

# Identiway Trusted Service Practice Statement

<b>Identitrade AB</b>		Document name <b>Identiway TSPS</b>		
Owner CEO	Class P (public)	Category Certification	Date 2019-06-18	Revision 11

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## Revision History

Version	Date	Change comment	Author
00B	2018-09-01	First Re-Draft from other format	Multiple
00B	2019-01-18	Work document	Multiple
01	2019-02-01	Updates	Philip Hallenborg
01	2019-02-06	Updates	Robert Arnesson
02	2019-02-09	Updates	May-Lis Farnes
03	2019-02-10	Updates	Philip Hallenborg
04	2019-02-15	Small updates	May-Lis Farnes
05	2019-02-25	Wording, Errors	Pihlip Hallenborg
06	2019-05-08	Update after TUV document review, not published	May-Lis Farnes, Tomas Zuoza
07	2019-05-27	Update to conform with template	Tomas Zuoza
08	2019-06-15	Updates deviation. Change name to TRA PS	Philip Hallenborg/Tomas Zuoza
09	2019-06-16	Updates structural changes	Philip Hallenborg
10	2019-06-17	Formatting	Tomas Zuoza
11	2019-06-18	6.7 more details added	Tomas Zuoza

## 1. Introduction

### 1.1. Overview

Identiway is the Registration Authority (RA) and identifies subscribers requesting qualified electronic signatures based on qualified certificates from a Certificate Authority (CA).

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The purpose of the RA service is to provide CAs and in specific eIDAS Trust Service Providers (e.g. QTSP CAs) with compliant subscriber registration.

The Identaway service under this Certificate Practice Statement (PS) is referred to as a Trusted Registration Authority Certificate Practice Statement (TSPS). The RA Service is referred to as the “trusted” in that it complies with eIDAS and thus is coined “TRA Service”.

Identaway performs identification of subscribers where the subscriber is a natural person and the qualified certificates are issued for the purpose of the subscriber signing documents on its own behalf.

The CA issues certificates, performs identification and authentication of subscribers and initiates or passes along revocation requests for certificates.

## 1.2. TRA Service Objective

TRA Service shall perform a successful identification of the natural person in a remote (online) environment. The TRA Service determines that the subscriber is physically present with a level of assurance at least at the level of a human face-to-face identity verification session. The TRA Service will:

- Check of the actual existence of the person in real life
- Use dual sources to verify whether the ID document belongs to the natural person
- Prove that identified natural person is the same as specified
- Check the legal authenticity of a national official ID document

## 1.3. eIDAS Legality, ETSI standards and German State-of-the-art

The Identaway Certificate Policy governing this TSPS consist of the eIDAS designated standards:

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- ETSI 319 401,
- ETSI 319 411-1
- ETSI 319 411-2

Under eIDAS article 24, paragraph 1d, Identiway uses German Video Identification Legislation as state-of-the-art to comply with the physical presence requirement “indirectly using means which provide equivalent assurance to physical presence”.

The TRA Service fulfills requirements under

- Verfügung gemäß § 11 Absatz 1 VDG (Mitteilung Nr. 208 des Amtsblatts-Nr. 11/2018 der Bundesnetzagentur) and
- German anti money laundering act legislation referring to the above legislation.

#### 1.4. Document name and identification

This practice statement is titled Identiway Trusted Registration Authority Practice Statement (Identiway TSPS).

#### 1.5. PKI participants

Identiway can provide their Identiway TRA Service as a standalone to CAs or include the service in its own CA.

All participating CAs need to comply with this TSPS and any CA's Certificate Practice Statement needs to comply with this TSPS and relevant regulations, standards and PSs.

##### 1.5.1. Certification Authorities (CA)

The requirements for the TRA Service will additionally be stated in the CA's PS and are met under the same standards:

- ETSI EN 319 411-2,
- ETSI EN 319 411-1 and
- ETSI EN 319 401

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The CA will have its name in the “Issuer” field of the Issuing CA certificates.

### 1.5.2. Registration Authority (RA)

Identiway is the RA in the TRA Service. No other RAs are foreseen. Identiway will perform a number of duties vis-a-vis the CA. These duties are:

- Control that all TRA Service operational procedures are performed in compliance with the present registration policy.
- Allow subscribers to apply for certificates via the TRA service,
- Report all security incidents to the CA,
- Manage the changes within this document upon validation of the CA,

Identiway is acting as the RA in the following way:

- On behalf of a relying party (e.g. finance service provider) forwarding documents that need an electronic signature
- On behalf of the subscriber as an intermediary to request a qualified certificate to be issued by a CA,
- On behalf of the subscriber as an intermediary to request the electronic signature of one or more documents
- On behalf of the subscriber as an intermediary while setting up a smartphone app based electronic identity
- On behalf of the subscriber, where necessary, executing a first bank transfer
- On behalf of the subscriber performing all required checks according to a national anti money laundering act on remote identification
- Provide full and comprehensive packaging of all checks above to the relying party and the CA

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### 1.5.3. Subscribers

The subscribers identified in for Identiway TRA Services are natural persons wishing to:

- request a qualified certificate to be issued by a CA,
- request a strong authentication sign-in provided by the CA
- request the electronic signature of one or more electronic documents
- setup and manage a smartphone app based electronic identity provided by a CA
- access data on a secure personal account (behind authentication)
- executing a first bank transfer for identification purposes
- performing all required checks according to a national anti money laundering act on remote identification

### 1.5.4. Relying parties

Relying parties are regulated service providers that will

- forward subscribers to the TRA Service
- forward documents to a CA that need an electronic signature using TRA Service as intermediary
- forward strong authentication requests to the CA with TRA Service as intermediary
- request full and comprehensive packaging of all identity checks

### 1.5.5. Other participants

No stipulation.

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## 1.6. Certificate usage

### 1.6.1. Appropriate certificate uses

Certificates issued as a result of the Identiway App registration process are issued by the CA to:

- Subscribers for authentication and non-repudiation signing.

The exact details of certificate usage will be defined by the CA in its PS.

### 1.6.2. Prohibited certificate uses

No Stipulation.

## 1.7. Policy administration

### 1.7.1. Organization administering the document

The TSPS has been implemented in the entire organization following a decision by the Management Board. This document is published and maintained by Identitrade AB Sweden.

### 1.7.2. Contact person

Mailing address:  
Identitrade AB  
Box 3437  
11156 Stockholm

Visiting address:  
Jakobsbergsgatan 16  
111 44 Stockholm  
Sweden

Contact:



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email: [support@identaway.com](mailto:support@identaway.com), [legal@identitrade.com](mailto:legal@identitrade.com)  
 telephone: +46 (0)10-199 40 00 (EN, SE), +370 5 2078882 (EN, LT)

### 1.7.3. Person determining PS suitability for the policy

Identaway Compliance Manager

### 1.7.4. PS approval procedures

The Management Board Decision Routine describes the PS approval process. This process is monitored by the Identaway Compliance Manager.

## 1.8. Definitions and acronyms

CA	Certification Authority
CRL	Certificate Revocation List
Control Panel	The Control Panel is the front end och application for the RPs to configure the TRA Service and receive data
Customer	Customer is a RP, typically a finance service provider
Identaway	Is the trading brand name of the legal entity Identitrade AB
Identaway TRA	Identaway Trusted Registration Authority
Identaway TRA Service	Identaway Trusted Registration Authority Service
Identaway TSPS	Identaway Trusted Registration Authority Practice Statement
ISO	International Organization for standardization
OID	Object Identifier Designation
Management System	Management System is Identaways internal Policies, Routines etc based on ISO 27001 and complies with relevant regulation and ETSI standards

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Relying Party	Relying parties (RA) are service providers in need of electronically signed documents, strong authentication and anti-money laundering compliant remote identification
PKCS	Public Key Cryptography Standards
PKI	Public Key Infrastructure
PKIX	Public Key Infrastructure X.509
RFC	Request For Comments
SIS	Swedish Standards Institute
Subscriber	Subscribers is a natural person seeking to sign documents electronically, set up an electronic identity, signing-in with strong authentication and perform remote identification.
Trusted 3rd Party Account	An existing account belonging to the subscriber behind secure remote e-authentication, accessed as a first process step of the TRA Service.
URI	Uniform Resource Identifier
URL	Uniform Resource Locator
UUID	Universally Unique Identifier

## 2. Publication and repository responsibilities

### 2.1. Repositories

Identiway publishes to its publicly available repository (<https://identiway.com/en/repository>) the following documents:

- Identitrade TSPS (this document)
- TRA Service Description
- Subscriber Terms and Conditions

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- Where applicable: Links to the repository of CA PS

## 2.2. Publication of certification information

No stipulation

## 2.3. Time or frequency of publication

Documentation listed under Repositories above are published with minimum delay when:

- when any material change in the underlying TRA service is made
- when any legal, regulatory or otherwise mandatory requirement calls for an update

Upcoming significant changes to the TSPS will be made public in advance. Subscribers and relying parties will be notified according to the Routine External Communication.

## 2.4. Access controls on repositories

Access to repositories is only granted to authorized Identiway personnel using secure access methods according to the Identiway Access Management and Access Controls Routines.

# 3. Identification and authentication

## 3.1. Naming

### 3.1.1. Types of names

No stipulation

### 3.1.2. Need for names to be meaningful

Within the Identiway TRA Service, the name of the subscriber is being checked against a copy of a government issued national

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ID document and against data from a trusted third party account.

Identiway collects the data of the user and checks it.

The following data will be collected, interpreted and vetted as a minimum:

- Name
- Date of Birth
- Place of Birth
- IBAN number (last 6 digits)
- Government issued national ID document
- Issuing country
- Nationality
- Type of identity number
- Phone number
- ID document issuing and expiry dates
- Biometric picture and signature on ID Document

### 3.1.3. Anonymity or pseudonymity of subscribers

All names are real names and have been checked against evidence in the form of a smartphone photo of the ID document, relayed to the TRA Service, and the data on a trusted 3rd party account, accessed via the TRA Service. Anonymity or pseudonymity is not accepted by Identiway.

### 3.1.4. Rules for interpretation of name forms

The subject name must contain the full name of the subscriber. The name used is the name of the subject at the time the certificate was issued. The name will always be taken from the identity document used to identify the subscriber provided it is verified also by the 3rd party account data.

### 3.1.5. Uniqueness of names

The uniqueness of each subject name is ensured by providing the full name of the subscriber together with two unique identifiers:

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- Personal/ or ID Document number and
- Unique Identiway number

### 3.1.6. Recognition, authentication and role of trademarks

No Stipulation.

## 3.2. Initial identity validation

### 3.2.1. Method to prove possession of private key

No stipulation.

### 3.2.2. Authentication of organization identity

No stipulation.

### 3.2.3. Authentication of individual identity

Identiway will authenticate the natural person remotely based on a subscriber self-service online process interacting with machine and manual processes in the TRA Service.

The full name, the date and the place of birth and other data (see 3.1.2) are provided as evidence by the subscriber to Identiway.

This is achieved by a module based approach. There are four modules in the TRA Service:

1. Third Party Account
2. Liveliness
3. ID Document
4. Manual Vetting
5. Video Conference

The modules can be accessed by the subscriber via either Identiway App (iTunes or AppStore) or a web interface.

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1. Subscriber selects language and country
2. Subscriber selects Third Party Account Provider and authenticates to the account in order to release identification data
3. Subscriber performs a Liveliness check according to instructions
4. Subscriber uses a smartphone to take a picture of a valid government issued ID document
5. Subscriber confirms the submitted information

The data on the third party account, combined with a unique identifier extracted from the ID document is checked for validity and for fulfilment of ICAO standards.

All verification steps are documented and stored by Identaway.

If the identity of the person is based on a subsequent remote authentication, the authentication is provided by the CA and uses at least two factor authentication as defined in ISO 29115 (knowledge, inherence or possession).

Any secret information exchanged in authentication protocols are cryptographically protected in transit. Two or more credentials implementing different authentication factors shall be used.

In the case of chain of remote authentication, the authentication factors are created during the initial identification which was performed in a way which provide equivalent assurance in terms of reliability to the physical presence.

If one of the authentication factors becomes unavailable (e.g. the user forgets a password), the user must perform a new identification process in the TRA service.

The TRA Service is designed with disabled people in mind. Deaf users and blind users with tailored devices can complete the TRA Service requirements. The video conferencing module includes additional measures to support subscribers with disabilities (e.g. chat).

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#### 3.2.4. Non-verified subscriber information

No stipulation.

#### 3.2.5. Validation of authority

No stipulation.

#### 3.2.6. Criteria for interoperation

Certificates generated based on the information provided by Identiway are compliant with ETSI EN 319 411-2 QCP-n-qscd.

### 3.3. Identification and authentication for re-key requests

#### 3.3.1. Identification and authentication for routine re-key

No stipulation.

#### 3.3.2. Identification and authentication for re-key after revocation

No stipulation.

### 3.4. Identification and authentication for revocation request

No stipulation.

## 4. Certificate life-cycle operational requirements

### 4.1. Certification Application

#### 4.1.1. Who can submit a certificate application

No stipulation.

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#### 4.1.2. Enrollment process and responsibilities

No stipulation.

#### 4.1.3. Certificate application processing

No stipulation.

#### 4.1.4. Performing identification and authentication functions

No stipulation.

#### 4.1.5. Approval or rejection of certificate applications

No stipulation.

#### 4.1.6. Time to certificate applications

No stipulation.

### 4.2. Certificate issuance

#### 4.2.1. CA actions during certificate issuance

No stipulation.

#### 4.2.2. Notification to the subscriber by the CA of issuance of certificate

No stipulation.

### 4.3. Certificate acceptance

#### 4.3.1. Conduct constituting certificate acceptance

No stipulation.



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#### 4.3.2. Publication of the certificate by the CA

No stipulation.

#### 4.3.3. Notification of certificate issuance by the CA to other entities

No stipulation.

### 4.4. Key pair and certificate usage

#### 4.4.1. Subscriber private key and certificate usage

No stipulation.

#### 4.4.2. Relying party public key and certificate usage

No stipulation.

### 4.5. Certificate renewal

#### 4.5.1. Circumstance for certificate renewal

No stipulation.

#### 4.5.2. Who may request renewal

No stipulation.

#### 4.5.3. Processing certificate renewal requests

No stipulation.

#### 4.5.4. Notification of new certificate issuance to subscriber

No stipulation.

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#### 4.5.5. Conduct constituting acceptance of a renewal certificate

No stipulation.

#### 4.5.6. Publication of the renewal certificate by the CA

No stipulation.

#### 4.5.7. Notification of certificate issuance by the CA to other entities

No stipulation.

### 4.6. Certificate re-key

#### 4.6.1. Circumstance for certificate re-key

No stipulation.

#### 4.6.2. Who may request certification of a new public key

No stipulation

#### 4.6.3. Processing certificate re-keying requests

No stipulation

#### 4.6.4. Notification of new certificate issuance to subscriber

No stipulation

#### 4.6.5. Conduct constituting acceptance of a re-keyed certificate

No stipulation

#### 4.6.6. Publication of the re-keyed certificate by the CA

No stipulation

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4.6.7. Notification of certificate issuance by the CA to other entities

No stipulation

## 4.7. Certificate modification

4.7.1. Circumstance for certificate modification

No stipulation

4.7.2. Who may request certificate modification

No stipulation

4.7.3. Processing certificate modification requests

No stipulation

4.7.4. Notification of new certificate issuance to subscriber

No stipulation

4.7.5. Conduct constituting acceptance of modified certificate

No stipulation

4.7.6. Publication of the modified certificate by the CA

No stipulation

4.7.7. Notification of certificate issuance by the CA to other entities

No stipulation

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## 4.8. Certificate revocation and suspension

### 4.8.1. Circumstances for revocation

No stipulation.

### 4.8.2. Who can request revocation

No stipulation.

### 4.8.3. Procedure for revocation request

No stipulation.

### 4.8.4. Revocation request grace period

No stipulation.

### 4.8.5. Time within which CA must process the revocation request

No stipulation.

### 4.8.6. Revocation checking requirement for relying parties

No stipulation

### 4.8.7. CRL issuance frequency (if applicable)

No stipulation.

### 4.8.8. Maximum latency for CRLs (if applicable)

No stipulation

### 4.8.9. On-line revocation/status checking availability

No stipulation.

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#### 4.8.10. On-line revocation checking requirements

No stipulation.

#### 4.8.11. Other forms of revocation advertisements available

No stipulation

#### 4.8.12. Special requirements re key compromise

No stipulation

#### 4.8.13. Circumstances for suspension

No stipulation.

#### 4.8.14. Who can request suspension

No stipulation

#### 4.8.15. Procedure for suspension request

No stipulation

#### 4.8.16. Limits on suspension period

No stipulation

### 4.9. Certificate status services

#### 4.9.1. Operational characteristics

No stipulation

#### 4.9.2. Service availability

No stipulation.

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#### 4.9.3. Optional features

No stipulation

#### 4.10. End of subscription

No stipulation.

#### 4.11. Key escrow and recovery

##### 4.11.1. Key escrow and recovery policy and practices

No stipulation

##### 4.11.2. Session key encapsulation and recovery policy and practices

No stipulation

## 5. Facility, management, and operational controls

### 5.1. Physical controls

Identiway has implemented a security policy and a set of routines that support the security requirements of the services, processes, and procedures covered by this PS.

All security mechanisms are based on risk assessments and impact analyses of the IT Architecture and environment in which threats arise from the TRA Service.

#### 5.1.1. Site location and construction

Identiway operations are conducted in Identiway's premises in Sweden and Lithuania. The premises meet the requirements set forth in the internal policies and routines.

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Physical controls have been implemented for the locations, which are used to process and store the personal data of the enrollment process in order to prevent unauthorized access to such premises:

For the manual vetting practices on premises Identaway routines require:

- Closed windows and doors
- Video surveillance
- Physical access restriction with manned and unmanned doors/entries
- Only authorized personnel are granted access to the premises
- Supervision or monitoring of third parties

Where Identaway utilizes IT systems at subcontractors, requirements are placed on them to meet and document security measures. Identaway reviews subcontractor policies and practices and documents them in its management system.

Identaway qualifies sub-contractors according to an internal Routine Procurement Contractors. The Routine describes an evaluation process that specifically looks at sub-contractor obligations vs. capabilities, compliance, policies and practices.

All external subcontractors are ISO 27001 certified and meet necessary physical security measures.

Identaway sites are physically protected with different layers.

Identaway has put in place necessary security mechanisms to protect the data in transit and rest, e.g. two factor access control, encryption and logging in order to detect unauthorized use of, access to, or disclosure of sensitive information and systems content. The principle of minimum access rights are implemented and only authorized resources can access the aforementioned systems.

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### 5.1.2. Power and air conditioning

The IT operators have industry standard power and air conditioning in place and are documented by the IT operator.

Furthermore, all relevant systems are provided with an uninterruptible power supply sufficient for a short period of operation in the absence of commercial power, to support either a smooth shutdown or to re-establish commercial power.

### 5.1.3. Water exposures

The IT operations are protected to minimize the impact by water exposure.

### 5.1.4. Fire prevention and protection

The IT operations are protected to minimize the impact of fire by fire industry standard prevention and protection measures.

### 5.1.5. Media storage

Identiway keeps a register of systems and storage media. Identiway has internal routines on how to decommission and destruct media or information on the media.

### 5.1.6. Waste disposal

No stipulation

### 5.1.7. Off-site backup

Identiway has backup routines that require separate physical premises to ensure redundancy.

## 5.2. Procedural controls

Procedural controls are documented in Identiways internal routines. Identiway personnel exercise administrative and management



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procedures and processes that are in line with the TSP's information security management procedures.

In specific, managerial personnel are provided training and are qualified according to experience with respect to the trust service that is provided. Managerial personnel have familiarity with security procedures for personnel, security responsibilities and experience with information security and risk assessment sufficient to carry out management functions.

#### 5.2.1. Trusted roles

Identiway has established and documented necessary Trusted roles to run their TRA Service. Identiway Management board appoints trusted roles and appointees accept the role responsibilities as part of their role.

#### 5.2.2. Number of persons required per task

Identiway has routines to ensure the right number of persons required per task.

#### 5.2.3. Identification and authentication for each role

Identification of persons that hold Trusted roles is performed during the HR process according to Routine Personnel. Proof-of-identity is done by checking an official national ID. All identity checks are performed face-to-face (physical presence).

#### 5.2.4. Roles requiring separation of duties

Identiway has routines to ensure segregation of duties and persons required per task. Identiway staff have job descriptions defined from the view point of roles fulfilled with segregation of duties and least privilege, determining position sensitivity based on the duties and access levels, background screening and employee training and awareness.

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### 5.2.5. Conflict of Interest

Identiway personnel in trusted roles shall be free from conflict of interest that might prejudice the impartiality of the TRA Service operations.

### 5.2.6. Trusted Roles Responsibilities

Identiway Trusted roles include the following responsibilities:

- Security Officers
- System Administrators
- System Operators
- System Auditors

## 5.3. Personnel controls

### 5.3.1. Qualifications, experience, and clearance requirements

Identiway has routines for qualification of personnel. The same controls apply all types of personnel, such as employees, consultants, contractors or others.

Controls include authentication, reference checks (if applicable) and formal qualifications.

### 5.3.2. Background check procedures

Identiway has routines for background checks that are done for all Trusted roles. Failure to complete the background check will be considered grounds for rejecting an application to a position in a Trusted role.

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### 5.3.3. Training requirements

Identivay has training routines for all personnel. All new personnel receives introduction and training sessions according to Personnel Management Routine.

### 5.3.4. Retraining frequency and requirements

Individual training is done according to Individual Development Plans. Training on Information and IT Security is mandatory and performed on a regular basis.

### 5.3.5. Job rotation frequency and sequence

No stipulation

### 5.3.6. Sanctions for unauthorized actions

Identivay has routines for disciplinary actions. Disciplinary actions for unauthorized actions may include warning, role change or termination depending on the severity of the unauthorized action. The actions in general follow local labour law stipulation on disciplinary actions.

### 5.3.7. Independent contractor requirements

Identivay has routines for qualification of personnel. The same controls apply all types of personnel, such as employees, consultants, contractors or others.

Contractors in Trusted roles that have not completed the background check will in the companies secure premises be escorted at all times by an employee of Identivay.

### 5.3.8. Documentation supplied to personnel

Published policies and routines in force are made available through Management System to all Personnel according to role.

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## 5.4. Audit logging procedures

### 5.4.1. Types of events recorded

Identiway TRA Service logs at least the following events relating to the CA and registration process:

Category	Log details
General events	<ul style="list-style-type: none"> <li>• Software installation, patches and updates</li> <li>• Backup related information</li> <li>• Boot and shutdown</li> <li>• Time synchronization</li> </ul>
General Security events	<ul style="list-style-type: none"> <li>• System subscriber account creation</li> <li>• Configuration changes to Firewalls, Switches, Intrusion detection systems, and load balancers</li> <li>• System crashes or other anomalies</li> </ul>
Identiway TRA events	<ul style="list-style-type: none"> <li>• Registration</li> <li>• Backup</li> <li>• Storage</li> <li>• Archival</li> <li>• Destruction</li> <li>• Certificate Applications</li> <li>• Certificate revocation</li> <li>• Successful or unsuccessful processing of events</li> </ul>

Log entries must also include:

- Date and Time
- Identity of the entry generator
- Attribute related to entry type

Identiway TRA logs of Certificate Applications include:

- Identifying document presented during application
- Personal data from accounts provided by trusted third parties
- Liveliness check output

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- Data pertaining to session (e.g. smartphone type) at registration.

#### 5.4.2. Frequency of processing log

Processing logs is scheduled at regular intervals depending on the type of log. Instructions related to frequency and work procedure related to a particular logs, is detailed in internal documentation.

#### 5.4.3. Retention period for audit log

Audit logs are archived at least 10 years from the conception of the log element.

#### 5.4.4. Protection of audit log

In sub-contractor systems audit logs are provided, logs are saved in dedicated storage, not encrypted, not validated. Audit log is protected by access management. Access to logs are further protected by Identiway personnel access management controls.

#### 5.4.5. Audit log backup procedures

Backup procedure for audit logs include regularly scheduled backup of audit logs and storage in two separate physically secure locations.

#### 5.4.6. Audit collection system (internal vs. external)

Logs are managed internally using an audit collection system that collects access and system related logs. Manual log entries are generated by Identiway TRA Service personnel.

#### 5.4.7. Notification to event-causing subject

Notification is not provided automatically for log entries generated by subscribers.

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#### 5.4.8. Vulnerability assessments

Vulnerability assessments are an important component in maintaining a relevant security posture. An independent, contracted external party does vulnerability assessments regularly as outlined in Identiways internal documentation for Routine IT-Security Controls. On the basis of these reports, updates, patches, reconfiguration or changes in policies may be implemented.

### 5.5. Records archival

Documentation related to the ongoing operation of the Identiway TRA service is archived. The following section relates to the archiving of these documents.

#### 5.5.1. Types of records archived

The following information is archived as a matter of ongoing operations:

- Registration requests (and Certificate requests) to CA
- Revocation requests made to CA
- Audit reports e.g. compliance with TSPS
- All versions of Identiway TSPS

In cases where the information is in digital format, and has been digitally signed, all information required to validate the signature is also stored for the duration of the archiving time frame.

#### 5.5.2. Retention period for archive

At least 10 years from the conception of the archive element. In case of Certificate issuance, this is the issuance date, or in case of a formal contract from the date of signing.

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### 5.5.3. Protection of archive

Archives are stored securely and protected from unauthorized viewing, modification or deletion. This is achieved through a combination of physical and/or logical security measures.

Confidential information is not made available to external parties, other than by a court order or where required by law.

All Parties are aware of the rapid pace of development of technology and thereby acknowledge that technology used for archiving or making the archived material available can be made redundant. In such cases where the archived information is more than 5 years old and Identiway TRA Service has no operational use for the redundant technology - Identiway TRA Service will be under no obligation to retain this technology. In such case, Identiway TRA Service will make necessary equipment available to process the archives at an extra fee equivalent to the cost to Identiway TRA Service.

### 5.5.4. Archive backup procedures

Information contained in the archives will be collected from the location of their inception and transferred securely to the location of the archives at regular intervals in time.

### 5.5.5. Requirements for time-stamping of records

All archived records will be time stamped with the date of their inception or execution.

### 5.5.6. Archive collection system (internal vs. external)

No stipulation

### 5.5.7. Procedures to obtain and verify archive information

Integrity and usability of archives shall be validated at least every 12 months.

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## 5.6. Key changeover

No stipulation

## 5.7. Compromise and disaster recovery

Identiway a Routine Business Continuity Plan (BCP) that guarantees a robust set of procedures as well as physical and logical security measures to minimize the impact of disaster. All procedures have been developed to minimize potential impact and restore operations within a reasonable period of time.

### 5.7.1. Incident and compromise handling procedures

Within the Information Security Management System an integral part of the Identiway TRA Service, change and incident management procedures have been developed to allow for a controlled, structured and accountable handling of incidents as well as recovery from systems or application disasters. Detailed instructions can be found in the Identiway Incident Management Routine and in the Information Security Management System. Finally, External Communication routine governs the means of communication that is deemed necessary by Incident Evaluation Team.

The incidents can be submitted using either internal or external submission forms, the latter is available on Identiway website, or as an email to [support@identitway.com](mailto:support@identitway.com)

The response time by the Incident Evaluation Team is determined by the severity of the incident, but is no longer than 24 hours on working days.

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

In such case where computing resources, software, and/or data have been identified as corrupt, appropriate steps are taken for incident investigation, appropriate escalation and incident response. If necessary, Identiway's internal



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documentation in the Management System, Compromise and disaster recovery plan may be applied.

#### 5.7.3. Entity private key compromise procedures

No stipulation

#### 5.7.4. Business continuity capabilities after a disaster

Identivay has implemented Identivay TRA Service infrastructure in a redundant configuration to minimize the impact of disasters. In addition, important information with respect to restoring the Identivay TRA Service is backed up for disaster recovery purposes.

### 5.8. CA or RA termination

#### 5.8.1. RA Termination

Identivay has a documented Termination Plan for its TRA Service which describes the process of a service termination. Stakeholders affected by any termination will be informed according to the Termination Plan and Routine External Communication.

#### 5.8.2. CA Termination

No stipulation.

## 6. Technical security controls

### 6.1. Key pair generation and installation

No stipulation

#### 6.1.1. Key pair generation

No stipulation

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### 6.1.2. Private key delivery to subscriber

No stipulation

### 6.1.3. Public key delivery to certificate issuer

No stipulation

### 6.1.4. CA public key delivery to relying parties

No stipulation

### 6.1.5. Key sizes

No stipulation

### 6.1.6. Public key parameters generation and quality checking

No stipulation

### 6.1.7. Key usage purposes (as per X.509 v3 key usage field)

No stipulation

## 6.2. Private key protection and cryptographic module engineering controls

### 6.2.1. Cryptographic module standards and controls

No stipulation

### 6.2.2. Private key (n out of m) multi-person control

No stipulation

### 6.2.3. Private key escrow

No stipulation

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#### 6.2.4. Private key backup

No stipulation

#### 6.2.5. Private key archival

No stipulation

#### 6.2.6. Private key transfer into or from a cryptographic module

No stipulation

#### 6.2.7. Private key storage on cryptographic module

No stipulation

#### 6.2.8. Method of activating private key

No stipulation

#### 6.2.9. Method of deactivating private key

No stipulation

#### 6.2.10. Method of destroying private key

No stipulation

#### 6.2.11. Cryptographic module rating

No stipulation

### 6.3. Other aspects of key pair management

#### 6.3.1. Public key archival

No stipulation

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### 6.3.2. Certificate operational periods and key pair usage periods

No stipulation

## 6.4. Activation data

### 6.4.1. Activation data generation and installation

No stipulation

### 6.4.2. Activation data protection

No stipulation

### 6.4.3. Other aspects of activation data

No stipulation

## 6.5. Computer security controls

### 6.5.1. Specific computer security technical requirements

User management is performed for all data processing systems which require protection. The access management is carried out using personal accounts only. No impersonal collection accounts are used.

The general guidelines for creating passwords (such as minimum length and password complexity) are the basis of the password policy. All employees are informed about the proper handling of passwords and have signed an appropriate guideline.

There is a defined timeout for sessions.

The consciousness of security of their work environment is refreshed for all employees in regular security awareness training.

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Only system administrators can access the server system and always through encrypted connections. All accesses are personalised and protected by passwords + 2FA authentication.

Hiring Manager issues with the respective superiors the appropriate rights which are specified according to the personnel processes. The rights are then reviewed by the CTO. When leaving the company, the withdrawal of access rights takes place within maximum 24 hours.

#### 6.5.2. Computer security rating

No stipulation

### 6.6. Life cycle technical controls

#### 6.6.1. System development controls

Identiway TRS Service has a structured change management process. A change originating from the development team or third party is first tested in a separate development environment. After successful completion of these tests the changes are implemented in a pre-production environment that is similar to the production environment. Acceptance tests are performed in the pre-production environment before going live in the production environment. This process follows the Identiway's internal documentation in the Management System, Routine Change Management.

#### 6.6.2. Security management controls

Security management controls/measures include execution of tools and procedures to ensure that the operational systems and networks adhere to configured security.

These tools and procedures are partly in the scope of the Identiways internal documentation Management System, Information Security policy, IT security policy etc.

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### 6.6.3. Life cycle security controls

No stipulation

## 6.7. Network security controls

All network traffic is carried over the public internet, with the exception of the internal traffic within the AWS systems and the CA system. All network traffic is encrypted with TLS. Firewalls have been set up specifically denying all traffic that is not explicitly allowed for all public-facing interfaces.

Security checks, such as vulnerability scans or patching are done according to a schedule present in an IT Security Review routine, some being checked monthly, some quarterly and some yearly. No two checks are separated by longer than a year.

Vulnerability and penetration tests are performed by an external specialized company:

- At least once per year; or
- After major network or system changes;
- When requested by a relying party or regulating bodies

The transfer of data to the relying party is always encrypted.

There is no physical transfer of data.

Identiway ensures the secure operation of all technical systems by "hardening". This includes in particular:

- Removal of unnecessary software/services
- Removal of unnecessary accounts
- Modifying the configurations in regards to security
- If necessary activation of security components
- Protection of network ports

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## 6.8. Time-stamping

All systems have their time with a timezone reference against UTC synchronised through NTP at least daily.

## 7. Certificate, CRL, and OCSP profiles

### 7.1. Certificate profile

No stipulation.

#### 7.1.1. Version number(s)

No stipulation

#### 7.1.2. Certificate extensions

No stipulation

#### 7.1.3. Algorithm object identifiers

No stipulation

#### 7.1.4. Name forms

No stipulation

#### 7.1.5. Name constraints

No stipulation

#### 7.1.6. Certificate policy object identifier

No stipulation

#### 7.1.7. Usage of policy constraints extension

No stipulation

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#### 7.1.8. Policy qualifiers syntax and semantics

No stipulation

#### 7.1.9. Processing semantics for the critical certificate policies extension

No stipulation

### 7.2. CRL profile

The CRL profile is described in the CA PS will be used.

#### 7.2.1. Version number(s)

No stipulation

#### 7.2.2. CRL and CRL entry extensions

No stipulation

### 7.3. OCSP profile

No stipulation.

#### 7.3.1. Version number(s)

No stipulation

#### 7.3.2. OCSP extensions

No stipulation



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## 8. Compliance audit and other assessments

### 8.1. Frequency or circumstances of assessment

An internal audit of compliance will be performed minimum annually or when larger changes are done. In Identiway's Management System periodically internal reviews are defined on a different level of the organisation.

### 8.2. Identity/qualifications of assessor

The internal auditor must demonstrate documented knowledge and experience in performing audits. In addition, the auditor must be thoroughly familiar with regulations,, ETSI standards and other relevant requirements.

### 8.3. Assessor's relationship to assessed entity

An internal auditor should not audit the part they are responsible for themselves.

### 8.4. Topics covered by assessment

The internal audit is to verify that Identiway TRA Service is compliant with the requirements in this Identiway TSPS, regulations, ETSI standard and other relevant standars.. The audit will cover requirements that define the operation and including:

- TSPS, Service Definition, Terms & Conditions Subscriber
- TRA Service
- TRA Process Description and TRA Operational Guide
- Management System (Routines, Policies, Controls and Records).

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## 8.5. Actions taken as a result of deficiency

Depending on the severity of the deficiency the following actions may be taken:

- Auditor may note the deficiency in the report
- An action plan can be developed and steps taken to remedy the deficiency. This could include a revision to the Identivay TSPS or to applied procedures.
- If the deficiency is judged to have risks for the operation of the Identivay TRA Service actions has to be taken without any delay.

## 8.6. Communication of results

The internal audit shall provide Identivay Management Board with the audit report. The results will not be made public.

# 9. Other business and legal matters

## 9.1. Fees

Fees are paid by RPs and are defined in a master service agreement (MSA). Subscribers do not pay fees for using the service.

### 9.1.1. Certificate issuance or renewal fees

No stipulation.

### 9.1.2. Certificate access fees

No stipulation.

### 9.1.3. Revocation of status information access fees

No stipulation.

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#### 9.1.4. Fees for other services

No stipulation.

#### 9.1.5. Refund policy

No stipulation.

## 9.2. Financial responsibility

Identiway (Identitrade AB) is audited by PriceWaterhouseCoopers Sweden and meets all requirements of Swedish limited companies.

Identiway describes its financial stability in internal documentation (Documentation of Financial Stability) - the documentation is updated on an annual basis following financial assessments. The purpose of the assessment is to verify that Identiway has the resources required to operate in conformity with this PS and the requirements of eIDAS.

The financial responsibility is complemented with multiple insurance types (see below).

#### 9.2.1. Insurance coverage

Identiway has adequate levels of insurance to support its business practices. Insurance coverage is reviewed annually. There are three separate insurance domains:

- eIDAS
- PSD2
- General company (including board and management)

The level of insurance will at minimum be reviewed yearly internal routines. For the purpose of meeting eIDAS requirements, insurance certificates are published on [www.identiway.com/repository](http://www.identiway.com/repository).

#### 9.2.2. Other assets

No stipulation

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### 9.2.3. Insurance or warranty coverage for end-entities

No stipulation

## 9.3. Confidentiality of business information

### 9.3.1. Scope of confidential information

All information not specifically deemed as public under this Identiway TSPS is to be considered confidential. Confidential information includes any information provided by subscribers for purposes of identity verification.

Identiway will disclose information required by law or a court decision.

### 9.3.2. Information not within the scope of confidential information

No stipulation.

### 9.3.3. Responsibility to protect confidential information

All confidential information will be protected against unauthorized access, modification or deletion using physical, logical and/or procedural security.

## 9.4. Privacy of personal information

Identiway TRA Service processes Personal Data in accordance with applicable national legislation (Sweden), and strictly adheres to subscriber rights pertaining to data protection set forth in General Data Protection Regulation (GDPR).

### 9.4.1. Privacy plan

TRA Service is a subscriber initiated and self-service type process including multiple levels of consent. As such it is GDPR by design. Subscriber consent needs to be active in that

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legal texts and buttons are shown to the subscriber and require conscious subscriber consent and action. The consent is the primary grounds of legality and follows the requirements of GDPR.

Where data processors are utilized as part of the TRA service, data processing agreements (DPA) are signed. All DPAs comply with the EU Model Clauses. These are standardized contractual clauses to ensure that any personal data leaving the EEA will be transferred in compliance with EU data-protection law and meet the requirements of the EU Data Protection Directive.

Identiway has appointed a data protection officer (DPO). The DPO can be reached at [dpo@identiway.com](mailto:dpo@identiway.com).

#### 9.4.2. Information treated as private

No stipulation

#### 9.4.3. Information not deemed private

No stipulation

#### 9.4.4. Responsibility to protect private information

No stipulation

#### 9.4.5. Notice and consent to use private information

No stipulation

#### 9.4.6. Disclosure pursuant to judicial or administrative process

No stipulation

#### 9.4.7. Other information disclosure circumstances

No stipulation

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## 9.5. Intellectual property rights

No stipulation.

## 9.6. Representations and warranties

### 9.6.1. CA representations and warranties

No stipulation.

### 9.6.2. RA representations and warranties

Identiway warrants as RA that a subscriber has been identified and authenticated in accordance with eIDAS and ETSI requirements.

Identiway further warrants that it manages privacy in accordance with GDPR and that all necessary measures are taken in order to protect the individual and minimize any impact of data processing.

Identiway further warrants that its services are non-discriminatory. That Identiway will operate in accordance with this Identiway TSPS and relating PS documents referring to this document.

Identiway will make every reasonable effort to inform relying parties and subscribers of their respective rights and obligations.

Every Certificate published or delivered will include a reference to the relevant policy (OID). The policy document states how the information contained in the certificate was verified.

### 9.6.3. Subscriber representations and warranties

No stipulation

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#### 9.6.4. Relying party representations and warranties

No stipulation

#### 9.6.5. Representations and warranties of other participants

No stipulation

### 9.7. Disclaimers of warranties

No stipulation.

### 9.8. Limitations of liability

No stipulation.

### 9.9. Indemnities

Identiway makes no claims as to the suitability of certificates issued under this TSPS for any purpose whatsoever. Relying parties use these certificates at their own risk. Identiway has no obligation to make any payments regarding costs associated with the malfunction or misuse of certificates issued under this TSPS.

### 9.10. Term and termination

#### 9.10.1. Term

This Identiway TSPS remains valid until such time when a new version or replacement is published, or information to that effect is published on

<https://www.identiway.com/repository>

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### 9.10.2. Termination

This Identaway TSPS is deemed terminated once a new version is published in the Repository.

### 9.10.3. Effect of termination and survival

Conditions and effect resulting from the termination of this document will be communicated in the Identaway TSPS.

## 9.11. Individual notices and communications with participants

No stipulation.

## 9.12. Amendments

### 9.12.1. Procedure for amendment

Only changes that do not affect the security level of the described procedures and regulations can be made to this Identaway RA-PS without notice. Changes that do not affect security include linguistic changes and minor rearrangements.

### 9.12.2. Notification mechanism and period

Changes that require notification will be made to this Identaway TSPS 20 days after notification.

Notification will be published on  
<https://www.identiway.com/repository>

Changes that affect the terms of an agreement with Identaway TSPS will be notified to the appropriate contact or signatory of the agreement.



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### 9.12.3. Circumstances under which OID must be changed

No stipulation.

## 9.13. Dispute resolution provisions

To submit complaints on the TRA Service, Identiway provides a simple web tool to submit complaints. See > Report an issue > Fill in a form. Or alternatively Identiway can be contacted via [support@identitway.com](mailto:support@identitway.com).

Disputes related to TRA Service should first hand be settled by negotiations. Otherwise dispute shall be settled by arbitration in accordance with the Reconciliation and Arbitration Rules of the International Chamber of Commerce (ICC). The Stockholm Chamber of Commerce shall administer the reconciliation. Proceeding shall be held in Stockholm in English.

## 9.14. Governing law

Swedish law governs the enforcement of the Identiway TSPS or agreements.

## 9.15. Compliance with applicable law

Identiway Scope of Applicability for its TRA Service include primarily:

- eIDAS and national implementations of electronic signature legislation
- eIDAS designated ETSI standards
- German regulation on remote identification: Verfügung gemäß § 11 Absatz 1 VDG (Mitteilung Nr. 208des Amtsblatts-Nr. 11/2018 der Bundesnetzagentur)
- GDPR
- National Anti-money laundering legislation (AML)
- PSD2 regulation and national implementation of PSD2

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## 9.16. Miscellaneous provisions

### 9.16.1. Entire agreement

Identiway shall not be liable to RA or subscriber for any failure or delay caused by events beyond Identiway's reasonable control, including, without limitation, subscriber's or RA's failure to furnish necessary information; sabotage; failure or delays in transportation or communication; failures or substitutions of equipment; labor disputes; accidents; shortages of labor, fuel, raw materials or equipment; or technical failures.

### 9.16.2. Assignment

No stipulation

### 9.16.3. Severability

No stipulation

### 9.16.4. Enforcement (attorneys' fees and waiver of rights)

No stipulation

### 9.16.5. Force Majeure

No stipulation

## 9.17. Other provisions

No stipulation