/PT/5>), as provided for in the Portuguese and European legislation, thus being legally empowered to issue digital certificates, including qualified digital certificates (digital certificates with the highest degree of security provided for in the legislation).

This policy grants that all public Multicert Certification Authorities are meant to comply with all the requirements listed here.

Multicert also manages a Timestamping Certification Authority (TSA) that provides proof of date at a given time. The TSA's specific conditions are described in the TSA Practices Statement document (MULTICERT_PJ.CA3_24.1.1_0002_en) available at <https://pki.multicert.com>.

1.3.1.1 External Certification Authorities

The definition of policies and data for the issuance and management of certificates for external Subordinate CA's are defined in the Subordinate CA Policy, which is available at <https://pki.multicert.com>.

1.3.2 Registration Authorities

Registration Authorities (RA) are responsible for the Identification of the Subscribers within an organization or an association and for the validation of the necessary data required for the digital certificate issuance.

Multicert RA's must sign an agreement with Multicert CA in order to comply with all the requirements for Identification. A process is established and the Registration Operators are duly identified and compromised with their Job Description.

1.3.3 Subscribers

Within the context of this document, the term Subscriber applies to all end-users to whom were attributed certificates by Multicert CA.

Subscribers of certificates issued by Multicert CA are considered those whose name is inscribed in the field "Subject" of the certificate and use the certificate and corresponding private key according to the established in this document and respective CPS, being issued for the following holders' categories:

- Individual or legal entity;
- Corporate entity (Organizations); or
- Services (such as computers, firewall, routers, servers).

1.3.4 Relying Parties

Relying parties are natural persons, entities or equipment that act in reliance on a certificate and/or digital signature issued by the Issuer CA.

Relying Parties must check the appropriate CRL or OCSP response prior to relying on information featured in a certificate.

1.3.5 Other Participants

Other participants includes all the Entities that somehow participate in the CA activity.

1.4 Certificate Usage

The certificates issued in the Multicert CA domain can be used by different Subscribers, systems, applications, mechanisms and protocols with the purpose of ensuring the following security services:

- a) Access control/Authentication;
- b) Confidentiality;

- c) Integrity;
- d) Authentication and,
- e) Non-repudiation.

1.4.1 Appropriate Certificate Uses

The certificates issued in accordance with this CP can be used for access control/authentication, confidentiality, integrity, authenticity or non-repudiation, depending on the key usage and extended key usage existing in the certificate.

The appropriate certificate usage is defined in the CPS.

The certificates issued by Multicert PKI are also used by the Trust Parties for the verification of the chain of trust of a certificate issued within Multicert CA, as well as to ensure the authenticity and identity of the issuer of a digital signature generated by the private key corresponding to the public key held in a certificate issued under Multicert CA`s.

1.4.2 Prohibited Certificate Uses

Certificates can be used in other contexts only to the extent of what is allowed by the applicable legislation and not in conflict with the CPS.

1.5 Policy Administration

1.5.1 Organization Administering the Document

This CP and all public documents belonging to Multicert PKI are managed by the Authentication Working Group, whose contacts are indicated in section 1.5.2.

1.5.2 Contact Person

NAME	Multicert PKI Authentication Working Group
Address:	Attn: Authentication Working Group Multicert – Serviços de Certificação Electrónica, S.A. Lagoas Park Edifício 3, Piso 3 2740-266 Porto Salvo – Oeiras, Portugal
E-mail:	ca.forum@multicert.com For PSD2 certificates: psd2@multicert.com
Web page:	https://www.multicert.com
Phone:	+351 217 123 010

In the scope of PSD2 certificates, if the NCA would like to notify or communicate with the TSP, regarding for instance the communication of changes to relevant regulatory information of PSD2, or if they would like to be notified each time a PSD2 certificate is issued or revoked, or if they would like to request the revocation of PSD2 certificates issued for a PSP, the NCA shall use the email above registered for communications of PSD2 certificates.

The Subscribers, Relying Parties, Application Software Suppliers, and other third parties may report suspected private key compromise, certificate misuse, or other types of fraud, compromise, misuse, inappropriate conduct, or any other matter related to certificates by sending email to the contacts above.

1.5.3 Person Determining CP Suitability for the Policy

The Authentication Working Group determines the suitability of this CP and is responsible for verifying the compliance of CPS with this CP.

1.5.4 CP Approval Procedures

The Management Working Group is responsible for this policy approval.

1.6 Definitions and Acronyms

1.6.1 Definitions

Item	Definition
Accreditation	Act by which it is recognized to an entity that requests it and that performs the activity of a certification authority the fulfilment of the requirements defined in this document for the purposes provided therein.
Accreditation Authority	Entity competent for the accreditation and supervision of certification authorities.
Certification Authority (CA)	Authority trusted by one or more users to create and assign certificates. A CA can be: i) a trust service provider that creates and assigns public key certificates; or ii) a technical certificate generation service that is used by a certification service provider that creates and assign public key certificates.
Certificate Policy	Named set of rules that indicates the applicability of a certificate to a particular community and/or class of application with common security requirements.
Certification Practice Statement (CPS)	Statement of the practices which a Certification Authority employs in issuing, managing, revoking, and renewing or re-keying certificates.
Certificate Revocation List (CRL)	Signed list indicating asset of certificates that have been revoked by the certificate issuer.

Conformity Assessment Body (CAB)	Means a body defined in point 13 of Article 2 of Regulation (EC) N° 765/2008, which is accredited in accordance with that Regulation as competent to carry out conformity assessment of a qualified trust service provider and the qualified trust services it provides.
Digital Certificate	Electronic document that links signature verification data to its subscriber and confirms the identity of such subscriber.
Digital signature	Advanced electronic signature mode based on an asymmetric cryptographic system consisting of an algorithm or series of algorithms, through which a unique and interdependent pair of asymmetric keys, one of which is private and one is public, is generated and which allows the subscriber to use the private key to declare the authorship of the electronic document to which the signature is affixed and the agreement with its contents; it further allows the recipient to use the public key to verify that the signature was created by using the corresponding private key and if the electronic document was changed after being signed.
Electronic address	Identification of a proper computer equipment to receive and file electronic documents.
Electronic document	Document prepared using electronic data processing.
Electronic Seal	Data in electronic format attached or logically associated with other data in electronic format to guarantee the origin and integrity of the latter.
Electronic signature	The result of an electronic data processing that may constitute an exclusive and individual right and be used to disclose the authorship of an electronic document.
Electronic Signature Product	Software, hardware or specific components indented for use in the provision of qualified electronic signature services by a certification authority or in the establishment and verification of qualified electronic signature.
Extended Certificate	Certificate that offers the same quality as a qualified certificate however without the legal constraints implicit in the qualified signature and without the requirement of using a secure device for its creation. It does not confer the legal probative value of a qualified signature.
Extended Electronic Seal	An electronic seal complying with the requirements laid down in Article 36 of Regulation 910/2014 EU of the European Parliament and the Council.
Extended electronic signature	Electronic signature that meets the following requirements: i) Uniquely identifies the subscriber as author of the document; ii) Its affixing to the document depends only on the will of the subscriber; iii) It is created with means that the subscriber can maintain under its exclusive control;

	iv) Its connection to the document allows detecting any changes in the content thereof.
OCSP Responder	An online server operated under the authority of the CA and connected to its repository for processing certificate status requests.
Online Certificate Status Protocol (OCSP)	An online certificate checking protocol that enables relying-party application software to determine the status of an identified certificate.
Private Key	Element of the asymmetric key pair intended to be known only by its owner, by which the digital signature is affixed to the electronic document or a previously encrypted electronic document is decrypted with the corresponding public key.
PSD2 Certificate	A Qualified Certificate that includes PSD2 Specific Attributes.
Public Key	Element of the asymmetric key pair intended to be disclosed and which verifies the digital signature affixed to the electronic document by the owner of the asymmetric key pair or encrypts an electronic document to be transmitted to the owner of the same key pair.
Public Key Infrastructure (PKI)	A set of hardware, software, people, procedures, rules, policies and obligations used to facilitate the trustworthy creation, issuance, management, and use of certificates and keys based on Public Key Cryptography.
Qualified Certificate	Electronic signature certificate, issued by a trusted service provider and which complies with the requirements set out in Annexes I, II III and IV to Regulation EU No. 910/2014.
Qualified Electronic Seal	Extended electronic seal created by a qualified electronic seal creation device based on an electronic seal certificate.
Qualified electronic signature	Digital signature or other advanced electronic signature mode that satisfies security requirements identical to those of the digital signature based on a qualified certificate and created through a secure signature creation device.
Relying Party	Any natural person or legal entity that relies on a valid certificate.
Registration Authority (RA)	Entity that is responsible for identification and authentication of subjects of certificates mainly. An RA can assist in the certificate application process or revocation process or both.
Root CA	The top level Certification Authority whose Root Certificate is distributed by application software suppliers and that issues Subordinate / Intermediate CA certificates.
Signature creation data	Unique set of data, such as private keys, used by the subscriber to create an electronic signature.
Signature creation device	Software or hardware used to enable the processing of signature creation data.

<p>Signature creation safe device</p>	<p>A signature creation device ensuring, through the appropriate technical and procedural means, that:</p> <ul style="list-style-type: none"> i) The data necessary for the creation of a signature used to generate a signature can only occur once and that the confidentiality of such data is ensured; ii) The data necessary for the creation of a signature used to generate a signature cannot, with a reasonable degree of security, be deducted from other data and that the signature is protected against forgery carried out using the available technologies; iii) The data necessary for the creation of a signature used to generate a signature can be effectively protected by the subscriber against unlawful use by third parties; iv) Data that need to be signed are not modified and can be presented to the subscriber before the signature process.
<p>Subject</p>	<p>The natural person, device, system, unit or legal entity identified in a certificate as the Subject. The subject is either the Subscriber or a device under the control and operation of the Subscriber.</p>
<p>Subordinate CA / Intermediate CA</p>	<p>Certification Authority whose certificate is signed by the Root CA, or another Subordinate CA. A Subordinate CA normally either issues and user certificates or other Subordinate CA certificates.</p>
<p>Subscriber</p>	<p>A natural person or legal entity to whom a certificate is issued and who is legally bound by a subscriber agreement or terms of use.</p>
<p>Supervisory Body</p>	<p>Body responsible for supervisory tasks in the designating Member State, namely:</p> <ul style="list-style-type: none"> - Supervise qualified trust service providers established in the territory of the designating Member State to ensure, through <i>ex ante</i> and <i>ex post</i> supervisory activities, that those qualified trust service provides and the qualified trust services that they provide meet the requirements laid down in the Regulation 910/2014; - Take action if necessary, in relation to non-qualified trust service providers established in the territory of the designated Member State, through <i>ex post</i> supervisory activities, when informed that those non-qualified trust service providers or the trust services they provide allegedly do not meet the requirements laid down in the Regulation 910/2014.

Timestamp validation	Declaration of the certification authority certifying the date and time of creation, sending, or reception of an electronic document.
Trust Service Provider (TSP)	Means a natural or a legal person who provides one or more trust services either as a qualified or as a non-qualified trust service provider.
Website Authentication Certificate	Certification that makes it possible to authenticate a website and associate it with the natural or legal person for whom the certificate has been issued.
Website Authentication Qualified Certificate	Certificate for website authentication which is issued by a trusted service provider and complies with the requirements set out in Annex IV to Regulation EU No. 910/2014.

1.6.2 Acronyms

Acronyms	Definition
ANSI	American National Standards Institute
BR	Baseline Requirements
CA	Certification Authority
CAA	Certification Authority Authorization
CAB	Conformity Assessment Body
CLMS	Certificates Lifecycle Management System
CP	Certificate Policy
CPS	Certification Practice Statement
CRL	Certificate Revocation List
DL	Decree-law
DN	Distinguished Name
EAL	Evaluation Assurance Level
MAC	Message Authentication Codes
NCA	National Competent Authority

NCP	Normalized Certificate Policy
NCP+	Extended Normalized Certificate Policy
OCSP	Online Certificate Status Protocol
OID	Object identifier
OVCP	Organizational Validation Certificate Policy
PKCS	Public-Key Cryptography Standards
PKI	Public Key Infrastructure
PSD2	Payment Services Directive 2
QCP-I	Policy for EU qualified certificate issued to a legal person
QCP-I-qscd	Policy for EU qualified certificate issued to a legal person where the private key and the related certificate reside on a QSCD
QCP-n	Policy for EU qualified certificate issued to a natural person
QCP-n-qscd	Policy for EU qualified certificate issued to a natural person where the private key and the related certificate reside on a QSCD
QEVCP-w	Certificate policy for EU qualified website authentication certificates based on EVCP
QSCD	Qualified electronic Signature/Seal Creation Device
SSCD	Secure Signature-Creation Device
TSA	Time-Stamping Authority (TSA)
TSP	Trust Service Provider

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2 Publication and Repository Responsibilities

2.1 Repositories

The CA's under this policy shall ensure that the revocation data for issued Certificates is publicly available through a repository 24 hours a day, 7 days a week with a minimum of 99% availability.

The CA's under this policy must make available a CP and a CPS, which shall be annually updated.

2.2 Publication of Certification Information

Multicert PKI public information is available on the web, in the repository available at <https://pki.multicert.com>.

2.3 Time or Frequency of Publication

The updates to this CP and corresponding CPS shall be published immediately after its approval.

The certificate from Multicert CA shall be published as soon as possible after their issuance.

The CRL from Multicert Root CA shall be published as soon as possible after their issuance.

The CRL from Multicert Subordinate CA shall be published immediately after their issuance.

2.4 Access Controls on Repositories

The information published by Multicert shall be available on the Internet, being subject to access control mechanisms (read-only access).

3 Identification and Authentication

3.1 Naming

3.1.1 Types of Names

Multicert certificates are issued in accordance with ITU X.500 standard and their Distinguished Name (DN) is built according with ETSI EN 319 412-1, ETSI EN 319 412-2 in case of certificates for singular person, ETSI EN 319 412-3 *in case of certificates for legal person and ETSI EN 319 412-4 in case of certificates for website authentication.

3.1.2 Need for Names to be Meaningful

The certificate types described in this document are issued using Unique Names in order to clarify a unique and identifiable name. Some attributes can be in place in order to turn names meaningful. An example of these attributes are the serial number and the organization identifier.

3.1.3 Anonymity or Pseudonymity of Subscribers

The certificate types described in this document can be issued with pseudonyms in specific cases, since this information is provided in the certificate and all validation of the Subscriber authenticity is correctly performed.

3.1.4 Rules for Interpreting Various Name Forms

The rules used by Multicert to interpret the name form must follow the established in RFC 5280², ensuring that all DirectoryString attributes of the “issuer” and “subject” fields of the certificate are encoded in UTF8String format, with the exception of the “country” and “serialnumber” which are encoded in PrintableString format.

3.1.5 Uniqueness of Names

All certificates issued under this policy have a serial number that provided them uniqueness. In case of SSL/QWAC certificates, the domain name uniqueness is controlled by the Internet Corporation for Assigned Names and Numbers (ICANN).

3.1.6 Recognition, Authentication and Role of Trademarks

Subscribers may not request Certificates with contents that infringes the intellectual property rights of a third party. The issuance of a certificate with a trademark is always subject of a meticulous verification.

² cf. RFC 5280. 2008, InternetX.509 Public Key Infrastructure Certificate and Certificate Revocation List (CRL) Profile.

3.2 Initial Identity Validation

The certificates issued under this policy are always subject of a meticulous verification of the individual and/or the organization for which the certificate will be issued.

3.2.1 Method to Prove Possession of Private Key

In the case of the Subscriber generating the private key, the CA issuing the certificate must confirm the possession of the key in the Certificate Signing Request (CSR). Once the certificate is a qualified certificate, the key must be generated and stored on a QSCD (Qualified Secure Cryptographic Provider).

3.2.2 Authentication of Organization Identity

For all certificates that include an organization identity, validation of the legal person's data is carried out using one of the forms described in the CPS.

In case of SSL certificates, the authority of the Subscriber to request a certificate on behalf of the organization is verified in accordance with section 3.2.5 of Baseline Requirements.

When a domain name is included in the certificate, Multicert shall authenticate the Organization's right to use the domain name as a fully qualified domain name. In these cases, confirmation of the domain control it is required, using one of the methods described in section 3.2.2.2 of CPS.

3.2.2.1 Method to Prove Email Address Control

When the email address is included in the Distinguished Name or Subject Alternative name attributes of the certificate, the Subscriber must prove that controls de email address to be included in the certificate.

3.2.2.2 Method to Validate Domain Name / IP Address Control

The CA confirms that, to date of issuance of the certificate, the certificate subscriber is the *Domain Name* responsible or has control over the *Full Qualified Domain Name*, through the procedures described in section 3.2.2.2 of the CPS.

3.2.3 Authentication of Individual Identity

The CA issuing certificates must confirm the authenticity of the individual identity. In order to do that, the CA uses one of the identity validation forms described in section 3.2.3 of CPS.

Whenever an email address is included in the Distinguished Name or Subject Alternative name attributes of the digital certificate, the subscriber must prove the control of the email as described in 3.2.2.1.

3.2.4 Non-Verified Subscriber Information

All subscriber information is verified before certificate issuance.

3.2.5 Validation of Authority

The authority of the individual requesting the certificate on behalf of the Applicant, when the Applicant is an organization, is verified according to the methods described in section 3.2.5 of the CPS.

3.2.6 Criteria for Interoperation

The certificates issued under this policy are issued under a sole Multicert chain.

For SSL certificates, the Multicert CA responsible for SSL certificates issuance is cross signed to assure Mozilla's recognition.

3.3 Identification and Authentication for Re-Key Requests

3.3.1 Identification and Authentication for Routine Re-Key

Multicert requires the Subscriber to use the same authentication details which they used in the original purchase of the certificate.

3.3.2 Identification and Authentication for Re-Key after Revocation

All requests after a revocation are treated like new issuances for certificates, subject to the same initial validation process.

3.4 Identification and Authentication for Revocation Request

Requests for revocation must be made in an authenticated manner, or otherwise ensuring validation of the authenticity of the request.

4 Certificate Life-Cycle Operational Requirements

4.1 Certificate Application

4.1.1 Who Can Submit a Certificate Application

Either the Subscriber or an individual authorized to request the certificate on behalf of the Subscriber can submit a certificate request. Subscribers are responsible for any data that the Subscriber or an individual authorized by the Subscriber supplies to Multicert. The certificate request must be accompanied by a Certificate Request Form fulfilled.

4.1.2 Enrollment Process and Responsibilities

The Registration Authority is responsible for verifying the registration process as defined in the CP and CPS, before submitting the request for the issuance of a certificate by the CA. The Subscriber or an individual authorized by the Subscriber is responsible for submitting the necessary information and documentation, in a complete and accurate manner, to allow the RA to carry out the necessary validations before the certificate issuance.

4.2 Certificate Application Processing

4.2.1 Performing Identification and Authentication Functions

The CA's and RA's must identify and verify all certificate requests according to the CPS sections 3.2 and 3.3.

4.2.2 Approval or Rejection of Certificate Applications

All application that has been successfully identified and verified, the issuer CA must approve the certificate issuance.

Once an application cannot be verified the issuer CA must reject its certificate issuance.

4.2.3 Time to Process Certificate Applications

Once an application is successful verified the CA will issue the certificate in accordance with the SLA agreed, which information is available in the Online Store.

4.3 Certificate issuance

4.3.1 CA Actions during Certificate Issuance

Issuer CAs shall verify the applications before proceeding to the certificate issuance, in accordance with the stipulation in section 3.2 of CPS.

All the systems that belong to the certificate issuance process should be protected against modification, through an access control policies, protection of the data bases, authentication between systems, etc.

When the certificate issuance involves the Root CA, individual authorized personnel belonging to the working groups are needed in order to issue a certificate manually in the Root CA.

4.3.2 Notification to Subscriber by the CA of Issuance of Certificate

The Issuers CAs shall notify the Subscriber by email when its certificate is issued.

4.4 Certification Acceptance

4.4.1 Conduct Constituting Certificate Acceptance

Certificates are considered accepted 7 days after the certificate`s issuance, or earlier upon use of the certificate when evidence exists that the Subscriber used the certificate.

4.4.2 Publication of the Certificate by the CA

The certificates of issued CA`s are published by Multicert in its own repository.

The Subscriber certificates are published through its delivery to the Subscriber.

4.4.3 Notification of Certificate Issuance by the CA to Other Entities

Multicert RA's or partners/resellers may be informed of the issuance of the certificate if they are involved in the initial certificate request.

In case of PSD2 certificates, the NCA from the country of the Subscriber may be notified if they have previously indicated that intention to Multicert.

4.5 Key Pair and Certificate Usage

4.5.1 Subscriber Private Key and Certificate Usage

The Subscriber shall use its private keys in accordance with the terms and conditions accepted on the agreement, and in accordance with CP and CPS.

The private keys are personal in a way that the subscriber must not make them available to third parties.

The private keys shall only be used for their intended purpose.

4.5.2 Relying Party Public Key and Certificate Usage

Relying Parties should always verify the certificate validity and status through the available methods by the CA, such as CRL's and OCSP.

4.6 Certificate Renewal

Certificate renewal refers to the issuance of a new certificate to the Subscriber, without changing the public key or the information contained in the certificate.

4.6.1 Circumstance for Certificate Renewal

A certificate can be replaced by Multicert on its own initiative, or can be renewed on the initiative of the Subscriber in the situations described in section 4.6.1 of CPS.

4.6.2 Who may Request Renewal

The CA may initiate a certificate renewal in its own discretion, after notifying the certificate Subscriber.

The Subscriber may request the certificate renewal in the conditions described in section 4.6.1 of CPS.

4.6.3 Processing Certificate Renewal Requests

When a certificate renewal occurs, the key pair, Not After date, and the data of the Distinguished Name and Subject Alternative Name of the certificate remains the same as the first issuance. For that reason, Multicert reuses the previous verified information in its sole description within the limits of information reuse described in section 4.6.1 of CPS.

When certificate replacement occurs, the Distinguished Name and/or Subject Alternative Name information may change. In this case, additional validation is provided if needed, according to CPS.

4.6.4 Notification of New Certificate Issuance to Subscriber

The CA shall notify the Subscriber within a reasonable time after certificate issuance and may use any reliable mechanism to deliver the certificate to the subscriber.

4.6.5 Conduct Constituting Acceptance of a Renewal Certificate

Renewed certificates are considered accepted after 7 days after delivery or notify of issuance of the certificate to the Subscriber, or when evidence exists that the Subscriber used the certificate.

4.6.6 Publication of the Renewal Certificate by the CA

See section 4.4.2.

4.6.7 Notification of Certificate Issuance by the CA to Other Entities

See section 4.4.3.

4.7 Certificate Re-Key

Re-keying a certificate consists of creating a new certificate with a new public key.

4.7.1 Circumstance for Certificate Re-Key

The Re-Key requests must be identified and authenticated in accordance with section 3.3.

4.7.2 Who may Request Certification of a New Public Key

Multicert may accept a certificate re-key request provided that it is from the certificate Subscriber or an Entity/Organization Representative, when applicable, or can re-key a certificate on your own initiative when verifies that the issued certificate does not meet the requirements defined in the respective certificate profile or CPS.

4.7.3 Processing Certificate Re-Keying Requests

The CA may request additional information before processing a re-key and may re-validate the Subscriber subject to re-verification of any previously validated data, if needed.

The new certificate issued is send through a reliable method of communication previously verified.

4.7.4 Notification of New Certificate Issuance to Subscriber

The CA notifies the Subscriber within a reasonable time after the certificate issues.

4.7.5 Conduct Constituting Acceptance of a Re-Keyed Certificate

Issued certificates are considered accepted 7 days after the certificate is rekeyed, or earlier upon use of the certificate when evidence exists that the Subscriber used the certificate.

4.7.6 Publication of the Re-Keyed Certificate by the CA

The CA publishes rekeyed certificates by delivering them to Subscribers.

4.7.7 Notification of Certificate Issuance by the CA to Other Entities

No Stipulation.

4.8 Certificate Modification

Certificate modification refers to the issuance of a new certificate due to changes in certificate information other than the Subscriber's public key.

4.8.1 Circumstance for Certificate Modification

A certificate can be modified at Multicert's initiative when it is found that it does not meet the requirements defined in the respective certificate profile or CPS. Certificates can be modified if:

- The certificate is neither expired nor revoked.

4.8.2 Who may Request Certificate Modification

Multicert may initiate the modification of a certificate on its own initiative, after notifying the Subscriber of the certificate.

4.8.3 Processing Certificate Modification Requests

When the modification of the certificate affects the data contained in the Distinguished Name and/or Subject Alternative Name, Multicert performs additional validations of the data to be modified. When changes other than the Distinguished Name and/or Subject Alternative Name data are made, Multicert reuses the information from the initial certificate request. The validity of the modified certificate is never greater than the validity of the Initial certificate.

4.8.4 Notification of New Certificate Issuance to Subscriber

Multicert notifies the Subscriber within a reasonable time after the certificate is issued.

4.8.5 Conduct Constituting Acceptance of Modified Certificate

Modified certificates are considered accepted 7 days after their delivery or notification of the issuance of the certificate to the Subscriber, or when there is evidence that the Subscriber has used the certificate.

4.8.6 Publication of the Modified Certificate by the CA

See section 4.4.2.

4.8.7 Notification of Certificate Issuance by the CA to Other Entities

See section 4.4.3.

4.9 Certificate Revocation and Suspension

4.9.1 Circumstances for Revocation

Revocation and suspension of certificates are actions by which the certificate is no longer valid before the end of its validity period, losing its operability.

Certificates in suspended state can revert to active state. Certificates with a revoked state cannot revert to active.

If one of the following reasons occurs, the certificate is revoked within 24 hours:

- The Subscriber requests, through a submission of a writing revocation request form, that the CA revoke the certificate;
- The Subscriber notifies the CA that the original certificate request was not authorized and does not retroactively grant authorization;
- The private key and/or the password to access the private key (e.g. PIN) has been compromised or it is suspected to be compromised;
- The private key was lost;
- The CA is made aware of a demonstrated or proven method that can easily compute the Subscriber`s private key based on the public key in the certificate;
- 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.

If one of the following reasons occurs, the certificate is revoked within 5 days:

- The certificate was misused;
- The CA is made aware of a material change in the information contained in the certificate;
- The CA determines or is made aware that any of the information appearing in the certificate is inaccurate;
- The CA is made aware that the Subscriber has violated one or more of its material obligations under the Subscriber Agreement or Terms of Use;
- The CA is made aware that the certificate was not issued in accordance with the requirements of the CA`s CPS, CP or applicable normative requirements;
- The certificate`s algorithm type and key size, or the public key parameters generation and quality checking no longer comply with the i) Baseline Requirements for the SSL certificates; and/or ii) ETSI TS 119 312;
- The CA is made aware of any circumstances 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 CA is made aware that a SSL Wildcard certificate has been used to authenticate a fraudulently misleading subordinate Fully-Qualified Domain Name;

- The CA is made aware of a demonstrated or proven method that exposes the Subscriber`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, or if there is clear evidence that the specific method used to generate the private key was flawed);
- When applicable, the cryptographic token/smartcard where the private key is stored have been lost, destruct or deteriorated.

If one of the following reasons occurs, the certificate may be revoked by the CA:

- The CA is notified due to a legal or administrative resolution;
- The CA is made aware that the certificate was used for illegal activities;
- The CA ceased operations and did not arrange another CA to provide revocation support for the certificates.

If one of the following reasons occurs, the PSD2 certificate may be revoked through a request by NCA:

- The NCA removes one or more roles to the PSP that were included in the certificate;
- The NCA removes the PSD2 authorization for the PSP that requested the certificate.

If one of the following reasons occurs, the Subordinate CA certificate is revoked within 7 days:

- The Subordinate CA requests revocation in writing;
- The Subordinate CA notifies the Issuing CA that the original certificate request was not authorized and does not retroactively grant authorization;
- The Issuing CA obtains evidence that the Subordinate CA`s private key corresponding to the public key in the certificate suffered a key compromise or no longer complies with the requirements of i) Baseline Requirements for the SSL certificates; and/or ii) ETSI TS 119 312;
- The Issuing CA obtains evidence that the certificate was misused;
- The Issuing CA is made aware that the certificate was not issued in accordance with or that Subordinate CA has not complied with Baseline Requirements or the applicable Certificate Policy or Certificate Practice Statement, in case of SSL and QWAC certificates;
- The Issuing CA determines that any of the information appearing in the certificate is inaccurate or misleading;
- The Issuing CA or Subordinate CA ceases operations for any reason and has not made arrangements for another CA to provide revocation support for the certificate;
- The Issuing CA or Subordinate CA`s right to issue certificates under the Baseline Requirements expires or is revoked or terminated, unless the Issuing CA has made arrangements to continue maintaining the CRL/OCSP repository;
- Revocation is required by the Issuing CA`s Certificate Policy and/or Certification Practice Statement.

4.9.2 Who Can Request Revocation

The CA or RA shall accept revocation requests from authenticated and authorized parties, such as the Subscriber or the Entity/Organization associated, when applicable.

The CA or RA may establish procedures that allow other entities to request certificate revocation, such as the NCA in case of PSD2 certificates.

4.9.3 Procedure for Revocation Request

The CA shall provide a process for Subscribers to request revocation of their own certificates. The process must be described in the CA CPS.

The CA will always revoke a certificate if the request is authenticated as originating from the Subscriber or the associated Entity/Organization, when applicable.

4.9.4 Revocation Request Grace Period

The revocation request grace period is the time available for a Subscriber to take any necessary actions themselves to request revocation of a suspected key compromise, use of a weak key or discovery of inaccurate information within an issued certificate.

In this situation, the Subscriber must require the revocation within 24 hours after detection.

4.9.5 Time within which CA must Process the Revocation Request

A CA shall revoke a certificate within 24 hours when the request is made through a written revocation request form. When the revocation request is made in an authenticated manner, the revocation is processed immediately.

4.9.6 Revocation Checking Requirement for Relying Parties

Relying Parties must confirm the validity of the certificate through the services that the CA make available, such as OCSP and CRL, in accordance with section 4.9.6 of CPS.

4.9.7 CRL Issuance Frequency

The CA's working under this policy must issue its CRL's with the following frequency:

- Intermediate/Subordinate CA's – it is issued a CRL daily and a Delta CRL every 12 hours;
- Root CA – every 12 months or within 24 hours if a Subordinate CA certificate is revoked.

4.9.8 Maximum Latency for CRLs

CRL's for certificates issued to end entity Subscribers are posted automatically to the online repository within a commercially reasonable time after generation, usually within minutes of generation.

When CRL's for Root CA are issued due to a Subordinate CA revocation, the CRL is published within 24 hours after issuance. Regularly scheduled CRL's are posted prior to the nextUpdate field in the previously issued CRL of the same scope.

4.9.9 On-Line Revocation/Status Checking Availability

All CA's under this policy shall provide an OCSP Service.

OCSP responses must be compliant with RFC 6960 or RFC 5019. OCSP responses must be always signed by the CA that issued the certificate whose revocation status is being checked.

4.9.10 On-Line Revocation Checking Requirements

A Relying Party must confirm the validity of a certificate in accordance with section 4.9.6 prior to relying on the certificate.

OCSP responders that receive a request for status of a certificate that has not been issued yet, shall not respond with a “good” status for such certificate.

4.9.11 Other Forms of Revocation Advertisements Available

No Stipulation.

4.9.12 Special Requirements Related to Key Compromise

The CA or RA shall use commercially reasonable efforts to notify potential Relying Parties if it discovers or suspects that its Private Key has been compromised. The CA must have the ability to transit from any revocation reason code to reason code “key compromise”.

The communication of a key compromise must be done in accordance with section 4.9.12 of CPS.

4.9.13 Circumstances for Suspension

Certificate suspension is allowed, except for SSL/QWAC certificates.

4.9.14 Who Can Request Suspension

The CA and RA shall accept authenticated requests for suspension. Authorization for suspension shall be accepted if the suspension request is received from either the Subscriber or an associated Entity/Organization, when applicable. The CA may also suspend the certificate at their own discretion.

4.9.15 Procedure for Suspension Request

Due to the nature of suspension requests and the need for efficiency, the CA and RA provide automated mechanisms for requesting and authenticating suspension requests.

4.9.16 Limits on Suspension Period

The limit on suspension period depends on the mean used to suspend the certificate. The limits of the suspension period are defined in section 4.9.16 of CPS

4.10 Certificate Status Services

4.10.1 Operational Characteristics

The CA shall make certificate status information available via CRL and OCSP. The CA shall list revoked certificates in the appropriate CRL, and they must remain after the expiration date.

4.10.2 Service Availability

The certificate status services shall be available 24 hours per day, 7 days per week.

4.10.3 Optional Features

No Stipulation.

4.11 End of Subscription

The CA shall allow Subscribers to end their subscription to certificate services by having their certificate revoked, allowing the certificate to expire without renewal, or allowing their subscriber agreement expires without renewal.

4.12 Key Escrow and Recovery

4.12.1 Key Escrow and Recovery Policy and Practices

Multicert PKI does not perform key escrow for end entity certificates.

Multicert PKI can perform key escrow for the CA's private keys, in this case a ceremony is planned and realized by the working group members necessary according to the artifacts needed for this operation.

4.12.2 Session Key Encapsulation and Recovery Policy and Practices

No Stipulation.

5 Facility, Management and Operational Controls

The CA's under this policy must implemented several rules and policies focusing on physical, procedural and human controls that support the security requirements present on this CP. This section briefly describes the non-technical security aspects that allow to perform the key generation, Subscriber authentication, certificate issuing, certificate revocation, audit and archive functions in a safe way. All these non-technical security aspects are critical to ensure the certificate trust, since any security shortage may compromise the operations of a CA.

5.1 Physical Controls

5.1.1 Site Location and Construction

The facilities of the CA's under this policy must be designed so as to provide an environment capable of controlling and auditing access to the certification systems, and to be physically protected from non-authorized access, damage or interference. The architecture need to use a deep defense concept, i.e. by security levels, ensuring that the access to a higher security level is only possible when we have previously reached the immediately prior level, and it is not possible for any location within the facilities to have access to safety level (n) from another level other than level (n-1).

The operations must be performed in a room within a high security zone, inserted in another high security zone, and inside a building that combines several security conditions, namely the total access control that prevents, detects and hinders unauthorized accesses based on multiple physical security levels.

The two high security zones are areas that obey to the following characteristics:

- a) Masonry, concrete or brick walls;
- b) Ceiling and floor with similar construction to the walls;
- c) Nonexistence of windows;
- d) Security door, with steel plate, with fixed hinges and steel doorpost, with security lock electronically activated, fire-resistant characteristics and a panic functionality.

Additionally, the following security conditions must be ensured:

- Clearly defined security perimeters;
- Masonry walls, ceiling and floor, no windows, which hinder unauthorized accesses;
- High security anti-theft bolts and locks on the access doors to the security environment;
- The building perimeter is tightly closed since there are no doors, windows or any other uncontrolled openings that allow unauthorized accesses;
- The access to the environment necessarily passes through human-control areas and through other control means that restrict the physical access only to duly authorized personnel.

5.1.2 Physical Access

Systems must be protected by, at least, 4 hierarchical physical security levels (the building itself, high security block, high security area, high security room), ensuring that the access to a higher security level is only possible when one has previously reached the necessary privileges for the immediately prior level.

Sensitive operational activities from the CA, creation and storage of cryptographic material, any activities in the scope of the life cycle of the certification process, as authentication, verification, and issuing are performed inside the most restrict high security zone. The access to each security level requires the use of an authentication magnetic card. Physical accesses are automatically registered and recorded on a TV closed circuit for audit purposes.

The access to the identification card requires a double individual access authentication control. The entrance and stay in security areas is not allowed to unaccompanied personnel, including unauthenticated employees or visitors. Unless all personnel who move around these security areas is guaranteed recognized by all, it is required the use of the respective access card in a visible way as to ensure that no unrecognized individuals move around without the respective access card visible.

The access to the most restrict high security zone requires, at minimum, two authentication factors, including biometric authentication. The cryptographic *hardware* and physical *tokens* have additional protection, and are kept in safe vaults and cabinets. The access to the most restrict high security zone, as well as to cryptographic *hardware* and to safe physical *tokens* is restricted, according to the responsibility segregation needs of the several Working Groups.

5.1.3 Power and Air Conditioning

The security environment must have redundant equipment, which ensures 24 hours a day, 7 days a week operation conditions of:

- Supply of uninterrupted electricity with enough power to autonomously maintain service availability during periods of lack of supply from the public network. The system guarantees the protection of equipment against electrical fluctuations that could damage it (the alternative to the public network is guaranteed by uninterruptible power supply units and batteries, as well as diesel electricity generators); and
- Refrigeration/ventilation/air conditioning, that control the temperature and humidity levels, ensuring adequate conditions for the correct operation of all the electronic and mechanical equipment present inside the environment. Failure to comply with the temperature/humidity parameters triggers alarms to be sent to the maintenance teams and to the Security Center.

5.1.4 Water Exposures

High security zones have the proper mechanisms installed (flood detectors) to minimize the flood impact in the systems of the CA.

5.1.5 Fire Prevention and Protection

The safe environment has all the necessary mechanisms installed to prevent and extinguish fires and other flame or fume derived incidents. These mechanisms are in compliance with the existing regulations:

- Fire detection and alarm systems are installed on the several security physical levels;
- Fixed and mobile fire extinguishing equipment are available and positioned on strategically and easy access places in order to be quickly used at the beginning of a fire and successfully extinguishing it;
- Well defined emergency procedures in case of fire.

5.1.6 Media Storage

All sensitive information supports holding production *software* and data, audit information, archive or backup copies must be kept in safe vaults and cabinets inside the high security zone, as well as in a distinct environment external to the building with physical and logical access controls appropriate to restrict the access only to authorized elements of the Working Groups. Besides the access restrictions, it also must have accident protection mechanisms implemented (e.g., caused by water or fire).

When, for backup copy archive purposes, sensitive information is transported from the high security zone to the external environment, the process is performed under the supervision of at least 2 (two) Working Group elements, who are required to ensure the safe transport of the information to the destination place. The information (or the information transport *token*) shall be always under visual control of the Working Group members.

In situations implying the physical move of the data storage *hardware* (i.e., hard discs...) outside the high security zone, for reasons other than the backup copy archive, each *hardware* element shall be verified to ensure that it does not hold any sensitive data. In these situations, the information may be eliminated using all necessary means (hard disc format, cryptographic *hardware reset*, or even the physical destruction of the storage equipment).

5.1.7 Waste Disposal

Paper documents and material holding sensitive information shall be shredded before they are eliminated.

It is assured that it is not possible to recover any information from the information supports used to store or transmit sensitive information (through low level “safe” formatting or physical destruction), before they are eliminated. Cryptographic elements or logic access physical keys are either physically destroyed or follow the destruction recommendations of the respective manufacturer prior to its elimination. Other storage equipment (hard discs, *tapes*,...) shall be duly cleaned in a way it is not possible to retrieve any information (through safe formatting, or physical destruction of the equipment).

5.1.8 Off-Site Backup

All backup copies are kept in a safe environment inside external facilities, being stored in safe vaults and cabinets placed in logic and physical access control zones, in order to restrict the access only to authorized personnel, also ensuring the protection against accidental damages (e.g., caused by water or fire).

5.2 Procedural Controls

A CA activity depends on the coordinated and complementary intervention of an extensive human resource cast, namely because:

- Given the inherent security requirements to the operation of a CA, it is vital to ensure a proper responsibility segregation, which minimizes the individual importance of each participant;
- It is necessary to ensure that the CA can only be subject to *denial-of-service* type of attacks by means of collusion by a significant number of participants.

For this reason, this section describes the trust roles and the responsibilities associated with each of those roles.

5.2.1 Trusted Roles

As authenticated people are defined all employees, suppliers, and consultants who have access to or control the cryptographic or authentication operations.

Multicert has established that the trust roles should be grouped in 8 (eight) different categories (which correspond to 6 distinct Working Groups) in order to ensure that the sensitive operations are performed by different authenticated people, eventually belonging to different Working Groups.

Entries in the "Production Environment" are not allowed without the minimum presence of two elements, belonging to distinct Working Groups (with the exception of the Custody Working Group that is not allowed to access this environment).

As an additional security measure, Multicert considers relevant, but not mandatory, the presence in all interventions of an Audit element.

5.2.1.1 Setup Working Group

It is responsible for the initial setup and base configuration (hardware and software) of the CA, until its initialization. This group must have a minimum of 1 member.

5.2.1.2 Operation Working Group

It is responsible for performing the routine tasks essential to the proper functioning and correct operation of the CA.

5.2.1.3 Authentication Working Group

It is responsible for ensuring the management, safeguard and availability (in the foreseen situations) of the (non-personal) passwords and authorization tokens, and the definition, update, and proposal of the CA policies for the Management Working Group approval.

5.2.1.4 Audit Working Group

It is responsible for performing the internal audit to the relevant and necessary actions to ensure the CE's operability.

5.2.1.5 Custody Working Group

It is responsible for the custody of some sensitive artefacts (authentication tokens,...), which may be collected by the members of the other Working Groups by the fulfilment of certain conditions.

Please note that, in order to improve the security levels, the business operability and continuity of the CA, there may exist several instances of this group, each in charge of the custody of a distinct set of artefacts. This group shall make use of the several safe environments available for the safekeeping of this type of items.

5.2.1.6 Registration Operation Working Group

It is responsible for validate the documentation related to the certificate request, ensuring the issuance, renewal, suspension and revocation of certificates.

5.2.1.7 Monitoring and Control Working Group

The mission of this group consists in the monitoring consolidation and analysis of the security control points of all the resources used in Multicert CA, which may lead to events, alarms or incidents.

Taking this framework into account, the Monitoring and Control Working Group interacts with the Audit Working Group to contribute to the effort for continuous improvement of the security commitments of Multicert CA, still assuming a relevant role in the incident control and related management process.

5.2.1.8 Management Working Group

It is the decision-making body of Multicert PKI.

The mission of the Management Working Group is mainly based on decision-making which is important and critical to the proper operation of Multicert CA, enhancing the revision and approval of all documents and policies of the CA`s proposed by the Authentication Working Group. The Management Working Group is also responsible for naming and/or destitution members of the other Working Groups and the safekeeping of some sensitive artefacts (authentication tokens, ...).

5.2.2 Number of Persons Required per Task

There are rigorous control procedures that require the division of responsibilities based on the specificities of each Working Group, and in order to ensure that sensitive tasks can only be performed by a multiple group of authenticated people.

The internal control procedures were elaborated in order to ensure a minimum of 2 authenticated individuals to be able to have physical and logical access to the security equipment. The access to the CA's cryptographic *hardware* follows strict procedures involving multiple individuals authorized to access to it during its life cycle, from reception and inspection to physical and/or logical destruction of the *hardware*. After the activation of a module with operational keys, additional access controls are used in order to ensure that the physical and logical accesses to the *hardware* are only possible with 2 or more authenticated individuals. Individuals with physical access to the modules do not hold the activation keys and vice-versa.

5.2.3 Identification and Authentication for each Role

The CA personnel must authenticate to the certificate management system before they are access the systems necessary to perform their tasks.

5.2.4 Roles Requiring Separation of Duties

The following matrix defines the incompatibilities (marked with ✖) between belonging to the group identified in the columns and belonging to the group identified in the rows, under the scope of this CA:

If belonging to the Group...	May belong to the Group?								
	Installation	Operation	Authentication	Registration Operation	Audit	Custody	Management	Monitoring and Control	
Installation				✖	✖	✖	✖		
Operation			✖		✖	✖	✖		
Authentication		✖		✖	✖	✖	✖		
Registration Operation	✖		✖		✖	✖	✖	✖	
Audit	✖	✖	✖	✖		✖	✖	✖	
Custody	✖	✖	✖	✖	✖		✖	✖	
Management	✖	✖	✖	✖	✖	✖		✖	
Monitoring and Control				✖	✖	✖	✖		

5.3 Personnel Controls

The hiring of staff who perform trust functions in the Working Groups is only possible if the following requirements are fulfilled:

- Being formally appointed to the function;
- Having proper training for the function;
- Prove his/her identity through documentation issued by reliable sources;
- Prove that he/she doesn't have criminal record;
- Present proof of the qualifications and experience demanded by the entity or group which formally appointed him/her;
- Ensure (formally) confidentiality (unless expressly authorized by the legal representatives of the entity that holds the CA) regarding any information about the CA, its operation, its environments and human resources at its service and about the subscribers of the digital certificates issued by it;

- Compromise (formally) to perform the functions for which he/she was appointed and not assume responsibilities which may lead to ethical or deontological problems to their performance. In that sense it is necessary to declare not only knowing the terms and conditions for the performance of the respective functions, as well as the capacity and availability to do them.

5.3.1 Qualifications, Experience and Clearance Requirements

The admission of new members in the Working Groups is only possible if they present proof of the required knowledge, qualifications and experience to perform the tasks of the Working Groups.

5.3.2 Background Check Procedures

Background check results from the accreditation process of individuals nominated to hold positions in any one of the trust functions. The background check³ includes:

- Identification confirmation using the documentation issued by reliable sources; and
- Criminal records investigation.

5.3.3 Training Requirements

Adequate training and experience is given to the members of the Working Groups in order to perform their tasks in a satisfactory and competent manner.

The Working Group elements are subject to a training and experience plan, including the following topics:

- a) Digital certification and Public Key Infrastructures;
- b) General concepts on information security;
- c) Specific training for their role inside the Working Group;
- d) Operation of *software* and/or *hardware* used in the CE;
- e) Certificate Policy and Certification Practices Statement;
- f) Recovery from disasters;
- g) Procedures for the continuation of the activity; and
- h) Basic legal aspects regarding the certification services.

5.3.4 Retraining Frequency and Requirements

Training sessions are performed, at minimum, each 12 months.

Whenever necessary, complementary training and experience shall be provided to the Working Group members, in order to ensure the required professional level for the competent and satisfactory performance of their responsibilities. In particular,

- Whenever there is technological change, introduction of new tools or changes in the procedures, an adequate training is given to all personnel allocated to the CA;
- Whenever there are changes introduced to the Certificate Policies or Certification Practices Statement, recycling sessions are held for all the elements of the CA.

5.3.5 Job Rotation Frequency and Sequence

No Stipulation.

5.3.6 Sanctions for Unauthorized Actions

Unauthorized actions are considered to be all actions that disrespect the Certification Practices Statement and the Certificate Policies, whether deliberately or by negligence.

Sanctions are applied according to the work rules, national laws and national security laws, to all the individuals who perform unauthorized actions or make unauthorized use of the systems.

5.3.7 Independent Contractor Requirements

Independent consultants or service providers have permission to access the high security zone as long as they are duly authorized, escorted and directly supervised by Working Group members, and after taking notice and accepting the Non-Disclosure Agreement.

5.3.8 Documentation Supplied to Personnel

All adequate information is made available to the Working Group members so they can perform their tasks in a competent and satisfactory manner.

5.4 Audit Logging Procedures

5.4.1 Types of Events Recorded

Significant events generate auditable records. These include at least the following:

- Request, issuance, renewal, reissuance and revocation of certificates;
- CRL publication;
- Events related with safety issues, including:
 - Access attempts (successful or not) to sensitive CE's resources;
 - Operations performed by members of the Working Groups;
 - Physical safety devices of entry/exit of several levels of security.

The entries in the records include the following information:

- Serial number of the event;
- Date and time of the event;
- Identity of the individual who caused the event;
- Category of the event;

- Description of the event.

5.4.2 Frequency of Processing Log

The records must be analyzed and reviewed regularly, and additionally every time there are suspicions or abnormal activities or threats of any kind. The actions taken, based on the records information, are also documented.

5.4.3 Retention Period for Audit Log

The records must be maintained for at least 2 months after processing, and then stored under the terms described in section 5.5.

5.4.4 Protection of Audit Log

The records shall be exclusively analyzed by authorized members belonging to the Working Groups.

The records must be protected by auditable electronic mechanisms in order to detect and hinder the attempt of unauthorized data changes, removal or any other manipulation schemes.

5.4.5 Audit Log Backup Procedures

Backup copies of records are regularly created in high capacity storage systems.

5.4.6 Audit Collection System (Internal vs. External)

The records are simultaneously collected internal and externally to the CA's system.

5.4.7 Notification to Event-Causing Subject

Auditable events must be registered in the audit system and stored in a safe way, without notification to the event causing subject.

5.4.8 Vulnerability Assessments

The auditable records are regularly assessed in order to minimize and eliminate potential attempts to break the system security.

5.5 Records Archival

5.5.1 Types of Records Archived

All auditable data are stored (as indicated in section 5.4.1), as well as information about the certificate requests and support documentation to the life cycle of the different operations.

5.5.2 Retention Period for Archive

The data subject to archiving is retained for a period of time of 7 years after the expiry date of the certificate to which it relates.

5.5.3 Protection of Archive

The archive:

- Is protected so that only authorized members of the Working Groups may consult and access to its content;
- Is protected against any change or attempt to remove it;
- Is protected against the deterioration of the media where it is stored, through the regular migration to a new media;
- Is protected against obsolescence of the *hardware*, operating systems and other *software*, through the conservation of the *hardware*, operating systems and other *software* which then make part of the archive itself, in order to allow the access and use of the stored records in a timeless manner, and
- Is stored in a safe manner in external environments.

5.5.4 Archive Backup Procedures

Backup copies of the archives are done in an incremental or total manner and stored in appropriate devices.

5.5.5 Requirements for Time-Stamping of Records

Some entries in the archives contain date and time information based on a safe time source.

5.5.6 Archive Collection System (Internal or External)

The stored data collection systems are internal.

5.5.7 Procedures to Obtain and Verify Archive Information

Only authorized members of the Working Groups have access to the archives, checking their integrity through its restoration.

5.6 Key Changeover

No Stipulation.

5.7 Compromise and Disaster Recovery

This section describes the requirements related to the notification and recovery procedures in case of disaster or compromise.

5.7.1 Incident and Compromise Handling Procedures

The backup copies of the CA's private keys (created and stored according to section 6.2.4) and of the archived records (section 5.5.1) are stored in external safe environments and available in case of disaster or compromise.

5.7.2 Computing Resources, Software, and/or Data are Corrupted

In case the computer resources, *software* and/or data are compromised or corruption is suspected, the backup copies of the private keys from the CA and the archived records may be obtained to check the integrity of the original data.

If it is confirmed that computer resources, *software* and/or data are corrupted, appropriate measures shall be taken to respond to the incident. The response to the incident shall include the recovery of the corrupted equipment/data, using similar equipment and/or recovering stored backup copies and records. Until the safe conditions are restored, Multicert CA shall suspend its services and notify the Supervisory Body.

5.7.3 Entity Private Key Compromise Procedures

In case the private key from Multicert CA is compromised or there is a suspicion of its compromise, appropriate measures shall be taken to respond to the incident. The responses to that incident may include:

- Notification of the Supervisory Body and all Subscribers of certificates issued in the trust hierarchy "branch" from Multicert CA;
- Revocation of the certificate from Multicert CA and all certificates issued in the trust hierarchy "branch" from the affected Multicert CA;
- Generation of a new key pair for the affected Multicert CA;
- Renewal of all certificates issued in the trust hierarchy "branch" from the affected Multicert CA.

5.7.4 Business Continuity Capabilities after a Disaster

The computing resources, *software*, backup copies and records of the CA should be stored in its safe secondary facilities, necessary to restore or recover essential operations (certificate issuing and revocation with the publication of the revocation information) after a natural disaster or other.

5.8 CA or RA Termination

In case the activity as trust service provider ceases, Multicert CA shall, with a minimum prior notice of three months, proceed to the following:

- a) Inform the Supervision Body;
- b) Inform all certificate Subscribers;
- c) Revoke all issued certificates;
- d) Provide a final notification for Subscribers 2 days prior to formal cessation of the activity;

- e) Destroy or prevent the use, in a definite manner, of the private keys;
- f) Guarantee the transfer (to be retained) of all information relative to the CA's activity, namely CA key, certificates, documentation stored (internally or externally), repositories and event records storage within the defined period in section 5.5.2.

In case of changes in the responsible CA activity managing body/structure, it shall inform the entities listed in the previous lines of that fact.

6 Technical Security Controls

This section defines the security measures implemented for Multicert CA in order to protect the cryptographic keys issued by it and related activation data. The security level assigned to the key maintenance shall be the highest so that private keys and safe keys, as well as activation data, are always protected and only accessed by duly authorized people.

6.1 Key Pair Generation and Installation

The generation of key pairs from CA's under this policy is processed in accordance with the requirements and algorithms defined in this policy.

6.1.1 Key Pair Generation

The generation of cryptographic keys must be done by Working Groups, composed by authorized elements for that purpose, in a ceremony planned and audited according to the written procedures for the operations to perform. All key creation ceremonies are registered, dated and signed by the elements involved in the Working Groups.

The cryptographic *hardware* used for the generation of keys from Multicert CA is compliant with the FIPS 140-2 level 3 and/or *Common Criteria* EAL 4+ requirements, and performs the key maintenance, storage, and all the operations involving cryptographic keys using the *hardware* exclusively. The access to critical keys is protected by security policies, role division between the Working Groups, as well as through limited user access rules. The backup copies from cryptographic keys are done using only the *hardware*, thus allowing the proper audit of these copies, and a full and safe recovery of the keys in the event of a data loss.

The private key for the qualified certificates issued to a natural or collective person (when they are not generated by the Subscriber in a secure module) are generated by the CA using cryptographic *hardware* compliant with FIPS 140-2 level 3 and/or *Common Criteria* EAL 4+ requirements.

6.1.2 Private Key Delivery to Subscriber

In the case that the CA generates the Key Pair, the delivery of the private key associated to the certificate for a natural or collective person is performed in SSCD cryptographic device (*Secure Signature-Creation Device*).

For the other certificate types, where the private key is not required to be in a QSCD, the private key is provided by the Subscriber.

6.1.3 Public Key Delivery to Certificate Issuer

The public key is delivered to the CA, according to the procedures mentioned in section 4.1.

6.1.4 CA Public Key Delivery to Relying Parties

The public key from CA shall be made available through the certificate from the CA, according to section 2.2.

6.1.5 Key Sizes

The length of the key pairs shall be enough to prevent possible cryptanalysis attacks discovering the private key corresponding to the key pair during the use period. The key sizes are defined in section 6.1.5 of CPS.

For RSA keys, the modulus size in bits must be evenly divisible by 8.

6.1.6 Public Key Parameters Generation and Quality Checking

The generation of the public key parameters and quality check shall always be based on the standard that defines the algorithm.

The CA's keys are generated based on the use of random/pseudo random processes described on ANSI X9.17 (Annex C), according to the stipulated in PKCS#11.

6.1.7 Key Usage Purposes (as per X.509 v3 key usage field)

According to section 1.4 of CPS and document Certificate Profiles List available at <https://pki.multicert.com>.

6.2 Private Key Protection and Cryptographic Module Engineering Controls

In this section are considered the requirements for private key protection and for cryptographic modules from Multicert CA. Multicert has implemented a combination of physical and logical controls, and procedures dully documented in order to ensure its private key confidentiality and integrity.

6.2.1 Cryptographic Module Standards and Controls

For the generation of the key pairs from Multicert CA, as well as for the storage of the private keys, Multicert uses a cryptographic module in *hardware*, which complies with the standards described in section 6.2.1 of CPS.

6.2.2 Private Key (n out of m) Multi-Person Control

The multi-personnel control is only used for CA keys, since the certificate's private key is under the exclusive control of its subscriber.

Multicert has implemented a set of mechanisms and techniques that require the participation of several members of the Working Group to perform sensitive cryptographic operations in CA.

The activation data necessary for using the private key from Multicert CA are divided in several parts (stored in the PED keys – small digital identification *tokens*, with physical USB pen format, identifying different access roles to HSM), being accessible, and at the responsibility of different members of the Working Group. A defined number of these parts (n) from the total number of parts (m) is necessary to activate the private key from Multicert CA stored in the *hardware* cryptographic module. Two parts (n) shall be necessary for the activation of the CA private key.

6.2.3 Private Key Escrow

Private keys of the CAs managed by Multicert are stored in a secure token hardware, being made a backup copy using a hardware to hardware direct connection between the two secure tokens. Generation of the backup is the last step when issuing a new key pair by a CA managed by Multicert.

The backup process uses an HSM with double-factor authentication (portable authentication console and PED keys – small digital identification tokens, in the form of USB pen – identifying the different roles when accessing the HSM), where different persons, each one with a PED key, must authenticate before it is possible to perform the backup.

The secure token hardware with the backup of the private key of the CA managed by Multicert is placed in a safe deposit box located in secure secondary facilities and accessible only to authorized members of the Working Groups. Physical access control to such facilities prevents non-authorized access to the private keys.

The backup of the private key of the CA managed by Multicert can be recovered in case of malfunction of the original key. The key recovery process uses the same double-factor authentication mechanisms and with multiple elements as in the backup process.

6.2.4 Private Key Backup

The private key from CA has at least one backup copy with the same security level as the original key, according to section 4.12 of CPS.

6.2.5 Private Key Archival

The private keys from CA, subject to backup copies, are stored as identified in section 4.12 of CPS.

6.2.6 Private Key Transfer into or from a Cryptographic Module

The private keys from Multicert CA are not extractable from the cryptographic *token* FIPS 140-2 level 3.

Even if a backup copy of the private keys from Multicert CA is made to another cryptographic *token*, that copy is done directly, *hardware to hardware*, thus ensuring the transport of the keys between modules in an enciphered transmission.

6.2.7 Private Key Storage on Cryptographic Module

The private keys from Multicert CA are stored in an enciphered way in the cryptographic *hardware* modules.

6.2.8 Method of Activating Private Key

For activating the private keys from CA it is necessary at least the intervention of four elements of the Working Group. Once the key is activated, it will remain that way until the deactivation process takes place.

6.2.9 Method of Deactivating Private Key

The private key from CA is deactivated when the CA's system is disconnected.

To deactivate CA's private keys it is necessary, at least, the intervention of four elements from the Working Group. Once deactivated, this will remain inactive until the activation process takes place.

6.2.10 Method of Destroying Private Key

The private keys from CA (including backup copies) must be erased/destroyed in a procedure duly identified and audited, as soon as their expiry date (or if they are revoked before that period).

The CA destroys the private keys ensuring that no residue will remain that might allow their reconstruction. For that, it uses the format function (zero initialization) made available by the cryptographic *hardware* and other appropriate means, in order to ensure the destruction of the CE's private keys.

6.2.11 Cryptographic Module Rating

Described in section 6.2.1.

6.3 Other Aspects of Key Pair Management

6.3.1 Public Key Archival

A backup copy of all public keys from Multicert CA is made by the members of the Working Group and remain stored after the expiry date of the corresponding certificates, to verify the signatures generated during its validity.

6.3.2 Certificate Operational Periods and Key Pair Usage Periods

The period to use the keys can have up to the same validity as the certificate's validity period.

Certificates signed by a specific CA must expire before the end of that key pair's operational period.

The validity of the various types of certificates are described in section 6.3.2 of CPS.

6.4 Activation Data

6.4.1 Activation Data Generation and Installation

The activation data necessary for using the private key from the CA are divided in several parts (stored in PED keys – small digital identification *tokens*, with physical USB pen format, identifying different access roles to HSM), and are at the responsibility of the different members of the Working Group. The different parts are generated according to what was defined in the

process/ceremony for the key generation, and obey to the requirements defined by standard FIPS 140-2 level 3.

6.4.2 Activation Data Protection

The activation data (in separate parts and/or password) are memorized and/or stored in *tokens* which show violation attempts and/or are stored in envelopes kept in safe vaults.

The private keys from the CA are stored in an enciphered way in cryptographic *token*.

6.4.3 Other Aspects of Activation Data

If there is a need to transmit the activation data from the private keys, this transmission will be protected against information loss, theft, data change and unauthorized release.

Activation data are destroyed (by format and/or physical destruction) when the associated private key is destroyed.

6.5 Computer Security Controls

6.5.1 Specific Computer Security Technical Requirements

The access to the servers from Multicert CA is restrict to the members of the Working Groups with a valid reason for that access. Multicert CA works *online*, and the certificate issuance request is done from the System for Managing the Certificate Life-cycle (SGCVC) and/or the operation console.

Multicert CA and SGCVC have border protection devices, namely a *firewall* system, and comply with the necessary requirements for identification, authentication, access control, administration, audit, reuse, service responsibility and recovery, and information exchange.

6.5.2 Computer Security Rating

The various systems and products used by CA are reliable and protected against changes.

The cryptographic module in *Hardware* from CA must be compliant with the standard EAL 4+ *Common Criteria for Information Technology Security Evaluation* and/or FIPS 140-2 level 3.

6.6 Life Cycle Technical Controls

6.6.1 System Development Controls

The applications are developed and implemented according with rules for system development and change management.

Auditable methodology is supplied, allowing to verify that the *software* from Multicert CA was not changed before it was first used. All configurations and changes of the *software* are done and audited by members of the Working Group.

6.6.2 Security Management Controls

Multicert has mechanisms and/or Working Groups to control and monitor the configuration of the CA's systems. The system from Multicert CA, when used by the first time, is verified to ensure that the *software* used is reliable, legal and was not changed after its installation.

6.6.3 Life Cycle Security Controls

The update and maintenance operations of the products and systems from Multicert CA follow the same control as the original equipment and are installed by the members of the Working Group with appropriate training for the purpose, in accordance with the procedures defined.

6.7 Network Security Controls

The CA's under this policy shall have border protection devices, namely a *firewall* system, and comply with the necessary requirements for identification, authentication, access control, administration, audit, reuse, service responsibility and recovery, and information exchange.

6.8 Time-Stamping

Certificates, CRLs and other entries in the database always have information about the date and hour of that entry. All these entries are digitally signed by a certificate issued for that purpose.

7 Certificate, CRL and OCSP Profiles

7.1 Certificate Profile

The users of a public key have to trust that the associated private key is held by the correct remote subscriber (person or system) with which they will use the encipher mechanism or digital signature. The trust is obtained through the use of X.509 v3 digital certificates, which are a data structure that makes the connection between the public key and its Subscriber. This connection is stated through the digital signature of each certificate by a trusted CA. The CA may base this statement on technical means (for example, proof of the possession of the private key through a challenge-response protocol), on the presentation of the private key or on the registration made by the Subscriber.

A certificate has a limited validity period, indicated in its content and signed by the CA. Since the signature of the certificate and its validity may be independently verified by any software that uses certificates, the certificates may be distributed through communication lines and public systems, and may also be stored in any type of storage units.

The user of a security system that requires the knowledge of the user's public key usually has to obtain and validate the certificate holding that key. If the service does not hold a trustful copy of the public key from the CA that signed the certificate, as well as the name of the CA and related information (such as the validity period), then there may be required an additional certificate to obtain a public key from the CA and validate the user's public key. Generally, to validate the public key from a user, there may be needed a network of multiple certificates, including the public key certificate of the user signed by a CA, and zero or more additional certificates from CAs signed by other CAs.

The profile of the web server certificate is compliant with:

- ITU.T recommendation X.509⁴;
- RFC 5280⁵;
- Applicable legislation, national and European; and
- Baseline Requirements for the Issuance and Management of Publicly-Trusted Certificates, CA/Browser Forum.

The certificate profiles can be consulted in the Certificate Profiles List document available at <https://pki.multicert.com>.

7.1.1 Version Number(s)

The “*version*” certificate field describes the version used in encoding the certificate. In this profile, the version used is 3 of X.509.

7.1.2 Certificates Extensions

The extensions of certificates issued in Multicert PKI are in compliance with RFC 5280.

⁴ cf. ITU-T Recommendation X.509. 1997, (1997 E): Information Technology - Open Systems Interconnection – The Directory: Authentication Framework.

⁵ cf. RFC 5280. 2008, Internet X.509 Public Key Infrastructure Certificate and Certificate Revocation List (CRL) Profile.

7.1.3 Algorithm Object Identifiers

Certificates issued in Multicert PKI are signed using the algorithm sha256WithRSAEncryption (1.2.840.113549.1.1.11):

```
{iso(1) member-body(2) us(840) rsadsi(113549) pkcs(1) pkcs-1(1)
sha256WithRSAEncryption(11)}
```

7.1.4 Name Forms

As defined in section 3.1.

7.1.5 Name Constraints

Multicert may include name constraints in the nameConstraints field when appropriate.

7.1.6 Certificate Policy Object Identifier

All certificates issued in Multicert PKI contain the qualifiers:

“*policyQualifierID*: 1.3.6.1.5.5.7.2.1” and “*cPSuri*”, which point to the URI where the Certification Practices Statement with the OID identified by the “*policyIdentifier*” can be found. Other certificate policy object identifiers are also included, depending on the type of certificate, according to section 1.2 of this document, and as described in document Certificate Profiles List (MULTICERT_PJ.ECRAIZ_428_en) available at <https://www.pki.multicert.com>.

7.1.7 Usage of Policy Constraints Extension

No Stipulation.

7.1.8 Policy Qualifier Syntax and Semantics

The “*certificate policies*” extension contains a type of policy qualifier to be used by the certificate issuers and the writers of the certificate policy. The type of qualifier is the “*CPSuri*”, which contains a pointer, in the form of URI, to the Certification Practices Statement published by the CA; and the “*userNotice explicitText*”, which contains a pointer, in the form of URI, to the Certificate Policy.

7.1.9 Processing Semantics for the Critical Certificate Policies Extension

No Stipulation.

7.2 CRL Profile

When a certificate is issued, it is expected to be in use for its entire validity period. However, several circumstances may cause a certificate to become invalid before the expiration of its validity period. Such circumstances include change of name, change of association between the subject and the certificate data (for example, an employee who terminates employment) and

compromise or suspected compromise of the corresponding private key. Under such circumstances, when the CA has knowledge revokes the certificate⁵.

The protocol X.509 defines a method of certificate revocation, which involves the periodic issuing, by the CA, of a signed data structure called a certificate revocation list (CRL). A CRL is a time stamped list identifying revoked certificates, which is signed by the CA and made freely available in a public repository. Each revoked certificate is identified in the CRL by its serial number. When an application uses a certificate (e.g., for verifying a remote user's digital signature), that application not only verifies the certificate signature and validity; it also obtains the most recent CRL and checks if the serial number of the certificate is not in it. Note that a CA issues a new CRL on a regular periodic basis⁵.

The CRL profile conforms to:

- ITU.T Recommendation X.509⁴;
- RFC 5280⁵ ; and
- Applicable legislation, national and European.

7.2.1 Version Number(s)

The CA's shall issue version 2 CRLs compliant with RFC 5280.

7.2.2 CRL and CRL Entry Extensions

The CA's shall issue CRL entry extensions according to RFC 5280.

7.3 OCSP Profile

The profile of the OCSP certificates is compliant with:

- ITU.T recommendation X.509⁴;
- RFC 6960⁶; and
- Applicable legislation, national and European.

7.3.1 Version Number(s)

CA's under this policy must support the version 1 of RFC 6960.

7.3.2 OCSP Extensions

No Stipulation.

⁶ cf. RFC 6960. 2013, X.509 Internet Public Key Infrastructure Online Certificate Status Protocol - OCSP.

8 Compliance Audit and Other Assessments

Regular internal audits to this CP and to other rules, procedures, ceremonies, and processes are performed.

Multicert PKI is subject to external audits, performed by a Conformity Assessment Body (CAB) in order to evaluate the compliance of Multicert PKI CA's and RA's with the National and European legislation.

8.1 Frequency or Circumstances of Assessment

The compliance audits are performed periodically in annual basis. Multicert must prove, through audit reports (produced by the Conformity Assessment Body), that it is in compliance with the applicable National and European legislation.

8.2 Identity/Qualifications of Assessor

The external compliance audits are performed by a Conformity Assessment Body (CAB) duly accredited⁷.

The National Accreditation Body (NAB) is responsible for the accreditation of the Conformity Assessment Bodies (CAB) on the basis of EN ISO/IEC 17065 as profiled by ETSI EN 319 403, which are qualified to carry out the conformity assessments, resulting from these evaluations a Conformity Assessment Report (CAR), which is subsequently made available to the Supervisory Body and other interested parties to evaluate the continuity of the trusted services.

8.3 Assessor's Relationship to Assessed Entity

The auditor and members of his/her team are independent, not acting partially or discriminatory towards the entity subject to the audit.

There must be ensured that no contractual relationship, financial, legal or organic dependency exists between the auditor and the entity subject to the audit, or any other type of dependency which may lead to conflict of interests.

8.4 Topics Covered by Assessment

The scope of audits and other assessments include the accordance with the applicable National and European legislation and this CP and other rules, procedures and processes (especially the ones related with key management operations, resources, management and operation controls and management of the certificates life-cycle).

⁷ <https://ec.europa.eu/futurium/en/content/list-conformity-assessment-bodies-cabs-accredited-against-requirements-eidas-regulation>

8.5 Actions Taken as a Result of Deficiency

If from an audit results non-conformities, the auditor proceeds as follows:

- a) Documents all non-conformities found during the audit in the Conformity Assessment Report (CAR). Depending on the severity of the non-conformities:
 - a. Failed if the non-conformities are severe, in this case the audited trust service is not certified conformant;
 - b. Passed if the non-conformities are not severe, in this case the audited trust service have 3 months to correct the non-conformities, performing the steps above.
- b) Bearing in mind the non-conformities stated on the CAR, the entity subject to the audit will send a Corrective Action Plan, where the actions, methodology and time needed for correction of the non-conformities shall be described;
- c) The CAB, after analyzing this action plan takes one of the following options:
 - a. Accepts the proposed actions, in this case after the actions are implemented a follow up audit is performed to verify the effective implementation of the actions;
 - b. Does not accept the proposed actions, in this case the audited must proposed another action plan.

8.6 Communication of Results

The results shall always be communicated to the Supervisory Body and other interested parties.

9 Other Business and Legal Matters

9.1 Fees

9.1.1 Certificate Issuance or Renewal Fees

The fees charged by Multicert are identified in its online store or in a formal proposal to be made by Multicert.

9.1.2 Certificate Access Fees

No Stipulation.

9.1.3 Revocation or Status Information Access Fees

Access to information about certificate status or revocation (CRL, Delta-CRL e OCSP), is free and open.

9.1.4 Fees for Other Services

The fees for the chronological validation is identified in a formal proposal to be made by Multicert.

9.1.5 Refund Policy

No Stipulation.

9.2 Financial Responsibility

9.2.1 Insurance Coverage

Multicert has the compulsory civil liability insurance, according to article 20 of the Decree-Law no. 12/2021 and Portaria nº 62/2021.

9.2.2 Other Assets

No Stipulation.

9.2.3 Insurance or Warranty Coverage for End-Entities

Multicert has the compulsory civil liability insurance, according to article 20 of the Decree-Law no. 12/2021 and Portaria nº 62/2021.

9.3 Confidentiality of Business Information

9.3.1 Scope of Confidential Information

Expressly declared as confidential information is that which cannot be released to third parties, namely:

- The private keys from any CA under this policy;
- All information relative to auditing safety, control, and procedures parameters;
- All information of a personal nature provided to CA during the registration process of the Subscribers of certificates, unless if there is explicit authorization for its release and/or if this is not included in the content of the issued certificate;
- Business continuity and recovery plans;
- Transaction records, including complete records and auditing records of the transactions;
- Information of all the documents related with CA (rules, policies, ceremonies, forms and processes), including organizational concepts, secret, confidential and/or privileged financial/commercial information, being the property of Multicert. These documents are entrusted to the human resources of CA's Working Groups on the condition of not being used or released beyond the scope of its duties under the established terms, without the previous and explicit authorization from Multicert;
- All passwords, PINs and other security elements related to CA;
- The identification of the members of CA's Working Groups;
- The location of CA's environments and its content.

9.3.2 Information not within the Scope of Confidential Information

It is considered as information for public access:

- Certificate Policy;
- Certification Practices Statement;
- CRL;
- Delta-CRL;
- All information classified as "public" (the information not expressly considered as "public" shall be considered as confidential).

The CA allows the access to non-confidential information without prejudice of the security controls necessary to protect the authenticity and integrity of the information.

9.3.3 Responsibility to Protect Confidential Information

The elements of the Working Groups or other entities receiving confidential information are responsible for ensuring that this is not copied, reproduced, stored, translated or transmitted to third parties by any means without the previous written consent from Multicert.

9.4 Privacy of Personal Information

9.4.1 Privacy Plan

The CA is responsible for implementing the measures ensuring the privacy of personal data, according to the Portuguese and European legislation.

9.4.2 Information Treated as Private

It is considered private information all the information supplied by the certificate Subscriber that is not available in the Subscriber's digital certificate or CRL.

9.4.3 Information not Deemed Private

It is considered information not protected by privacy all the information supplied to the certificate Subscriber that is available in the Subscriber's digital certificate or CRL.

9.4.4 Responsibility to Protect Private Information

In accordance with the Portuguese and European legislation.

9.4.5 Notice and Consent to Use Private Information

In accordance with the Portuguese and European legislation

9.4.6 Disclosure Pursuant to Judicial or Administrative Process

No Stipulation.

9.4.7 Other Information Disclosure Circumstances

No Stipulation.

9.5 Intellectual Property Rights

All intellectual property rights, including those which refer to issued certificates, CRL, Delta-CRL, OID, CPS and CP, as well as any other document, property of Multicert CA belong to Multicert, S.A..

The private keys and the public keys are property of the Subscriber, independent of the physical means employed for storing them.

The Subscriber always has the right to brands, products or commercial names contained in the certificate.

9.6 Representations and Warranties

9.6.1 CA Representations and Warranties

CA's are obliged to:

- a) Carry out its operations in accordance with this Policy;
- b) Clearly state all its Certification Practices in the appropriate document;
- c) Protect its private keys;
- d) Issue certificates in accordance with the X.509 *standard*;
- e) Issue certificates that are compliant with the information known at the time it is issued and free from data input errors;
- f) Ensure confidentiality in the data generating process for creating the signature and forwarding it through a safe procedure to the Subscriber;
- g) Use reliable systems and products that are protected against all changes and which ensure the technical and cryptographic safety of the certification processes;
- h) Use reliable systems to store recognized certificates, that enable proving their authenticity and prevent unauthorized people from changing data;
- i) Store the certificates issued without any changes;
- j) Ensure that they can determine the precise date and hour in which it issued, revoked or suspended a certificate ;
- k) Employ personnel with the necessary qualifications, knowledge, and experience to provide certification services;
- l) Revoke the certificates under the terms of section 4.9 of this document and publish the revoked certificates on the CRL in the repository from Multicert CA, with the frequency stipulated in section 4.9.7;
- m) Publish their CPS and applicable Certificate Policies in its repository guaranteeing the access to current versions;
- n) Make available the previous versions of its CPS;
- o) Notify with the necessary speed, by e-mail the certificate subscribers in case the CE revokes or suspends the certificates, indicating the corresponding reason for such action;
- p) Collaborate with the audits performed by the Conformity Assessment Body;
- q) Operate in accordance with the applicable legislation;
- r) Protect eventual existing keys that are under its custody;
- s) Guarantee the availability of the CRL in accordance with the dispositions in section2,
- t) In case its activity ceases this shall be communicated with a minimum prior notice of 2 months to all Subscribers of the certificates issued, as well as to the Supervisory Body;
- u) Comply with the specifications contained in the Portuguese and European regulation on Protection of Personal Data;
- v) Maintain all information and documentation relative to a recognized certificate and the Certification Practices Statements in force at each moment and for 7 (seven) years after the certificate expires;

- w) Make the certificates from CA available.

9.6.2 RA Representations and Warranties

Registration Authorities are obliged to:

- a) Carry out its operations in accordance with this Policy;
- b) Allow the issuance of certificates free of errors of data entry;
- c) Ensure confidentiality in the data generating process for creating the signature and forwarding it through a safe procedure to the Subscriber;
- d) Use reliable systems and products that are protected against all changes and which ensure the technical and cryptographic safety of the certification processes;
- e) Store the certificates issued without any changes;
- f) Employ personnel with the necessary qualifications, knowledge, and experience to provide trust services;
- g) Collaborate with the audits performed by the Conformity Assessment Body;
- h) Operate in accordance with applicable legislation, namely in accordance with the Regulation 910/2014;
- i) Protect the keys under their custody, in case they exist;
- j) In case its activity ceases this shall be communicated with a minimum prior notice of two months to all Subscribers of the certificates issued, as well as to the Supervisory Body;
- k) Comply with the specifications contained in the European regulation on Protection of Personal Data;
- l) Maintain all information and documentation relative to a recognized certificate at each moment and for 7 years after the certificate expires.

9.6.3 Subscriber Representations and Warranties

It is the obligation of the Subscribers of the issued certificates to:

- a) Limit and adjust the use of the certificates in accordance with the uses foreseen in the Certificate Policies, General Terms and Conditions of Digital Certificate Issuance, and in section 1.4 of CPS;
- b) Take all care and measures necessary to guarantee possession of its private key;
- c) Immediately request the certificate revocation in the case of having knowledge or suspicion that the private key corresponding to the public key contained in the certificate has been compromised, or other reason stated in section 4.9 occurs;
- d) Not use a digital certificate that has lost its effectiveness, both due to revocation, suspension or expiration of its validity period;
- e) Submit to the Certification Authority (or Registration Authority) the information that they consider accurate and complete with relation to the data that these require to carry out the registration process. The CA should be informed on any changes in this information; and

- f) Not monitor, manipulate or carry out reversed engineering on the technique implemented (hardware and software) for certification services, without the previous duly authorization, in writing, from Multicert S.A..

9.6.4 Relying Party Representations and Warranties

It is the obligation of the parties that are entrusted with the certificates issued by a CA to:

- a) Limit the reliability of the certificates to the uses allowed to them in compliance with that expressed in the corresponding Certificate Policy and section 1.4 of CPS;
- b) Verify the validity of the certificates at the moment of carrying out any operation based on the same;
- c) Assume the responsibilities of the correct verification of the digital signatures;
- d) Assume the responsibility in proving the validity, revocation or suspension of the certificates in which it trusts;
- e) Have full knowledge as to the guarantees and responsibilities applicable for acceptance and use of the certificates in which it trusts and to which it accepts to be subject to;
- f) Notify any occurrence or anomalous situation related to the certificate that may be considered the cause of its revocation, using means indicated by Multicert in its CPS.

9.6.5 Representations and Warranties of other Participants

No Stipulation.

9.7 Disclaimers of Warranties

Multicert refuses all service guarantees that are not bound by the obligations set forth in this CP.

9.8 Limitations of Liability

Multicert , as a Certificate Authority:

- a) Respond for acts and omissions in the exercise of its activity in accordance with Article 15 of Decree-Law 12/2021;
- b) Respond for the damage it causes to Subscribers or third parties due to the lack or delay in including a revoked or suspended certificate in the certificate validity consultation service, once it becomes aware of it;
- c) Assumes all responsibility through third parties for the functions necessary for the provision of reliable services, within the scope of the action of the Subscribers;
- d) Its administration / management responsibility is based on an objective basis and covers all the risk that individuals suffer whenever this is a consequence of the normal or abnormal functioning of its services;
- e) It is only liable for damages caused by the misuse of the recognized certificate, when the limits of possible use have not been recorded in the certificate, clearly recognized by third parties;

- f) Does not respond when the Subscriber exceeds the limits set out in the certificate regarding its possible uses, in accordance with the conditions established and communicated to the Subscriber;
- g) Does not respond if the recipient of electronically signed documents does not prove them and takes into account the restrictions contained in the certificate regarding their possible uses;
- h) It assumes no liability in the event of loss or damage:
 - i. Of the services provided, in case of war, natural disaster or any other reason of force majeure;
 - ii. Resulting from the use of certificates when this use exceeds the limits established in the CPS and CP.
- i) Resulting from the improper or fraudulent use of certificates or CRL`s issued by the CA`s of Multicert PKI.

9.9 Indemnities

In accordance with the legislation in force.

9.10 Term and Termination

9.10.1 Term

The documents related with Multicert CA (including this CP) become effective immediately after they are approved by the Management Working Group.

This CP comes into force from the moment it is published in the repository from Multicert CA.

This CP remains in force while it is not expressly revoked by issuing a new version.

9.10.2 Termination

The changes are appropriately marked by an indicated minor version.

The changes become effective after the approval of the Management Working Group and the publication in the repository of a new major version.

9.10.3 Effect of Termination and Survival

The obligations and restrictions established in this CP, regarding the compliance audits, confidential information, records archival, obligations and responsibilities, born while it is in force, shall subsist after the replacement by a new version in everything that does not oppose it.

9.11 Individual Notices and Communications with Participants

Any notification related to this CP shall be made by digitally signed e-mail, signed forms sent by mail, or other, depending on the criticality and subject of the communication. These notifications shall be sent to the contacts indicated in section 1.5.

9.12 Amendments

9.12.1 Procedure for Amendment

Changes to this CP are carried out by the Authentication Working Group. Suggestions of changes to be included can be submitted to the Authentication Working Group, through the contacts provided in section 1.5, to be analyzed.

The Authentication Working Group records revision changes in minor versions of the CP. When a new version of the CP is ready for approval, the Authentication Working Group submits the document to be approved by the Management Working Group, and a major version is incremented in the CP.

9.12.2 Notification Mechanism and Period

Amendments to the CP are recorded in the Version History table of this document, containing the version identification, date and details of changes made.

When a new major version of the CP is approved by the Management Working Group, an updated version of this document is published in the Multicert's repository.

9.12.3 Circumstances under which OID must be Changed

If the Authentication Working Group determines that a change is necessary in the OID corresponding to a CPS or CP, it proposes it to the Management Working Group. In this case, a new CPS or CP document is created with a different OID.

Otherwise, amendments shall not require a change in CPS or CP OID.

9.13 Dispute Resolution Provisions

In case of dispute, the consumer may resort to an Alternative Dispute Resolution Entity. The official list of such entities is available on the Consumer Website at www.consumidor.pt.

Without prejudice to the possibility of prior use of mediation, if no agreement is reached between the parties within the scope of such procedure as to any dispute arising from interpretation, application or execution of this document, either party may appeal to the courts, being set as competent jurisdiction for the purpose the District Court of Lisbon.

9.14 Governing Law

Multicert is obliged to fulfil the requirements established in the current Portuguese and European Union law as a company that provides trust services, such as digital certification services.

More information regarding the Multicert's PKI applicable law and standards can be found in section 1.6.3.

9.15 Compliance with Applicable Law

See section 9.14.

9.16 Miscellaneous Provisions

9.16.1 Entire Agreement

All trusting parties totally assume the content of the last version of this CP.

9.16.2 Assignment

Parties operating under this CP or applicable agreements cannot assign their rights or obligations without the prior written consent of Multicert.

9.16.3 Severability

If a provision of this CP, including limitation of liability clauses, is found to be ineffective or enforceable, the remainder of this CP should be interpreted in the sense of the parties' original intention. Any provision of this CP which provides for a limitation of liability, is intended to be severable and independent of any other provision and should be enforced as such.

9.16.4 Enforcement (Attorneys' Fees and Waiver of Rights)

Multicert may seek indemnification and attorneys' fees from a party for damage, losses and expenses related to that party's conduct. Multicert's failure to enforce a provision of this CP does not waive Multicert's right to enforce the same provision later or right to enforce any other provisions of this CP. To be effective any waivers must be in writing and signed by Multicert.

9.16.5 Force Majeure

Force majeure clauses are included in the General Terms and Conditions of Digital Certificate Issuance.

9.17 Other Provisions

No Stipulation.

Approval

Nuno Ponte (Management Working Group)