První certifikační autorita, a.s.

I.CA RemoteSign Policy

(Remote Creation of Electronic Signatures)

Version 1.04

CONTENT

Table 1 – Document history

Version	Date of Release	Approved by	Comments
1.00	26 February 2020	CEO of První certifikační autorita, a.s.	First release.
1.01	27 August 2022	CEO of První certifikační autorita, a.s.	Classification of document marked, audit recommendation included, more accurate text. Possibility to use the certificates issued for the Slovak Republic included.
1.02	31 August 2022	CEO of První certifikační autorita, a.s.	Formal error correction.
1.03	2 December 2022	CEO of První certifikační autorita, a.s.	Possibility to use also the certificates issued by other trust services provider added.
1.04	23 November 2023	CEO of První certifikační autorita, a.s.	Two other ways to authorize individual identity added (other qualified certificate for qualified electronic signature validation of the same subscriber and remotely vis ZealiD).

1 INTRODUCTION

This document determines the principles applied by První certifikační autorita, a.s. (also as the I.CA), a qualified provider of trust services, in providing trust service I.CA RemoteSign i.e., remote creation of electronic signatures (also as the Service). It also describes Service's end user (also as Client) actions relying to issuance and management of relevant qualified certificate. ¨

The Service is primarily intended for electronic signing based on qualified certificates issued by I.CA, but can be also used for electronic signing based on qualified certificates issued by other trust services providers.

Condition is the contractual relationship between I.CA and these trust services providers and also the fact, that the private key used for electronic signing was generated and is stored in secure cryptographic device or in QSCD, which are under sole control of I.CA.

In the following text these terms are used:

- Signing certificate in the meaning of qualified certificate for electronic signature issued under the legislation of the Czech Republic or under the legislation of the Slovak Republic;
- Mandate certificate in the meaning of qualified mandate certificate issued under the legislation of the Slovak Republic;
- The Certificate for all mentioned types of certificates.

The statutory requirements in respect of the Service are defined in:

- Regulation (EU) no 910/2014 of the European Parliament and of the Council on electronic identification and trust services for electronic transactions in the internal market and repealing Directive 1999/93/EC;
- Act of the Czech Republic No. 297/2016 Coll., on trust services for electronic transactions;
- Act of the Slovak Republic No. 272/2016 Coll., on Trust Services for Electronic Transactions in the Internal Market and on granting Amendment and Supplementing of certain Acts (Trust Services Act);
- Legislation concerning personal data protection in compliance with Regulation (EU) no 2016/679 of the European Parliament and of the Council on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation).

The Service of První certifikační autorita, a.s., creating remotely electronic signatures is provided to all Clients who need to create electronic signatures for subject sending them documents to be signed (also as third party). I.CA imposes no restrictions on potential end users, and the provision of the Service is non-discriminatory and the Service is also available to the disabled.

Note: Any reference to technical standard, norm or legislation is always a reference to that technical standard, norm or legislation or to replacing technical standard, norm or legislation. If this document is in conflict with any technical standard, norm or legislation that replaces the current technical standard, norm or legislation, a new version will be released.

1.1 Overview

The document **I.CA RemoteSign Policy (Remote Creation of Electronic Signatures)** is prepared by První certifikační autorita, a.s., deals with the issues related to the Service while taking account of valid technical and other standards and norms of the European Union and the laws of the Czech Republic pertinent to this sphere. The document is divided into nine basic chapters and these are briefly introduced in the following list:

- Chapter 1 identifies this document, generally describes subjects taking part in the provision of this Service and defines the acceptable use of the Service;
- Chapter 2 deals with the responsibility for the publication and information or documents;
- Chapter 3 describes the processes of the Service identification and authentication;
- Chapter 4 defines life cycle processes of the Service up to Service's provision termination;
- Chapter 5 covers physical, procedural and personal security, including the definition of the set of events subject to logging, the keeping of these records and responses to emergency and compromising situations;
- Chapter 6 focuses on the technical security including the computer and network protection;
- Chapter 7 focuses on assessing the Service delivered;
- Chapter 8 deals with commercial and legal aspectsů
- Chapter 9 contains final provisions.

More details concerning the Service are given in two practice statements (also as Statements – not yet translated) required by ETSI TS 119 431-1 and ETSI TS 119 431-2 standards (see chapter 6.1.2), i.e. I.CA RemoteSign Practice Statement ETSI TS 119 431-1 (also as Statement1) and I.CA RemoteSign Practice Statement ETSI TS 119 431-2 (also as Statement2).

Note: This is English translation of the Policy; Czech version always takes precedence.

1.2 Document name and identification

Document's title:	I.CA RemoteSign Policy (Remote Creation of Electronic Signatures), version 1.04
Supported OIDs:	**0.4.0.19431.2.1.2** (eu-advanced-x509, AdES based on X.509 certificates); and
	0.4.0.19431.1.1.2 (Normalized SSASC policy) – in case of storage signing keys in SCDev; or
	0.4.0.19431.1.1.3 (EU SSASC policy) - in case of storage signing keys in QSCD

1.3 PKI Participants

1.3.1 Service provider

První certifikační autorita, a.s., as the qualified trust services provider.

1.3.2 Contact points

Contact points serving in cases of physical presence of Client or of his agent (see chapter 3.1.2) are implemented via:

- Public registration authorities I.CA; and
- Client registration authorities; and
- Specialized contact points oriented only to activities related to the Service.

Registration authorities can be stationary or mobile.

Contact points:

- Accept applications for the Service, provide required information, handle complaints, etc.;
- Are entitled, for urgent operational or technical reasons, to suspend, in whole or in part, the performance of their activities;
- Are authorized to conclude contracts “Contract about issuing the certificate and usage of I.CA RemoteSign service” (also as Contract) on behalf of I.CA;
- Are authorized to charge for the I.CA services provided through contact point unless otherwise agreed in the Contract.

1.3.3 Relying parties

Any entity relying on electronic signature created using the Service is a relying party.

1.3.4 Other participants

Other participating parties are investigative, prosecuting and adjudicating bodies, supervisory bodies and other bodies recognized as such by current legislation.

1.4 Service usage

1.4.1 Appropriate service uses

Service provided under this Policy may be used in electronic signature creation processes for the benefit of specific third party in compliance with current legislation.

1.4.2 Prohibited service uses

Service provided under this Policy may not be used contrary to the acceptable use described in 1.4.1 or contrary to law. It also may not be used for electronic signing of any document which was not sent to Client by third party.

1.5 Policy administration

1.5.1 Organization administering the document

This Policy and its Statements are administered by První certifikační autorita, a.s.

1.5.2 Contact person

The contact person of První certifikační autorita, a.s., in respect of this Policy and its Statements is specified on a web page – see 2.2.

1.5.3 Person determining providing statement suitability for the policy

CEO of První certifikační autorita, a.s., is the sole person responsible for making decisions about compliance of the procedures of První certifikační autorita, a.s., as set out in Statements with this Policy.

1.5.4 Providing statement approval procedures

If it is necessary to make changes to Statement1 or Statement2 to create new version thereof, CEO of První certifikační autorita, a.s., appoints a person authorized to perform such changes. No new version may take force unless it has been approved by CEO of První certifikační autorita, a.s.

1.6 Definitions and acronyms

Table 2 – Definitions

Term	Explanation
activation code	QR code or barcode inside of activation envelope under safety sticker used to activate the Service for specific Client
activation envelope	envelope which Client receives at contact point; at the front side or under transparent window at the front side there is an identification barcode, inside the activation envelope under safety sticker there is other, activation QR code or barcode
Classified Information Protection Act	act of the Czech Republic no. 412/2005 Coll., on the protection of classified information and security eligibility
electronic signature	advanced electronic signature or recognized electronic signature or qualified electronic signature under trust services legislation
remote electronic signature	electronic signature created using private key stored in device operated by I.CA; this private key is under sole control of Client
identification code	barcode at front side of activation envelope or under transparent window at front side of activation envelope linking specific key pair to specific Client; identification code is also listed as number to allow typing

Labor Code	the Czech Republic's Act No. 262/2006 Coll., Labour Code, as amended
QR code	Quick Response code, means for automated data collection, stays readable after removal of substantial part of figure
supervisory body	the body supervising qualified trust services providers
trust service / qualified trust service	trust service / qualified trust service defined by trust services legislation
trust services legislation	current legislation on trust services
written contract	text of the contract in electronic or paper form

Table 3 – Acronyms

Acronym	Explanation
AdES	Advanced Electronic Signature
CAdES	CMS Advanced Electronic Signature
ARC	Alarm Receiving Centre
CR	Czech Republic
ČSN	Czech Technical Norm
eIDAS	REGULATION (EU) no 910/2014 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 23 July 2014 on electronic identification and trust services for electronic transactions in the internal market and repealing Directive 1999/93/EC
EN	European Standard, a type of ETSI standard
ETSI	European Telecommunications Standards Institute, a European standardization institute for information and communication technologies
EU	European Union
FAS	Fire Alarm System
GDPR	Global Data Protection Regulation, REGULATION (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation)
http	Hypertext Transfer Protocol, protocol for exchanging html documents
https	Hypertext Transfer Protocol, protocol for secure exchanging of html documents
IAS	Intrusion Alarm System
IEC	International Electrotechnical Commission, the global organization publishing standards for electrical and electronic engineering, communication technologies and related industries
ISMS	Information Security Management System

ISO	International Organization for Standardization, an international organization of national standardization organizations; designation of standards
OID	Object Identifier
PC	Personal Computer
PDCA	Plan-Do-Check-Act, Deming cycle, management method for control and continuous improvement
SCDev	Secure Cryptographic Device
SSASC	Server Signing Application Service Component
TS	Technical Specification, type of ETSI standard
UPS	Uninterruptible Power Supply/Source
ZOOÚ	current personal data protection legislation

2 PUBLICATION AND REPOSITORY RESPONSIBILITIES

2.1 Repositories

První certifikační autorita, a.s., sets up and operates repositories of both public and non-public information.

2.2 Publication of certification information

The basic addresses (also as the Information Addresses) for obtaining information about První certifikační autorita, a.s., are as follows:

- Registered office:

  První certifikační autorita, a.s.

  Podvinný mlýn 2178/6

  190 00 Praha 9

  The Czech Republic
- Website: http://www.ica.cz.

Electronic address for contact between general public and I.CA is info@ica.cz, ID of data box of I.CA is a69fvfb.

Information concerning the Service is also available at this web address.

Http and https are the permitted protocols for access to public information. I.CA may terminate or suspend access to some information without cause.

2.3 Time or frequency of publication

I.CA publishes information as follows:

- Policy of the Service – after a new version is approved and issued;
- Practice statements of the Service – immediately;
- Other public information – no specific time limit, the general rule is that this information must correspond to the current state of the services provided.

2.4 Access controls on repositories

All public information is made available by I.CA free of charge without any restrictions.

Non-public information is available only to authorized employees of I.CA or the parties specified by the relevant legislation. Access to such information is governed by the rules defined in internal documentation.

3 IDENTIFICATION AND AUTHENTICATION

3.1 Initial identity validation

Clients of third parties' services whose list the specific third party sent to I.CA can become Clients of the Service. Based on sent list the Contract can be concluded with them and then they can activate the Service.

3.1.1 Authentication of organization identity

Authentication of organization identity is relevant to third party authentication before concluding contract with this third party, for authentication of Client's employer identity or for identity authentication of Client who is self-employed. For such authentication the following must be submitted:

- Original or certified copy of the entry in the Commercial Register or in another register specified by law, of a trade license, of a deed of incorporation, or of another document of the same legal force; or
- Printed extract from public registers to be submitted by the applicant or prepared by the RA operator.

This document must contain full business name, identification number (NTR if assigned), registered office, the name(s) of the person(s) authorized to act on behalf of the legal entity (authorized representatives).

3.1.2 Authentication of individual identity

Individual identity authentication may be done in one of these ways:

- The presence of the Client on contact point;
- On the basis of another existing qualified certificate for validation of qualified electronic signature of the same Client;
- Remotely via certified ZealiD TRA Service using ZealiD application installed on Client's mobile device.

Methods of individual identity authentication are described in following subchapters.

3.1.2.1 Presence on contact point

In this way it's possible to ask for:

- Qualified certificate for validation of qualified electronic signature created remotely;
- Qualified mandate certificate for validation of qualified electronic signature created remotely.

Third party first sends to I.CA (in a trustworthy way) the list of authorized applicants for Service activation containing their identification data. The next step depends on the type signing or mandate, of Certificate, which should be applied for. In both cases Client is, after issuing the Certificate, to RemoteSign application, as the first transaction, the Contract. If the Contact is not signed by the specified time, the Certificate will be revoked.

3.1.2.1.1 Signing certificate

Valid personal identity card or passport must be used as the primary personal document for the citizens of the Czech Republic or of the Slovak Republic. Valid passport is the primary personal document for foreigners; citizens of EU member countries may use their valid personal identity card they use in their country as the proof of their identity.

The following data are validated in this document:

- Full civil name;
- Date and place of birth or the birth certification number if shown in the primary document;
- Number of the primary personal document;
- Permanent address (if shown in the primary document).

The secondary document must contain a unique identification, such as birth identification number or personal identity card number, matching it to the primary document and must show at least one of these items:

- Date of birth (or birth certification number if specified);
- Permanent address;
- Photograph of the face.

The secondary personal document data uniquely identifying the Client must be identical to those in the primary personal document.

If neither the primary nor the secondary personal document shows permanent address it will be specified only in Contract (not in Certificate). Operator does not verify but it must correspond to countryName attribute in Certificate application.

For employees an employment confirmation with the organization identification of which should be specified in Certificate (also as Organization) is also required. This confirmation is to be submitted by the Client to contact point, but may be provided in the manner defined in the contract between I.CA and the Organization. The person authorized to act for the Organization must prove her or his identity through the primary personal document – see above, or the signature on the certificate of the Certificate subscriber's employment must be officially authenticated. If this person is not defined by law as a person authorized to represent the Organization, this person must also submit an officially authenticated power of attorney, signed by the Organization's authorized representative, for representing the Organization.

Employment confirmation can be also submitted electronically. Must be .PDF format and provided with at least advanced electronic signature of the person authorized to act on behalf of the Organization. Electronic signature must be based on qualified certificate.

If an agent represents the Client vis-à-vis contact point, officially authenticated authorization to act as agent is required.

If the Client is OSVČ and this is to be specified in the Certificate, the relevant requirements under 3.1.1 apply.

3.1.2.1.2 Mandate certificate

When the primary Certificate is applied, the **mandatary's** (Certificate subscriber's) identity authentication procedure, where mandatary always must be present in person on RA, requires two identification documents, the primary and the secondary one, and also the document identifying the mandator (including identification data) on behalf of which mandatary operates or acts and confirming authorization to act or operate.

Valid personal identity card or passport must be used as the primary personal document for the citizens of the Slovak Republic. Valid passport is the primary personal document for foreigners; citizens of EU member countries may use their valid personal identity card they use in their country as the proof of their identity.

The following data are validated in this document:

- Full civil name;
- Date and place of birth or the birth certification number if shown in the primary document;
- Number of the primary personal document;
- Permanent address (if shown in the primary document);
- Additional Identifier/identifiers (in compliance with the Slovak Republic legislation).

The secondary personal document must contain a unique identification, such as birth certification number or personal identity card number, matching it to the primary document and must show at least one of these items:

- Full civil name;
- Birth certification number in case of the Czech Republic or the Slovak Republic citizens, or date of birth of the applicant (foreigner who was not granted the birth certification number by public authority of the Czech Republic or the Slovak Republic);
- Permanent address;
- Photograph of the face.

The secondary personal document data uniquely identifying the Certificate subscriber must be identical to those in the primary personal document. RA employee decides whether the data are identical or not. If the applicant does not submit two personal documents fulfilling the above requirements the application will not be accepted. Acceptable secondary personal documents are passport, driving license, service card of state office, member of parliament card, service card of the police, gun license, military book, health insurance card, public transportation card, company card, student card etc.

The certificate of right to operate or act for person or public authority must be signed by person authorized to act for organization. If this person is not authorized to act for organization, i.e. is not statutory representative (is not listed in certificate of incorporation or in other register determined by law or in trade certificate in deed of foundation or in law, in case of organizational unit of state/public authority in special legislation) an other officially verified document (power of attorney, authorization, legal representation certificate) signed by statutory representative of the organization is required to confirm the right of this person to act on behalf of this organization.

When the **primary Certificate** is applied the **manadator** proves (mandate proving) through a power of attorney (depending on requirements stated in list on mandates published by NBÚ SR, unless otherwise specified) submitted by mandatary these data:

- In case of natural person:
  - Full civil name;
  - In case of employee organization name and organization identification of the employer;
  - Birth certification number in case of the Czech Republic or the Slovak Republic citizens, or date of birth of the applicant (foreigner who was not granted the birth certification number by public authority of the Czech Republic od the Slovak Republic);

- Number of ID card or passport;

- In case of legal person or public authority the name and Identification data.

Procedure is described into detail in Conditions.

3.1.2.2 Another existing qualified certificate of the same Client

This way of identity authentication may be used only when the Client owns valid qualified certificate for qualified electronic signature validation which meets following requirements:

- Certificate was issued by I.CA;
- Corresponding private key is stored on smartcard Starcos 3.7 or higher;
- Certificate was issued on the basis of on-site identity authentication in the presence of the Client on contact point.

Issuing of these types of Certificates may be applied for:

- Qualified certificate for validation of qualified electronic signature created remotely on the basis of another qualified certificate for qualified signature validation of the same Client or of qualified mandate certificate for qualified electronic signature signing of the same Clients;
- Qualified mandate certificate for validation of qualified electronic signature created remotely on the basis of another qualified mandate certificate for qualified signature validation of the same Client;

when fulfillment of attributes corresponds with fulfillment of original certificate attributes.

Third party first sends to I.CA (in a trustworthy way) the list of authorized applicants for Service activation containing their identification data (at least name, surname and e-mail address). This list is entered into I.CA system and to the e-mail addresses are sent unique links allowing Clients to start Service activation and guiding them through the process of individual identity authentication.

Within the application processing it's checked if the data obtained from third party matches the data of the certificate based on which the Certificate is supposed to be issued. Negative result of any check means that the process of Certificate issuance is terminated and the Certificate is not issued.

After issuing the Certificate, Client is to RemoteSign application sent, as the first transaction, the Contract. If the Contact is not signed by the specified time, the Certificate will be revoked.

3.1.2.3 On-line identity authentication (ZealiD)

This way of Client's identity authentication may be used only for issuing the qualified Certificate for electronic signing (other data relating mandate certificate cannot be entered in this).

Third party first sends to I.CA (in a trustworthy way) the list of authorized applicants for Service activation containing their identification data (at least name, surname and e-mail address) who can use on-line identity authentication.

On-line identity authentication procedure uses certified ZealiD TRA Service using ZealiD application installed on the applicant's mobile phone or tablet. For this method of identity authentication, a primary personal document is required, which must be a valid personal identity card or passport for the citizens of the Czech Republic. Valid passport is the primary personal identity document for foreigners; citizens of EU member countries may use their valid personal identity card they use in their country as the proof of their identity. The guide with detailed instructions can be found at the I.CA website. The guide informs the applicant

(Certificate subscriber) about the process of issuing the Certificate, including information for users about the conditions under which the Certificate can be issued in this way.

This list of authorized applicants is entered into I.CA system and to e-mail addresses are sent unique links allowing Clients to start Service activation and guiding them through the process of individual identity authentication.

Within the application processing it's checked if the data obtained from third party matches the data obtained via ZealiD. Negative result of any check means that the process of Certificate issuance is terminated and the Certificate is not issued.

The process of on-line authenticating the applicant's identity and issuing the Certificate consists of several successive steps and includes:

- Installation of the ZealiD application on the applicant's mobile device (supported platforms are Apple and Android);
- Registration of the mobile device to the system;
- Biometric facial analysis - for the required functionality, it is necessary to allow access to the camera when installing the ZealiD application;
- Verification of the personal document – scanning it and then biometric comparison of the photograph from the document with the applicant's face is performed;
- Generating Certificate application.

If any of the checks does not end with a positive result, e.g., if the verification of the form does not take place in required quality, the process is terminated and the Certificate is not issued. The condition for the exposure of the Certificate on the list of issued certificates is the signing of the agreement on the issuance and use of the certificate, otherwise the Certificate is revoked.

After issuing the Certificate, Client is to RemoteSign application sent, as the first transaction, the Contract. If the Contact is not signed by the specified time, the Certificate will be revoked.

Restrictions for usage of the on-line individual identity authentication procedure is that the applicant cannot be represented by an agent.

3.2 Identity validation for service extending

Service extending is automatic. I.CA as the third party inserts the query into Client's queue whether he wants to issue subsequent Certificate. If the answer is yes (answer is electronically signed, signature is based on private key corresponding with Certificate to which the subsequent should be issued) the Service is extended to the end of validity of subsequent Certificate. This way the Client also confirms continuing validity of his identification data validated as part of initial validity validation.

3.3 Modification of data

If it is not possible to issue subsequent Certificate because data has changed the Client is obliged to pass individual identity authentication process in one of the ways described in chapter 3.1.2.

4 SERVICE LIFE CYCLE REQUIREMENTS

In chapters below the Service life cycle is described.

4.1 Conclusion of the contract

The Contract for activation and usage of Service is concluded between I.CA and the Client.

4.2 Service activation

Activation the Service depends on the way of individual identity authentication (see chapter 3.1.2) when:

- The Contract is concluded;
- Certificate application is created;
- Depending on the way of individual identity authentication:
  - The Client is given activation envelope for Service activation and mobile application activation;
  - Unique QR code is sent to the Client to activate the Service and mobile application,
- Certificate is issued and published.

Further handling with Certificate may be specified in the contract concluded between specific third party and I.CA (I.CA is also special case of third party).

4.2.1 Enrollment process and responsibilities

Process is performed only in case of setting up the Service and so issuance of the primary Certificate. Its progress depends on the way of individual identity authentication – see chapter 3.2.1.

The Client is required to do the following, among other things:

- Get acquainted with this Policy and with Certification policy for issuing qualified certificates for remote electronic signatures (RSA algorithm) or with Certification policy for issuing qualified certificates for remote electronic signatures according to the legislation of the Slovak Republic (RSA algorithm);
- Get acquainted with the Contract;
- Observe all relevant provisions the Contract;
- Use the Service in compliance with chapter 1.4;
- Use the identification and authentication data for access to the Servis so that they cannot be abused;
- Inform immediately the Service provider that the identification and authentication data for access to the Service were abused and ask for Certificate revocation;
- Provide true and complete information for setting up the Service;
- Check whether the data retyped from submitted documents are correct and correspond to the required data;

- Choose a suitable Certificate revocation password (the minimum/maximum password length is 4/32 characters; permitted characters: 0..9, A..Z, a..z).

The Service provider is required to do the following, among other things:

- Inform the Client about the terms and conditions before concluding the Contract;
- Conclude with the Client contract that meets the requirements imposed by current legislation and technical standards;
- During the process of setting up the Service validate all validable data according to the submitted documents;
- Issue a Certificate that contains materially correct data on the basis of the information available to the Service provider as at the issuance of the Certificate;
- Publish the certificates of issuing and root certification authorities;
- Publish public information in accordance with 2.2;
- Provide any Service-related activity in accordance with current legislation, this Policy, the relevant certification policy and certification practice statement, Corporate Security Policy, System Security Policy - Trustworthy Systems and the operational documentation.

4.2.2 Conduct constituting Certificate acceptance

Issued certificate is accepted by Client after signing the Contract. This Contract is sent to him as first transaction into RemoteSign application and if the Contract is not signed in specified time period, issued Certificate will be revoked.

4.3 Activation of the Service

Service is activated immediately after Certificate issuance. To use the Service, Client must install mobile or PC application (in case of client's identity authentication via ZealiD or on the basis of his other existing qualified certificate the installation is linked with creation of Certificate application). Through this installation Client gains access to his private key, any other access to private key of specific Client is not possible.

4.4 Modification of data

Modification of Client's data in Certificate is not possible. If Client data in the certificate are not up to date, Client must request for revocation the Certificate and then to go through the process of setting up the Service.

4.5 Extending the validity of the Contract

Client is, before Certificate's expiration, notified and asked whether he wants to issue subsequent certificate with different public key, but with the same content of subject and subjectAlternatioveName fields. If Client does not answer in affirmative the Certificate expires and the Contract is terminated. In an opposite case (answer is electronically signed and the signature is based on private key corresponding with public key in Certificate, to which the subsequent one should be issued) Contract remains in force and the Service in provided continuously.

Client (subscriber of the Certificate) is obliged to inform the Service provider of all changes in Contractual data (and in subject and subjectAlternativeName fields od Certificate).

4.6 Contract expiration

Expiration of the Contract is closely tied with Certificate expiration. When:

- Client does not agree subsequent Certificate issuance;
- Clients revokes the Certificate and this one is listed on CRL;

the Contract expires.

4.6.1 Certificate revocation

Request for revocation may be submitted by:

- Provider of this Service (CEO of I.CA is the person authorized to request for revocation):
  - If the Certificate was issued on the basis of false data;
  - If establishes that the Certificate was issued in spite of non-compliance with the requirements of trust services legislation;
  - If demonstrably establishes that the Certificate was used contrary to the restrictions defined in 1.4.2;
  - If demonstrably establishes that the Certificate's subscriber has died or been limited in legal capacity by court or the data based on which the Certificate was issued are no more valid;
  - If the public key in the Certificate application is the same as the public key in a certificate already issued;
- Supervisory body and other entities as may be specified in trust services legislation.

Other ways are described in chapter below.

4.6.1.1 Signing certificate

Request for revocation of the Certificate may be submitted by:

- Certificate's subscriber;
- In case of employee Certificate any person authorized to act on behalf of the Organization;
- Any person who is beneficiary in Certificate's subscriber probate proceedings;
- In case of employee Certificate any person authorized to act for the legal successor to the original entity (the Organization) to which the Certificate was issued for that entity's employee.

4.6.1.2 Mandate certificate

Request for revocation of the Certificate may be submitted by:

- Subscriber of the Certificate (Client, mandatary):
  - If there is the risk of his private key abuse;

- □ If demonstrably establishes that the mandator died, was finally declared dead or ceased to exist;
- □ If the status of a public authority for which the mandatory performed activities, was terminated;

- Mandator for whom the mandatory performed activity or function under specific regulation when mandatary's performance of activity creased of function under specific legislation was terminated;
- Subject explicitly specified therefore in the Service (under this CP) contract;
- Person who is beneficiary in mandatary probate proceedings.

4.6.2 Submitting revocation request

Options for submission the request for revocation by the Client are as follows:

- In case of personal handover at contact point (RA) the request must include the Certificate's serial number in the decimal or hexadecimal format (introduced by the string '0x'), the full name of the natural person authorized to request for Certificate's revocation, and the Certificate revocation password. If the natural person authorized to request for revocation does not know the Certificate revocation password, s/he must explicitly state this in the written application, along with the number of the primary personal document submitted in the Certificate application procedure or the number of the new primary personal document if the original document has been replaced. The person must use this primary personal document to prove their identity with the RA employee. If the request is legitimate, the RA employee revokes the Certificate, and the Certificate revocation date and time are the date and time the request is processed by CA's information system. If the Certificate revocation application cannot be accepted (wrong revocation password or no proof of identity of the natural person authorized to request for Certificate revocation) the RA employee seeks to rectify these defects, and dismisses the request if the defects cannot be rectified for any reason. The RA employee always notifies the requestor of the result.
- The following options are available in case of electronic submission:
  - □ Using the form on the information web page. The Certificate revocation date and time are the date and time when Certificate revocation request is dealt with in the CA's information system. The requestor receives a notice if the request was processed positively;
  - □ Electronic message not signed electronically – the body must contain the text (in Czech or Slovak with or without diacritics, or in English):

    Zadam o zneplatneni certifikatu cislo = xxxxxxx. [I request revocation of certificate number = xxxxxxx.]

    Heslo pro zneplatneni = yyyyyy. [Revocation password = yyyyyy.],

    where '*xxxxxxx*' is the Certificate's serial number and '*yyyyyy*' the revocation password. The Certificate's serial number must be given either in decimal or in hexadecimal format (introduced by the string '0x');

  If the request meets the requirements of options listed above, the employee in charge immediately revokes the Certificate in the CA's system, and the date and time the request is processed by the CA's information system are the date and time of the Certificate's revocation. The requestor receives a notice if the request is granted.

- In case of submission as a registered post letter, the request must contain following text (in Czech or Slovak with or without diacritics, or in English):

  Zadam o zneplatneni certifikatu cislo = xxxxxxx. [I request revocation of certificate number = xxxxxxx.]

  Heslo pro zneplatneni = yyyyyy. [Revocation password = yyyyyy.],

  where '*xxxxxxx*' is the Certificate's serial number and '*yyyyyy*' the revocation password. The serial number must be given either in decimal or in hexadecimal format (introduced by the string '0x'). If the request meets these requirements, the I.CA employee in charge immediately revokes the Certificate in the CA's system, and the date and time the request is processed by the CA's information system are the date and time of the Certificate's revocation. If the request cannot be accepted (wrong revocation password), the Certificate revocation request will be rejected. Requestor is informed by a registered letter sent to postal address of request sender how the request was handled.

Request for revocation employee's Certificate submitted by the person authorized to act on behalf of Organization (given in organizationName attribute) must be in electronic form as electronically signed or unsigned (in special cases) message. The message must contain the text (in Czech or Slovak with or without diacritics, or in English):

Zadam o zneplatneni certifikatu cislo = xxxxxxx [I request revocation of certificate number = xxxxxxx.]

where '*xxxxxxx*' is the Certificate's serial number which must be given either in decimal or in hexadecimal format (introduced by the string '0x').

4.7 Blocking and unblocking of mobile or PC application

Mobile or PC application may be blocked for example if mobile device or PC are stolen.

4.7.1 Blocking

Blocked mobile or PC application means that it is marked as blocked a cannot be used to access the Certificate. Certificate remains valid (and can be accessed through any other activated application of the same Client). Blocking is possible:

- Through any other activated mobile or PC application (of the same Client);
- By phone at +420 284 081 930, +420 284 081 931 or +420 284 081 933. Technical support employee finds out first name, surName and degree of the Client, number of his primary personal identification document and his residence. Technical support employee can ask any other information which is not present in the Certificate but was given in application for Service's setting up. Technical support employee is in case of any ambiguity in Client's answers allowed to refer the Client to another way of blocking.
- By e-mail to podpora@ica.cz sent from address which was communicated by Client when setting up the Service. E-mail must contain the text:
  - Client *degree, first name (names), surname*, date of birth *dd.mm.yyyy*, number of primary identification document *abcdefghij*, residence *street, house number, zip code, town* requests blocking of mobile device for access to the service of remote electronic signature creation *identification of mobile device*.

  In case of any ambiguity blocking may be rejected, in all cases the Client is informed by e-mail about the result of processing the request for blocking.

- In person at contact point, it is necessary to submit primary and secondary personal identity document (secondary document necessary to submit primary and secondary personal identity document (secondary document may not be the he same as the one submitted by initials identity validation as described in 3.1.1, but must contain one of items mentioned in 3.1.1).

4.7.2 Unblocking

Mobile or PC application can be unblocked only through any other activated application (of the same Client). If application was blocked for a limited time, it is unblocked automatically after this expiration period (set when blocking).

4.8 Use of the Service

Service provides remote creation of electronic signatures. Documents to be signed are sent by third parties, the procedure is as follows:

- Third party queues the request for electronic signing of specific document into the I.CA RemoteSign queue. The request contains identification of the Client who is to sign, encrypted preview of document to be signed (only authorized Client can decrypt it) and list of electronic signature parameters (AdES and CAdES are supported);
- Client runs the application and enters the password;
- After password verification all request for electronic signature creation are downloaded into the application;
- Client can check the details of the request (alternatively the preview if it was sent by third party);
- If Client has decided to create specific electronic signature, he presses the button “Podepsat” (“Sign”) and enters private key’s password;
- If the password is correct the required electronic signature based on private key stored in secure cryptographic device or in QSCD will be created and sent back to the third party.

5 FACILITY, MANAGEMENT, AND OPERATIONAL CONTROLS

Facility, management, and operational controls primarily deal with:

- System designed to support the Service;
- All processes supporting the provision of the Service.

The facility, management, and operational controls are addressed in the fundamental documents Corporate Security Policy, System Security Policy - Trustworthy Systems, Statements, Business Continuity Plan and Recovery Plan as well as in the more detailed internal documentation. These documents take account of the results of periodic risk analyses.

5.1 Physical controls

5.1.1 Site location and construction

The operating site buildings are situated in geographically different locations, which are also different from the site of the company headquarters, the business and development sites, the contact points sites and the points of sale.

Systems designed to support the Service are situated on reserved premises of operating sites. These premises are secured in a manner similar to that required by the Classified Information Protection Act for the 'Confidential' category secure areas.

5.1.2 Physical access

Requirements for physical access to the reserved premises (protected with mechanical and electronic features) of operating sites are described in internal documentation. Buildings are protected with intrusion alarm system (IAS), alarm receiving centre (ARC) and, as may be the case, a special system to monitor movement of persons and vehicles.

5.1.3 Power and air conditioning

The premises housing systems supporting the Service have active air-conditioning of adequate capacity, which keeps the temperature at 20°C ± 5°C all year round. The supply of electricity is backed up with a UPS (Uninterruptible Power Supply) and a diesel unit.

5.1.4 Water exposures

The systems supporting the Service are so located as to ensure they cannot be flooded with a 100-year flood. Where relevant operating sites have water ingress sensors to detect heating water leakage or rainfall leakage through the roof (as a result of heavy rains).

5.1.5 Fire prevention and protection

The buildings of the operating sites and the information storage sites have electronic fire alarm system (FAS). Fireproof insulation is installed in the entrance doors to the restricted areas in which systems designed to support the Service are situated, and fire extinguishers are fitted in these areas.

5.1.6 Media storage

Storage media containing operational backups and electronic records are stored in metal boxes or safes. Copies are kept at a site geographically different from the site of the operating office.

Any paper media required to be archived are stored at a site geographically different from the site of the operating office.

5.1.7 Waste disposal

Any paper office waste is shredded before it leaves I.CA operating sites.

5.1.8 Off-site backup

The copies of operating and working backups are stored at a place designated by the COO of I.CA and described in internal documentation.

5.2 Procedural controls

5.2.1 Trusted roles

Trusted roles are defined for selected activities carried out at I.CA. The trusted role employee appointment procedure, the trusted roles and their responsibilities are defined in internal documentation.

No employee of I.CA appointed to a trusted role may be in a conflict of interests that could compromise the impartiality of I.CA operations.

5.2.2 Number of persons required per task

Jobs are defined for the processes related to the key pairs of certification authorities and OCSP responders and these jobs must be performed with more than a single person attending. These jobs include:

- Initializing cryptographic module designated for generation and stage of sensitive data which are necessary for providing the Service;
- Making backups of these data stored in cryptographic module;
- Restoring these data into cryptographic module.

The number of attending persons is not defined for other jobs, but all persons must be authorized ones.

5.2.3 Identification and authentication for each role

Each role's employees are assigned identification (name and certificate) and authentication (password and private key) data for those components which are necessary for their jobs.

Selected jobs require two-factor authentication by the trusted role employees.

5.2.4 Roles requiring separation of duties

The roles requiring separation of duties (and the roles' job descriptions) are described in internal documentation.

5.3 Personnel controls

5.3.1 Qualification, experience, and clearance requirements

I.CA's trusted role employees are selected and hired using the following criteria:

- Clean criminal record – statement of criminal conviction records or affirmation is required;
- Bachelor's or master's degree in an accredited university program and ICT job experience of three years or longer, or secondary education and ICT job experience of five years or longer, of which at least one-year job experience in the provision of trust services;
- Knowledge in public key infrastructure and information security.

Any other I.CA employee taking part in providing trust services is accepted using the following criteria:

- Bachelor's or master's degree in an accredited university program, or secondary education;
- Basic orientation in public key infrastructure and information security.

Description of employee's activities is defined by the employment contract.

Before completion all entry checks employee is not granted both logical and physical access to systems supporting the Service.

Managers must have job experience or technical training in respect of the trustworthiness of the Service, the knowledge of security procedures with security responsibility, and experience in information security and risk assessment.

5.3.2 Background check procedures

The sources of information about all employees of I.CA are:

- The employees themselves;
- Persons familiar with a particular employee;
- Public sources of information.

Initial information is provided by employees at job interviews, and this information is updated at periodic appraisal interviews with the manager during employment.

5.3.3 Training requirements

I.CA employees receive technical training in the use of specific software and specialized devices. The training takes the form of self-study combined with guidance from a trained employee. The training covers information security, personal protection data and other relevant topics.

5.3.4 Retraining frequency and requirements

I.CA employees are provided with the current developments in their spheres of interest two times every 12 months.

Training in the processes related to contact point operations is held for contact points employees at least once in every three years.

5.3.5 Job rotation frequency and sequence

I.CA employees are encouraged to acquire knowledge necessary for working in other roles at I.CA, in order to ensure substitutability for cases of emergency.

5.3.6 Sanctions for unauthorized actions

If an employee is detected to have been performing unauthorized activity, the employee is subject to the procedure described in internal documentation and governed by the Labour Code (this process does not prevent criminal prosecution if the unauthorized activity exhibits that degree of gravity).

5.3.7 Independent contractor requirements

I.CA may or must procure some activities from independent contractors, and is fully liable for the job they deliver. These business relations are regulated in bilateral business contracts with parties such as contracted registration authorities, application software developers, hardware suppliers, system software suppliers, external auditors and other parties. These parties are required to observe the pertinent certification policies, the relevant parts of internal documentation provided for them, and the required normative documents. Contractual penalties are applied for a breach of the obligations or duties specified in the said documents, or the contract with the contractor in breach is terminated immediately.

5.3.8 Documentation supplied to personnel

In addition to Policy, Statements and the security and operating documentation, I.CA employees have available any other relevant standard, policy, manual and guidance they may need for their job.

5.4 Audit logging procedures

5.4.1 Types of events recorded

Subject to logging are all the events required by trust services legislation or the relevant technical and other standards to be logged.

All audit records are made, kept and processed to the extent as necessary, while preserving the proof of origin and maintaining integrity, availability, confidentiality and time authenticity.

The auditing system is designed and run in a manner ensuring audit data integrity, sufficient space for audit data, automatic non-rewriting of the audit file, user-friendly presentation of audit records, and audit file access limited to the defined users only.

5.4.2 Frequency of processing log

Audit records are checked and assessed at the intervals defined in internal documentation, or immediately when a security incident occurs.

5.4.3 Retention period for audit log

Unless the relevant legislation provides otherwise, audit records are kept for a minimum of 10 years of the day they are made.

5.4.4 Protection of audit log

Both electronic and printed audit records are stored in a manner ensuring they are protected against change, stealing and destruction (willful or accidental).

Electronic audit records are stored in two copies, with each copy kept in a different room of the operating site. These audit records are stored on a medium each month or more frequently and this medium is kept outside the operating premises of I.CA.

Printed audit records are kept outside the operating premises of I.CA.

The protection of the aforesaid types of audit records is described in internal documentation.

5.4.5 Audit log backup procedures

Electronic audit records are backed up similarly to how other electronic information is backed up. No backup of printed audit records takes place.

5.4.6 Audit collection system (internal vs. external)

The audit record collection system is an internal one relative to the Service information systems.

5.4.7 Notification to event-causing subject

Parties are not notified of that an event is registered in an audit record.

5.4.8 Vulnerability assessments

První certifikační autorita, a.s., carries out periodic vulnerability assessments as part of risk assessments. Vulnerability monitoring of the hardware and software related to the Service is described in internal documentation.

5.5 Records archival

The storage of records i.e., information and documentation, at První certifikační autorita, a.s., is regulated in internal documentation.

5.5.1 Types of stored records

I.CA stores the following electronic or printed records pertaining to the Service provided, such as:

- Client's Contracts and amendments of these Contracts;
- Information handling records, such as takeover, handover, saving, check, conversion from printed to electronic, etc.;
- Application software, operating and security documentation.

5.5.2 Retention period for archive

All records are stored in accordance with 5.4.3.

The record storage procedures are regulated in internal documentation.

5.5.3 Protection of archive

The premises where records are stored are secured in a manner based on risk analysis results and the Classified Information Protection Act.

The procedures to protect the stored records are regulated by internal documentation.

5.5.4 Archive backup procedures

The record backup procedures are regulated in internal documentation.

5.5.5 Requirements for time-stamping of records

If time-stamp tokens are used, they are qualified electronic time-stamp tokens issued by I.CA.

5.5.6 Archive collection system (internal or external)

Records are stored at a place designated by COO of I.CA.

Internal documentation regulates how both electronic and printed records are prepared for storage and stored. Records are kept of collecting the records subject to storage.

5.5.7 Procedures to obtain and verify archive information

Stored information and records are placed at sites designated therefore and are accessible to:

- I.CA employees if they need to have such an access for their job;
- Authorized supervising and inspection entities and law enforcement authorities if required by legislation.

A written record is made of any such permitted access.

5.6 Compromise and disaster recovery

5.6.1 Incident and compromise handling procedures

In the event of incident or compromise, I.CA takes a course of action in accordance with its internal business continuity plan and recovery plan, plus any other relevant internal documentation.

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

See. 5.6.1.

5.6.3 Business continuity capabilities after a disaster

See. 5.6.1.

5.7 Service's provider termination

The following rules apply to the termination of qualified trusted services provider operations:

- The termination must be notified in writing to the supervisory body and all parties having valid Contract;
- The termination must be published on the web page pursuant to 2.2;
- The termination of operations is a controlled process following a pre-defined plan, which includes the description of the procedure to preserve and disclose information for judicial or administrative proceedings discovery and for arranging the continuity of services.

In the event of withdrawal of the qualified trusted services provider status:

- The information must be notified in writing or electronically to all parties having valid Contract;
- The information must be published in accordance with 2.2;
- The subsequent course of action will be decided by CEO of I.CA while taking account of the decision of the supervisory body.

6 TECHNICAL SECURITY CONTROLS

6.1 Computer security controls

6.1.1 Specific computer security technical requirements

The level of security of the components used in providing the Service is, including the scope of necessary evaluations and assessments and also trustworthy systems configuration checks, and their periodicity, defined in trust services legislation and the technical standards referred to therein.

6.1.2 Computer security rating

The assessment of I.CA computer security is based on the requirements set out in the specified technical and other standards, in particular:

- ČSN EN 419241-1 Trustworthy Systems Supporting Server Signing - Part 1: Security Requirements;
- EN 419241-1 Trustworthy Systems Supporting Server Signing - Part 1: Security Requirements;
- ČSN EN 419241-2 Trustworthy Systems Supporting Server Signing - Part 2: Protection profile for QSCD for Server Signing;
- EN 419241-2 Trustworthy Systems Supporting Server Signing - Part 2: Protection profile for QSCD for Server Signing;
- ČSN EN 419221-5 – Protection Profiles for TSP Cryptographic Modules - Part 5 - Cryptographic Module for Trust Services;
- EN 419221-5 – Protection Profiles for TSP Cryptographic Modules - Part 5 - Cryptographic Module for Trust Services;
- ETSI TS 119 431-1 Electronic Signatures and Infrastructures (ESI); Policy and security requirements for trust service providers; Part 1: TSP service components operating a remote QSCD / SCDev;
- ETSI TS 119 431-2 Electronic Signatures and Infrastructures (ESI); Policy and security requirements for trust service providers; Part 2: TSP service components supporting AdES digital signature creation;
- ETSI TS 119 432 Electronic Signatures and Infrastructures (ESI); Protocols for remote digital signature creation;
- CEN/TS 419261 Security requirements for trustworthy systems managing certificates and time-stamps;
- ČSN ETSI EN 319 401 Electronic Signatures and Infrastructures (ESI); General Policy Requirements for Trust Service Providers;
- ETSI EN 319 401 Electronic Signatures and Infrastructures (ESI); General Policy Requirements for Trust Service Providers;
- ČSN ETSI EN 319 403 Electronic Signatures and Infrastructures (ESI); Trust Service Provider Conformity Assessment - Requirements for conformity assessment bodies assessing Trust Service Providers;

- ETSI EN 319 403 Electronic Signatures and Infrastructures (ESI); Trust Service Provider Conformity Assessment - Requirements for conformity assessment bodies assessing Trust Service Providers;
- EN 301 549 Accessibility requirements for ICT products and services.
- ETSI TS 119 312 Electronic Signatures and Infrastructures (ESI); Cryptographic Suites;
- ETSI TS 119 101 Electronic Signatures and Infrastructures (ESI); Policy and security requirements for applications for signature creation and signature validation;
- ČSN ISO/IEC 27006 Information Technology – Security Techniques – Requirements for Bodies Providing Audit and Certification of Information Security Management Systems;
- ISO/IEC 17021 Conformity assessment -- Requirements for bodies providing audit and certification of management systems;
- ISO/IEC 17065 Conformity assessment -- Requirements for bodies certifying products, processes and services.

6.2 Life cycle technical controls

6.2.1 System development controls

System development is carried out in accordance with internal documentation.

6.2.2 Security management controls

Information security management and compliance with technical standards are inspected as part of the periodic trust services inspections and also during information security management system (ISMS) audits.

Information security at I.CA is governed by the following standards:

- ČSN ISO/IEC 27000 Information Technology – Security Techniques – Information Security Management Systems – Overview and Vocabulary;
- ČSN ISO/IEC 27001 Information Technology – Security Techniques – Information Security Management Systems – Requirements;
- ČSN ISO/IEC 27002 Information Technology – Security Techniques – Information Security Management Systems – Code of Practice for Information Security Controls.

6.2.3 Life cycle security controls

I.CA takes the Plan-Do-Check-Act (PDCA) procedural approach to life cycle security management; the PDCA approach consists of the following consecutive processes:

- Establishing – defining the scope and the boundaries for information security management, determining a security policy and plans, and choosing security controls depending on the risks identified, all this in accordance with the corporate security policy;
- Implementing and operating – effective and systematic enforcement of the selected security controls;

- Monitoring and reviewing – providing feedback, regular monitoring and evaluation of the successful and the poor aspects of information security management, providing the knowledge gained for the company management for assessment;
- Maintenance and improvement – implementing corrective and improvement measures as decided by the company management.

6.3 Network security controls

In the I.CA environment the trustworthy systems destined for supporting trust services and situated at operating sites of I.CA are not directly accessible from the Internet. These systems are protected with a firewall-type commercial product with an integrated intrusion prevention system (IPS). All communication between RA and the operating sites is encrypted. Details are described in internal documentation.

6.4 Protection against fraud and theft of data

Protection against fraud and theft of data is part of complete information security management system i.e., not only of systems supporting the Service, but all systems of I.CA. Involved are top management, senior staff and also employees in trusted roles having appropriate authorizations.

7 CONFORMITY ASSESSMENTS AND OTHER ASSESSMENTS

7.1 Frequency or circumstances of assessment

The assessment interval and circumstances are defined in trust services legislation and the technical standards referred to therein regulating the assessment procedure.

The intervals for other assessments are specified in the relevant technical standards.

7.2 Identity/qualifications of assessor

The identity (accredited conformity assessment entity) and the qualification of the assessor carrying out the assessment pursuant to trust services legislation are defined in this legislation and the technical standards referred to therein.

The qualification of the assessor carrying out other assessments is specified in the relevant technical standards.

7.3 Assessor's relationship to assessed entity

Internal assessor is not subordinate to the organizational unit which provides the operation of the Service.

External assessor is an assessor without any ties to I.CA both through property and person.

7.4 Topics covered by assessment

The areas to be assessed in an assessment required under trust services legislation are those as specified in that legislation, in any other assessment are specified in the technical standards under which the assessment is made.

7.5 Actions taken as a result of deficiency

The findings in any type of assessment are communicated to the I.CA security manager, who makes sure that any defect identified is remedied. If defects are identified that critically prevent the provision of the Service, I.CA must suspend providing it until the defects are remedied.

7.6 Communication of results

Assessment result notification is subject to the requirements of trust services legislation and the relevant technical standards.

Assessments results are notified as a written report handed over by the assessor to CEO and the security manager of I.CA.

The I.CA security manager calls a security committee meeting as soon as possible and communicates the final report at the meeting; company management members must attend the meeting.

8 OTHER BUSINESS AND LEGAL MATTERS

8.1 Fees

8.1.1 Service fees

The fees of the Service are given by contract concluded between I.CA and specific third party (can be flat fee per time period, paying for successful creation of electronic signature etc.).

8.1.2 Fees for other services

Not applicable to this document.

8.1.3 Refund policy

Not applicable to this document.

8.2 Financial responsibility

8.2.1 Insurance coverage

První certifikační autorita, a.s., represents it holds a valid business risk insurance policy that covers financial damage.

První certifikační autorita, a.s., has drawn an employee liability insurance policy for each employee, with a scope of coverage as determined by the company's board of directors.

8.2.2 Other assets

První certifikační autorita, a.s., represents it has available financial resources and other financial assurances sufficient for providing trust services given the risk of a liability-for-damage claim.

See the Annual Report of První certifikační autorita, a.s., published in Commercial Register for detailed information on the company's assets.

8.2.3 Insurance or warranty coverage for end-entities

Not applicable to this document.

8.3 Confidentiality of business information

8.3.1 Scope of confidential information

I.CA's confidential information covers any information other than public information and other than that published in the manner pursuant to 2.2, including:

- All cryptographic pieces of information used in providing the Service;
- I.CA's business information;
- Any internal information and documentation;
- Any personal data.

8.3.2 Information not within the scope of confidential information

Public information is only the information designated as public and that published in the manner pursuant to 2.2.

8.3.3 Responsibility to protect confidential information

No employee of I.CA who comes in contact with confidential information may disclose the same to a third party without consent of CEO of I.CA.

8.4 Privacy of personal information

8.4.1 Privacy plan

I.CA protects personal data and other non-public information in accordance with the relevant legislation, that is ZOOÚ and GDPR in particular.

8.4.2 Information treated as private

Any personal data subject to protection under relevant legislation is treated as private.

I.CA employees or the entities defined by relevant legislation that come into contact with personal data must maintain confidentiality of these data and the security controls the disclosure of which would put the security of these data at risk. The confidentiality duty survives the termination of employment or other similar relationship, or the completion of pertinent work.

8.4.3 Information not deemed private

Any information outside the scope of relevant legislation is not considered personal data.

8.4.4 Responsibility to protect private information

CEO of I.CA is responsible for the protection of personal data.

8.4.5 Notice and consent to use private information

I.CA deals with the notifying of personal data use and consents to personal data processing in accordance with the relevant legislation.

8.4.6 Disclosure pursuant to judicial or administrative process

I.CA discloses personal data for judicial or administrative purpose in accordance with the relevant legislation.

8.4.7 Other Information disclosure circumstances

I.CA provides access to personal data strictly as regulated in relevant legislation.

8.5 Intellectual property rights

This Policy, all related documents, the website content and the procedures facilitating the operation of the systems providing the Service are copyrighted by První certifikační autorita, a.s., and are important know-how thereof.

8.6 Representations and warranties

8.6.1 CA Representations and warranties

I.CA warrants that:

- Technical support of Service operations, dealing with non-standard situations and Service operational consultancy through contacts provided at www.ica.cz;
- The Service is all the time legislatively and technically actual and in compliance with relevant legislation and technical standards and norms.

All warranties and the performance resulting therefrom may only be recognized on condition that Client did not violate obligations arising from the Contract.

8.6.2 Contract points representations and warranties

Contact point:

- Assumes the obligation that the services it provides are correct;
- Does not accept the application unless it validates all the application items or the Client provides the required data or is authorized to submit the request for Service;
- Is responsible for handling objections and complaints.

8.6.3 Representations and warranties of other participants

Not applicable to this document.

8.7 Disclaimers of warranties

První certifikační autorita, a.s., provides only the warranties as given in 8.6.

8.8 Limitations of liability

První certifikační autorita, a.s., is not responsible in case of this Service for any damage suffered by relying parties where the relying party breaches its duty under trust services legislation and this Policy. První certifikační autorita, a.s., is also not responsible for any damage resulting from breach of obligations of I.CA as a result of force majeure.

8.9 Indemnities

Applicable to the provision of trust services are the relevant provisions of the current legislation regulating provider–consumer relations and the warranties agreed between První certifikační autorita, a.s., and the Client. The contract must not be in conflict with current legislation and must always take an electronic or printed form.

První certifikační autorita, a.s.:

- Undertakes to discharge all the obligations defined in relevant legislation and specific policies;
- Provides all warranties during the term of the Contract;
- Agrees that the application software suppliers with a valid contract with První certifikační autorita, a.s., for the distribution of the root certificate assume no obligation or liability, except for where damage or loss is directly attributable to the software of that supplier.

První certifikační autorita, a.s., **may not be held liable for** any defect in the services rendered which is due to incorrect or unauthorized use of the services rendered under the Contract, particularly for any use contrary to the terms and conditions specified in this Policy, and for any defect due to force majeure, including a temporary telecommunication connection failure.

Claims and complaints may be made by:

- E-mail to reklamace@ica.cz;
- Message to data box of I.CA;
- Registered post letter to the registered office of the company;
- Hand at the registered office of the company.

The party making the claim or complaint must provide:

- Description of the defect that is as accurate as possible;
- Suggestion how the claim/complaint should be resolved.

I.CA will decide the claim/complaint within three business days of receiving it. The decision will be communicated to the party making the claim/complaint by e-mail, data box message or registered post letter unless the parties agree to a different method.

The claim/complaint, including the defect, will be dealt with without undue delay, within 30 days of the date of the claim/complaint unless the parties agree otherwise.

Any other possible compensation is based on the relevant legislation and the amount of damage may be determined by court.

8.10 Term and termination

8.10.1 Term

This Policy takes effect on the date specified in Table 1 and remains ii effect no shorter than the Service is provided or this Policy is replaced with a new version.

8.10.2 Termination

CEO of První certifikační autorita, a.s., is the sole person authorized to approve the termination of this CP.

8.10.3 Effect of termination and survival

The obligations of I.CA out of this Policy survive until the last Contract is terminated.

8.11 Individual notices and communications with participants

For individual notices and communication with the participating parties, I.CA may use the e-mail and postal addresses and the phone numbers provided by the participating parties, personal meetings and other channels.

Communication with I.CA is also possible through the channels specified on the web information address.

8.12 Amendments

8.12.1 Amending procedure

This procedure is a controlled process described in an internal documentation.

8.12.2 Notification mechanism and period

The release of a new Policy version is always notified as published information.

8.12.3 Circumstances under which OID must be changed

No OID is assigned to this Policy, it covers OIDs as defined in chapter 1.2. Any change to this Policy results in a new version of the document.

8.13 Disputes resolution provisions

If the Client or the relying party disagrees with the proposed way of resolving the dispute, they may use the following levels of appeal:

- Contact point employee in charge;
- I.CA employee in charge (electronic or written filing is required);

- CEO of I.CA (electronic or written filing is required).

This procedure provides the dissenting party with an opportunity to assert its opinion more swiftly than before a court.

8.14 Governing law

The business of První certifikační autorita, a.s., is governed by the laws of the Czech Republic.

8.15 Compliance with applicable law

The system of providing trust services is in compliance with the statutory requirements of EU and the Czech Republic and all relevant international standards.

8.16 Miscellaneous provisions

8.16.1 Entire agreement

Not applicable to this document.

8.16.2 Assignment

Not applicable to this document.

8.16.3 Severability

If a court or a public authority with jurisdiction over the activities covered by this Policy establishes that the implementation of a mandatory requirement is unlawful, the scope of that requirement will be so limited as to ensure the requirement is lawful and complies with relevant legislation.

8.16.4 Enforcement (attorneys' fees and waiver of rights)

Not applicable to this document.

8.16.5 Force Majeure

První certifikační autorita, a.s., is not responsible for breaching its obligations under Contract if it is a result of force majeure, such as major natural disaster, major disaster caused by human activity, strike or civil unrest always followed by the declaration of a situation of emergency, or the declaration of a threat to the state or a state of war, or communication failure.

8.17 Other provisions

Not applicable to this document.

9 FINAL PROVISIONS

This Policy issued by První certifikační autorita, a.s., takes force and effect date mentioned above in Table 1.