CERTIFICATION PRACTICES STATEMENT DIGITAL CERTIFICATES AC CAMERFIRMA SA

Version 3.3.1

Language: **English**

October 2004	v2.0	New Hierarchies. Inclusion of code signing policy. Errata correction v2.0
Mar 2004	V2.2	Inclusion of power of attorney, corporate digital seal and TSA certificates
June 2006	V3	Amendment to adapt the document to latest changes and to ISO17799. This document is valid as an LOPD (Data Protection Act) security document and as a Security document.
May 2007	V3.1	Expiry of certificates With Power of Attorney and Without Power of Attorney
December 2007	V3.1.1	Review of policies. (Amendment of key usage to include non-repudiation in signing certificates.
May 2008	V3.1.2	Clarifications in corporate digital seal and code signing certificate validation process. Changes to types of certificates in RACER hierarchy with certification policy.
July 2008	V3.1.3	Inclusion of CA Corporate Server EV. Changes requested by E&Y for WEBTRUST audit
July 2008	V3.1.4	Inclusion of section on applicable legal regulations. Changes requested by E&Y for WEBTRUST audit
June 2009	V3.2	Complete review of wording, inclusion of EV certificates. Inclusion of OID RACER. Information about the new ROOT 2008 passwords. Civil Servant Certificate according to the development of Law 11/2007 LAECSP. Comments on validating the title-holder in the corporate digital seal. Signing of OCSP certificates by CA. Monthly validation of EV certificates.
February 2010	V3.2.1	Inclusion of the new intermediate CA for Public Administrations (point 1.2.1.1 point 5) Improved description of EV certificate issue process, required by Mozilla. General review. Amended description of the person responsible for the certificate (points 1.4.8 and 2.1.3). Corrections to CRL issue (point 2.6.2) Corrections to registration of CA Public Administrations (point 6.1.1) Add reference to HSM nCipher (points 6.1.8 and 6.2) Amendment 4.8. Amendment to 8.2.1
February 2011	V3.2.2	Review of E&Y WebTrust renovation audit process
March 2011	V3.2.3	Improved description of the definition of responsibilities of the parties involved in the certification system, especially Camerfirma and the RAs. 2.2. 2.5.5 Returns policy 3.1.8 Inclusion of authorization in seal and code signing certificates. 4.5.4 Deletion of the revocation via SMS, which is no longer used. 5.2.2 Double validation of EV requests. Amendment of links to information on Camerfirma's web site.
September 2011	V3.2.4	Change to profile of field 1.3.6.1.4.1.17326.30.3 organization's identification document number. The first two characters that denote the country are deleted in the individual, power of representation, power of attorney, encryption and electronic invoicing profiles.
March 2012	V3.2.5	Periodic Review. Improved wording, inclusion of references in technical documentation not included in this document. BR and EV adaptation by CABFORUM Changes to length of user passwords to 2048. Inclusion 3.1.4.1

June 2015	V3.2.7	General review. Changes to time stamp procedures Changes to the SSL issue process. Changes of address for the links on the WEB due to changing content manager. Correction in the table of contents. Informa has been added as a source of information for issuing component certificates. Self-Employed people have been added as applicants for component certificates. Review of seal and code signing process. Inclusion of the SubCA certificate issuing for third parties, either with internal or external resources. The hierarchy of the Government of Andorra has been added in Chambersign Global Root. CGCOM Outdated certificate procedure for Vodafone mobile phones deleted. (4.3.2.3) Explanations have been added for issuing SAN certificates. 3.1.8.2.1 / 3.1.8.2.5 Centralized management of HSM passwords added. Corrections of WebTrust 2015.
September 2015	v.3.2.8	Modification INDECOPI (Peru Supervisor Body), 4.8.2 Causes of revocation: NEW: Signature resolution of the competent administrative or judicial authority.
December 2015	v.3.2.8	Text correction 6.2 about private key protection. Add Codesign OID.
July 2016	V3.2.9	Substitution of certificates of legal person for certificates of physical representation and electronic seals.
March 2018	v.3.3	1.2 clarification on the alignment of these practices with the Baseline Requirement of CA / B FORUM. 3.1.8.3.1 Incorporation of CAA checking in the validation process for Server certificates according to RFC 6844. 4.8.3 Revocation by third parties. Revocation in case of incorrect issuance (CA / BFORUM requirement). 1.5.4 Domain check delegation. 1.2.1.1 No test certificates for SSL/TSL
May 2018	V3.3.1	Adaptation of the CPS document structure according to the RFC3647 3.2.3.5 Other documents accepted to prove the link between the owner of the domain and the certificate holder. 9.1.5 Refund policy modification. 9.4 Update of the privacy clause of personal information according to European RGPD 9.7 Exemption of responsibility of the CA and AR in case of delegation of the certificate to a third party

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1 Introduction

1.1 General Overview

Given that there is no specific definition of the concepts of Certification Practice Statement and Certification Policies, and due to some confusion that has arisen, Camerfirma understands that it is necessary to explain its stance in relation to these concepts.

Certification Policy (CP): a set of rules defining the applicability of a certificate in a community and/or in an application, with common security and usage requirements. In other words, a Certification Policy must generally define the applicability of certificate types for certain applications that establish the same security and usage requirements.

Certification Practice Statement (CPS) is defined as a set of practices adopted by a Certification Authority for issuing certificates. It usually contains detailed information about its certificate security, support, administration and issue system, as well as the trust relationship between the Signatory/Subscriber or Trusting Third Party and the Certification Authority. These may be completely comprehensible and robust documents which provide an accurate description of the services offered, detailed certificate life cycle management procedures, and so on.

These Certification Policies and Certification Practice Statement concepts are different, although they are still closely interrelated.

A detailed Certification Practice Statement is not an acceptable basis for the interoperability of Certification Authorities. On the whole, Certification Policies are a better basis for common security standards and criteria.

In summary, a Policy defines "**what**" security requirements are required for issuing certificates. **The Certification Practice Statement tells us** "how" the security requirements established in the Policy are fulfilled.

This document specifies the Certification Practice Statement (hereinafter, CPS) that AC Camerfirma SA (hereinafter, Camerfirma) has established for issuing certificates and is based on the following standards specification:

- RCF 3647 – Internet X. 509 Public Key Infrastructure Certificate Policy, by IETF,
- RFC 3739 3039 IETF Internet X.509 Public Key Infrastructure: Qualified Certificates Profile.
- RFC 5280, RFC 3280: Internet X.509 Public Key Infrastructure. Certificate and Certificate Revocation List (CRL).
- RFC 6960 Online Certificate Status Protocol – OCSP
- ETSI TS 101 456 V1.2.1 Policy requirements for certification authorities issuing qualified certificates
- ETSI TS 102 042 V1.1.1 Policy requirements for certification authorities issuing public key certificates
- ETSI TS 102 023 V1.2.1 Policy requirements for time-stamping authorities technically equivalent to RFC 3628
- CA/Browser Forum Baseline Requirements for issuing and managing Publicly Trusted Certificates.

- These practices are aligned with the requirements set out in the Baseline Requirements for the Issue and Management of Publicly-Trusted Certificates prepared by the CA/BROWSER FORUM http://www.cabforum.org in its version 1.5.4.

Additionally, in the requirements established in the certification policies to which this CPS refers. The recommendations in the technical document *Security CWA 14167-1 Requirements for Trustworthy Systems Managing Certificates for Electronic Signatures – Part 1: System Security Requirements* have also been taken into consideration.

In general, the certificates that are not eligible or recognised comply with the requirements that are set forth in the technical specification ETSI TS 102 042, for the NCP or NCP + policy when greater security guarantees are required.

The eligible certificates comply with the requirements that are set forth in the technical specifications ETSI TS 101 456, for the QCP public or QCP + SSCD policy when issued together with a secure device for creating electronic signatures.

This CPS is compliant with the Certification Policies for the different certificates that Camerfirma issues, which are established in section 1.2.1 of this CPS. In the event of any conflict between both documents, the provisions of this document shall prevail

1.2 Document Name and Identification

Name:	CPS Camerfirma SA.
Description:	Document to fulfil requirements of Policies with identification: See section 1.3.1 and 1.3.2
Version:	See homepage
OID	1.3.6.1.4.1.17326.10.1
Location:	https://policy.camerfirma.com/

1.3 Community and Scope of Application.

1.3.1 Certification Authority (CA).

It is the component of a PKI that is responsible for issuing and managing digital certificates. It acts as the trusted third party between the Signatory (Subscriber) and the trusting third party in electronic transactions, linking a specific public key with a person.

A Certification Authority (CA) uses Registration Authorities (RA) to carry out the tasks involving the checking and sorting of the documentation from the content included in the digital certificate.

A CA belongs to a legal entity indicated in the organisation field (O) of the associated digital certificate.

The information concerning the CAs managed by Camerfirma can be found in this document or on the Camerfirma website http://www.camerfirma.com

More than one intermediate may exist between the root certification authority and the certificate from the final entity. The number of intermediate CAs allowed is specified in the Basic Constraints extension (pathLenConstraint) of the certificate from the Certification Authority.

1.3.2 Registration Authority (RA)

An RA may be a natural person or a legal entity acting in accordance with this CPS and, if applicable, through an agreement with a specific CA, exercising the roles of managing the requests, identification and registration of certificate applicants, and any responsibilities established in the specific Certification Policies. RAs are authorities delegated by the CA, although the latter is ultimately responsible for the service.

Under current practices, the following types of RA are recognised:

- **Chambers RA:** Those managed directly or under the control of a Spanish Chamber of Commerce, Industry and Navigation.
- **Corporate RA:** Managed by a public organisation or a private entity for distributing certificates to its employees. It will be controlled by a Cameral AR when we talk about the AC "Camerfirma Certificados Camerales ".
- **Remote RA:** A registration authority managed in a remote location that communicates with the platform through the AC Camerfirma - STATUS management platform integration layer.
- **PVP.** Point of Physical Verification that always depends on an RA. Its main mission is to provide evidence of the applicant's physical presence and deliver the documentation to the RA, which is validated in accordance with applicable policy for processing the application for issuing the certificate. For these functions, the PVPs are not subject to training, but may be subject to specific controls.

  Sometimes, the PVPs' functions may be extended to compiling the documentation submitted, checking its suitability for the type of certificate requested and delivery to the applicant in the case of the cryptographic card. AC Camerfirma has drafted a relationship type document between the RA and the PVP.

For the purpose of this CPS, the following can act as RAs:

For the Chambers of Commerce Root Hierarchy:

- The Certification Authority.
- The Chambers of Commerce, Industry and Navigation, or the entities appointed by them. The registration process can be carried out on behalf of the different delegated entities:
- The Business Registration Authorities (Business RA), as entities delegated by a RA, to which they are contractually bound, in order to carry out the complete registrations of Signatories/Subscribers within a certain organization or demarcation. In general, the operators of the said Business RAs shall solely manage the applications and the certificates in the scope of their organization or demarcation, unless it is determined in another way by the RA that they depend on. For example, a corporation's employees, members of a corporate group, members of a professional body.
- The Public Administration, in the case of certificates issued under the **AC Camerfirma Public Administrations**.
- Any RA can delegate, in the Physical Verification Point (PVPs), the certificate-holder's on-site verification function and the receipt of documentation and, if applicable, the compiling of documentation and verification of its suitability as well as the delivery of material. In view of the fact that they do not have the ability to

register, they are contractually bound with an RA by means of a contract that is provided by Camerfirma. Based on the documentation supplied by the PVP, the RA operator checks the documentation and, if applicable the CA issues the certificate with no need to carry out a new on-site verification. The contract defines the functions delegated by the RA in the PVP.

For the Chambersign Hierarchy.

- The Certification Authority.
- Any national or international agent that has a contractual relationship with the CA and has passed the registration and audit processes established in the Certification Policies**.**

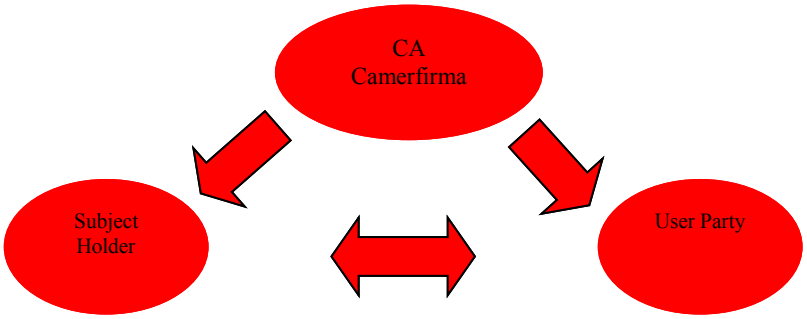
As is the case for the Chamber of Commerce Root hierarchy, the RA can delegate certain functions at the On-site Verification Points (OVPs) that are not related to the registration, such as the on-site verification of the certificate holder.

1.3.3 Signatory/Subscriber.

We understand the Signatory / Subscriber to the certificate holder when this is a natural or legal person and is described in the CN field of the certificate. When issued in the name of a hardware device or computer application, the person or legal entity requesting the certificate issued shall be considered the signatory / Subscriber.

1.3.4 User Party or certificate user.

In this CPS, the User Party or user is the person receiving a digital transaction carried out with a certificate issued by any of the Camerfirma CAs and who voluntarily trusts the Certificate that this CA issues. Flow diagram.



1.3.5 Intermediate or Subordinate Certification Authority.

An Intermediate Certification Authority or Subordinate CA is a hierarchical object that obtains a certificate from the Root CA to issue final-entity certificates or other CA certificates.

The Subordinate CAs enable risks to be distributed in a complex hierarchical structure, which allows their keys to be managed in a more agile “online” environment, protecting the CA Root keys stored in a secure disconnected environment. A Subordinate CA enables the organisation of various types of certificates issued by the main CA.

The Subordinate CA’s certificate is signed by a root CA certificate (origin root entity of the certification hierarchy) or another Subordinate CA.

A SubCA may be subject to limitations by the CA on which it depends hierarchically. Technically through a combination of the following parameters within the certificate: Extended Key Usage and Name constrains in addition to those established contractually.

An intermediate Authority can be identified as internal or external. An **Internal Subordinate CA** is owned by the same organisation as the CA on which it depends hierarchically, in this case, AC Camerfirma. By contrast, an **external Subordinate CA** is owned by a different organisation, which has applied to join the hierarchy of the CA on which it depends hierarchically and may or may not use a different technical infrastructure employed by it.

1.3.6 Accreditation Entity or Supervisory Body.

The supervision authority is the corresponding management entity that accepts, accredits and supervises the TSPs within a specific geographic area. Within Spain, this task is the responsibility of the Ministry for Energy, Tourism and the Digital Agenda, which is the competent authority depending on the Spanish State member of the European Economic Space.

The SubCAs developed by Camerfirma may be subject to legal frameworks of different countries or regions, with the Accreditation entity falling, in these cases, into the corresponding national bodies.

- Spain: Ministerio de Industria, Energía y Turismo. http://www.minetur.gob.es
- Colombia: Organismo Nacional de Acreditación de Colombia (ONAC http:// http://www.onac.org.co/) designado por el Gobierno del Estado colombiano
- Andorra: Ministeri d'Economia y Territori del Govern d'Andorra
- Perú: Instituto Nacional de Defensa de la Competencia y de la Protección de la Propiedad Intelectual (Indecopi http://www.indecopi.gob.pe/) adscrito a la Presidencia del Consejo de Ministros del Gobierno del Estado peruano
- México: Secretaria de Economía del Poder Ejecutivo de los Estados Unidos Mexicanos.

1.3.7 Trusted Service Provider (TSP).

We understand under this CPS, a PSC as that entity, trusted third party, that provides the specific services related to the life cycle of the certificates and that can directly or indirectly manage one or more Certification Authorities and associated services such as issue of time stamps, provision of signature devices or validation services.

AC Camerfirma issues SubCA certificates to third parties for accreditation within and outside of the Spanish legal framework, and these third parties may be considered PSC in those countries before their national Accreditation entities.

1.3.8 Entity/Organization.

The Entity is a public or private, individual or collective organisation, recognised under the law, with which the Subject maintains a certain relationship, as defined in the ORGANISATION field (O) in each certificate.

And so

- ✓ In case of **certificado de Persona física o de empleado público** of connection, the Entity is linked to the Signatory / Subscriber through a commercial, labor, school, etc. relationship.

- ✓ In case of **certificado de Representante**, the Entity is represented with broad powers by the Signatory/Subscriber.

- ✓ In case of **certificado de Representante de Persona Jurídica para trámites con las AAPP en QSCD**, the Entity is represented with powers by the Signatory/Subscriber for procedures with the AAPP.

- ✓ In case of **certificado de Representante de Persona Jurídica para trámites con las AAPP**, the Entity is represented with powers by the Signatory/Subscriber for procedures with the AAPP.

- ✓ In case of **certificado de Representante de Entidad sin Personalidad Jurídica para trámites con las AAPP en QSCD**, the Entity is represented with powers by the Subscriber/Signatory for procedures with the Public Administrations.

- ✓ In case of **certificado de Representante de Entidad sin Personalidad Jurídica para trámites con las AAPP**, the Entity is represented with powers by the Signatory / Subscriber for procedures with the AAPP.

- ✓ In case of **certificado de Apoderamiento Especial**, the Entity is represented for certain procedures by the Signatory/Subscriber.

- ✓ In case of **certificado de Facturación electrónica**, the Entity authorizes the Signatory/Subscriber to perform the electronic invoicing of the same.

- ✓ In case of **certificados de Servidor Seguro/Sello electrónico/Cualificado de Sello Electrónico en QSCD/Cualificado de Sello Electrónico, Sede electrónica**, the Entity is the owner of the Internet domain or the application for which the certificate has been requested.

- ✓ In case of **certificados de firma de código**. The Entity linked to the development carried out on which the signature is produced.

- ✓ Other cases in other certificates (Andorra, CGCOM, Colombia, etc.…) where the link with the Entity is that they can mark their respective certification practices.

As a general rule, the Entity is identified within the certificate in the organization field (O) and its fiscal identifier in a field owner of the certificate. For more information see section 3.1.1.

1.3.9 Applicant

Applicant will be understood as the individual who makes the request to issue the Certificate to the PSC, either directly or through an authorized representative.
They can be applicants:

- The person who will be the future signer of the certificate.
- A representative of the organization under which the certificate will be issued.
- A person authorized by the future subscriber/signer of the certificate.
- A person authorized by the Registration Authority.
- A person authorized by the Certification Authority.

1.3.10 Certificate Holder/Key Holder

For certificates issued to individuals, this CPS considers the certificate holder (the signatory/subscriber) responsible.

For certificates issued to legal entities, this CPS considers the physical person making the request responsible (the applicant) who must be identified within the certificate, even if the request is made through a third party, when the latter has knowledge of the existence of the certificate.

For component certificates, this CPS considers the natural person, the Signatory submitting the application on their own behalf or via a third party to be the responsible party.

1.3.11 End User

End users are the people who obtain and use personal, entity, device and object certificates issued by the Certification Entities, and, specifically, we can distinguish the following end users:

- Certificate applicants.
- Subscribers or certificate holders.
- Key holders.
- The verifiers of signatures and certificates.

1.3.12 Hierarchies

This section describes the hierarchies and Certification Authorities (hereinafter CA or CAs) that Camerfirma manages. The use of hierarchies reduces the risks involved in issuing certificates and organising them in the different CAs.

All the Certification Authorities (CAs) described can issue OCSP responder certificates. This certificate is used to sign and verify the OCSP service's responses regarding the status of the certificates issued by these CAs.

Camerfirma manages two hierarchical structures:

- **Chambers of Commerce Root.**
- **Global Chambersign Root.**

In general, the names of the CAs in the certificates issued for them are modified on their expiry date to include the year of their issue. For example, the name of the "CA Express Corporate Server" CA may be observed, which has changed to "CA Express Corporate Server 2009". Nevertheless, their OID and their characteristics will remain the same, unless otherwise indicated in this CPS.

1.3.12.1 Issuing set test certificates and general test certificates.

Camerfirma issues certificates with a real hierarchy, but with fictitious data for regulatory entities for inspection or new certificate registration processes, as well as for application developers in the process of integration or evaluation for acceptance. Camerfirma includes the following information in the certificates so that the User Party can clearly see that it is a test certificate without liability:

Name of the entity	[TEST ONLY] ENTITY
Entity Tax ID No.	R05999990
Entity address (street/number)	ADDRESS
Post code	5001
Contact telephone	902361207
Name	JUAN
First Surname	CÁMARA
Second Surname	SPANISH
National ID No.	00000000T

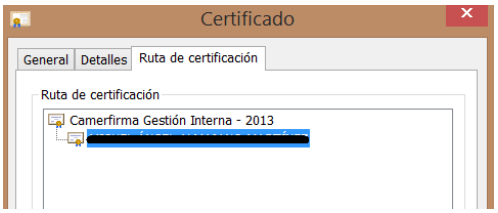
In cases where the approval, evaluation process... Requires a test certificate to be issued with real data, the process is carried out after the signing of a confidentiality agreement with the entity responsible for overseeing approval or evaluation tasks. The data is specified by each customer, but in front of the name of the entity [ONLY TESTS] always appears in order to identify at first glance that it is a test certificate without accountability.

No test certificates are issued for Website - SSL/TLS.

1.3.12.2 Camerfirma Internal Management Hierarchy.

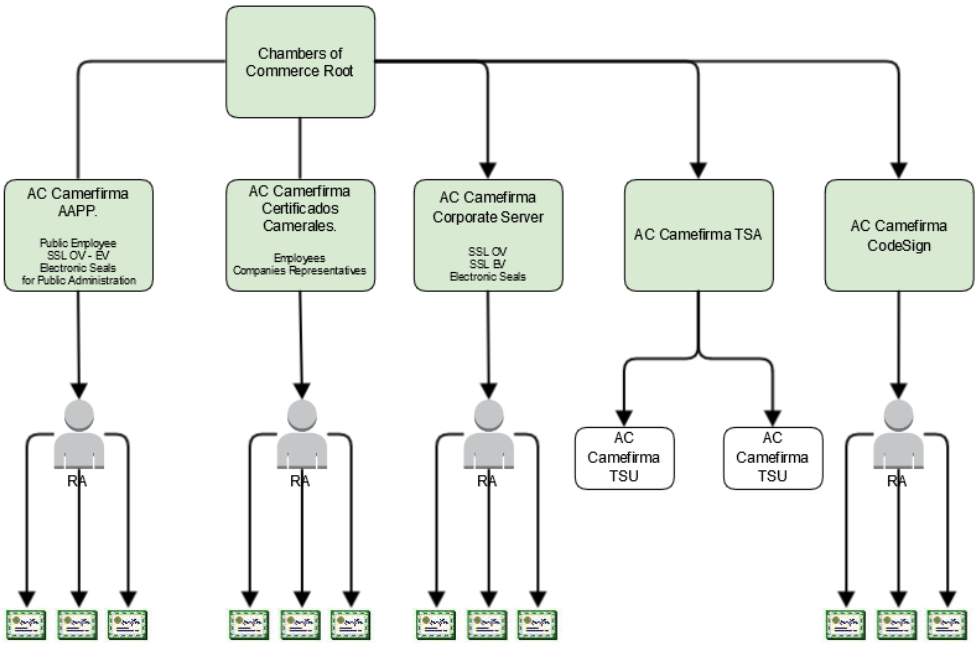
Camerfirma has developed a special certification authority to issue registration entity operator certificates. With this certificate, operators can perform the steps related to their own role on the Camerfirma STATUS® management platform.

This hierarchy consists of a single CA that issues final entity certificates.



As a general design, the name of the CA certificates issued by Camerfirma includes the creation year of the associated cryptographic keys at the end, amending the corresponding year in each re-certification process.

1.3.12.3 Chambers of Commerce Root Hierarchy.



(Chambers of Commerce Root) AnyPolicy

This Hierarchy is designed to develop a trusted network, with the ultimate aim of issuing corporate identity digital certificates and in which the Registration Authorities (hereinafter RA or RAs) are managed by the Spanish Chambers of Commerce, Industry and Navigation or related public or private entities.

EXCEPTIONS: The component certificates (corporate digital seal, SSL, TSU, Code Signature) do not have any territorial limitations.
This hierarchy includes intermediate Certification Authorities that issue digital certificates

The characteristics of this hierarchy are summarised below:

- Spanish Geographical Scope. *(except for exceptions)*
- Registration Authorities managed by Chambers of Commerce.
- Business Scope.

in different environments:

CA Express Corporate Server.	AnyPolicy
Certificates for Secure server (OV)	1.3.6.1.4.1.17326.10.9.8
OCSP Responder	1.3.6.1.4.1.17326.10.12.2
AC Camerfirma CodeSign.	AnyPolicy
CodeSign	1.3.6.1.4.1.17326.10.12.2
OCSP Responder	1.3.6.1.4.1.17326.10.9.8
Time-stamping Authority (TSA).	AnyPolicy
TSU-2 Passwords in SW stored in HW. SmartTSU	1.3.6.1.4.1.17326.10.13.1.2
Time stamp TSU-2	1.3.6.1.4.1.17326.10.13.1.2.1
TSU-3 Passwords in HW with authenticated access to the service.	1.3.6.1.4.1.17326.10.13.1.3
Time stamp TSU-3	1.3.6.1.4.1.17326.10.13.1.3.1
OCSP Responder	1.3.6.1.4.1.17326.10.9.8
Camerfirma Corporate Server.	AnyPolicy
Certificates for Secure Server (EV)	1.3.6.1.4.1.17326.10.14.2
Corporate digital seal certificate.	1.3.6.1.4.1.17326.10.11.3
Certificates for Secure server (OV)	1.3.6.1.4.1.17326.10.11.2
OCSP Responder	1.3.6.1.4.1.17326.10.9.8
AC Camerfirma Chamber of Commerce Certificates	AnyPolicy
Contractual relationship with Entity.	1.3.6.1.4.1.17326.10.9.2
Powers of Representation.	1.3.6.1.4.1.17326.10.9.3
Special Power of Attorney.	1.3.6.1.4.1.17326.10.9.5
Legal entities.	1.3.6.1.4.1.17326.10.9.4
Electronic invoicing.	1.3.6.1.4.1.17326.10.9.7
Encryption.	1.3.6.1.4.1.17326.10.9.6
OCSP Responder	1.3.6.1.4.1.17326.10.9.8
AC Camerfirma AAPP	AnyPolicy
Electronic office, high-level.	1.3.6.1.4.1.17326.1.3.2.1
Electronic office, mid-level.	1.3.6.1.4.1.17326.1.3.2.2
Electronic Seal for Automated Procedures, high-level.	1.3.6.1.4.1.17326.1.3.3.1
Electronic Seal for Automated Procedures, mid-level.	1.3.6.1.4.1.17326.1.3.3.2
Public Employee, high-level, signature.	1.3.6.1.4.1.17326.1.3.4.1
Public Employee, high-level, authentication.	1.3.6.1.4.1.17326.1.3.4.2
Public Employee, high-level, encrypted.	1.3.6.1.4.1.17326.1.3.4.3
Public Employee, mid-level.	1.3.6.1.4.1.17326.1.3.4.4
OCSP Responder	1.3.6.1.4.1.17326.10.9.8

An updated list of this structure can be found on the Camerfirma website, in the section "Hierarchy Certification Practice and Policies"

1.3.12.3.1 Express Corporate Server.

The certificates issued by this CA will have continuity with the OID in the certification authority "Camerfirma Corporate Server – AAAA". AAAA represents the year of issue of the certificate.

This is an intermediate CA that issues digital certificates, the holders of which are machines or applications. This CA issues two different policies:

- **Certificates for OV (Organisation Validation) secure server** Issued to HTML web server applications via SSL/TLS or HTTPS protocol. This protocol is required to identify and establish secure channels between the user's or trusting third party's browser and the Signatory/Subscriber's HTML web server. ***The issue of this type of certificate complies with the requirements established by the document Baseline* Requirements for issuing and managing Publicly-Trusted Certificates *created by the CA/BROWSER FORUM http://www.cabforum.org*** using a policy identifier belonging to Camerfirma.

- **Corporate digital seal certificate**. This certificate is related to a key stored by a machine or application. Procedures that are carried out collectively are done automatically and without requiring assistance. The keys linked to the electronic seal certificate provide the documents and transactions to which it is applied with integrity and authenticity. It can also be used as client machine identification element in SSL/TLS or HTTPS secure communication protocols, and data encryption.

1.3.12.3.2 Code Signing.

The certificates issued by this CA will have continuity with the OID ones in the CA "Camerfirma Codesign – AAAA". AAAA represents the year of issue of the certificate.

Intermediate CA called **"Camerfirma CodeSign"** which issues certificates for code signing. As the name suggests, code signing certificates enable developers to apply an electronic signature to the code they have developed: ActiveX, Java applets, Microsoft Office macros, and so on, thus establishing the guaranteed integrity and authenticity of this code.

1.3.12.3.3 Time stamps.

The certificates issued by this CA will have continuity with the OID ones in the CA "Camerfirma TSA – AAAA". AAAA represents the year of issue of the certificate.

The third intermediate Authority **"AC Camerfirma TSA"** issues certificates for **issuing time stamps**. A time stamp is a data package with a standardised structure that associates the HASH code of a document or electronic transaction with a specific date and time.

The time stamp authority issues certificates to intermediate entities called "Time Stamp Units" **TSU**. These stamp units are responsible for ultimately issuing the time stamps upon the receipt of a standardised application that follows RFC 3161 specifications. Each one of

these **TSUs** can be associated either to specific technical characteristics of the service or to exclusive use by a customer.

The TSU certificates have a duration of six years and a private key use of one year.Therefore the time certificates issued by these TSUs have a minimum duration of five years.

Under this DPC the issue of TSU certificates to companies and organisations that are located outside of Spanish territory is allowed. The procedure for issuing certificates is covered in the corresponding section in this DPC.

AC Camerfirma issues TSU certificates in **systems that are approved** by AC Camerfirma. The approved systems are published on the Camerfirma website. The approved systems can be located in the subscriber's installations under the signature of a affidavit and the compliance of the requirements associated with the issue of a TSU certificate.

AC Camerfirma also issues TSU certificates to be stored in **third party platforms** provided that these platforms:

- They are synchronised with the time sources established by Camerfirma.
- Allow Camerfirma or an authorised third party to audit the systems.
- Allow AC Camerfirma applications to access its stamp services with the aim of establishing the corresponding controls with respect to correcting the time stamp.
- Sign a service agreement.
- Allow AC Camerfirma access in order to gather information for the stamps issued or to send a periodic report for the number of stamps issued.
- Present a key creation document in a safe environment as is indicated in the Camerfirma TSA certification policies (HSM certified FIPS 140-1 Level 2) signed by a competent organisation. This document is previously assessed and signed by AC Camerfirma technical personnel before being deemed valid.

The TSU certificate policies are:

1.3.12.3.3.1 **OID 1.3.6.1.4.1.17326.10.13.1.2.**

The keys are created and stored on a certified, cryptographic set of cards EAL4+ CWA 14169. The key creation and storage process is recorded in the systems department, which is responsible for carrying out these operations.

Access to the service is authenticated by user/password or by digital certificate. IP authentication implementations are also allowed.

1.3.12.3.3.2 **1.2.1.3.3.2 OID 1.3.6.1.4.1.17326.10.13.1.3**

The keys are created and stored in a HSM FIPFS 140-1 certificate, level 2 or higher.

Access to the service is authenticated by user/password or by digital certificate. IP authentication implementations are also allowed.

1.3.12.3.4 Corporate Server. EV Secure Server.

The certificates issued by this CA will have continuity with the OID ones in the CA "Corporate Server – AAAA". AAAA represents the year of issue of the certificate.

This intermediate certification authority, **"AC Camerfirma Corporate Server EV"**, issues digital certificates for Secure Server or corporate electronic seals, with the same functions as the "Express Corporate Server" certification authority but subject to the requirements of the ***"CA/Browser Forum Guidelines for Issuance and Management of extended validation certificates"***. This regulation promotes the issue of secure server certificates with extra guarantees in the certificate holders' identification process. In this case, the name of the certification authority loses the word Express because the accreditation guarantees required for receiving the certificate are more demanding and therefore require a more elaborate procedure, resulting in a longer issuing time.

An EV Secure Server certificate provides browsers who connect to this service an extra level of guarantee; which they can see from the green background in the browser address bar.

Certificates issued up until this time by the "AC Camerfirma Express Corporate Server" CA are managed under this CA, using the same identification data from the OID policy.

1.3.12.3.5 AC Camerfirma Chamber of Commerce Certificates.

The certificates issued by this CA will have continuity with the OID ones in the CA "AC Camerfirma Chamber of Commerce Certificates – AAAA". AAAA being the year that the certificate is issued

"AC Camerfirma Chamber of Commerce Certificates" is a multi-policy Certification Authority that issues qualified or recognised business relationship certifications within Spain, pursuant to the criteria established in Law 59/2003, 19 December, on electronic signatures, the functions of which are described below.

The final certificates are intended for:

1.3.12.3.5.1 **Natural persons with a business relationship with an Entity.**

1.3.12.3.5.1.1 Contractual relationship with Entity.

These determine the type of contractual relationship (labour, mercantile, member of professional body, etc.) between a natural person (certificate holder/signatory/subscriber) and an Entity (organisation field in certificate).

1.3.12.3.5.1.2 Powers of Representation.

This determines the powers of legal representation or general power of attorney between the natural person (certificate holder/signatory/subscriber) and an Entity (also described in the Organisation field in the certificate).

1.3.12.3.5.1.3 Special Power of Attorney.

This determines the powers of specific representation or special power of attorney between the natural person (certificate holder/signatory/subscriber) and an Entity (also described in the Organisation field in the certificate).

1.3.12.3.5.1.4 Natural Person Qualified Certificate for Legal Person Representation in e-transactions with the Public Administrations.

It determines the legal representation relationship between the natural person (holder of the certificate / signatory / subscriber) and an Entity with legal personality (also described in the Organization field of the certificate).

1.3.12.3.5.1.5 Natural Person Qualified Certificate for Entity Representation without Legal Personality in e-transactions with the AAPP.

It determines the relationship of legal representation between the natural person (holder of the certificate / signatory / subscriber) and an Entity with legal personality (also described in the Organization field of the certificate).

1.3.12.3.5.1.6 Natural Person Qualified Certificate for Legal Entity Proxy Representative.

It determines the relationship of legal representation between the natural person (holder of the certificate / signatory / subscriber) and an Entity (described in the Organization field of the certificate).

1.3.12.3.5.2 **Legal entities. (Cessation of issue from July 1, 2016).**

The Legal Entity's digital certificate is created pursuant to **Law 59/2003**, Electronic Signatures, 19 December.

Camerfirma issues these certificates for documents that consist of the relationship between the Entity (Legal entity) and the Public Administrations (fiscal relations, electronic invoice issue, etc.) and, in general, as is determined in the current, applicable legislation for those proceedings that constitute the ordinary bank orders or dealings of the Entity, without prejudice to the possible quantitative or qualitative limits that may be added.

"Camerfirma mainly issues these certificates for tax purposes, allowing companies to conduct online procedures with the Spanish Tax Office. Outside of this scope, Camerfirma considers these certificates to be similar to the corporate digital seal and the Third Party that it trusts shall assess the use of the signature associated with this type of certificate as such." A seal guarantees the related document's authenticity and integrity."

In the case of a Legal Entity certificate, the holder/subscriber/signatory is the Entity itself, although it can only be applied for by one of the Entity's legal or voluntary representatives with sufficient powers for this purpose, who acts as custodian of the keys and as the person responsible for any actions undertaken with this certificate. ***However, contractually, and pursuant to the provisions of Law 59/2003, and without prejudice to the responsibilities that apply to the holder and applicant of the certificate, and which the holder or applicant subsequently assume, the certificate holder, if considered convenient to do so, will be able to transfer the use of the keys to a third party or to be included in an IT application, in order to meet each user's common practice needs of. In these cases in which the keys are transferred, the responsibility for their use continues to be assumed by the holder, without any kind of limitation.***

1.3.12.3.5.3 **Electronic invoicing.**

Electronic invoicing has been one of the means of promoting the use of electronic certificates. The Tax Agency regulates the use of the electronic certificates in the Royal Decree 1496/2003. In order to create an electronic invoice, it is necessary to sign the electronic document with an acknowledged certificate. Through the invoice certificate, Camerfirma creates a document adapted to the specific needs of electronic invoicing. The certificate is issued to a natural person who the Entity expressly authorises, and its use is limited to electronic invoicing.

1.3.12.3.5.4 **Encryption.**

Encryption certificates are technical certificates for the **exclusive** use of data encryption.

The aforementioned certificates (natural person with a relationship with entity, powers of representation, special power of attorney, electronic invoicing and legal entity) allow the key to be used for data encryption, but Camerfirma does not keep or store the private keys belonging to the certificate holders, pursuant to the requirements of **Law 59/2003** on Electronic Signatures, of 19 December. In this situation, if the certificate holder or, in the case of the legal entity certificate, the certificate custodian, loses control of the private key, access to all of the encrypted data with the related public key will also be lost.

The encryption certificate allows the service provider, in this case, Camerfirma, to look after the certificate holder's private key in order to be able to retrieve it in the event that it is lost.

1.3.12.3.6 AC Camerfirma AAPP.

The certificates issued by this CA will have continuity with the OID ones in the CA "Camerfirma AAAP-AAAA". AAAA being the year that the certificate is issued

Law 11/2007, 22 June, on Citizens' Electronic Access to Public Services (LAECSP), Chapter Two, Heading Two, establishes the methods of application for identification and electronic signing via electronic certificates.

This Law provides various solutions to many problems that currently exist in relation to identification and electronic signing for Public Administrations, including with citizens and companies, and public sector employees.

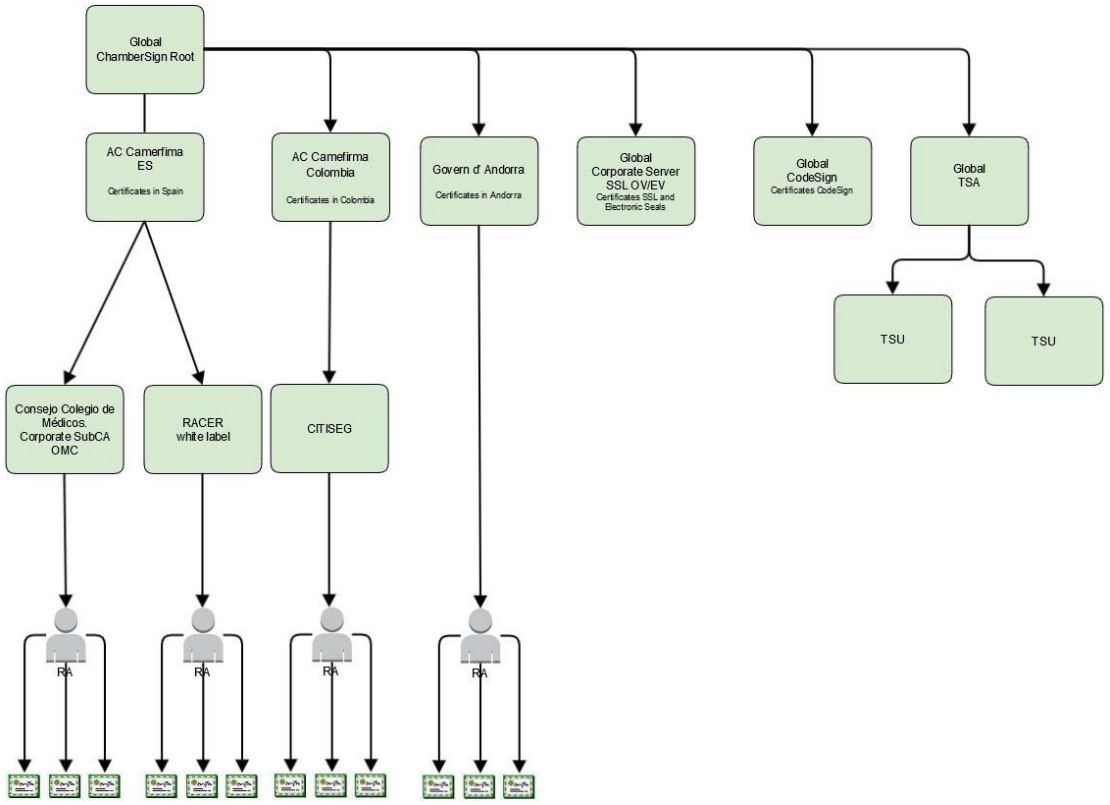
The General State Administration has defined a certification model that includes public certification service providers as well as the possibility of dependent bodies on the General State Administration being able to hire private certification service providers.

This model is mixed, due to being a regulated free market model, in which private certification service providers could be hired by any dependent body on the Public Administration to provide certification services.

Pursuant to the foregoing and the Public Administration identification and signing system, and specifically its certification policy, AC Camerfirma issues the following types of certificates:

- Recognised Electronic Seal for Automated Procedures Certificate, high-level.
- Recognised Electronic Seal for Automated Procedures Certificate, high-level.
- Recognised Public Employee Certificate, high-level, signature.
- Recognised Public Employee Certificate, high-level, authentication.
- Recognised Public Employee Certificate, high-level, encryption.
- Recognised Public Employee Certificate, mid-level.
- Electronic office, mid-level.
- Electronic office, high-level.
- Public Employee-MID-LEVEL HARDWARE Smart Card Logon

1.3.12.4 Hierarchy Global Chambersign ROOT.



(Global ChamberSign Root) AnyPolicy

This hierarchy is created for the issue of certificates for specific projects with a specific Entity or specific Entities. It is therefore an open hierarchy in which certificates and their management are in keeping with the specific project needs. In this sense, and unlike the previously explained "Chamber of Commerce Root", the Registration Authorities are not necessarily included within the scope of the Spanish Chambers of Commerce, or within a specific regional scope, specific business scope or a business relationship.

Global Chambersign Root can also issue SubCA certificates to third party entities under the conditions described in the sections corresponding with this CPS.

The aim of this hierarchy is to develop a replicable model in different countries.

The main characteristics of this hierarchy are:

- UNRESTRICTED geographical scope
- UNRESTRICTED Registration Authorities.
- UNRESTRICTED scope in a business relationship.

In the scope of this hierarchy, different intermediate Certification Authorities are developed that correspond with different national scopes. The first intermediate Authority corresponds with AC Camerfirma SA (Spain) and within this Certification Authority:

- **AC Camerfirma (Spain)** AnyPolicy
  - **RACER (Spain)** AnyPolicy

Natural person with Business Relationship, Contractual Relationship Certificate	1.3.6.1.4.1.17326.10.8.2
Natural person with Business Relationship, Contractual Relationship Certificate	1.3.6.1.4.1.17326.10.8.3
Legal entity Certificate	1.3.6.1.4.1.17326.10.8.4
Electronic Seal Certificate	1.3.6.1.4.1.17326.10.8.5
Natural person for Entrepreneurial Citizen Certificate	1.3.6.1.4.1.17326.10.8.6
Natural person with Business Relationship, Electronic Invoicing Certificate.	1.3.6.1.4.1.17326.10.8.7
Natural person with Business Relationship, Power of Attorney Certificate	1.3.6.1.4.1.17326.10.8.8
Natural person Encryption Certificate	1.3.6.1.4.1.17326.10.8.9

  - **Certificate Entity OMC Organisation of Medical Colleges (Spain) – Own DPC/CPS** Any Policy.

College business certificate for identification purposes.	1.3.6.1.4.1.26852.1.1.1.1
College business certificate for signature.	1.3.6.1.4.1.26852.1.1.1.2
College business certificate for encryption	1.3.6.1.4.1.26852.1.1.1.3
College business certificate in software, for identification purposes, signature and encryption.	1.3.6.1.4.1.26852.1.1.7
College business certificate in HSM, for identification purposes, signature and encryption.	1.3.6.1.4.1.26852.1.1.9
Business certificate for administrative personnel for identification purposes.	1.3.6.1.4.1.26852.1.1.2.1
Business certificate for administrative personnel for signature.	1.3.6.1.4.1.26852.1.1.2.2
Card encryption certificate, for administrative personnel.	1.3.6.1.4.1.26852.1.1.2.3
Business certificate for administrative personnel, in software, for identification purposes, signature and encryption.	1.3.6.1.4.1.26852.1.1.1.6
Business certificate for a legal entity for identification purposes.	1.3.6.1.4.1.26852.1.1.3.1
Business certificate for a legal entity for signature.	1.3.6.1.4.1.26852.1.1.3.2
Card encryption certificate, for a legal entity.	1.3.6.1.4.1.26852.1.1.3.3
Business certificate for a legal entity in software, for identification purposes, signature and encryption.	1.3.6.1.4.1.26852.1.1.1.5

- **Global Chambersign CodeSign.** AnyPolicy.
- **Global Chambersign Corporate Server.** AnyPolicy.
- **Global Chambersign TSA.** AnyPolicy.

- **Andorra Public Administration Certification Entity** DPC/CPS Own AnyPolicy.

INDIVIDUAL in DSCF – SIGNATURA	2.16.20.2.1.3.1.1.3
INDIVIDUAL in DSCF – IDENTITAT	2.16.20.2.1.3.1.1.1
INDIVIDUAL in programari	2.16.20.2.1.3.1.1.2
PF INDIVIDUAL de ciutadà andorrà in DSCF – SIGNATURA	2.16.20.2.1.3.1.1.3
PF INDIVIDUAL de ciutadà andorrà in DSCF – IDENTITAT	2.16.20.2.1.3.1.1.1
INDIVIDUAL de ciutadà andorrà in programari	2.16.20.2.1.3.1.1.2
PROFESSIONAL INDIVIDUAL in DSCF – SIGNATURA	2.16.20.2.1.3.1.12.3
PROFESSIONAL INDIVIDUAL in DSCF – IDENTITAT	2.16.20.2.1.3.1.12.1
PROFESSIONAL INDIVIDUAL in programari	2.16.20.2.1.3.1.12.2
PROFESSIONAL INDIVIDUAL COL·LEGIAT in DSCF – SIGNATURA	2.16.20.2.1.3.1.12.3
PROFESSIONAL INDIVIDUAL COL·LEGIAT in DSCF – IDENTITAT	2.16.20.2.1.3.1.12.1
PROFESSIONAL INDIVIDUAL COL·LEGIAT in DSCF – XIFRAT	2.16.20.2.1.3.1.11.1
PROFESSIONAL INDIVIDUAL COL·LEGIAT in programari	2.16.20.2.1.3.1.12.2
INDIVIDUAL al servei d'una ORGANITZACIÓ in DSCF – SIGNATURA	2.16.20.2.1.3.1.4.3
INDIVIDUAL al servei d'una ORGANITZACIÓ in DSCF – IDENTITAT	2.16.20.2.1.3.1.4.1
INDIVIDUAL al servei d'una ORGANITZACIÓ in programari	2.16.20.2.1.3.1.4.2
INDIVIDUAL al servei de l´ADMINISTRACIÓ in DSCF – SIGNATURA	2.16.20.2.1.3.1.5.3
INDIVIDUAL al servei de l´ADMINISTRACIÓ in DSCF – IDENTITAT	2.16.20.2.1.3.1.5.1
INDIVIDUAL al servei de l´ADMINISTRACIÓ in DSCF – XIFRAT	2.16.20.2.1.3.1.11.1

INDIVIDUAL al servei de l'ADMINISTRACIÓ in programari	2.16.20.2.1.3.1.5.2
SEGELL D'EMPRESA (Legal entity) in HSM – Segell Electrònic	2.16.20.2.1.3.1.2.3
SEGELL D'EMPRESA (Legal entity) in HSM – IDENTITAT	2.16.20.2.1.3.1.2.1
SEGELL D'EMPRESA (Legal entity) in programari	2.16.20.2.1.3.1.2.2
REPRESENTANT INDIVIDUAL in DSCF – SIGNATURA	2.16.20.2.1.3.1.12.3
REPRESENTANT INDIVIDUAL in DSCF – IDENTITAT	2.16.20.2.1.3.1.12.1
REPRESENTANT INDIVIDUAL in programari	2.16.20.2.1.3.1.12.2
REPRESENTANT INDIVIDUAL in HSM – Segell Electrònic	2.16.20.2.1.3.1.3.3
REPRESENTANT INDIVIDUAL in HSM – IDENTITAT	2.16.20.2.1.3.1.3.1
REPRESENTANT INDIVIDUAL in programari	2.16.20.2.1.3.1.3.2
Govern d'Andorra TSA – Software – keys created by the PSC	2.16.20.2.1.3.1.13.1
Certificat d'actuació d'Administració, Òrgan o Entitat de Dret Públic in HSM	2.16.20.2.1.3.1.8.3
Certificat d'actuació d'Administració, Òrgan o Entitat de Dret Públic in programari	2.16.20.2.1.3.1.8.2

- **AC Camerfirma Colombia 2014**
  - **AC Camerfirma Colombia Type A – 2014 Any Policy.**

Legal entity Certificate	1.3.6.1.4.1.17326.20.1.3.*
Natural Person Certificate.	1.3.6.1.4.1.17326.20.1.4.*
Certificate belonging to Company.	1.3.6.1.4.1.17326.20.1.5.*
Corporate Representative Certificate.	1.3.6.1.4.1.17326.20.1.7.*
Professional Qualification Certificate.	1.3.6.1.4.1.17326.20.1.6.*
Public Role Certificate.	1.3.6.1.4.1.17326.20.1.2.*
Academic Community Certificate.	1.3.6.1.4.1.17326.20.1.1.*
Time Stamp Certificate	1.3.6.1.4.1.17326.20.2.1.*

1.3.12.4.1 AC Camerfirma

The certificates issued by this CA will have continuity with the OID ones in the CA "AC Camerfirma – AAAA". AAAA being the year that the certificate is issued

The purpose of this intermediate CA is to issue sector-specialised CA certificates (Banking, Health, etc.). To date, only one **general-purpose generic-brand** CA has been developed under this CA, called RACER.

1.3.12.4.1.1 **CA RACER (acronym translated into English, High Capillarity Network of Registration Authorities)**

The certificates issued by this CA will have continuity with the OID ones in the CA "RACER – AAAA". AAAA represents the certificate's year of issue.

The main characteristic of RACER is that it can be used by any agent as a Registration Authority, provided that the agent has previously received suitable training and has been subject to a registration process and auditing that verifies it is in a position to suitably comply with the "obligations" stipulated in the corresponding Certification Policies.

Also under this **CA**, natural person certificates can be applied for that do **not determine** the natural person's relationship or association with a legal entity and always guarantees the his or her identity as the Signatory/Subscriber, holder of the certificate.

RACER's policies do not define a specific regional scope, meaning that it can issue certificates anywhere there is a recognised RA that meets Camerfirma's established requirements, and ***always subject to current, applicable law and pursuant to international trading relations.*** However, the development of the Hierarchy Chambersign Global Root organises the issue of digital certificates in different countries by establishing the certification authorities expressly created for issuing certificates in a specific country and therefore better adapted to the legal framework and specific regulations.

1.3.12.4.1.2 **CA of the Organisation of Medical Colleges. (OMC)**

This CA is constituted under the hierarchy of the Global Chambersign Root for issuing certificates within the scope of the Organisation of Medical Colleges, the latter being established as the service provider for certification under Spanish legislation and has the Ministry for Industry as a national regulatory agency.

The particular characteristics of this Certification Authority makes it necessary for an independent document for AC Camerfirma SA general certification practice to be created. This practice document is available upon request by writing to juridico@camerfirma.com.

1.3.12.4.2 AC Global Chambersign Corporate Server AAAA.

The certificates issued by this CA will have continuity with the OID ones in the CA "AC Chambersign Corporate Server – AAAA". AAAA represents the certificate's year of issue.

This certification authority is created for issuing component certificates (Electronic Stamp, Secure Server SSL, OV, EV).

1.3.12.4.3 AC Global Chambersign CodeSign AAAA.

The certificates issued by this CA will have continuity with the OID ones in the CA "AC Chambersign Corporate Server – AAAA". AAAA represents the certificate's year of issue.

This certification authority is created for the issuing of component certificates (Code signing).

1.3.12.4.4 AC Global Chambersign TSA AAAA.

The certificates issued by this CA will have continuity with the OID ones in the CA "AC Chambersign Corporate Server – AAAA". AAAA represents the certificate's year of issue.

This certification authority is created for issuing TSU certificates.

1.3.12.4.5 AC Camerfirma Colombia XXXX.

The certificates issued by this CA will have continuity with the OID ones in the CA "AC AC Camerfirma Colombia – AAAA". AAAA represents the certificate's year of issue.

This CA, which belongs to AC Camerfirma, operates under the hierarchy of Global Chambersign Root for issuing certificates from the Certification Authority in Colombia under the Colombian legal framework.

This CA issues certificates to other Certification Entities that operate in Colombian territory.

Under this CA the second level CA CITISEG-XXXX operates, which issues final entity certificates. This CA belongs to CITISEG, a company formed in Colombia to undertake service provision activities for certification under the corresponding Colombian regulatory agency.

The particular characteristics of this Certification Authority makes it necessary for an independent document for AC Camerfirma SA general certification practice to be created. This practice document is available upon request by writing to juridico@camerfirma.com.

1.3.12.4.6 Certification Entity of the Andorra Public Administration.

Following the guidelines of the hierarchical organisation, this certification authority has been created with the aim to issue certificates in the geographical scope of the Principality of Andorra.

In general, the public hierarchy of certification of Andorra includes:

- The issue of certificates in the public sector of Andorra and to the citizens of Andorra, who are understood as the legal entities or natural persons of Andorran nationality or with legal residence in Andorra.
- The admission of certificates for the citizens of Andorra and foreigners who are not residents in Andorra, in their electronic relations with the public sector of Andorra.

For the purposes of this document, the public sector must be understood as:

- The Public Administration, as is defined in Article 13 of the Administration Code:
- The Executive Board and the governing bodies that are under their management.
- The common ones and areas and the governing bodies that depend on it.
- The independent entities or parapublic entities.
- The public corporations, with shares held by the Public Administration.

Depending on the use of the certificates, the following classification is established for them:

- Electronic signature certificates, which allow their use for the authentication of documents on behalf of a natural person, in agreement with the definition contained in Article 7, Law 6/2009, 29 December, regarding electronic signatures. Certificates can be ordinary or qualified.

  In general, ordinary certificates comply with the requirements that are set forth in the technical specification ETSI TS 102 042, for the NCP or NCP + policy, when higher level security guarantees are required.

  Qualified certificates comply with the requirements that are set forth in the technical specification ETSI TS 101 456, for the QCP public or QCP + SSCD policy, when they are issued together with a secure device for creating electronic signatures.

- Electronic seal certificates, which allow their use for the authentication of documents on behalf of a legal entity.

  In general, the electronic seal certificates comply with the requirements that are set forth in the technical specification ETSI TS 102 042, for the NCP or NCP + policy, when higher level security guarantees are required.

- Electronic identity certificates, which allow their use for the electronic identification of a natural person or legal entity.

  In general, the identity certificates comply with the requirements that are set forth in the technical specification ETSI TS 102 042, for the NCP or NCP + policy, when higher level security guarantees are required.

- Encryption certificates, which allow their use in order to guarantee the confidentiality of documents and the transfer of data.

  In general, encryption certificates comply with the requirements that are set forth in the technical specification ETSI TS 102 042, for the NCP policy.

Depending on the acquirer of the certificates, this policy establishes the following classification:

- Public corporate certificates, acquired on behalf of the public sector to cover their security needs.

- Citizenship certificates, issued by the Andorran Public Administration Certification Entity, or on behalf of other service providers of certification, when they have been submitted on behalf of the Public Administration.

The particular characteristics of this Certification Authority makes it necessary for an independent document for AC Camerfirma SA general certification practice to be created. This practice document is available in Spanish and Catalan upon request by writing to juridico@camerfirma.com.

1.4 Scope of Application and Usage

This CPS fulfils the Certification Policies described in section 0 of this CPS.

1.4.1 Appropriate Certificate Uses

Camerfirma certificates can be used pursuant to the terms and conditions set out in the Certification Policies.

In general terms, certificates are allowed for the following uses:

- **Authentication** based on certificates X.509v3, pursuant to the corresponding electronic authentication policy.
- **Electronic signature**, advanced or recognised, based on X.509v3 certificates, pursuant to the corresponding electronic signature policy.
- **Asymmetric or mixed encryption**, based on X.509v3 certificates, pursuant to the corresponding encryption policy.

1.4.2 Prohibited and Unauthorised Certificate Uses

The certificates can only be used for the purposes for which they were issued and are subject to the established limits defined in the certification policies.

The certificates have not been designed, cannot be assigned and are not authorised for use or resale as control systems for dangerous situations or for uses that require fail-safe functioning, such as nuclear power plant operations, navigation systems or aviation communications, or weaponry control systems, where an error may directly result in death, personal injury or severe environmental damages.

The use of digital certificates in transactions that contravene the Certification Policies applicable to each of the Certificates, the CPS or the Contracts that the CAs sign with the RAs or Signatories/Subscribers are considered illegal, and the CA is exempt from any liability due to the signatory or third party's misuse of the certificates pursuant to current law.

Camerfirma does not have access to the data for which a certificate is used. Therefore, due to this technical impossibility of being able to access the message content, Camerfirma cannot issue any appraisal regarding this content, and the signatory is consequently

responsible for the content linked to the use of the certificate. The signatory is also responsible for the consequences of any use of this data in breach of the limitations and terms and conditions established in the Certification Policies applicable to each Certificate, the CPS and the contracts the CAs sign with the Signatories, as well as any misuse thereof pursuant to this paragraph or which could be interpreted as such by virtue of current law.

Camerfirma includes information in the certificate with regards to the limitation of use, either in standardised fields in the attributes *key usage*, *basic constraints* and/or *name constraints* marked as critical in the certificate and therefore of obligatory compliance by the applications that use them, or even limitations in the attributes such as *extended key usage* and/or by means of text included in the *user notice* field indicated as "not critical" but of obligatory compliance by the certificate holder and user.

1.5 Policy Authority

This CPS defines the way in which the Certification Authority meets all the requirements and security levels imposed by the Certification Policies.

The Certification Authority's activity may be subject to inspection by the Policy Authority (PA) or anyone appointed by it.

For the hierarchies described herein, the Policy Authority falls to Camerfirma's legal department.

Camerfirma's legal department therefore constitutes the Policy Authority for the Hierarchies and Certification Authorities described above and is responsible for managing the CPS.

1.5.1 Organization administering the document

The drafting and control of this CPS is managed by the CA Camerfirma SA legal department in collaboration with the operations department.

1.5.2 Contact Person

Address:	Calle Ribera del Loira, 12. Madrid (Madrid)
Phone:	+34 902 361 207
Fax:	+34 902 930 422
E-mail:	juridico@camerfirma.com

In terms of the content of this CPS, it is assumed that the reader is familiar with the basic concepts of PKI, certification and digital signing. Should the reader not be familiar with these concepts, information can be obtained from Camerfirma's website

http://www.camerfirma.com where general information can be found about the use of the digital signatures and digital certificates.

To report security incidents related to certificates by the TSP, you can contact AC Camerfirma through incidentes@camerfirma.com

1.5.3 Person determining CPS suitability for the policy

The legal department of Camerfirma is therefore constituted in the Policy Authority (PA) of the Hierarchies and Certification Authorities described above being responsible for the administration of the CPS.

1.5.4 CPS approval procedures

The publication of the revisions of this CPS must be approved by the Management of Camerfirma.

AC Camerfirma publishes every new version on its website. The CPS is published in PDF format electronically signed with the digital certificate of the legal entity of AC Camerfirma SA.

1.6 Definitions and Acronyms

1.6.1 Acronyms

CA	Certification Authority
CPS	Certification Practice Statement.
CRL	Certificate Revocation List. List of revoked certificates
CSR	Certificate Signing Request.
DES	Data Encryption Standard. Standard for encrypting data
DN	Distinguished Name. Distinguished name in the digital certificate
DSA	Digital Signature Algorithm. The signature's algorithm standard
FIPS	Federal Information Processing Standard Publication
IETF	Internet Engineering Task Force

ISO	International Standards Organisation International Standards Organisation
ITU	International Telecommunications Union.
LDAP	Lightweight Directory Access Protocol. Protocol for directory access
OCSP	On-line Certificate Status Protocol. Protocol for accessing the status of certificates
OID	Object Identifier.
PA	Policy Authority.
PC	Certification Policy
PIN	Personal Identification Number.
PKI	Public Key Infrastructure.
RA	Registration Authority
RSA	Rivest-Shamir-Adleman. Type of encryption algorithm
SHA	Secure Hash Algorithm.
SSCD	Secure Signature Creation Device
SSCDSD	Secure Signature Creation Data Storage Device
SSL	Secure Sockets Layer. A protocol designed by Netscape that has become standard on the Internet. It allows the transmission of encrypted information between a browser and a server.
TCP/IP	Transmission Control. *Protocol/Internet Protocol*. System of protocols, as defined in the IETF framework. The TCP protocol is used to split source information into packets and then recompile it on arrival. The IP protocol is responsible for correctly directing the information to the recipient.

1.6.2 Definitions

Activation data	Private data such as PINs or passwords used for activating the private key
Applicant	Within the context of this certification policy, the applicant is a natural person with special powers to carry out certain procedures on behalf of the entity.
Certificate	A file that associates the public key with some data identifying the Subject/Signatory and signed by the CA.
Certification Authority	This is the entity responsible for issuing and managing digital certificates. It acts as the trusted third party between the Subject/Signatory and the User Party, associating a specific public key with a person.
Certification Policy	A set of rules defining the applicability of a certificate in a community and/or in an application, with common security and usage requirements.
CPS	Defined as a set of practices adopted by a Certification Authority for issuing certificates in compliance with a specific certification policy.
CRL	A file containing a list of certificates that have been revoked for a certain period of time and which is signed by the CA.
Cross certification	Establishing a trust relationship between two CAs, by exchanging certificates between the two under similar levels of security.
Digital signature	The result of the transformation of a message, or any type of data, by the private application in conjunction with known algorithms, thus ensuring: a) that the data has not been modified (integrity) b) that the person signing the data is who he/she claims (ID) c) that the person signing the data cannot deny having done so (non-repudiation at origin)

Entity	Within the context of these certification policies, a company or organisation of any type with which the applicant has any kind of relationship.
Key pair	A set consisting of a public and private key, both related to each other mathematically.
OID	A unique numeric identifier registered under the ISO standardisation and referring to a particular object or object class.
PKI	A set of hardware, software and human resources elements and procedures, etc., that a system is made up of based on the creation and management of public key certificates.
Policy authority	A person or group of people responsible for all decisions relating to the creation, management, maintenance and removal of certification and CPS policies.
Private key	A mathematical value known only to the Subject/Signatory and used for creating a digital signature or decrypting data. Also called **signature creation data**.
Public key	A publicly known mathematical value used for verifying a digital signature or encrypting data. Also called **signature verification data**. The CA's private key is to be used for signing certificates and CRLs.
Registration Authority	The entity responsible for managing applications and identification and registration of certificates.
SCDSD	*Secure Signature Creation Data Storage Device* A software or hardware element used to safeguard the Subject/Signatory's private key so that only he/she has control over it.
SSCD	Secure Signature Creation Device. A software or hardware element used by the Subject/Signatory for generating digital signatures, so that cryptographic operations are performed within the device and control is guaranteed solely by the Subject/Signatory.

Subject/Signatory	Within the context of this certification practices statement, the natural person whose public key is certified by the CA and who has a valid private key for generating digital signatures.
User Party	Within the context of this certification policy, the person who voluntarily trusts the digital certificate and uses it as a means for accrediting the authenticity and integrity of the signed document.

2 Publication and Repository Responsibilities

2.1 Repository

Camerfirma provides a service for consulting issued certificates and revocation lists. These services are available to the public on its website: http://www.camerfirma.com/area-de-usuario/consulta-de-certificados/

Query services are designed to ensure availability 24 hours a day, seven days a week.

Policy and certification practice repository. These services are available to the public on its website.

This information is stored in a relational database with security measures to ensure it is stored in accordance with the corresponding Certification Policy requirements.

Camerfirma publishes the issued certificates, revocation lists, and certification policies and practices at no cost.

Camerfirma previously claims authorisation of the certificate holder before publication of the certificate.

2.2 Publication

2.2.1 Publication of CA information.

Camerfirma generally publishes the following information in its repository:

- An updated certificate directory indicating the certificates issued and whether they are valid or their application has been suspended, or terminated.
- The lists of revoked certificates and other information about the status of revoked certificates.
- The general certification policy and, where appropriate, specific policies.
- Certificate profiles and lists of revoked certificates.
- The Certification Practices Statement and the corresponding PDS (*PKI Disclosure Statement*).
- Binding legal instruments with Signatories and verifiers.

Any changes to specifications or conditions of service shall be communicated to users by the Certification Authority, through its website http://www.camerfirma.com

AC Camerfirma shall not remove the previous version of the changed document, indicating that it has been replaced by the new version.

External Subordinate CA certificates are published in a repository provided by AC Camerfirma, or if applicable, in its own repository which, by contractual agreement, Camerfirma can access.

2.2.1.1 Certification Policies and Practices.

This CPS and Policies are available to the public on the following website: https://policy.camerfirma.com.

Subordinate CA certification policies are also published or referenced on AC Camerfirma's website.

2.2.1.2 Terms and conditions.

Users can find the service terms and conditions in Camerfirma's certification policies and practices. The Subject/Signatory receives information on the terms and conditions in the certificate issuing process, either via the physical contract or the condition acceptance process prior to submitting the application.

When the Subject/Signatory accepts the terms and conditions on paper they must be signed in writing. If they are accepted in electronic format it is done by accepting the terms and uses in the application form.

2.2.1.3 Distribution of the certificates.

The issued certificates can be accessed as long as the Signatory/Subject has provided consent. Prior to issuing the certificate, the applicant must accept the uses, granting Camerfirma the right to publish the certificate on the website:

http://www.camerfirma.com/area-de-usuario/consulta-de-certificados/.

The root keys in the Camerfirma hierarchies can be downloaded from:
https://www.camerfirma.com/clavespublicas

The certificates can be viewed from a secure website by entering the Signatory's email address. If a Signatory with that email address is found, the system displays a page with all the related certificates, whether active, expired or revoked. Therefore, the query service does not allow the mass download of certificates.

2.3 Publication frequency

AC Camerfirma publishes the final entity certificates immediately after they have been issued, provided that the Signatory/Subscriber has given his/her approval.

AC Camerfirma frequently issues and publishes lists of revocation documents following the table indicated in the section of this practice document "Issuing frequency of CRLs"

Camerfirma immediately publishes on its website https://policy.camerfirma.com. Any modification made in the Policies and the CPS, keeping a record of versions.

The Camerfirma information is published when it is available and in particular, immediately published when the mentions are issued referring to the certificate validity.

The changes in the CPS are governed by the corresponding section of the CPS.

The certificate status revocation information is published pursuant to the corresponding section of this CPS.

Fifteen (15) days after publishing the new version, the reference to the change can be removed from the main page and inserted in the depository. The old versions of the documentation are conserved for a period of fifteen (15) years by the Certification Entity, and are available to be consulted by the interested parties should they have a valid reason to do so

2.4 Access controls to repositories

Camerfirma publishes certificates and CRLs on its web site. The certificate holder's e-mail address is required to access the certificate directory, and an anti-robot control must be passed to therefore eliminate the possibility of mass searches and downloads.

Access to revocation information and certificates issued by Camerfirma is free-of-charge.

Camerfirma uses reliable systems for the repository, in such a way that:

The authenticity of the certificates can be checked. The certificate itself signed by the certification authority guarantees its authenticity.

- Unauthorised persons cannot change the information. The certification authority's electronic signature protects the information included in the certificate from being tampered with.
- The certificates can only be accessed by people indicated by the signatory. The applicant authorises or rejects the publication of its certificate in the application process.
- Any technical change that affects the security requirements can be detected. The database that acts as a repository is equipped with protection mechanisms for data integrity and unauthorised access.

3 Identification and Authentication

3.1 Initial record

3.1.1 Types of names

The Signatory/Subscriber is described in the certificates by a distinguished name (DN, distinguished name, Subject) pursuant to the X.501 standard. The DN field descriptions are shown in each of the certificate profile documents. Similarly, it includes a "Common Name" component (CN =).

The syntactic structure and the content of the fields of each certificate issued by Camerfirma, as well as its semantic meaning, shall be described in each one of the certificate profile documents.

- In certificates corresponding to natural persons the identification of the signatory is formed by their name and surname(s), in addition to their tax identification code.
- Certificates corresponding to legal entities shall be identified by means of their corporate or business name and tax identification code.
- The final entity certificates that describe machines or services include an identification name for the machine or service, additionally the legal entity that owns the said service in the organisation field "O" of the "CN".
- The structure for the SubCA, TSU, TSA, OCSP certificates includes, at least:
    - A descriptive name that identifies the Certification Authority (CN)
    - The legal entity responsible for the keys (O)
    - The tax identification number of the organisation responsible for the keys (SN)
    - The country where the corporate activity of the organisation responsible for the keys is undertaken. (C)
- The Secure Server certificate includes, depending on the type of FQDN domain certificate (Fully Qualified Domain Name) for which the organisation "O" described in the company has ownership and control.
- The ROOT certificates have a descriptive name that identifies the Certification Authority and in the field (O) the name of the organisation responsible for the Certification Authority

3.1.2 Need for names to be meaningful

All Distinguished Names must be meaningful, and the identification the attributes associated to the subscriber should be in a human readable form.

3.1.3 Pseudonyms

The acceptance or not of pseudonyms is dealt with in each certification policy. If accepted, Camerfirma uses the Pseudonym with the CN attribute of the Signatory/Subscriber's name, keeping the Signatory/Subscriber's real identity confidential.

The pseudonym in certificates in which it is allowed is calculated in such a way that it unmistakeably identifies the real certificate holder, attaching an organisation's acronym to the certificate serial number

3.1.4 Rules used to interpret several name formats

Camerfirma complies with the ISO/IEC 9594 X.500 standard.

3.1.5 Uniqueness of names

Within a single CA, a Subject/Signatory name that has already been taken cannot be re-assigned to a different Subject/Signatory. This is ensured by including the unique tax identification code to the name chain distinguishing the certificate holder.

3.1.5.1 Issuance of several natural person certificates for the same certificate holder

Under this CPS a subscriber can apply for more than one certificate, provided that the combination of the following values existing in the application are different for a valid certificate:

Tax identification code Corporate tax identification code
National tax identification code Tax identification code for natural person
Type of certificate (Certificate description field).

As an exception, this CPS allows a certificate to be issued when the Corporate Tax identification code, National tax identification code, Type, all coincide with an active certificate, provided that another differentiating element exists between them, in the fields TITLE and/or DEPARTMENT.

3.1.6 Name dispute resolution procedure

Camerfirma has no responsibility in the case of resolution of name disputes.

In any case, the assignment of names will be made based on their order of entry.

Camerfirma does not arbitrate this type of disputes that must be resolved directly by the parties.

Camerfirma in any case complies with the provisions of section 9.13 of this CPS.

3.1.7 Recognition, authentication and function of registered trademarks and other distinctive symbols

Camerfirma does not assume any obligations regarding the issue of certificates in relation to the use of a trademark. Camerfirma does not purposefully allow the use of a name for which the Signatory/Subscriber does not own the right to use. Nevertheless, Camerfirma is not obliged to search for proof of ownership of trademarks for issuing certificates.

3.2 Initial Identity Validation

Identity verification does not differentiate between certificates in different hierarchies, it is associated with the type of certificate issued.

To properly identify the Applicant's identity, the entity and their relationship, Camerfirma establishes the following requirements through the RA:

3.2.1 Methods of proving private key ownership.

Camerfirma uses various circuits for issuing certificates in which the private key is managed differently. Either the user or Camerfirma can create the private key.

The key creation method used is shown in the certificate, through the Policy ID and the Description attribute in the certificate DN field. These codes are described in the corresponding policies and in the certificate profile records.

a) Keys created by Camerfirma.

   In software: They are given to the Signatory in person or by mail via protected files, using Standard **PKCS#12**. The security process is guaranteed because the access code to the file **PKCS#12** that enables its installation in applications is delivered by a different method to that used for receiving the file (email, phone).

   Camerfirma can give keys to the Signatory/Subscriber directly or via a registration authority on a security card (DSCF).

b) Keys created by the Signatory.

   The Signatory has a key creation mechanism, either software or hardware. Proof of ownership of the private key in this case is the request that Camerfirma receives in **PKCS#10** format.

3.2.2 Entity's ID

Prior to the issuing and delivering a certificate for an organisation, the information must be authenticated with regards to the formation and legal nature of the entity. The RA requests the required documentation depending on the type of entity in order to identify it. This information is published in the RA's operating manuals and on Camerfirma's web site.

Documentation proving that the public administration, public body or public entity exists is not required, because the said identity forms part of corporate scope of the General State Administration or other State Public Administrations.

The documentation necessary to issue a certificate is published at:

http://www.camerfirma.com/index/buscador-documentos.php

Within the certificate, the identification of the company associated with the certificate holder is included in the "non-critical" extension of the "CN" with OID 1.6.5 1.3.6.1.4.1.17326.30.2, and the type of supporting document in the "non-critical" extension of the "CN" with OID 1.6.5 1.3.6.1.4.1.17326.30.3.

In the certificate profile documents it can be seen in which field the identification document number is included and, if applicable, the type of document.

The profile documents can be requested through the AC Camerfirma customer support service 902 361 207 or through the application https://secure.camerfirma.com/incidencias.

3.2.3 Subject/Signatory Identification

The Signatories/Subscribers are required to appear in person when they are also the Applicant, or the Applicant's representative when this is a legal entity, and they as well as presenting the following:

- National Identification Document.
- Residency card.
- Passport.

Within the certificate, the identification of the holder is included in the field "Serial Number" of the "CN" indicating the identification number. The type of document used is included in the "non-critical" extension of the "CN" with OID 1.6.5 1.3.6.1.4.1.17326.30.4. It may be that the certificate holder is a company with which the identification information, in this case, shall correspond to the information and documents that identify the company.

Physical attendance is not required for these certificates in the cases established in Law 59/2003.

The documentation necessary to issue a certificate is published at: http://www.camerfirma.com/index/buscador-documentos.php

3.2.3.1 Proof of relationship

For the **Special Power of Attorney Certificate and Power of Representation Certificate**, the notary deeds must be submitted to prove the Signatory/Subscriber's powers of representation in relation to the entity. A certificate issued by the public register at least 10 days previously is submitted. The RA can also check the status and level of the applicant's powers of representation online.

In the Special Powers of Representation Certificates, the different powers are described in a table of sections, which are included in the certificate in two ways: one, placing the sections of the powers of representation in the TITLE field, and two, by means of a link in the USER NOTICE that forwards the deeds that have been scanned and signed by the RA operator. The list of powers of attorney can be found at:

https://www.camerfirma.com/apoderado/poderes.php.

For the Relationship certificates, usually a signed authorisation from a legal representative or proxy must be submitted.

In the Legal entity certificates, where the Signatory/Subscriber and the Applicant are different, documentary evidence is required that the Applicant has sufficient powers to apply for the certificate on behalf of the Signatory/Subscriber, in the form of a certificate from the public registry issued in the last 10 days or by the RA making an online query of the corresponding public record.

In the Public Employee/Headquarters and Seal Certificates the identification document of the person who is acting as responsible for it, on behalf of the said Public Administration, Agency or Public Law

Entity. The Applicant/person responsible is identified by the RA with his/her National Identification Document and the authorisation of the person responsible, where it is indicated that he/she is a public employee or appointed in the Official Bulletin where the person's National Tax Identification code appears

3.2.3.2 Considerations in the identification of the user in cases of high position.

AC Camerfirma uses special procedures for the identification of senior positions in companies and administration for the issuance of digital certificates. In these cases a registry operator moves to the facilities of the organization to ensure the physical presence of the owner. For the relations between the holder and the organization represented in public administration, the publication of the positions in the official bulletins is usually used.

3.2.3.3 Considerations in the identification of users and linkage in the AAPP

There are aspects to consider regarding the registration authorities established in the public administration and operated by public employees, the latter being considered as notaries to

guarantee the relationship between a public employee who requests the certificate and the body to which it is linked. In these cases, the collection of documentation that is part of the file can be simplified.

3.2.3.4 For technical or component certificates.

There are aspects to consider regarding the registration authorities established in the public

3.2.3.5 For OV (Organisation Validation) secure server certificates

In order to validate an application for an OV (Organisation Validation) secure server certificate the following is checked:

1. The entity's existence by accessing public registers (www.registradores.org; www.rmc.es), Camerdata (www.camerdata.es), Informa (www.informa.es) or the databases of the Spanish Tax Agency (www.aeat.es). The entity is described in the Organisation field of the certificate and matches the domain owner. The circumstances may arise in which a certificate is issued for this type of self-employed person, in this case, an entity does not exist, which is identified by means of an up-to-date receipt from the IAE tax in addition to their Identification Document.

   For entities outside of Spanish territory, the documentation that must be provided is the Official Registry of the corresponding country, duly apostilled, where the existence of the entity in the said country is indicated.

2. **The existence of the domain or ID address** and the subscriber's right to use it. This is checked by accessing the WHOIS Internet domains. The use of a domain name or private IP addresses is allowed but is obsolete (and will be prohibited after October 2016, meaning that Camerfirma will stop issuing certificates of this kind from **1 November 2015**. In any case, issued certificates of this type are revoked if their expiry date is later than **October 2015**. The customer will be notified of this before the certificate is issued.

   Domain information is taken from the WHOIS service of the registrar of the domain for which the rules established in the corresponding ccTLD or gTLD shall be applied.

3. **The subscriber's control over the domain**,

checking that the information found in the WHOIS Internet service search matches the entity's information submitted in the application.

It may occur that the domain is assigned in the registrar's database to a third parry responsible for its management. In such circumstances, in order for the last domain owner's details to appear in the certificate, the following is needed:

a. An authorisation of this for issuing the certificate.
b. Communication indicating these circumstances from the organisation or person that controls the domain record.
c. Document certifying in a reliable manner the right to use the domain (contract of assignment, order, technical test ...)

The certificate is downloaded by the administrative and/or technical contacts who appear in the domain databases after they provide a random number previously emailed by Camerfirma. The STATUS management application does not allow the validation of certificates without entering the administrative and technical contact details and a random value sent previously to the contacts, which are automatically notified.

In the certificates issued with a SAN extension (SubjectAltName). The aforementioned procedures must be executed for each of the domains included in the certificate. The certificate cannot be issued if any of them do not comply with the indicated requirements

Camerfirma examines the registry of the authorized ACs, CAA, according to RFC 6844, and if those CAA records are present and do not allow Camerfirma to issue those certificates because it is not registered, Camerfirma will not issue that certificate but will allow the applicants to perform again the request once this situation has been corrected. The client must modify the data of their domain to allow Camerfirma to issue said certificate.

3.2.3.6 For Corporate Seal Digital Certificates

The issuing of the **corporate digital seal certificates** is supported with documents in the following way: an enquiry into the existence of the company/entity is checked in the AEAT, Camerdata, Informa or public registry databases, in the same way as for the issuing of the aforementioned OV secure server certificates. The applicant's email address must come from an account with a domain related to the company or body that made the application.

The certificate is downloaded from the STATUS management platform by the applicant, for which they have previously received an e-mail with the downloading instructions. The

document with the key information and the certificate is subsequently downloaded. An e-mail is then received with the information required in order to install the keys.

To complete the procedure, authorisation from the subscriber is requested, which can be issued by a legal or human resources department

3.2.3.7 Codesigning certificates

For **code signing certificates,** the same checking system is used as for the issuing of OV secure server certificates

3.2.3.8 Certificates for encryption

The encryption certificates are issued online, using a valid, recognised certificate in the process.

Pursuant to this CPS, encryption certificates can be issued in batch processes. In this case, the identity can be checked via remote processes, submitting a document with the applicant's identity and relationship with the entity to an RA or to Camerfirma. This remote process is only used when the certificate is for exclusive encryption use.

3.2.3.9 In EV secure server certificates

For *"extended validation"* **Secure Server Certificates (EV)** that follow the *"CA/Browser Forum Guidelines for Issuance and Management of extended validation certificates"*, the same procedures apply as for a Recognised contractual relationship certificate, i.e.:

1. The Signatories/Subscribers, or an Applicant's representative if it is an entity, must introduce themselves in person and present an identity document or passport. In the event of entities outside of the Spanish territory, the passport of specific, duly apostilled document attesting to the country must be presented.
2. The RA requests the required documentation depending on the type of entity in order to identify it. The entity's business activity must be proven. This is checked by accessing the commercial registry or other business activity registers. In the event of entities outside of the Spanish territory, the documentation that must be provided is the Official Registry of the corresponding country, duly apostilled, where the existence of the entity in the said country appears.
3. Submission of authorisation signed by an entity's representative, who acts as the Applicant. In the event of entities outside of the Spanish territory, the documentary accreditation for the representation powers of the person signing the authorisation must be provided, duly apostilled, in order to check the authenticity of the documentation provided.

For these certificates, the RA must also check:

1. The entity's existence:

By accessing public registrars (www.registradores.org; www.rmc.es), Camerdata (www.camerdata.es), Informa (www.informa.es) or the databases if the Spanish Tax Agency (www.aeat.es). If the RA operators require further information on the organisation than appears on the certificate, they can access a corporate risk management database **Camerfirma SA https://www.camerfirma.com**. This database provides commercial registry information on companies and their representatives, including risk information. In the event of entities outside of the Spanish territory, the documentation that must be provided is the Official Registry of the corresponding country, duly apostilled, where the existence of the entity in the said country appears.

- It must be checked that the submitted data or documents are not older than **one year**.
- That the organisation has legally existed for the minimum of **one year**.
- Certificates cannot be issued for eradicated companies in countries where there is a government ban on doing business.

2. The existence of the domain and the subscriber's right to use it is checked by accessing the WHOIS domain databases:
   - http://www.internic.net/whois.html
   - http://www.networksolutions.com
   - http://en.gandi.net
   - http://www.interdomain.es
   - https://www.nic.es (.es domains)
   - http://www.eurid.eu (.eu domains)
   - http://www.nic.coop/whoissearch.aspx (.coop domains)
   - http://www.nominalia.com
   - http://www.arsys.es

3. That the entity has control over the Internet domain for which the certificate has been issued. In other words, the entity described in the internet domain database access service is clearly identified and matches the entity that the certificate applicant is representing.

The certificate issue guidelines require that a distinction be made between different types of organisations (private, government, business). In these cases, the applicant specifies the type of entity to which he/she belongs on the application form. The registration authority checks

the information is accurate. The certificate includes this information as defined in the reference certification policies.

In the certificates issued with the SAN extension (Subject Alternative Name). The aforementioned procedures must be executed for each of the domains included in the certificate. The certificate cannot be issued if any of them do not comply with the indicated requirements

3.2.3.10 In the SubCA, TSU certificates

For the issuing of a SubCA or TSU certificate, a service agreement is previously signed with the applicant, having recognised their existence, their legal representatives and their powers for the distribution of the certificates under the AC Camerfirma hierarchy. This decision is made by the company's senior management.

3.2.4 Non-verified subscriber information

In general, it's not allowed to include non-verified information in the "Subject Name" of a certificate.

3.2.5 In RA operator certificates (natural person)

On the one hand, it is checked that the applicant has passed the operator exam and on the other hand, that the information is identical to that in the RA operator document delivered by the organisation to which the operator belongs. It is checked that the Tax identification code is associated with the organisation and that the e-mail associated with the certificate is an e-mail of the organisation.

3.2.6 Special considerations for issuing certificates outside of Spanish territory

Aspects that are related to the identification documentation for natural persons, legal entities and relationships between them in the different countries where Camerfirma issues certificates. The documentation required for such purposes is that which is established by law in each country, provided that it allows compliance with the corresponding identification obligation pursuant to Spanish legislation.

- PERU
- ANDORRA
- COLOMBIA
- MEXICO
- UK
- FRANCE

3.3 Identification and authentication for re-key requests

3.3.1 Identification and authentication for routine re-key

Once a certificate has been rendered invalid, it cannot be renewed automatically. The applicant must start a new issuance procedure.

***Exception**: When the renewal takes place on final entity certificates due to a certificate replacement process or an issuing error or **a loss**, the certificate can be renewed following a revocation, as long as it shows the current situation. The supporting documentation submitted to issue the replaced certificate is reused and the physical presence is no longer required, if this were necessary due to the type of certificate. Camerfirma updates the number of years since the last physical presence to the status of the certificate being replaced, just as if this process had been the result of an ordinary renewal.*

3.3.2 Identification and authentication for re-key after revocation

3.4 Identification and authentication for revocation request

The method for submitting revocation requests is established in section 4.5 of this document.

4 Certificate life-cycle operational requirements

AC Camerfirma uses its STATUS platform for certificate lifecycle management. This platform allows the application, registration, publication and revocation of all certificates issued.

4.1 Certificate request

4.1.1 Who can submit a certificate application

A certificate application can be submitted by the subject of the certificate or by an authorized representative of the subject.

4.1.2 Enrollment process and responsibilities

4.1.2.1 Web forms.

Certificate requests are submitted via the application forms at the address or by sending the applicant a link to a specific form.

http://www.camerfirma.com/certificados/

The website contains the forms required to apply for each type of certificate that Camerfirma distributes in different formats and the signature creation devices, if they are required.

The form allows for the inclusion of a CSR (PKCS#11) if the user has created the keys.

After confirmation of the application data, the user receives an email sent to the account associated with the certificate application containing a link to confirm the application and accept the terms of use.

Once the application has been confirmed, the subscriber is informed of the documentation that must be presented at an authorised registration office and that he/she must comply with the physical attendance identification requirements, if applicable.

SubCA, TSA certificates must be applied for through the application for a commercial offer and subsequently included in the STATUS platform application forms.

4.1.2.2 Batches.

The STATUS platform also allows batch request circuits. In this case, the applicant sends the RA a file with a structure designed by Camerfirma containing the applicants' details. The RA uploads these requests in the management application.

4.1.2.3 Applications for final-entity certificates in HSM, TSU and Subordinate CA.

Applications for issuing certificates in HSM, TSU or Subordinate CA are made through a sales quotation at a sales area. http://www.camerfirma.com/camerfirma/localizacion.

AC Camerfirma reserves the right to send an internal or external auditor to verify that the development of the key creation event complies with certification policies and associated practices.

When the customer generates the cryptographic keys in an HSM device using its own resources and requests a certificate on hardware, Camerfirma collects the necessary evidence, for which it requests the following documents:

- Statement from the applicant indicating that the keys have been generated within a hardware device and/or a technical report from a third party (service provider) certifying this process. AC Camerfirma provides the statement forms for Signatories and third parties.

- Records from key creation events indicating:

    - The process followed to create the keys
    - The people involved
    - The environment in which it was created
    - The HSM device used (model and make)
    - Security policies employed: (size of keys, key creation parameters, exportable/not exportable and any other relevant information)
    - The PKCS#10 request generated
    - Any incidents and solutions.

- Device specifications: The technical data sheet of the devices may be acceptable.

This information is included by the RA into the media documentary record for issuing the certificate.

For each type of certificate, the Signatory must accept the terms and conditions of use between the Signatory, the registration authority and the certification authority. This is carried out by manually signing a contract or accepting the terms and conditions displayed on a website before creating and downloading the certificate.

4.1.2.4 Applications via Web Services (WS) layer.

In order to integrate third party applications in the Camerfirma certificate management platform, a Web Services (WS) layer has been created that provides certificate issuance, renewal and revocation services. Calls to these WS are signed with a certificate recognised by the platform.

The "blind" issuance of such certificates means that the process is reviewed in detail. Before beginning the issuance by means of this system, there must be a favourable Camerfirma technical report, a contract where the registration authority agrees to maintain the system in optimum security conditions and to notify Camerfirma of any change or incident. In addition, the system is subject to annual audits to verify the following:

1. Documentary records of certificates issued
2. That the certificates are being issued under the guidelines established by the certification policies and this certification practices statement under which they are governed.

4.1.2.5 Cross certification request

Camerfirma does not have any cross certification process established at this time.

4.2 Processing the certification request.

4.2.1 Performing identification and authentication functions

Once a certificate application has been submitted, the RA operator verifies the information provided by accessing the management platform (STATUS), pursuant to the corresponding section of this DPC.

The operator of the STATUS platform has an internal management certificate that is issued in order to carry out these operations and which is obtained after a training and evaluation process.

4.2.2 Approval or rejection of certificate applications

The registration operator looks at the pending applications requiring processing based on a distribution of projects. In other words, the operator only sees the applications that enter a project to which he/she is associated.

The RA operator waits for the subscriber to present the corresponding documentation.

If the information is not correct, the RA denies the application. If the information is correctly verified, the Registration Entity approves the issue of the certificate by means of the electronic signature with its RA operator certificates.

4.2.3 Time to process certificate applications

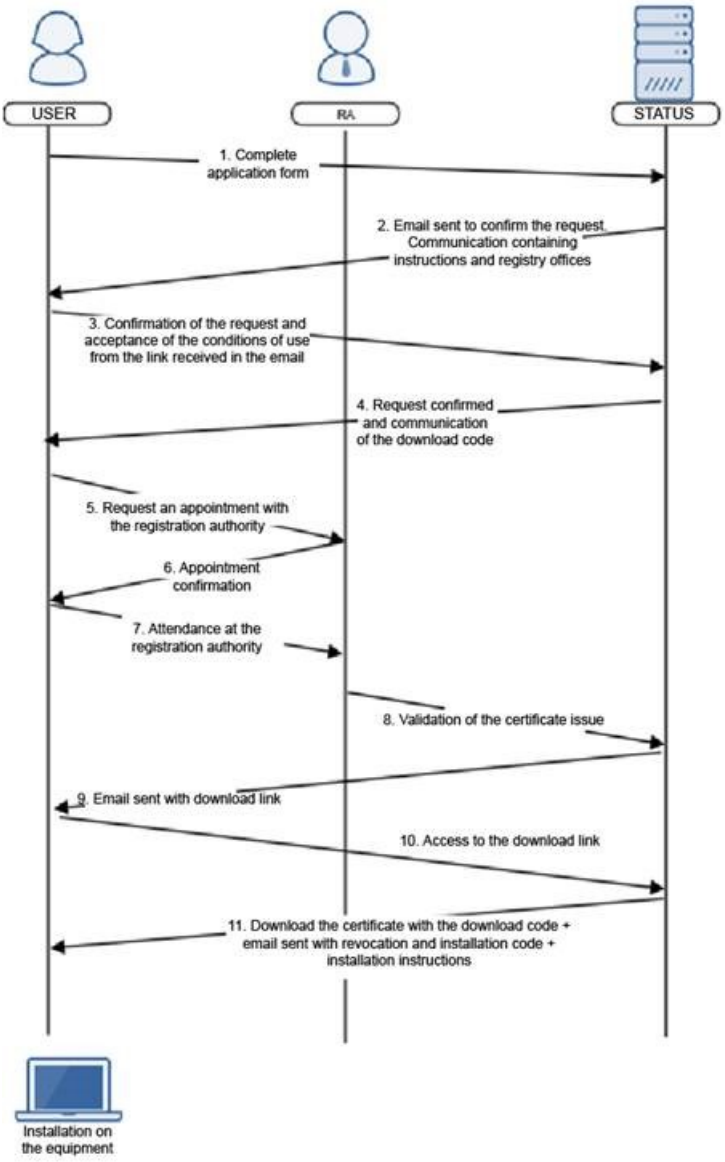
Applications made through web services are directly executed when they are received and authenticated with a certificate that has previously been recognised by Camerfirma.

4.3 Certificate issuance

4.3.1 CA actions during certificate issuance

4.3.1.1 Certificates via Software:

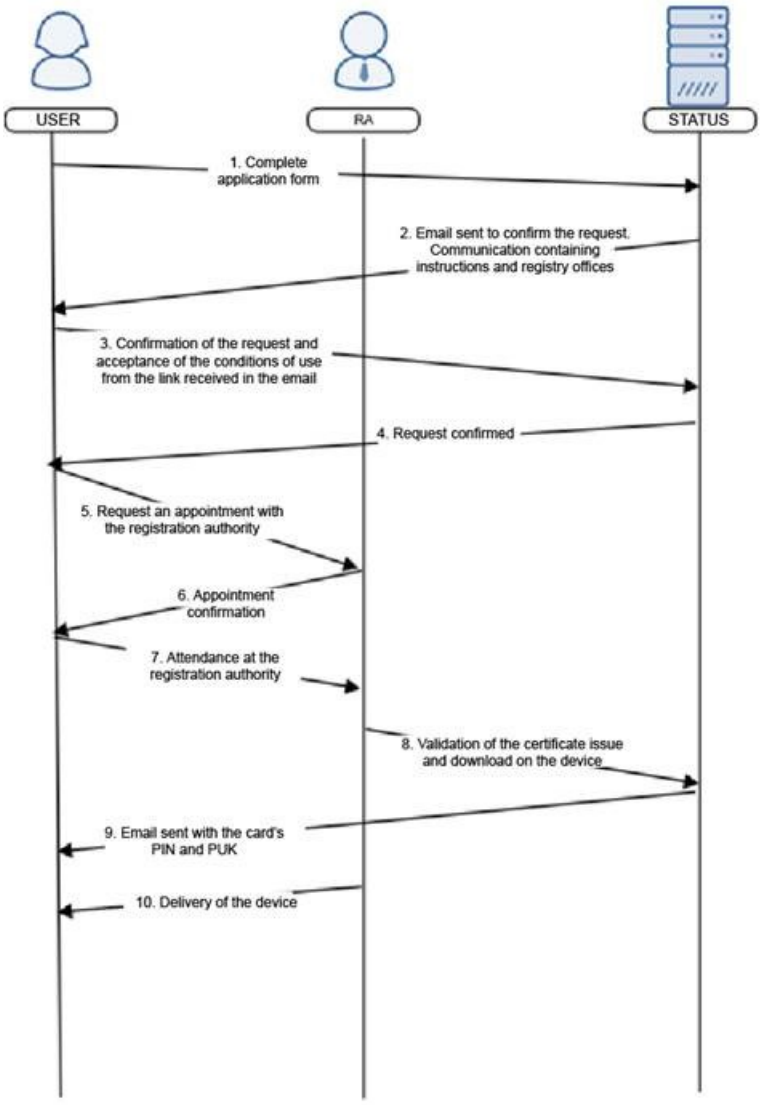
Once the application has been approved, the subscriber receives an e-mail with the approval notification, from which the certificate can be created and downloaded. The product code provided with the contract and an installation code sent in a separate email or via SMS together with a revocation code is required to install it.



Reference document: **IN-2008-03-01**-Generation_certs_software

4.3.1.2 Certificates via HW (Secure Signature Creation Device):

4.3.1.2.1 Cryptographic Card or Token.



The user receives the signature device with the certificates and created keys at the RA's offices.

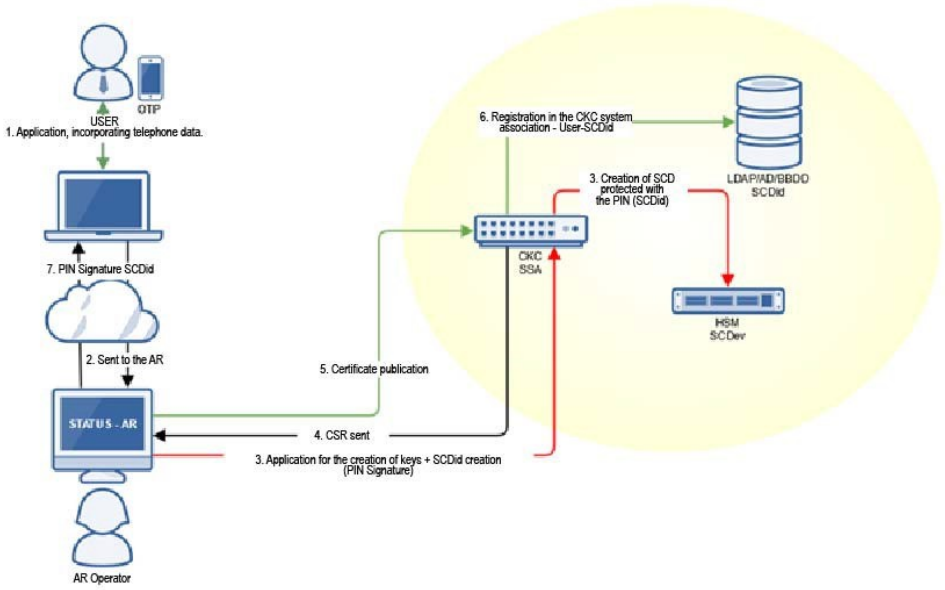
The Registration Authority operator chooses which cryptographic card to use to create the keys. For this purpose, the operator's work station is suitably configured with the corresponding CSP (Cryptographic Service Provider). AC Camerfirma currently allows several types of USB cards and tokens, all CWA 14169 SSCD Type-3 certified.

For the default cards (distributed by bit4id) the subscriber receives an e-mail in the associated account containing the access code to the cryptographic device

and the unlocking code, as well as a renewal key. For other cards, the PIN/PUK management is outside of the scope of this document.

Reference document: IN-2008-03-02-Generacion_certs_tarjeta_tecnico

4.3.1.2.2 Certificates on centralised key management platform



AC Camerfirma has a solution for the centralised key management system. The keys are created in an HSM FIPS 140 2 level three where they are stored for subsequent use by the public key certificate holders that are associated with them.

On the STATUS platform, the Registration Authority operator chooses to create the keys on a centralised cryptographic device. The operator's work station must therefore be configured with the CSP (Cryptographic Service Provider) corresponding with the centralised key creation device.

Subscribers must have client software installed on their PC in order to allow their local key store to be linked securely to the real keys stored on the centralised PC.

The subscribers receive the private key activation codes by email. This means they have exclusive control of the key.

At this time, the centralised key management system is awaiting recognition by the Ministry for Industry as a secure signature creation device.

4.3.1.2.3 Applications via WS:

Applications can be received via duly signed calls to the STATUS application WS services layer, pursuant to section 4.1.4.

4.3.1.3 EV Secure server certificate

In accordance with the specific policies for EV secure server certificates, these certificates require the physical presence of the applicant or an approved third party. The RA administrator must verify the service payment, the related documentation and the Subject/Signatory's identity.

The certification policies for issuing SSL EV certificates to those that adhere to this CPS ("*CA/Browser Forum Guidelines for Issuance and Management of extended validation certificates*"), require that each EV certificate issue request is approved by two different people. The procedure followed to validate these certificates guarantees double verification, as follows:

- Operator validation of the registration of administrative details and physical presence and delivery of documentation and authorisations.

- Once this procedure is complete, the AC Camerfirma internal audit department checks the documentation and proceeds with the final certificate validation and issuance.

Signatories can use their own resources to create the keys in a cryptographic device and deliver the request to Camerfirma in PKCS#10 format to issue the certificate. In the event that the certificate was issued under the HSM hardware device format, evidence of this is requested as described in section 4.1.3 of this document.

If Camerfirma creates the private key, once the RA operator has approved the request, the following is sent to the Subject/Signatory:

- ✓ A link to the web page where the certificate is created in PKCS#12 format.
- ✓ A password is required to install the keys and certificate on the Signatory's computer.
- ✓ The Subject/Signatory also requires a download code supplied by the application during the application process to obtain the keys and certificate.

If the Signatory generates the key, Camerfirma sends the user a certificate in PKCS#7 format.

4.3.1.4 Certificate for Encryption.

Encryption certificates are also issued automatically once the holder has submitted a valid identity document to the web application developed for that purpose, at

http://www.camerfirma.com/certificados/compontentes/certificado-camerfirma-cifrado/

or via certificate batch applications, based on which Camerfirma issues PKCS#12 files.

AC Camerfirma stores a copy of the keys and the certificate in software format PKCS#12, maintained secure by a password distributed between 4 AC Camerfirma operators. At least two of them must participate in order to recover the decryption key.

4.3.1.5 Subordinate CA Certificates:

Subordinate CA certificates are issued in a Subordinate CA certificate issuance event in AC Camerfirma's facilities in a secure environment and under the supervision of an internal auditor.

4.3.2 Notification to subscriber by the CA of issuance of certificate

In the final entity certificates issued by Camerfirma, an email notification is sent to the applicant indicating the request's approval or denial.

Intermediate or root entity certificates are issued in a key ceremony and subsequently delivered to the certificate holder.

4.4 Certificate acceptance.

4.4.1 Conduct constituting certificate acceptance

Once the certificate has been delivered or downloaded, the user has seven days to verify that it has been issued correctly.

If the certificate has not been issued correctly due to technical problems, it is revoked and a new one is issued.

4.4.2 Publication of the certificate by the CA

The issued certificates are published at this link http://www.camerfirma.com/area-de-usuario/consulta-de-certificados/

AC Camerfirma uses its STATUS® platform to publish certificates and CRLs at the customer's offices in such a way that the information can be accessed locally. It can be published in an active directory, an LDAP service or a database

4.4.3 Notification of the issuance to third parties

AC Camerfirma provides a system for querying the status of certificates issued, on its website http://www.camerfirma.com/area-de-usuario/consulta-de-certificados/. Access to this page is free.

In some cases the national supervisor is required to send the certificates and CRL issued by the provider on a regular basis.

In the case of SSL EV certificates, notification is sent to various accredited registration services prior to issuing the certificate. Google requires this for recognition of SSL EV certificates in a process called **"Certificate Transparency"**.

4.5 Key pair and certificate usage

4.5.1 Subscriber private key and certificate usage

The keys are only used for the purposes indicated in the section "Purpose of key use" of the certification policies of each one of the certificates issued.

The CA makes every possible effort that is in within their scope to confirm that the CA signature keys are only used for certificate creation purposes and for the signing of CRLs.

Despite the fact that the encryption of information is technically possible with the certificates, Camerfirma shall not be held responsible for the damages caused due to the holder's loss of control of the private key needed to decipher the information, except in the certificate exclusively issued for this use. For certificates that are not exclusively for encryption, Camerfirma does not copy or store private keys associated with them

4.5.2 Relying party public key and certificate usage

Relying parties must access and use the public key and certificate as stipulated in this CPS and as indicated in the "Relying Party Agreement".

4.6 Certificate renewal.

4.6.1 Circumstance for certificate renewal

Subordinate CA certificates are not renewed automatically; they must be issued in a new procedure based on prior planning, ensuring that the life of the certificate is always longer than the maximum validity period of certificates issued under its hierarchical branch.

RA Operator certificates are renewed every year as long as there is no proof that the entity has ceased to be an RA operator.

TSU certificates are issued for a period of six years with a private key use of one year, which are renewed annually.

ROOT certificates are issued in a new procedure through a process created for this purpose.

OCSP certificates are issued periodically and no renewal processes are established.

4.6.2 Who may request renewal

In certificates where renewal is allowed, the holder is authenticated on the basis of the certificate to be renewed.

4.6.3 Processing certificate renewal requests

Before renewing a certificate, Camerfirma checks that the information used to verify identity and other data of the Signatory and the key holder is valid.

Under these practices, if any of the Signatory or key holder's information has changed, a new record must be made and issued pursuant to the relevant sections in this document.

Camerfirma always issues new keys to renew certificates. Therefore, the technical process of issuing the certificate is the same as the process for submitting a new application.

When **qualified or recognised certificates** for electronic signatures are renewed, the Law for Electronic Signatures 59/2003 allows the issuing of certificates without physical presence for a period of up to **five years** from the last on-site registration. Once the period established has transpired, the subscriber must follow the same on-site issue process as for the first issue. Under these practices, if more than five years have not passed at the time of the certificate renewal, the physical presence of the owner is not required.

STATUS, the management application used by Camerfirma makes four notifications (30 days, 15 days, 7 days, 1 day) by e-mail to the subscriber advising that the certificate is going to expire.

The renewal process can be initiated from the Camerfirma website http://www.camerfirma.com/area-de-usuario/renovacion-de-certificados/. A valid (not revoked) certificate is required to complete the renewal process.

- Once the certificate being renewed has been identified, the application gives the Signatory the old certificate details and requests confirmation. The application allows the Signatory to change the email address assigned to the certificate. If other information included in the certificate has changed, the certificate must be revoked and a new one issued.

- The request is included in the RA application. Once the operator has checked the data, the CA is requested to issue the certificate.

- As a general rule, Camerfirma issues a new certificate, taking the expiry date of the certificate being renewed as this new certificate's start date. In some cases, certificate

renewal with the date at the same time of renewal, subsequently revoking the certificate to be renewed, is allowed in the emission processes through web services.

4.6.4 Notification of new certificate issuance to subscriber

The notification of the issuance of a renewed certificate it will occur as described in section 4.3.2 of this document.

4.6.5 Conduct constituting acceptance of a renewal certificate

As stipulated in section 4.4.1 of this document.

4.6.6 Publication of the renewal certificate by the CA

As stipulated in section 4.4.2 of this document.

4.6.7 Notification of certificate issuance by the CA to other entities

Not stipulated

4.7 Key Renewal

Since this is the common process for renewing AC Camerfirma certificates, the processes described in this section refer to this renewal method-.

4.8 Certificate modification

Any need for modification to certificates requires a new application. The certificate is revoked and a new one issued with the corrected data.

If it is a certificate **replacement process**, it is considered to be a renewal and thus counted when calculating the years of renewal without physical presence as required by law.

The certificates may be modified as renewal when the attributes of the Signatory or key holder that form part of the uniqueness control provided for this policy have not changed.

If the modification request is made within the ordinary period for renewal of the certificate, it is renewed instead of modified with prior revocation of the certificate to be modified.

4.9 Certificate suspension and revocation.

Revocation refers to any change in a certificate's status caused by being rendered invalid due to any reason other than its expiry.

Suspension, on the other hand, refers to revocation with cause for suspension (i.e. a specific revocation case). A certificate is revoked until it is decided whether it should be revoked definitively or activated.

Rendering a digital certificate invalid due to revocation or suspension becomes effective for third parties as soon as notice of the termination has been given in the certification service provider's certificate validity query service (publication of the list of revoked certificates or query the OCSP service).

The reasons for suspending a certificate are defined in the specific certification policy.

AC Camerfirma maintains the certificates on the revocation list until the end of their validity. When this occurs, they are removed from the list of revoked certificates. Camerfirma will only eliminate a certificate from the revocation list in either of the following situations:

- Certificate expired
- Certificate revoked due to suspension, and once reviewed it is concluded that there are no reasons for it to be revoked definitively.

4.9.1 Causes for revocation and documentary proof

The reasons for revoking a certificate are defined in the specific certification policy.

As a general rule, a certificate will be revoked where:

- Any of the details contained in the certificate are amended.
- Errors or incomplete data detected in the data submitted in the certificate request or there are changes to the circumstances verified for issuing the certificate.
- Failure to pay for the certificate.

Due to circumstances affecting key or certificate security.

- The private key or infrastructures or systems belonging to the Certification Authority that issued the certificate are compromised, whenever this incident affects the accuracy of the issued certificates.
- The Certification Authority has breached the requirements in the certificate management procedures established in this CPS.
- The security of the key or certificate belonging to the Signatory or person/entity responsible for the certificate is compromised or suspected of being compromised.

- There is unauthorised third party access or use of the private key of the Signatory or person/entity responsible for the certificate.
- There is misuse of the certificate by the Signatory or person/entity responsible for the certificate or failure to keep the private key secure.

Due to circumstances affecting the security of the cryptographic device

- Security of the cryptographic device is compromised or suspected of being compromised.
- There is loss or disablement due to damage to the cryptographic device.
- There is unauthorised third party access to the activation details of the Signatory or person/entity responsible for the certificate.

There are circumstances that affect the Signatory or person/entity responsible for the certificate.

- The relationship is terminated between the Certification Authority and the Signatory or person/entity responsible for the certificate.
- There are changes to or termination of the underlying legal relationship or cause for issuing the certificate to the Signatory or person/entity responsible for the certificate.
- The applicant breaches part of the requirements established for requesting the certificate.
- The Signatory or person responsible for the certificate breach part of their obligations, responsibility and guarantees established in the legal document or in this Certification Practices Statement.
- The sudden incapacity or death of the Signatory or person/entity responsible for the certificate.
- There is a termination of the legal entity that is Signatory of the certificate and expiry of the authorisation provided by the Signatory to the person/entity responsible for the certificate, or termination of the relationship between the Signatory and the person/entity responsible for the certificate.
- The Signatory requests revocation of the certificate in accordance with the provisions of this CPS.
- Firm resolution of the competent administrative or judicial authority

Other circumstances

- Suspension of the digital certificate for a longer period than established in this CPS.
- Termination of the Certification Authority's service, in accordance with the corresponding section of this CPS.

In order to justify the need for the proposed revocation, required documents must be submitted to the RA or CA, depending on the reason for the request.

- If the certificate holder or the natural person applying for the certificate for a legal entity, a signed statement must be provided indicating the certificate to be revoked and the reason for this request and identification must be provided to the RA.

- If the revocation is requested by a third party, it must present authorisation from the natural person certificate holder or the legal representative of the legal entity certificate holder. The third party must indicate the reasons for requesting revocation of the certificate and identify itself to the RA.

- If the entity requesting revocation is associated with the certificate holder due to termination of the relationship with it, this circumstance must be proven (revocation of powers, contract termination, etc.) and they applicant must identify him/herself to the RA as authorised to represent the entity.

The Signatories have revocation codes that they can use in the online revocation services or by calling the helplines.

4.9.2 Who can request revocation

Certificate revocation can be requested by:

- The Subject/Signatory
- The responsible Applicant
- The Entity (via a representative)
- The RA or CA.
- Anyone established in the specific certification policies.

Camerfirma can, in case of an error located into the certificate, revoke it unilaterally within a maximum period of 1 week. Depending on the severity and in case the user's security may be compromised, the provider may unilaterally revoke the certificate within 24 hours.

4.9.3 Revocation request procedure.

All requests must be made:

- ✓ Via the online Revocation Service, by accessing the revocation service on Camerfirma's website and entering the Revocation PIN number.

  http://www.camerfirma.com/area-de-usuario/revocacion-de-certificados/

- ✓ By physically going to the RA's offices during opening hours, showing the Subject/Signatory or Applicant's National Identity Card.

- ✓ By sending Camerfirma a document signed by a representative with sufficient representation powers for the entity requesting certificate revocation. This form must be used to revoke Subordinate CA and TSU certificates.

- ✓ For **secure server, corporate seal or CodeSign** certificates, this revocation can be requested by email, using the address used to request issuance of the certificate, sending the revocation request to gestión_soporte@camerfirma.com. The Camerfirma operator must confirm the revocation request by telephone in order to act upon it.

Camerfirma stores all the information relating to certificate revocation processes on its website.

The revocation management service and the query service are considered critical services, as specified in Camerfirma's contingency plan and business continuity plan. These services are available **24 hours a day, seven days a week**. In the event of a system failure, or any other circumstance out of Camerfirma's control, Camerfirma will make every effort to ensure that services are not down longer than **24 hours**.

In case of revocation due to non-payment of the issued certificate price, the RA or CA shall request by emailing the Signatory at their contact e-mail address, prior and on two successive occasions, that this situation is remedied within **eight days**, failing which, the certificate will be revoked immediately.

4.9.4 Revocation period

The revocation period, from the moment Camerfirma or an RA has reliable knowledge of a certificate revocation, takes place immediately, and is included in the next CRL issued and based on the data from the management platform from which the OCSP responder is fed.

4.9.5 Time within which CA must process the revocation request

Camerfirma will process a revocation request immediately following the procedure described in point 4.9.3

In the revocations produced by a bad issuance of the certificate, the holder will be notified in advance to agree on the terms of their replacement.

Camerfirma in any case and under these certification practices, can revoke a certificate unilaterally and immediately for security reasons, without the owner can claim any compensation for this fact.

4.9.6 CRL checking requirements

Trusting third parties must first check the status of the certificates before their use, , and in any case must check the latest CRL that has been issued, which can be downloaded from the following website:

http://www.camerfirma.com/area-de-usuario/consulta-de-certificados/

Camerfirma always issues CRLs signed by the CA that issued the certificate. The access to the CRL is also referred to in the certificate extension "CRL distribution points".

4.9.7 CRL issuance frequency

AC	Issued every...	Duration
CHAMBERS OF COMMERCE ROOT	**365 days**	**365 days**
CAMERFIRMA CHAMBER OF COMMERCE CERTIFICATES	24 hours	48 hours
CAMERFIRMA PUBLIC ADMINISTRATIONS	24 hours	48 hours
CAMERFIRMA EXPRESS CORPORATE SERVER v3	24 hours	48 hours
CAMERFIRMA CODESIGN v2	24 hours	48 hours
CAMERFIRMA TSA	24 hours	48 hours

CHAMBERSIGN ROOT	**365 days**	**365 days**
AC CAMERFIRMA	365 days	365 days
RACER	24 hours	48 hours

CHAMBERS OF COMMERCE ROOT – XXXX	**365 days**	**365 days**
CAMERFIRMA CHAMBER OF COMMERCE CERTIFICATES – XXXX	24 hours	48 hours
CAMERFIRMA PUBIC ADMINISTRATION – XXXX	24 hours	48 hours
CAMERFIRMA CORPORATE SERVER – XXXX	24 hours	48 hours
CAMERFIRMA CODESIGN – XXXX	24 hours	48 hours
CAMERFIRMA TSA – XXXX	24 hours	48 hours

GLOBAL CHAMBERSIGN ROOT – XXXX	**365 days**	**365 days**
AC CAMERFIRMA – XXXX	365 days	365 days
RACER – XXXX	24 hours	48 hours
AC CAMERFIRMA COLOMBIA – XXXX	365 days	365 days
AC CITISEG – XXXX	24 hours	48 hours
GOVERNMENT OF ANDORRA	24 hours	48 hours
CGCOM	24 hours	48 hours

4.9.8 Maximum latency for CRLs

CRLs are issued every 24 hours with a validity of 48 hours.

4.9.9 Availability of online service to check revocation

CA provides an online service to check revocations at:

http://www.camerfirma.com/area-de-usuario/consulta-de-certificados/

Also via OCSP queries at:

http://www.camerfirma.com/servicios/respondedor-ocsp/

The addresses to access these services are included in the digital certificate. For the CRLs and ARLs in the CRL Distribution Point extension and the OCSP address in the Authority Information Access extension.

The certificates may include more than one address to access the CRL in order to guarantee availability.

The OCSP service is fed from the CRLs issued by the various certification authorities (CA) or by access to the platform's database (EE). Technical access data and the OCSP response validation certificates are published on the Camerfirma website http://www.camerfirma.com/servicios/respondedor-ocsp/

These services are available **24 hours per day, seven days per week, 365 days per year**.

Camerfirma makes every effort to ensure service is not down for more than **24 hours**. This service is critical for Camerfirma's activities and is therefore considered in the **contingency and business continuity plans**.

4.9.10 Requirements of the online service to check revocation

To verify a revocation, the User Party must know the e-mail address related to the certificate that they want to consult if this is accessed online.

OCSP responses are signed by the CA that issued the certificate on request; the certificate is required to validate the response. Updated certificates can be found at the link

http://www.camerfirma.com/servicios/respondedor-ocsp/

4.9.11 Other methods of disclosing revocation information

Mechanisms that Camerfirma makes available to system users is published on its website http://www.camerfirma.com/area-de-usuario/consulta-de-certificados/

4.9.12 Special revocation requirements due to compromised key security

Not stipulated

4.9.13 Suspension

When a certificate suspension takes place, Camerfirma will have **one week** to decide on the certificate's final status: (revoked or active). If all the information required to verify the status is not provided within this period, Camerfirma will revoke the certificate for unknown reason.

If the certificate is suspended, a notice is sent to the Subject/Signatory by email specifying the time of suspension and the reason.

If the suspension does not take place and the certificate has to be activated again, the Subject/Signatory will receive an email specifying the new certificate status.

The suspension process does not apply to certificates

- From TSU/TSA
- From CA and Subordinate CA
- From RA Operator.

4.9.14 Who can request suspension

See section 4.9.2.

4.9.15 Procedure for suspension request

The suspension can be requested by accessing the relevant page on Camerfirma's website or by previously authenticated oral or written communication. The Signatory must have the revocation code in order to suspend the certificate.

4.9.16 Suspension period limits

A certificate shall not be suspended for more than **one week**.

Camerfirma supervises, via a certificate management platform alert system (STATUS), that the suspension period established by the Policies and this CPS is not exceeded.

4.10 Certificate Status Services

4.10.1 Operational characteristics

Camerfirma provides a service for consulting issued certificates and revocation lists. These services are available to the public on its website: http://www.camerfirma.com/area-de-usuario/consulta-de-certificados/

4.10.2 Service availability

These services are available **24 hours a day, seven days a week**, **365 days a year.**

Camerfirma will make every effort to ensure that the service is not down for more than **24 hours**.

4.10.3 Optional features

Not stipulated.

4.11 End of subscription

The subscription to the service will end after the validity period of the certificate. As an exception, the subscriber can maintain the current service by requesting the renewal of the certificate, within the advance period determined by this Declaration of Certification Practices.

4.12 Key Escrow and Recovery

4.12.1 Key escrow and recovery policy and practices

Camerfirma does not store or copy the subscriber's private keys when they are created by the PSC and they are subject to the electronic signature law 59/2003. For certificates on hardware devices it is the user who generates and keeps the private key in the cryptographic card delivered by the PSC.

Camerfirma only stores a copy of the subscriber's private key when this is "exclusively" used for information encryption purposes or those certificates associated with the keys that are not subject to the electronic signature law 59/2003.

Notes on the centralised key management system:

This document considers the responsibility of the organisation that houses the users' private keys, in a centralised key management system.

Camerfirma stores these keys in an experimental mode in the distribution of certificates with centralised keys, taking i the new European regulation in which this practice is permitted into account. In this system, the user keys are stored and protected by a certified cryptographic device FIPS 140-2 level 3

4.12.2 Session key encapsulation and recovery policy and practices

Not stipulated.

5 Physical, Procedural and Personnel Security Controls

5.1 Physical Security Controls

Camerfirma is subject to the annual validations established by the UNE-ISO/IEC 27001 standard, which regulates the establishment of suitable processes to ensure proper security management in information systems.

Camerfirma has established physical and environmental security controls to protect resources in the buildings where the systems and equipment used for the transactions are stored.

The physical and environmental security policy applicable to the certificate creation services provides protection against:

- ✓ Unauthorised physical access
- ✓ Natural disasters
- ✓ Fires
- ✓ Failure in supporting systems (electricity, telecommunications, etc.).
- ✓ Building collapse
- ✓ Flooding
- ✓ Theft
- ✓ Unauthorised withdrawal of equipment, information, devices and applications related to the components used for the Certification Service Provider's services

The facilities have preventive and corrective maintenance services with **24h/365** day per year assistance and assistance during the **24 hours** following the notice.

Reference document: **IN-2005-01-01-Physical access control**

5.1.1 Location and building

Camerfirma's facilities are built from materials that guarantee protection against brute force attacks and are located in an area with a low risk of natural disasters and with quick access.

The room where encryption activities take place is a Faraday cage protected against external radiation, with double flooring, fire detection and extinguishing system, damp proof system, dual cooling system and dual power supply system.

Reference document: **IN-2015-01-01-CPD**

5.1.2 Physical access

Physical access to Camerfirma's offices where encryption processes are undertaken is limited and protected by a combination of physical and procedural measures.

Access is limited to expressly authorised personnel who must show identification when they access and register, and CCTV cameras film and record any activity.

Any external person must be accompanied by a person in charge of the organisation when they are found within restricted areas for any reason.

The facilities include presence detectors at every vulnerable point as well as intruder alarm systems that send a warning via alternative channels.

The rooms are accessed by ID card scanners which are managed by a software system that maintains an automatic audit log of comings and goings.

The most critical system elements are accessed through three different zones with increasingly limited access.

Access to the certification system is protected by four access levels. Building, offices, DPC and cryptography room.

5.1.3 Power supply and air conditioning

Camerfirma's facilities have voltage stabilisers and a dual power supply system with a generator.

The rooms in which computer equipment is stored have temperature control systems with dual air conditioning units.

5.1.4 Exposure to water

Camerfirma's facilities are in an area with a low flooding risk and are on the first floor. The rooms in which computer equipment is stored have a humidity detection system.

5.1.5 Fire protection and prevention

The rooms in which computer equipment is stored have automatic fire detection and extinguishing systems.

Cryptographic devices, and supports that store Certification Entity keys have a specific and additional fire protection system relative to the rest of the facility.

5.1.6 Storage systems.

Each demountable storage device (tapes, cartridges, CDs, disks, etc.) is only accessible by authorised personnel.

Regardless of the storage device, confidential information is stored in fireproof or permanently locked cabinets and can only be accessed with express authorisation.

5.1.7 Waste disposal

Once sensitive information is no longer useful, it is destroyed using the most appropriate means for the media containing it.

Print-outs and paper: shredders or waste bins are provided for this purpose, for subsequent destruction in a controlled manner.

Storage media: before being thrown away or reused they must be processed for deletion by being physically destroyed, or the contained data made illegible.

Reference document: **IN-2005-01-03-Environmental security**

5.1.8 External backup

Camerfirma uses a secure external building to keep documents, magnetic and electronic devices safe, which is separate from the operating centre.

At least two expressly authorised people are required to access, store or withdraw devices.

Related document: **IN-2005-04-06**-Critical file backup procedure

5.2 Procedural controls

5.2.1 Roles of trust

Roles of trust are described in the respective Certification Policies, thus guaranteeing the distribution of duties to share out control and limit internal fraud and avoid one person from controlling the entire certification process from start to finish, and granting a minimum privilege, wherever possible.

In order the determine the sensitivity of the function, the following elements are taken into account:

- Duties associated with the function.
- Level of access.
- Monitoring of the function.
- Training and awareness.
- Required skills.

Internal Auditor:

Responsible for fulfilling the operational procedures. This person does not belong to the Information Systems department.

Internal Auditor duties are incompatible with Certification duties and incompatible with Systems. These duties are subordinated to Operations Management, reporting to this Management and to the Technical Department.

Systems Administrator:
Responsible for the correct performance of the hardware and software supporting the certification platform.

CA Administrator.
Responsible for the activities to be undertaken with the cryptographic material or for performing any duties involving the activation of the CA's private keys described herein, or any of its elements.

CA Operator.
Responsible, together with the CA Administrator, for safekeeping of the cryptographic key activation material, and for CA backup and maintenance procedures.

RA Administrator:
Responsible for approving certification applications from the subscriber.

Security Manager:
Responsible for coordinating, controlling and complying with the security measures defined by the Camerfirma security policies. The security manager is be responsible for aspects related to information security: logical, physical, networks, organisational, etc.

IN-2005-02-07 Personnel duties and responsibilities

5.2.2 Number of people required per task

Camerfirma guarantees that at least **two people will carry out tasks classified as sensitive**. Mainly handling the Root CA and intermediate CA key storage device.

5.2.3 Identification and authentication for each role

The internal auditor assigns the people for each role; this auditor must ensure that each person carries out the procedures to which he/she is assigned.

Each person only controls assets required for his/her role, thereby ensuring that nobody accesses unassigned resources.

Depending on the asset, resources are accessed via cryptographic cards and activation codes.

5.2.4 Roles requiring separation of duties

The internal document IN-2016-03-01 job profile file reflects the tasks assigned to the different profiles with a table of segregation of roles.

	Responsable de Seguridad	Administracion de Sistemas	Oeración de sistemas	Auditor Plataforma CA	Especialidsta Validacion SSL	Operador RA
Responsable de Seguridad		SI	NO	SI	SI	SI
Administracion de Sistemas	NO		NO	NO	NO	NO
Operación de Sistemas	NO	NO		NO	NO	NO
Auditor Plataformas CA	NO	NO	NO		SI	SI
Especialidsta Validacion SSL	NO	NO	NO	SI		SI
Operador RA	NO	NO	NO	NO	SI	

5.2.5 Switching the PKI management system on and off.

The PKI system is formed by the following modules:

RA Management Module, for which specific page management services are activated or deactivated.

AC CAMERFIRMA manages two different technical platforms for each hierarchy, although the system is switched off in the same way by deactivating page management services.

Request management module, for which specific page management services are activated or deactivated.

Key management module, located in the HSM. Activated or deactivated by physically switching it on and off.

Database module, centralised certificate management and managed CRLs, OCSP and TSA. Switching the specific database management service on and off.

OCSP module. Online certificate status response server. Switching the system service responsible for this task on and off.

TSA module. Timestamp server. Switching the service on and off

The module switch-off sequence is:

- Application Module
- RA module
- OCSP module
- TSA module
- Database module
- Key management module.

The switching on process is carried out in reverse.

Internal reference document: **IN-2005-05-01**-Manual switching off procedure.

5.3 Personnel security controls

5.3.1 Background, qualifications, experience and accreditation requirements

All personnel undertaking tasks classified as duties of trust must have worked at the workplace for at least **one year** and have a fixed employment contract.

All personnel are qualified and have been trained in the procedures to which they have been assigned.

Personnel in positions of trust must have no personal interests that conflict with undertaking the role to which they are entrusted.

Camerfirma ensures that registration personnel or RA Administrators are trustworthy and belong to a Chamber of Commerce or the body delegated to undertake registration work.

RA Administrators must have taken a training course for request validation request duties.

In general, Camerfirma removes an employee's trust roles if it discovers that person has committed any criminal act that could affect the performance of his/her duties.

Camerfirma shall not assign a trusted or managed site to a person who is not suitable for the position, especially for having been convicted of a crime or misdemeanour affecting their suitability for the position. For this reason, an investigation will first be carried out, to the extent permitted by applicable law, on the following aspects:

- Studies, including alleged degree.
- Previous work, up to five years, including professional references and checking that the alleged work was actually performed.
- Delinquency

Reference documentation:

IN-2005-02-07-Personnel duties and responsibilities.

IN-2005-02-17-Human Resource Management

IN-2008-00-06-Job Profile Format

IN-2008-00-09-Training Logs

IN-2006-02-03-Security Organisation

5.3.2 Background checking procedures

Camerfirma's HR procedures include conducting relevant investigations before hiring anyone.

Camerfirma never assigns duties of trust to personnel who have been working at the company for less than **one year**.

The job application reports on the need to be subjected to undergo prior investigation and warns that refusal to submit to the investigation shall result in the application's rejection. Also, unequivocal consent from the affected party is required for the investigation and for processing and protecting his/her personal data in accordance with the Personal Data Protection law.

5.3.3 Training requirements

Personnel undertaking duties of trust must have been trained in accordance with Certification Policies. There is a training plan that is part of the UNE-ISO/IEC 27001 controls.

Registration operators who validate EV secure server certificates receive specific training in accordance with special regulations on issuing these certificates.

Training includes the following content:

- Security principles and mechanisms of the public certification hierarchy.
- Versions of hardware and applications in use.
- Tasks to be carried out by the person.
- Management and processing of incidents and security compromises.
- Business continuity and emergency procedures.
- Management and security procedure related to processing personal data.

5.3.4 Information updating requirements and frequency

Camerfirma undertakes the required updating procedures to ensure certification duties are undertaken properly, especially when they are modified substantially.

5.3.5 Task rotation frequency and sequence

Not stipulated

5.3.6 Penalties for unauthorised actions

Camerfirma has established an internal penalty system, which is described in its HR policy, to be applied when an employee undertakes unauthorised actions, which includes the possibility of dismissal.

5.3.7 Personnel hiring requirements

Employees hired to undertake duties of trust must sign the confidentiality clauses and operational requirements that Camerfirma uses. Any action compromising the security of the accepted processes could lead to termination of the employee's contract, once evaluated.

In the event that all or part of the certification services are operated by a third party, the controls and provisions made in this section or in other parts of the CPS are applied and enforced by the third party that performs the operational functions of the certification services, and the certification authority is responsible for the actual implementation in all situations.

These aspects are specified in the legal instrument used to agree on the provision of certification services by third parties other than Camerfirma, and the third parties must be obliged to meet the requirements demanded by Camerfirma.

Reference documentation: **IN-2006-05-02**-Clauses that apply to external developers

5.3.8 Documentation given to personnel

Camerfirma provides all personnel with documentation describing the assigned duties, with special emphasis on security regulations and the CPS.

This documentation is in an internal repository accessible by any Camerfirma employee; the repository contains a list of documents of mandatory knowledge and compliance.

Any documentation that employees require is also supplied at any given time so that they can perform their duties competently.

5.4 Audit Logging Procedures

Camerfirma is subject to the annual validations established by the UNE-ISO/IEC 27001 standard, which regulates the establishment of suitable processes to ensure proper security management in information systems.

5.4.1 Types of recorded events

Camerfirma records and saves the audit logs of every event relating to the CA's security system.

The following events are recorded:

- ✓ System switching on and off.
- ✓ Creation, deletion and setting up of passwords or changed privileges.
- ✓ Attempts to log in and out.
- ✓ Attempts at unauthorised access to the CA's system made online.
- ✓ Attempts at unauthorised access to the file system.
- ✓ Physical access to audit logs.
- ✓ Changes to system settings and maintenance.
- ✓ CA application logs.
- ✓ CA application switching on and off.
- ✓ Changes to the CA's details and/or passwords.
- ✓ Changes to the creation of certificate policies.
- ✓ Creation of own passwords.
- ✓ Certificate creation and revocation.
- ✓ Logs of destruction of devices containing activation keys and data.
- ✓ Events related to the cryptographic module's lifecycle, such as its reception, use and uninstallation.

Camerfirma also retains the following information, either manually or digitally:

- The key generation event and key management databases.
- Physical access records.
- Maintenance and system configuration changes.
- Personnel changes.
- Reports on compromises and discrepancies.
- Records of the destruction of material containing key information, activation data or personal information about the Signatory for individual certificates or a future key holder for organisation certificates, access to the certificate.
- Possession of activation data for operations with the Certification Authority's private key.
- Complete reports on physical intrusion attempts in infrastructure that support certificate issuance and management.

Camerfirma maintains a system that guarantees:

- Sufficient space for storing audit logs.
- Audit log files are not rewritten.

- That the saved information includes at least the following: event type, date and time, user executing the event and result of the process.
- The audit log files are saved in structured files that can be included in a database for subsequent data mining.

5.4.2 Frequency of processing log

Camerfirma checks the audit logs when there is a system alert due to an incident.

Processing audit records involves reviewing records that include verification that they have not been tampered with, a brief inspection of all log entries and further investigation of any alerts or irregularities in the logs. The actions taken from the audit review are documented

Camerfirma maintains a system that guarantees:

• Enough space for logs storage
• That the log files are not rewritten.
• That the information stored includes at least: type of event, date and time, user that executes the event and result of the operation.
• The log files will be stored in structured files that can be incorporated into a database for further exploration.

5.4.3 Retention periods for audit logs

Camerfirma stores the information from audit logs for at least **seven years**.

5.4.4 Audit log protection

The systems' audit logs are protected against manipulation via signatures in the files that contain them.

They are stored in fireproof devices.

Availability is protected by storing them in buildings outside of the CA's workplace.

Audit log files can only be accessed by authorised persons.

Devices are always handled by authorised personnel.

There is an internal procedure that specifies the procedure to manage devices containing audit log data.

5.4.5 Audit Log backup procedures

Camerfirma uses a suitable backup system to ensure that, in the event that important files are lost or destroyed, audit log backups are available for a short period of time.

Camerfirma has implemented a secure backup system for audit logs by making backup copies of every audit log on an external device once per week.

A copy is also kept at an external custody centre.

Reference documentation: **IN-2005-04-10-**audit log management procedure.

5.4.6 Audit data collection system

Event audit information is collected internally and automatically by the operating system, the network and by the certificate management software, in addition to the data generated manually, which is stored by duly authorised personnel, all of which makes up the audit record accumulation system.

5.4.7 Notifying the party that caused the event

When the audit log accumulation system records an event, there is no need to send a notification to the individual, organisation, device or application that caused the event.

It may be communicated whether the result of his/her action was successful or not, but the action is not audited.

5.4.8 Vulnerability analysis

The analysis of vulnerabilities is covered by the Camerfirma audit processes. Risk and vulnerability management processes are reviewed once a year in accordance with the UNE-ISO/IEC 27001 certificate and included in the Risk analysis document, code **CONF-2005-05-01**. This document specifies the controls implemented to guarantee required security objectives.

The system audit data is stored so that it can be used to investigate any incident and locate vulnerabilities.

Camerfirma runs a monthly systems analysis with the aim of detecting suspicious activities. This report is executed by an external company and includes:

- Intrusion Detection - IDS (HIDS)
- OSSEC Integrity Control System
- SPLUNK. Operations intelligence.
- Event correlation report.

Camerfirma corrects any problem reported and registered by the systems department.

5.5 Records Archival

5.5.1 Type of recorded files.

The following documents that are part of the certificate's life cycle are stored by the CA or RAs:

- ✓ Any system audit data. PKI, TSA and OCSP
- ✓ Any data related to certificates, including contracts with Signatories and the RA. The data relating to their identification and location.
- ✓ Requests to issue and revoke certificates.
- ✓ Type of document submitted in the license application.
- ✓ Identity of the Registration Authority that accepts the certificate application.
- ✓ Unique identification number provided by the previous document.
- ✓ Any issued or published certificates.
- ✓ Issued CRLs or logs of the status of created certificates.
- ✓ Log of created keys.
- ✓ Communications between PKI elements.
- ✓ Certification Policies and Practices

Camerfirma is responsible for correctly filing all this material.

5.5.2 File storage period

Certificates, contracts with Subjects/Signatories and any information relating to the Subject/Signatory's identification and authentication must be kept for at least 15 years.

Older versions of documents are also kept for a period of at least fifteen (15) years by AC Camerfirma and may be consulted by stakeholders with reasonable cause.

5.5.3 File protection

Camerfirma ensures files are protected by assigning qualified staff to process and store them in fireproof safes in external facilities.

Related document: **IN-2005-04-01-** ***backup management***

5.5.4 File backup procedures

Camerfirma has an external storage centre to ensure the availability of digital file backups. The physical documents are stored in secure places restricted to authorised personnel.

Related document: **IN-2005-04-01-** ***backup management***

Camerfirma makes incremental backups of all digital documents at least daily and performs full backups weekly for data recovery purposes.

5.5.5 Requirements for log timestamping

Logs are dated with a reliable source via NTP from the ROA, GPS and radio synchronisation systems.

Camerfirma has an IT security document which describes the configuration of the date and time settings for the devices used for certificate issuance.

Related document: **IN-2006-04-01-Time synchronisation**

5.5.6 Audit data collection system

Reference documentation: **IN-2005-04-10-**audit log management procedure.

5.5.7 Procedures to retrieve and verify filed information

Camerfirma has a software security document that describes the process for checking that the filed information is correct and accessible.

Related document: **IN-2005-04-06**-Critical file backup procedure

5.6 Key Changeover

The **final entity's** keys are changed by starting a new issuance procedure (see the corresponding section of this CPS).

In CA (**Root CA, Subordinate CA**). The key will be changed before the CA certificate expires. The certificate to be updated from the CA and its private key can only be used to sign CRLs while there are active certificates issued by the old CA. A new CA certificate is generated with a new private key and a CN (*common name*) other than the CA certificate to be replaced.

A CA's certificate is also changed when there is a change to cryptographic technology (algorithms, key size, etc.) that so requires it.

Reference document: **IN-2005-04-04-Key changing procedure.**

5.7 Compromise and disaster recovery

If root key security is compromised, this must be considered a specific case in the contingency and business continuity document. If the keys are replaced, this incident affects recognition by the various private and public sector applications. Recovering the validity of keys in business terms mainly depends on the duration of these recognised processes. The contingency and business continuity document include these purely technical and operational terms to ensure that new keys are available, which is not the case for recognition by third parties.

The commitment of algorithms or associated parameters used for generating digital certificates or associated services is also incorporated into the contingency and business continuity plan.

Related Document **IN-2007-02-08 Continuous Improvement Procedure**

5.7.1 Incident and compromise handling procedures

Camerfirma has developed a Contingency plan to retrieve critical systems, if an alternative data centre were necessary as part of the UNE-ISO/IEC 27001 certification.

The continuity and contingency plan is drafted in document **CONF-2003-00-01 Continuity and Availability**.

5.7.2 Computing resources, software, and/or data are corrupted

Any failure to meet the targets set by this contingency plan is considered reasonably unavoidable unless there is a breach of obligations on Camerfirma's part in implementing these processes.

A part of the implementation of its ISO27001 and ISO20000 systems, Camerfirma has developed plans and procedures for continuous improvement in a way that systematically reinforces all experiences covered in the management of incidents and avoids their repetition.

5.7.3 Entity private key compromise procedures

The contingency plan encompassed in Camerfirma's UNE-ISO/IEC 27001 certification considers that compromised security of the CA's private key is a disaster.

If the security of a root key is compromised:

- All Subjects/Signatories, User Parties and other CAs with which agreements or other relationships have been established must be informed.

- They are informed that the certificates and information relating to the revocation status that are signed using this key are not valid.

5.7.4 Business continuity capabilities after a disaster

Camerfirma will reinstate critical services (revocation and publication of revocations) in accordance with the contingency and business continuity plan encompassed in the UNE-ISO/IEC 27001 certification, indicating restoration within 24 hours.

Camerfirma has an alternative centre if required to start up the certification systems, which is described in the business continuity plan.

5.8 Termination of the CA Activity

Before Camerfirma ceases its activity, it will:

- Provide the required funds (via a public liability insurance policy) to complete the revocation processes.

- Inform all Subjects/Signatories, User Parties and other CAs with which it has agreements or other types of relationships regarding termination of activity at least **six months** in advance.

- Revoke any authorisation from subcontracted entities to act on behalf of the CA in the certificate issuance procedure.

- Pass on its obligations related to maintaining log data and audit logs for the established time period indicated to Signatories and Users.

- The CA's private keys must be destroyed or disabled.

- Camerfirma will keep any active certificates and the verification and revocation system until all issued certificates have expired.

6 Technical Security Controls

6.1 Key pair creation and installation

6.1.1 Creating the key pair

The computers used by Camerfirma to store root keys and are certified in accordance with **FIPS 140-2, level 3**.

The root keys are generated and managed on an off-line computer in a cryptographic room. Reference document **CONF-00-2012-02**-Script of CA ROOT generation xxxx where "xxxx" is the year corresponding to the creation of the key.

The creation of Subordinate CAs keys is generated in HSM equipment certified **FIPS 140-2, level 3**, where it is hosted for its corresponding use. The certificate issued by the root key is made in a secure cryptographic room.

CA certificate	Key size	Sign. Alg. *1	From	To
Chambers of Commerce Root	**2.048**	**1**	**2.003**	**30/09/2.037**
AC Camerfirma Certificados Camerales	2.048	1	2.004	09/02/2.034
AC Camerfirma Codesign v2	2.048	1	2.009	18/01/2.019
AC Camerfirma Express Corporate Server v3	2.048	1	2.009	18/01/2.019
AC Camerfirma TSA CA	2.048	1	2.005	20/05/2.035
Global Chambersign Root	**2.048**	**1**	**2.003**	**30/09/2.037**
AC Camerfirma	2.048	1	2.003	14/11/2.033
RACER	2.048	1	2.003	04/12/2.023
Chambers of Commerce Root - 2008	**4.096**	**1**	**2.008**	**31/07/2.038**
Camerfirma AAPP - 2012	4.096	1	2.012	14/07/2.022
Camerfirma AAPP II - 2014	4.096	2	2.014	15/12/2.037
Camerfirma Certificados Camerales - 2009	4.096	1	2.009	14/03/2.019
Camerfirma Codesign - 2009	4.096	1	2.009	14/03/2.019
Camerfirma Codesign II - 2014	4.096	2	2.014	15/12/2.037
Camerfirma Corporate Server - 2009	4.096	1	2.009	14/03/2.019
Camerfirma Corporate Server II - 2014	4.096	2	2.014	15/12/2.037

Camerfirma TSA - 2009	4.096	1	2.009	14/03/2.019
Camerfirma TSA - 2013	4.096	1	2.013	19/02/2.037
Camerfirma TSA II - 2014	4.096	2	2.014	15/12/2.037
Global Chambersign Root -2008	**4.096**	**1**	**2.008**	**31/07/2.038**
AC Camerfirma - 2009	4.096	1	2.009	11/03/2.029
RACER - 2009	4.096	1	2.009	23/03/2.019
OMC	4.096	1	2.014	21/11/2.024
Entitat de Certificació de l'Administració Pública Andorrana	4.096	1	2.013	13/07/2.033
AC Camerfirma Colombia - 2014	4.096	1	2.014	27/09/2.036
AC CITISEG - 2014	4.096	1	2.014	26/09/2.036
AC Camerfirma Colombia II – 2015	4.096	2	2.015	14/10/2.037
AC CITISEG II - 2015	4.096	2	2.015	2/10/2.037
GLOBAL CORPORATE SERVER	4.096	2	2.017	19/05/2.037
AC Camerfirma Portugal – 2015	4.096	2	2.015	21/11/2.037
DigitalSign Primary CA	4.096	2	2.015	9/11/2.037

*1 SHA1WithRSAEncription = 1
SHA256WithRSAEncription = 2

Further information at http://www.camerfirma.com/area-de-usuario/politicas-y-practicas-de-certificacion/

Reference documentation:

CONF-00-2012-01 RECORDS from key creation events.
CONF-00-2012-02/04 Key generation SCRIPTS.
CONF-00-2012-05 Auditor Report.
CONF-00-2012-03 Distributing keys among operators.

6.1.1.1 Creating the Signatory's key pair

Subjects/Signatories can create their own keys using Camerfirma-authorised hardware or software devices or Camerfirma can create them in **PKCS#12** software format.

If the certificate is qualified and requires a secure signature creation device it is only used with such devices for digital signatures.

The management platform uses its own resources to generate a random and robust password and a private key protected with this password using the 3DES algorithm. A certificate signing request is generated in PKCS#10 format from that private key. With this request, the

CA signs the Signatory's certificate. The certificate is delivered to the user in a PKCS#12 file which includes the certificate and associated private key. The password for the private key and PKCS#12 file is never clear in the system.

Keys are created using the **RSA** public key algorithm.

Keys can also be created in a remote RA system using the web services layer for PKCS#10 request and collection of the corresponding PKCS#7.

The keys have a minimum length of **2048 bits**.

6.1.1.2 Key creation hardware/software

Subjects/Signatories can create their own keys in a Camerfirma-authorised device. See section 6.1.1.1.

The **ROOT** keys use a cryptographic device that complies with **FIPS 140-2 level 3** specifications.

6.1.2 Private key delivery to subscriber

See section 3.2.1

6.1.3 Delivering the public key to the certificate issuer

The public key is sent to Camerfirma to create the certificate when the circuit so requires. It is sent in standard **PKCS#10** format.

6.1.4 Delivering the CA's public key to users

The CA's certificate and fingerprint will be available to users on Camerfirma's web site.

http://www.camerfirma.com/area-de-usuario/descarga-de-claves-publicas/

6.1.5 Key Size

The Subject/Signatory's private keys are based on the RSA algorithm with a minimum length of 2048 bits.

The period of use for the public and private key varies depending on the certificate type. See

section 6.1.1.

6.1.6 Public key creation parameters.

The public key for the Root CA and Subordinate CA and for Signatories' certificates is encrypted pursuant to RFC 3280 and PKCS#1. RSA is the key generation algorithm.

- Key size = minimum 2,048 bits
- Key creation algorithm: rsagen1
- Padding scheme: emsa-pkcs1-v1_5
- Hash functions: SHA-256

6.1.7 Key usage purposes

All certificates issued contain the "KEY USAGE" and "EXTENDED KEY USAGE" attributes, as defined by the X.509v3 standard. More information is available in section 7.1.2.

6.2 Private Key Protection and Cryptographic Module Engineering Controls

6.2.1 Cryptographic module standards and controls

6.2.1.1 The Signatory's private key

The Signatory's private key can be stored in a software or hardware device.

When it is stored in software format, Camerfirma provides configuration instructions for secure use.

Cryptographic devices distributed by Camerfirma to host qualified certificates must meet all requirements of qualified secure signature creation devices and therefore are suitable for generating qualified signatures.

Information regarding the key creation and custody process that Camerfirma uses is included in the digital certificate itself, in the corresponding OID, allowing the User Party to act in consequence.

Reference documentation:

CONF-2016-04-02-Protecting and Activating Online CA Keys

CONF-2012-04-10 - Certificate issue ceremony script.

6.2.1.2 The CA's private key

The private signature key of the root CAs and Subordinate CAs are maintained in a cryptographic device that meets **FIPS 140-2 level 3** specifications.

When the CA's private key is outside the device, it is kept encrypted.

A backup is made of the CA private key which is stored and only retrieved by authorised personnel in accordance with the roles of trust, using at least dual control on a secure physical device.

The CA's private key backups are stored securely. This procedure is described in detail in the Camerfirma security policies.

Subordinate CAs' keys are kept on devices that comply with at least **FIPS 140-1 Level 3**.

6.2.2 Multi-person control (n out of m) of the private key

Multi-person control is required for activation of the CA's private key. In accordance with this CPS, there is a policy of **two of four people** in order to activate keys.

Reference documentation: **CONF-00-2012-03-Distributing keys among operators**

6.2.3 Private key escrow

Camerfirma does not store or copy the private keys of the owners. Only in the case of certificates for information encryption does Camerfirma keep a copy of this key.

6.2.4 Private key backup

Camerfirma makes backups of CA private keys to allow their retrieval in the event of natural disaster, loss or damage. At least two people are required to create the copy and retrieve it.

These retrieval files are stored in fireproof cabinets and in an external custody centre.

The Signatory's keys created on software can be stored for retrieval in the event of a contingency in an external storage device separately from the installation key, as specified in the software key installation manual.

The Signatory's keys created on hardware cannot be copied because they cannot be taken out of the cryptographic device.

Camerfirma keeps records on CA private key management processes.

Reference documentation: **CONF-00-2012-01-Minutes on backup of root CA keys.**

6.2.5 Archiving the private key

The CAs private keys are filed for at least **10 years** after the last certificate has been issued. They are stored in secure fireproof cabinets in the external custody centre. At least two people are required to retrieve the CA's private key from the initial cryptographic device.

Signatories may store keys delivered on software for the certificate duration period, but must then destroy them and ensure they have no information encrypted with the public key.

Signatories can only store the private key for as long as they deem appropriate in the case of encryption certificates. In this case, Camerfirma will also keep a copy of the private key associated with the encryption certificate.

When PKCS#12 format is used, Camerfirma ensure the elimination of user keys by executing a daily task. This task verifies that three business days have not passed from the date of generation of the certificate. The folder where the files are stored has a filter that prevents files with extension p12 being backed up.

Camerfirma keeps records on CA private key management processes.

6.2.6 Entering the private key in the cryptographic module.

CA keys are created inside cryptographic devices. See Camerfirma CA key creation events.

CONF-00-2012-01/06/07/08 RECORDS from key creation events.

Keys created on the Signatories' software are created in Camerfirma's systems and are delivered to the end Signatory in a PKCS#12 software device. See Signatory key creation procedure.

Keys created on Signatories' hardware are created inside the cryptographic device delivered by the CA. See Signatory key creation procedure.

At least two people are required to enter the key in the cryptographic module.

Keys associated with Signatories cannot be transferred.

Camerfirma keeps records on CA private key management processes.

6.2.7 Private key storage on cryptographic module

The CA ROOT keys are kept stored in the PCI cryptographic module with the associated equipment disconnected when no operation is being performed.

The keys of the intermediate CAs are stored in HSM network equipment online, so that they can be accessed from the PKI applications for the generation of certificates.

6.2.8 Private key activation method.

The Signatory's private key is accessed via an activation key, which only the Signatory knows and must avoid writing down.

The CA Root's key is activated via an m out of n process. See section 6.3.1

Intermediate CA private key activation is managed by the management application.

Reference documentation: **CONF-2008-04-09-Acceso_PKCS#11_CAS_online**

Camerfirma keeps records on CA private key management processes.

6.2.9 Private key deactivation method

For certificates on a card, the Signatory's private key is deactivated once the cryptographic device used to create the signature is removed from the reader.

When the key is stored in software, it can be deactivated by deleting the keys from the application in which they are installed.

The CA's private keys are deactivated following the steps described in the cryptographic device administrator's manual.

For Root, CA, Subordinate CA and TSU entity keys, there is a cryptographic event from which the corresponding record is made.

6.2.10 Private key destruction method

Before the keys are destroyed, a revocation of the certificate of the public key associated with them is issued.

Devices that have any part of the private keys belonging to the Hierarchy CAs are destroyed or restarted at a low level. The steps described in the cryptographic device administrator's manual are followed to eliminate them.

Backups are destroyed securely.

The Signatory's keys stored on software can be destroyed by deleting them in accordance with instructions from the application on which they are stored.

The Signatory's keys on hardware can be destroyed using special software at the Registration points or the CA's facilities.

Camerfirma keeps records on CA private key management processes.

6.2.11 Cryptographic Module Rating

Cryptographic modules are certified FIPS-140-2 level 3 are managed by at least two operators in a model n of m. The teams are housed in secure environments. The cryptographic module that stores the Root keys is managed inside an isolated and disconnected cryptographic room. The cryptographic modules that store the SubCA keys are stored in secure environments within a CPD following ISO27001 regulations.

6.3 Other aspects of managing key pairs

6.3.1 Archiving the public key

The CA maintains its archives for a minimum period of **fifteen (15) years** provided that the technology at the time allows this. The documentation to be kept includes public key certificates issued to Signatories and proprietary public key certificates.

6.3.2 Period of use for public and private keys

The private key must not be used once the validity period of the associated public key certificate has expired.

The public key or its public key certificate can be used as a mechanism for verifying encrypted data with the public key outside the temporary scope for validation work.

A private key can only be used outside the period established by the digital certificate to retrieve the encrypted data.

6.4 Private key activation data.

6.4.1 Generation.

The activation data of the user's private key is generated differently depending on the type of certificate.

In software. The certificate is delivered in a standardised PKCS#12 file protected by a password generated by the management application and delivered to the Subject via the email address associated with the digital certificate.

On the Camerfirma hardware device. Cards used by Camerfirma are generated protected with a factory-calculated PIN and PUK. This information is sent by the management platform to the Subject via the email address associated with the digital certificate. The Subject has software to change their card's PIN and PUK.

On a third party hardware device. AC Camerfirma accredits third-party devices, even though they are managed separately.

6.4.2 Activation data protection

Activation data is communicated to the Subject by an independent channel. AC Camerfirma stores this information in its database. Data can be sent back to the subject at prior request to the email address associated with the certificate, and it is effective as long as the user has not previously changed it.

6.4.3 Other activation data aspects

Not stipulated.

6.5 Computer security controls

Camerfirma uses reliable systems to provide certification services. Camerfirma has undertaken IT controls and audits to manage its IT assets with the security level required for managing digital certification systems.

In relation to information security, the certification model on ISO 270001 information management systems is followed.

Computers used are initially configured with the appropriate security profiles by Camerfirma system personnel, for the following aspects:

1. Operating system security settings.
2. Application security settings.
3. Correct system dimensioning.
4. User and permission settings.
5. Configuring audit log events.
6. Back-up and recovery plan.
7. Antivirus settings
8. Network traffic requirements

6.5.1 Specific computer security technical requirements

Each Camerfirma server includes the following functions:

- ✓ access control to CA services and privilege management.
- ✓ separation of tasks for managing privileges
- ✓ identification and authentication of roles related to identities
- ✓ the Signatory's and CA's log file and audit data
- ✓ audit of security events
- ✓ self-diagnosis of security related to CA services
- ✓ Key and CA system retrieval mechanisms

The functions described above are carried out using a combination of operating system, KPI software, physical protection and procedures.

6.5.2 Computer security appraisal

Computer security is shown in an initial risk analysis, such that the security measures applied are a response to the probability of a group of threats breaching security and their impact.

6.6 Lifecycle security controls

The certificates store the Signatory's keys in a qualified signature creation device **(Hardware)**.

The hardware device is a cryptographic card or USB token certified as a qualified signature creation device in compliance with Appendix II of e-IDAS.

As regards hardware devices

a) Hardware devices are prepared and sealed by an external provider.
b) The external provider sends the device to the registration authorities to be delivered to the Signatory.
c) The Signatory or RA uses the device to generate the key pair and send the public key to the CA.
d) The CA sends a public key certificate to the Signatory or RA, which is entered into the device.
e) The device can be reused and can store several key pairs securely.
f) The device is owned by the Subject/Signatory.

6.6.1 System development controls

Camerfirma has established a procedure to control changes to operating system and application versions that involve upgrades to security functions or to resolve any detected vulnerability.

In response to intrusion and vulnerability analyses, adaptations are made to systems and applications that may have security problems, and to security alerts received from managed security services contracted with third parties. The corresponding RFCs (Request for Changes) are sent so that security patches can be incorporated or the versions with problems updated.

The RFC is incorporated and the measures taken for acceptance, implementation or rejection of the change are documented.

In cases where the implementation of the update or correction of a problem entails a situation of vulnerability or a significant risk, it is included in the risk analysis and alternative controls are implemented until the risk level is acceptable.

Reference documentation:

IN-2006-05-02-Clauses that apply to external developers

IN-2006-03-04-Systems and Software Change Control

6.6.2 Security management controls

6.6.2.1 Security management

Camerfirma organises the required training and awareness activities for employees in the field of security. The training materials used and the process descriptions are updated once approved by a security management group.

An annual training plan has been established for such purposes.

Camerfirma establishes the equivalent security measures for any external provider involved in certification work in contracts.

6.6.2.2 Data and asset classification and management

Camerfirma maintains an inventory of assets and documentation and a procedure to manage this material to guarantee its use.

Reference documentation: **IN-2005-02-15**-Asset Classification and Inventory

Camerfirma's security policy describes the information management procedures, classifying them according to level of confidentiality.

Documents are classified into three levels: PUBLIC, INTERNAL USE AND CONFIDENTIAL.

Reference documentation: **IN-2005-02-04-Security Policy**

6.6.2.3 Management procedures

Camerfirma has established an incident management and response procedure via an alert and periodic reporting system. Camerfirma's security document describes the incident management process in detail.

Reference documentation: **IN-2010-10-08 Incident management**

Camerfirma records the entire procedure relating to the functions and responsibilities of the personnel involved in controlling and handling elements of the certification process.

Reference documentation: **IN-2005-02-07 Personnel duties and responsibilities**

Processing devices and security

All devices are processed securely in accordance with information classification requirements. Devices containing sensitive data are destroyed securely if they are no longer required.

Camerfirma has a systems fortification procedure in which the processes for secure installation of equipment are defined. The measures described include disabling services and accesses not used by the installed services.

Reference documentation:

CONF-2006-01-04-Device Input and Output Registration Procedure
IN-2012-04-03-Security Operating Procedures for System Fortification.

System planning

Camerfirma's Systems department maintains a log of equipment capacity. Together with the resource control application, each system can be re-dimensioned.

Related documentation:

IN-2010-10-10 Configuration management

IN-2010-10-05 Capacity Management

IN-2010-10-03 Availability Management

IN-2010-10-01 Service Level Management

IN-2010-10-00 IT Services Management Manual

IN-2010-10-13 New Services Planning

Incident reporting and response

Camerfirma has established a procedure to monitor incidents and resolve them, including recording of the responses and an economic evaluation of the incident solution.

Reference documentation: **IN-2010-10-08 Incident management**

Operating procedures and responsibilities

Camerfirma defines activities, assigned to people with a role of trust other than the people responsible for carrying out daily activities that are not confidential.

Reference documentation: IN-2005-02-07 Personnel duties and responsibilities

6.6.2.4 Access system management

Camerfirma makes every effort to ensure access is limited to authorised personnel.

Reference documentation: **IN-2011-04-10 Network access control**.

In particular:

General CA

a) There are controls based on firewalls, antivirus and IDS with high availability.

b) Sensitive data is protected via cryptographic methods or strict identification access controls.

c) Camerfirma has established a documented procedure to process user registrations and cancellations and a detailed access policy in its security policy.

d) Camerfirma has implemented procedures to ensure tasks are undertaken in accordance with the roles policy.

e) Each person is assigned a role to carry out certification procedures.

f) Camerfirma employees are responsible for their actions in accordance with the confidentiality agreement signed with the company.

Creating the certificate

Authentication for the issuance process is via an m out of n operators system to activate the CA's private key.

Revocation management

Revocation takes place via strict card-based authentication of an authorised administrator's applications. The audit log systems generate evidence that guarantees non-repudiation of the action taken by the CA administrator.

Revocation status

The revocation status application includes access control based on authentication via certificates to prevent attempts to change the revocation status information.

6.6.2.5 Managing the cryptographic hardware lifecycle

Camerfirma inspects the delivered material to make sure that the cryptographic hardware used to sign certificates is not manipulated during transport.

Cryptographic hardware is transported using means designed to prevent any manipulation. Camerfirma records all important information contained in the device to add to the assets catalogue.

At least two trusted employees are required in order to use certificate signature cryptographic hardware.

Camerfirma runs regular tests to ensure the device is in perfect working order.

The cryptographic hardware device is only handled by trustworthy personnel.

The CA's private signature key stored in the cryptographic hardware will be deleted once the device has been removed.

The CA's system settings and any modifications and updates are recorded and controlled.

Camerfirma has established a device maintenance contract. Any changes or updates are authorised by the security manager and recorded in the corresponding work records. These configurations are carried out by at least two trustworthy employees.

6.6.3 Lifecycle security evaluation

Not stipulated

6.7 Network security controls

Camerfirma protects physical access to network management devices and has an architecture that sorts traffic based on its security characteristics, creating clearly-defined network sections. These sections are divided by firewalls.

Confidential information transferred via insecure networks is encrypted using SSL protocols.

The policy used to configure security systems and elements is to start from an initial state of total blocking and to open the services and ports necessary for executing the services. Reviewing accesses is one of the tasks carried out in the systems department.

Management systems and production systems are in separate environments as indicated in the reference document.

Reference documentation: **IN-2011-04-10 Network access control**.

6.8 Time Sources

Camerfirma has established a time synchronisation procedure in coordination with the ROA Real Instituto y Observatorio de la Armada (Royal Navy Institute) in San Fernando via NTP. It also obtains a secure source via GPS and radio synchronisation. Reference documentation: **IN-2006-04-01-Time synchronisation**

7 Certificate Profiles and CRL

7.1 Certificate Profile

Certificate profiles comply with RFC 5280.

All qualified or recognised certificates issued in accordance with this policy comply with standard X.509 version 3, and RFC 3739 and the different profiles described in the EN 319 412 standard.

The profile records for these certificates can be requested from gestion_soporte@camerfirma.com or by telephone 902 361 207

7.1.1 Version number

Camerfirma issues X.509 certificates Version 3

7.1.2 Certificate extensions

Certificate extension documents are described in the profile files. The profile records can be requested from gestion_soporte@camerfirma.com or by telephone 902 361 207

7.1.3 Algorithm object identifiers (OID)

The signature algorithm object identifier is

- 1.2.840.113549.1.1.11 - sha256WithRSAEncryption

The *Subject Public Key Info* field (1.2.840.113549.1.1.1) includes the *rsaEncryption* value.

7.1.4 Name format.

Certificates must contain the information that is required for its use, as determined by the corresponding authentication policy, digital signature, encryption or digital evidence.

In general, certificates for use in the public sector must contain the identity of the person who receives them, preferably in the Subject Name or Subject Alternative Name fields, including the following data:

- The full name of the Signatory person, certificate holder or represented, in separate fields, or indicating the algorithm that allows the separation automatically.
- Name of the legal entity, where applicable.
- Numbers of the corresponding identification documents, in accordance with the law applicable to the Signatory person, certificate holder or represented, whether a natural person or a legal entity.

This rule does not apply to certificates with a pseudonym, which must identify this condition.

The exact semantics of the names described in the profile files.The profile records can be requested from gestion_soporte@camerfirma.com or by telephone 902 361 207

7.1.5 Name restrictions

Camerfirma may use name restrictions (using the "name constraints" certificate extension) in Subordinate CA certificates issued to third parties so that only the set of certificates allowed in this extension can be issued by the Subordinate CA.

7.1.6 Certification Policy (OID) object identifier

All certificates have a policy identifier that starts from the base 1.3.6.1.4.1.17326.

1.1.1 Using the "Policy Constraints" extension

Camerfirma may use policy restrictions (using the "*policy constraints*" certificate extension) in Subordinate CA certificates issued to third parties so that only the set of certificates allowed in this extension can be issued by the Subordinate CA.

7.1.7 Syntax and semantics of policy qualifiers

Not stipulated

7.1.8 Semantic treatment for the critical extension "Certificate Policy"

The "Certificate Policy" extension identifies the policy that defines the practices that Camerfirma explicitly associates with the certificate. The extension may contain a qualifier from the policy. See 7.1.6.

7.2 CRL Profile

The CRL profile matches the one proposed in the relevant certification policies. The CRLs are signed by the CA that issued the certificates.

The CRL's detailed profile can be requested from gestion_soporte@camerfirma.com or by telephone 902 361 207.

7.2.1 Version number

The CRLs issued by Camerfirma are version 2.

7.2.2 CRL and extensions

Those established in the certification policies. The detailed profile of the CRL and its extensions can be requested from gestion_soporte@camerfirma.com or by telephone 902 361 207.

7.3 OCSP Profile

7.3.1 Version number

The OCSP Responder certificates are Version 3. These certificates are issued by each CA managed by AC Camerfirma according to the RFC 6960 standard.

7.3.2 OCSP Extensions

The profile of the OCSP responder certificates can be obtained from gestion_soporte@camerfirma.com or by telephone 902 361 207.

An updated list of OCSP certificates can be obtained from http://www.camerfirma.com/servicios/respondedor-ocsp list.

8 Compliance Audit and Other Assessment

Camerfirma is committed to the security and quality of its services.

Camerfirma's objectives in relation to security and quality have essentially involved obtaining ISO/IEC 27001, ISO/IEC 20000 certification and carrying out biennial audits on its certification system, and essentially on the Registration Authorities, in order to guarantee compliance with internal procedures.

Camerfirma is subject to regular audits, with the ***WEBTRUST for CA***, ***WEBTRUST SSL BR*** and ***WEBTRUST EV*** seal, which guarantees that the policy and CPS documents have the appropriate format and scope and are fully aligned with their certification policy and practices.

In order to comply with eIDAS requirements, AC Camerfirma undertakes a biennial compliance evaluation as established in the regulation of the following standards: **EN 319 401, EN 319 411-1, EN 319 411-2, EN 319 421.**

The **Registration Authorities** belonging to both hierarchies are subject to an internal audit process. These audits are conducted periodically on a discretionary basis based on a risk assessment by the number of certificates issued and number of registration operators, which also determines whether the audit is carried out on site or remotely. The audits are described in an "Annual Audit Plan".

AC Camerfirma is subject to a biennial Spanish Personal Data Protection Act audit.

AC Camerfirma performs an internal audit on entities that have obtained a **Subordinate CA** or **TSU** certificate and that issue and manage certificates with their own technical and operational resources. In this audit, Camerfirma randomly checks a number of certificates issued by this registration authority, ensuring that the evidence collected is correct and sufficient for the issuance of the certificate.

8.1 Audit frequency

Camerfirma conducts an annual compliance audit, in addition to the internal audits performed on a discretionary basis.

- **ISO 27001** and **ISO20000** auditing on a three-year cycle with annual reviews.
- **WEBTRUST for CA, WEBTRUST SSL BR, WEBTRUST EV SSL** annually.
- **eIDAS** Conformity Assessment, biennial with annual review
- **Spanish Personal Data Protection Act** audit, biennial with annual review.
- **RA** audits on a discretionary basis.
- **Internal** Audits, External Subordinate CAs, External TSUs, on a discretionary basis.

8.1.1 External Subordinate CA audits.

Through its auditors, AC Camerfirma conducts an annual audit on the organisations that have obtained a Subordinate CA or TSA certificate and that issue certificates with their own technical and operational resources. This audit can be replaced by a favourable ***WebTrust for CA*** and/or ***WebTrust for EV*** audit certificate as applicable to the certificates issued.

8.1.2 Auditing the Registration Authorities

Every RA is audited. These audits are performed at least every two years on a discretionary basis and based on a risk analysis. The audits check compliance with the Certification Policy requirements in relation to undertaking the registration duties established in the signed service agreement.

As part of the internal audit, samples are taken of the certificates issued to check they have been processed correctly.

Reference documentation regarding the RA audit process are:

IN-2010-04-12-RA Security Evaluation Procedure
IN-2010-04-15-Ficha de la visita de evaluación.doc
IN-2010-04-16-Check List
IN-2006-03-08-RA Work Procedures.
IN-2010-04-17-Evaluation Report

8.2 Auditor identification and rating

The audits are conducted by independent external companies that are widely renowned in computer security, information systems security and in compliance audits by Certification Authorities:

- For the WEBTRUST - AUREN audit:http://www.auren.com.
- For ISO27001/20000 AENOR audits. http://www.aenor.es/aenor/inicio/home/home.asp
- For internal audits / RA / Subordinate CA, TSA Spanish Personal Data Protection Act – AUREN http://www.auren.com/
- For conformity assessment of eIDAS Natural Person & Legal Person. – TÜVIT https://www.tuvit.de/en/
- For eIDAS conformity assessment of CSQA Timestamps and Certificates Website https://www.csqa.it/

8.3 Relationship between the auditor and the CA

The audit companies used are independent and reputed companies with specialist IT audit departments that manage digital certificates and trusted services, which rules out any conflict of interest that may affect their activities in relation to the CA.

There is no financial or organisational association between auditing firms and AC Camerfirma.

8.4 Topics covered in the audit

In general terms, the audits verify:

a) That Camerfirma has a system that guarantees service quality.
b) That Camerfirma complies with the requirements of the Certification Policies that regulate the issuing of the different digital certificates.
c) That the CPS is in keeping with the provisions of the Policies, with that agreed by the Authority that approves the Policy and as established under current law.
d) That Camerfirma properly manages the security of its information systems.
e) In the OV and EV certificates, the audit checks variance with the policies established by CABFORUM in the "*Baseline Requirements*" as well as "*EV SSL Certificate guidelines*".

In general, the elements audited are:

- Camerfirma processes, RAs and related elements in the issuing of TSA timestamp certificates and validation of services in OCSP line.
- Information systems.
- Protecting the data processing centre.
- Documentation required for each type of certificate.
- Verification that the RA operators know AC Camerfirma's CPS and Policies

8.5 Processing the audit report

Once the compliance report from the audit is received, Camerfirma discusses any deficiencies found with the entity that carried out the audit and develops and implements a corrective plan in order to address the shortcomings.

If the audited entity is unable to develop and/or implement the plan within the time frame requested, or if the deficiencies pose an immediate threat to the system's security or integrity, the policy authority must be notified immediately, and may take the following actions:

- Cease operations temporarily.
- Revoke the corresponding certificate, and restore infrastructure.
- Terminate service to the Entity.
- Other complementary actions as may be needed.

8.6 Communication of results

The communication of results will be carried out by the auditors who have carried out the evaluation to the person in charge of security and regulatory compliance. It is carried out in an act with the presence of the corporate management. The audit certificate is published on the Camerfirma website.

9 Administration specification.

9.1 Fees

9.1.1 Price for certificate issuing and renewal.

The prices for certification services or any other related services are available and updated on Camerfirma's website

http://www.camerfirma.com/certificados/ or by prior consultation with the Camerfirma support department athttps://secure.camerfirma.com/incidencias/ or by telephone 902 361 207.

The specific price is published for each type of certificate, except those subject to previous negotiation.

9.1.2 Prices for access to certificates.

Access to certificates is free-of-charge, although AC Camerfirma applies controls in order to avoid mass certificate downloads. Any other situation that Camerfirma deems must be considered in this respect will be published on Camerfirma's website http://www.camerfirma.com/certificados/ or by prior consultation with the Camerfirma support department at https://secure.camerfirma.com/incidencias/ or by telephone: 902 361 207.

9.1.3 Prices for access to information relating to the status of certificates or renewed certificates.

Camerfirma provides free access to information relating to the status of certificates or revoked certificates via certificate revocation lists or via its website http://www.camerfirma.com/area-de-usuario/consulta-de-certificados/.

Camerfirma currently offers the OCSP service free-of-charge but reserves the right to invoice for these services. If invoiced, the prices of these services are published at http://www.camerfirma.com/servicios/respondedor-ocsp/.

9.1.4 Prices for access to the contents of these certification practices.

Access to the content of this CPS is free-of-charge on Camerfirma's website https://policy.camerfirma.com.

9.1.5 Refund policy.

AC Camerfirma does not have a specific refund policy, and adheres to general current regulations.

9.2 Financial Responsibility

9.2.1 Insurance coverage

Camerfirma, in its role as a CSP, has a public liability insurance policy that covers its liabilities to pay compensation for damages and losses caused to the users of its services: the Subject/Signatory and the User Party and third parties, for a total amount of **3,700,000 euros**.

9.2.2 Other assets

Not stipulated

9.2.3 Insurance or warranty coverage for end-entities

See section 9.2.1

9.3 Confidentiality

9.3.1 Type of information to be kept confidential

Camerfirma considers any information not classified as public to be confidential. Information declared confidential is not disclosed without express written consent from the entity or organisation that classified this information as confidential, unless established by law.

Camerfirma has established a policy for processing confidentiality agreement information and forms, which anyone accessing confidential information must sign.

Reference documentation:

IN-2005-02-04-Security Policy.
IN-2006-02-03-Security Regulations.

9.3.2 Type of information considered not confidential

Camerfirma considers the following information not confidential:

a) The contents of this CPS and the Certification Policies
b) The information contained in the certificates.
c) Any information whose accessibility is prohibited by current law.

9.3.3 Disclosure of information about certificate revocation/suspension

Camerfirma discloses information on the suspension or revocation of a certificate by periodically publishing corresponding CRLs.

Camerfirma provides a CRL and Certificate query service on the following website: http://www.camerfirma.com/area-de-usuario/consulta-de-certificados/

Camerfirma has an online query service for the status of certificates based on the OCSP standard at http://ocsp.camerfirma.com. The OCSP service provides standardised responses about the status of a digital certificate under the RFC 2560; in other words, whether the certificate consulted is active, revoked or whether it has been issued by the certification authority.

The policy for dissemination of information about certificate revocation in External Subordinate CAs with use of proprietary technology is based on their own CPS.

9.3.4 Sending information to the Competent Authority

Camerfirma will provide the information that the competent authority or corresponding regulatory entity requests in compliance with current law.

9.4 Privacy of Personal Information

9.4.1 Privacy plan

Camerfirma complies strictly with current data protection law. In this sense, in accordance with Law 59/2003 on Digital Signatures (Article 19.3), this document serves as a security document.

Reference documentation:

IN-2006-05-11-Compliance with legal requirements

9.4.2 Information treated as private

Personal information about an individual that is not publicly available in the contents of a certificate or CRL is considered private.

9.4.3 Information not considered private

The personal information about an individual available in the contents of a certificate or CRL, is considered as non-private when it is necessary to provide the contracted service, without prejudice to the rights corresponding to the holder of the personal data under the LOPD / legislation. RGPD.

9.4.4 Responsibility to protect private information

It is the responsibility of the controller to adequately protect private information.

9.4.5 Notice and consent to use private information

Before entering into a contractual relationship, Camerfirma will offer interested parties prior information about the processing of their personal data and the exercise of rights, and, if applicable, will obtain the mandatory consent for the differentiated treatment of the main treatment for the provision of contracted services.

9.4.6 Disclosure in accordance with a judicial or administrative process

Personal data that are considered private or not, may only be disclosed if necessary for the formulation, exercise or defense of claims, either by a judicial procedure or an administrative or extrajudicial procedure.

9.4.7 Other circumstances of disclosure of information

Personal data will not be transferred to third parties except legal obligation.

9.5 Intellectual Property Rights

Camerfirma owns the intellectual property rights on this CPS. The CPS of Subordinate CAs associated with Camerfirma hierarchies is owned by Camerfirma, without prejudice to the assignments of use of their rights in favour of Subordinate CAs and without prejudice to the contributions of the Subordinate CAs that are owned by them.

9.6 Representations and Warranties

9.6.1 CA representations and warranties

9.6.1.1 CA

In accordance with the stipulations of the Certification Policies and this CPS, and in accordance with current law regarding certification service provision, Camerfirma undertakes to:

- Adhere to the provisions within the scope of this CPS and the corresponding Certification Policies.
- Protect its private keys and keep them secure.
- Issue certificates in accordance with this CPS, the Certification Policies and the applicable technical standards.
- Issue certificates in accordance with the information in its possession and which do not contain errors.
- Issue certificates with the minimum content defined by current law for qualified or recognised certificates.
- Publish issued certificates in a directory, respecting all legal provisions regarding data protection.
- Suspend and revoke certificates in accordance with this Policy and publish the revocations in the CRL.
- Inform Subjects/Signatories about the revocation or suspension of their certificates, on time and in accordance with current law.
- Publish this CPS and the Certification Policies on its website.
- Report changes to this CPS and the Certification Policies to the Subjects/Signatories and its associated RAs.
- Do not store or copy the Subject/Signatory's signature creation data except for encryption certificates and when it is legally provided for or allowed to be stored or copied.
- Protect data used to create the signature while in its safekeeping, if applicable.
- Establish data creation and custody systems in the aforementioned activities, protecting data from being lost, destroyed or forged.
- Keep data relating to the issued certificate for the minimum period required by current law.

Camerfirma's responsibility

Article 22.1 of the Law on Digital Signatures establishes that:

> "Certification service providers are responsible for damages and losses caused to any person during their activities in the event they breach the obligations established in this Law.
>
> The certification service provider regulated herein shall be held liable in accordance with general regulations on contractual or non-contractual liability, as applicable,

although the certification service provider must prove that it acted with due professional diligence."

Article 13 of the eIDAS regulation provides:

> *1. Without prejudice to the provisions of paragraph 2, trusted service providers are responsible for damages caused intentionally or negligently to any natural person or legal entity for breach of its obligations under this Regulation.*
>
> *The burden of proof of intent or negligence of an unqualified trusted service provider corresponds to the natural person or legal entity claiming the damages that the first paragraph refers to.*
>
> *The intent or negligence of a qualified trusted service provider is presumed unless the qualified trusted service provider proves that the damage referred to in the first paragraph occurred without intent or negligence on its part.*
>
> *2. When a service provider duly informs its customers in advance about the limitations of the use of the services provided and these limitations are recognisable to a third party, the trusted service provider is not responsible for damages caused by use of services beyond the limitations stated.*
>
> *3. Paragraphs 1 and 2 shall apply in accordance with Spanish liability regulations.*

Camerfirma is responsible for any damages or losses caused to users of its services, whether the Subject/Signatory or the User Party, and other third parties in accordance with the terms and conditions established under current law and in the Certification Policies.

In this sense, Camerfirma is the only party responsible for (i) issuing the certificates, (ii) managing them throughout their lifecycle and (iii) in particular, if necessary, in the event of suspension and revocation of the certificates. Specifically, Camerfirma is fundamentally responsible for:

- The accuracy of the information contained in the certificate on the date of issue by confirming the applicant's details and the RA practices.
- Guaranteeing that when the certificate is delivered, the Subject/Signatory is in possession of the private key relating to the public key given or identified in the certificate when required, by using standard request forms in PKCS#10 format.
- Guaranteeing that the public and private keys work in conjunction with each other, using certified cryptographic devices and mechanisms.
- That the certificate requested and the certificate delivered match.
- Any liability established under current law.

In accordance with current law, Camerfirma holds a public liability insurance policy that fulfils the requirements established in the certification policies affected by these certification practices.

9.6.1.2 External Subordinate CA.

External Subordinate CAs are CAs incorporated into the root CA's hierarchy but are owned by a different organisation and may or may not use a different technique or infrastructure.

- Protect their private keys.
- Issue certificates pursuant to certification policies and/or corresponding CPS.
- Issue certificates that are free from errors.
- Publish issued certificates in a directory, respecting all legal provisions regarding data protection.
- Allow an annual audit by AC Camerfirma.
- Safeguard, for the duration established by law, the documentary information and systems that have been used or generated for issuing certificates.
- Notify AC Camerfirma of any incident in the delegated activity.

Responsibility of the Subordinate CA (Internal/External).

Without prejudice to Camerfirma's responsibility for issuing and revoking digital certificates of Subordinate CAs as well as the agreed contractual terms in each case, the Subordinate CAs (through the legal entity on which they depend) are responsible for issuing and revoking digital certificates issued to the end user, responding to the Signatories and other third parties or users affected by the service in accordance with their own Certification Practices Statements, Certification Policies and national legislation, if applicable.

9.6.2 RA representations and warranties

RAs are entities that the CA appoints to register and approve certificates; therefore, the RAs also carry out the obligations defined in the Certification Practices for issuing certificates, particularly to:

- Adhere to the provisions of this CPS and the Certification Policy.
- Protect their private keys that are used for exercising their functions.
- Check the identity of the Subjects/Signatories and Applicants of certificates when necessary, definitively proving the Signatory's identity, for individual certificates, or the key holder, for organisation certificates, pursuant to the provisions of the corresponding sections of this document.
- Check the accuracy and authenticity of information provided by the Applicant.

- Provide the Signatory, for individual certificates, or the future key holder, for organisation certificates, access to the certificate.
- If applicable, deliver the corresponding cryptographic device.
- Keep the documents provided by the applicant or Signatory on file for the period required by current law.
- Respect contract provisions signed with Camerfirma and with the Subject/Signatory.
- Inform Camerfirma about the causes for revocation, when known.
- Provide basic information about the certificate's policy and use, especially including information about Camerfirma and the applicable Certification Practices Statement, as well as their obligations, powers and responsibilities.
- Provide information about the certificate and the cryptographic device.
- Compile information and evidence about the certificate holder or receiver and, if applicable, the cryptographic device, and acceptance of such elements.
- Report on the attribution method exclusive to the private key holder and, if applicable, the cryptographic device's certificate activation data, according to this document's corresponding sections.

These obligations are even in cases of entities delegated by these such as points of physical verification.

The information about the Signatory's use and responsibilities is provided once the terms of use are accepted prior to the confirmation of the certificate application and via email.

The RAs' responsibility

The RAs sign a service provision agreement with Camerfirma, by virtue of which Camerfirma delegates registration duties to the RAs, which mainly consist of:

1.- Obligations prior to issuing a certificate.

- Informing applicants about signing their obligations and responsibilities.
- Properly identifying applicants, who must be trained or authorised to request a digital certificate.
- Checking the validity of the applicant's details and the Entity's details, if there is a contractual relationship or powers of representation.
- Accessing the Registration Authority application to process requests and issued certificates.

2.- Obligations once the certificate has been issued.

- Signing Digital Certification Service Provision agreements with applicants. In most issuance processes, this contract is formalised by accepting the conditions on the websites that are part of the process of issuing the certificate. The certificate cannot be issued without the terms of use having previously been accepted.

- Maintaining the certificates while they are still in force (expiry, suspension, revocation).
- Filing copies of submitted documentation and the agreements signed by the applicants in accordance with the Certification Policies published by Camerfirma and current law.

Therefore, the RAs are responsible for any consequences due to non-compliance of registration duties, and undertake to adhere to Camerfirma's internal regulations (Policies and CPS), which the RAs must keep perfectly controlled and which they must use as guidelines.

In the event of a claim from a Subject, Entity or user, the CA must offer proof that it has acted diligently and if there is evidence that the cause of the claim is due to incorrect data validation or checking, the CA can hold the RA liable for the consequences, in accordance with the agreement signed with the RAs. Because, although legally the CA is the legal entity liable to the Subject, an Entity or User Party, and the Subject, an Entity or User Party has liability insurance, according to the current agreement and binding policies, the RA has a contractual obligation to "correctly identify and authenticate the Applicant and, if applicable, the corresponding Entity", and in virtue of this must respond to Camerfirma in the event of breach.

Of course, it is not Camerfirma's intention to burden the RAs with the entire weight of responsibility for any damages due to a breach of the duties delegated to the RAs. For this reason, in the same way as for the CAs, the RA is subject to a control system imposed by Camerfirma, not only based on checking the files and filing systems the RA receives, but also audits to evaluate the resources used and its knowledge and control over the operational procedures used to provide the RA services.

The same responsibilities are assumed by the RA in virtue of breaches of the delegated entities such as points of physical verification (PVP), without prejudice to their right to contest them.

9.6.3 Subscriber representations and warranties

9.6.3.1 Signatory / Subscriber

Signatory / Subscriber will be obliged to comply with the provisions of current regulations and in addition to:

- Use the certificate as established in this CPS and in the applicable Certification Policies.
- Respect the provisions of the documents signed with Camerfirma and the RA.

- Inform as soon as possible of the existence of any cause of suspension / revocation.
- Notify any inaccuracy or change in the data provided for the creation of the certificate during its validity period.
- Do not use the private key nor the certificate from the moment it was requested by Camerfirma or the RA because suspension or revocation, or once the period of validity of the certificate has expired.
- Make use of the digital certificate with the nature of personal and non-transferable and, therefore, assume responsibility for any action that is carried out in contravention of this obligation, as well as meet the obligations that are specific to the regulations applicable to said digital certifications.
- Authorize Camerfirma to process the personal data contained in the certificates, in connection with the purposes of the electronic relationship and, in any case, to comply with the legal obligations of certificate verification.
- Assure that all the information included, by any means, the certificate application and in the same certificate is accurate, complete for the purpose of the certificate and is updated at all times.
- Immediately inform the corresponding certification service provider of any inaccuracy in the detected certificate once it has been issued, as well as of the changes that occur in the information provided by the issuance of the certificate.
- In the case of certificates in a material device, in the event that it loses possession, bring it to the attention of the entity that issued it in the shortest possible time and, in any case, within 24 hours after the production of the aforementioned circumstance, regardless of the specific event that originated it or the actions it may eventually exercise.
- Not to use the private key, the electronic certificate or any other technical support delivered by the corresponding certification service provider to carry out any transaction prohibited by applicable law.

In the case of qualified certificates, the subscriber or the certificate holder must use the key pair exclusively for the creation of electronic signatures or stamps and in accordance with any other limitations that may be notified.

Likewise, it must be especially diligent in the custody of its private key and its secure signature creation device, in order to avoid unauthorized uses.

If the subscriber generates his own keys, he is obliged to:

- Generate your subscriber keys using an algorithm recognized as acceptable for the electronic signature, if applicable, or the electronic seal, where appropriate qualified.
- Create the keys within the signature or seal creation device, using a secure device when appropriate.
- Use key lengths and algorithms recognized as acceptable for the electronic signature, if necessary qualified, or the electronic seal, if applicable qualified.

9.6.3.2 Certificate applicant

The Applicant (either directly or through an authorized third party) of a certificate will be required to comply with the provisions of the regulations and in addition to:

- ✓ Provide the AR with the necessary information to make a correct identification.
- ✓ Guarantee the accuracy and veracity of the information provided.
- ✓ Notify any change in the data provided for the creation of the certificate during its validity period.
- ✓ Protect your private key diligently.

9.6.3.3 Entity

In the case of certificates involving a business relationship, the Entity undertakes to request suspension/revocation of the certificate from the RA when the Subject/Signatory ends its business relationship with the organisation.

9.6.4 Relying party representations and warranties

The User Party undertakes to comply with legal provisions and to:

- Check the validity of the certificates before undertaking any transaction based on them. Camerfirma has established various channels for this verification, such as access to revocation lists or online query services such as OCSP, all of which are described on Camerfirma's website.
- Become familiar with and adhere to the guarantees, limitations and responsibilities regarding acceptance and use of trusted certificates, and agree to be subject to them.

9.6.5 Representations and warranties of other participants

No stipulation

9.7 Exemption from liability

In accordance with current law, the responsibility assumed by Camerfirma and the RA does not apply in cases in which certificate misuse is caused by actions attributable to the Subject and the User Party due to:

- Not having provided the right information, initially or later as a result of changes to the circumstances described in the digital certificate, when the certification service provider has not been able to detect the inaccuracy of the data.
- Having acted negligently in terms of storing the data used to create the signature and keeping it confidential;
- Not having requested the suspension or revocation of the digital certificate data in the event of doubts raised over their storage or confidentiality;
- Having used the signature once the digital certificate has expired;
- Exceeding the limits established in the digital certificate.
- Actions attributable to the User Party, if this party acts negligently, that is, when it does not check or heed the restrictions established in the certificate in relation to allowed use and limited amount of transactions, or when it does not consider the certificate's validity situation.
- Damages caused to the Subject or trusting third parties due to the inaccuracy of the data contained in the digital certificate, if this has been proven via a public document registered in a public register, if required.
- An inadequate or fraudulent use of the certificate in case the Subject / Holder has assigned it or authorized its use in favor of a third person by virtue of a legal transaction such as the mandate or empowerment, being the sole responsibility of the Subject / Holder the control of the keys associated with your certificate.

Camerfirma and the RAs are not liable in any way in the event of any of the following circumstances:

1. Warfare, natural disasters or any other case of Force Majeure.
2. The use of certificates in breach of current law and the Certification Policies.
3. Improper or fraudulent use of certificates or CRLs issued by the CA.
4. Use of the information contained in the Certificate or CRL.
5. Damages caused during verification of the causes for revocation/suspension.
6. Due to the content of messages or documents signed or encrypted digitally.
7. Failure to retrieve encrypted documents with the Subject's public key.

9.8 Limitations of liability

The monetary limit of the transaction value is expressed in the final entity's certificate by including the extension "***qcStatements***", (OID 1.3.6.1.5.5.7.1.3), as defined in **RFC 3039**. The monetary value expression shall be in keeping with section 5.2.2 of standard **TS 101 862** of the ETSI (European Telecommunications Standards Institute, www.etsi.org).

Unless the aforementioned certificate extension states otherwise, the maximum limit Camerfirma allows in financial transactions is 0 (zero) euros.

9.9 Indemnities

See section 9.2 and 9.6.1

9.10 Term and Termination

9.10.1 Term

See section 5.7.3

9.10.2 Termination

See section 5.7.3

9.10.3 Effect of termination and survival

See section 5.7.3

9.11 Individual notices and communications with participants

Any notification in relation to this CPS shall be made by email or certified mail to any of the addresses listed in the contact details section.

9.12 Procedures specifying changes.

9.12.1 Procedure for amendment

This CPS is amended when any significant changes are made to certificate management for any type of certificate to which it applies. Yearly reviews will take place should no changes have been made in that time. These reviews are included in the version table at the start of the document.

9.12.2 Changes with notice

9.12.2.1 List of aspects

Any aspect of this CPS can be changed without notice.

9.12.2.2 Notification method

Any proposed changes to this policy are published immediately on Camerfirma's website

http://www.camerfirma.com/area-de-usuario/politicas-y-practicas-de-certificacion/

This document contains a section on changes and versions, specifying the changes that occurred since it was created and the dates of those changes.

Changes to this document are expressly communicated to third party entities and companies that issue certificates under this CPS.

9.12.2.3 Period for comments

The affected Subjects/Signatories and Trusted Third Parties can submit their comments to the policy management organisation within 15 days following receipt of notice. The Policies state 15 days

9.12.2.4 Comment processing system

Any action taken as a result of comments is at the PA's discretion

9.12.3 Circumstances under which OID must be changed

Not stipulated

9.13 Dispute resolution procedure

Any dispute or conflict arising from this document shall be definitively resolved by means of arbitration administered by the Spanish Court Arbitration in accordance with its Regulations and Statutes, entrusted with the administration of the arbitration and the nomination of the arbitrator or arbitrators. The parties undertake to comply with the decision reached.

9.14 Applicable legal regulations

Camerfirma is obliged to fulfil the requirements established within **current Spanish and European Union law as** the trading company providing digital certification services (hereinafter, regulations or current law). This law is defined in the internal document "Compliance with legal requirements"

9.15 Compliance with applicable law

See section 9.14

9.16 Miscellaneous provisions

9.16.1 Complete Agreement

The Signers and third parties that rely on the Certificates assume in their entirety the content of this Certification Practices and Policy Statement.

9.16.2 Assignment

Parties to this CPS may not assign any of their rights or obligations under this CPS or applicable agreements without the written consent of Camerfirma

9.16.3 Separability

Should individual provisions of this CPS prove to be ineffective or incomplete, this shall be without prejudice to the effectiveness of all other provisions.
The ineffective provision will be replaced by an effective provision deemed as most closely reflecting the sense and purpose of the ineffective provision. In the case of incomplete provisions, amendment will be agreed as deemed to correspond to what would have reasonably been agreed upon in line with the sense and purposes of this CPS, had the matter been considered beforehand.

9.16.4 Compliance (attorneys' fees and exemption of rights)

No stipulation

9.16.5 Force majeure

Force Majeure clauses, if existing, are included in the “Subscriber Agreement”.

9.17 Other Provisions

9.17.1 Policy publication and copy

An electronic copy of this CPS is available at:

http://www.camerfirma.com/area-de-usuario/politicas-y-practicas-de-certificacion/

9.17.2 CPS approval procedures

The publication of reviewed versions of this CPS must be approved by Camerfirma Management.

AC Camerfirma publishes each new version on its website. The CPS is published in PDF format digitally signed by AC Camerfirma SA management.