

AK

Certificate Policy

for

Fullgilt auðkenni

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1 INTRODUCTION

1.1 OVERVIEW

This document is the Certification Policy (CP) that defines procedure and operational requirements that Auðkenni ehf. (AK) adheres to and requires entities to adhere to when issuing and managing Certificates for Fullgilt auðkenni (FA). FA is an intermediary root owned by Auðkenni, issued by Íslandsrót, used to issue Certificates to end-users. Íslandsrót, the default Icelandic root anchor, is managed by the Ministry of Finance. The full CA hierarchy is described in the TSPS [12]. The Certificate Profiles issued by FA under this Certificate Policy are as following:

Certificate Policy / Technology	QCP-n-qscd	QCP-l-qscd	QCP-l	NCP+	NCP	Signature	Authentication
SIM on Mobile device	X			X		X	X
Card	X			X		X	X
App on Smart device	X			X		X	X
eSeal		X	X	X		X	
Equipment authentication					X	X	X

The Certificate Policy is a "named set of rules that indicate the applicability of a Certificate to a particular community and/or class of application with common security requirements." The content and format of this document complies with the requirements of the IETF RFC 3647 [4] framework. It consists of 9 sections that contain the security requirements, processes and the practices defined by AK to be followed during the provision of services. To strictly preserve the outline specified by IETF RFC 3647, sections where the Certificate Policy does not impose a requirement have the statement "No stipulation".

This document contains the requirements of multiple Certificate Policies. Most of the requirements defined in the document apply to all the Certificate Policies uniformly and are not otherwise mentioned. Where the policies require different requirements, it will be clearly identified which Certificate Policy the given requirement refers to.

Each product, except in the case of eSeals, contains two key pairs and thus two Certificates: an Authentication Certificate and a Qualified Electronic Signature Certificate and their corresponding Private Keys. Each Private Key is protected by depending on the level of protection based on the quality of the FA Certificate profile. A single person can have several valid Certificate pairs. eSeals have one Certificate that can be used for Seal, Authentication, or both.

Issuing and managing Certificates within FA is regulated by the eIDAS Regulation (EU) 910/2014 implemented into Icelandic law with Icelandic act no. 55/2019 [1] which establishes a legal framework for electronic authentication and trust services in Iceland.

This document describes restrictions to Policy for EU qualified certificate issued to natural persons or legal persons where the private key and the related certificate reside on a QSCD (QCP-n-qscd and QCP-l-qscd) from ETSI EN 319 401 and ETSI EN 319 411-2 [3], and Normalized Certificate Policy (NCP) requiring a secure cryptographic device (NCP+) from ETSI EN 319 401 and ETSI EN 319 411-1 [2].

The Certification Service for Qualified Electronic Signature Certificates described in this CP SHALL be a qualified trust service and claimed as such to the Trusted List of Iceland.

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The keywords “**MUST, MUST NOT, IS REQUIRED, SHALL, SHALL NOT, SHOULD, SHOULD NOT, RECOMMENDED, CAN** and **OPTIONAL**” in this document must be interpreted as described in [5]. The exact meaning of these words is modified in accordance with the requirements within the text where they occur.

When the words **MUST** and **MANDATORY** are used, this means that the definition is an absolute requirement in the specification.

MUST NOT or **SHALL NOT** means that the definition is absolutely forbidden in the specification.

SHOULD or **RECOMMENDED** means that there may be cases where there are strong reasons to ignore a subject, but in doing so, one must understand and consider the full consequence of choosing another solution.

SHOULD NOT or **NOT RECOMMENDED** means that there may be cases where there are strong reasons to, or it would be useful to, perform a certain task, but in doing so, one must understand and consider the full consequence of performing a task that is described with these words.

CAN or **OPTIONAL** means that the subject/element is optional.

1.2 DOCUMENT NAME AND IDENTIFICATION

Refer to Clause 5.3 of ETSI EN 319 411-1 [2] and ETSI EN 319 411-2 [3].

This document is named “AK Certificate Policy for Fullgilt auðkenni”.

This CP is identified by the OID: {joint-iso-itu-t(2) country(16) is(352) organizations-and-institutes(1) audkenni(2) pki(1) public-pki(1) cp(2) } This can also be written as {2.16.352.1.2.1.1.2}. The OID for this CP is fixed and will not change with new versions of this document.

Qualified Electronic Signature Certificate by FA issued to Subscribers SHALL include OID's of the following policies:

- ETSI EN 319 411-2 [3] clause 5.3 c) for QCP-n-qscd: 0.4.0.194112.1.2
 - Itu-t(0) identified-organization(4) etsi(0) qualified-certificate-policies(194112) policy-identifiers(1) qcp-natural-qscd (2)
- ETSI EN 319 411-2 [3] clause 5.3 d) for QCP-l-qscd: 0.4.0.194112.1.3
 - Itu-t(0) identified-organization(4) etsi(0) qualified-certificate-policies(194112) policy-identifiers(1) qcp-legal-qscd (3)
- ETSI EN 319 411-2 [3] clause 5.3 b) for QCP-l: 0.4.0.194112.1.1
 - itu-t(0) identified-organization(4) etsi(0) qualified-certificate-policies(194112) policy-identifiers(1) qcp-legal (1)
- This CP.

Authentication Certificates by FA issued to Subscribers SHALL include OID's of the following policies:

- ETSI EN 319 411-1 [2] clause 5.3 b) for NCP+: 0.4.0.2042.1.2
 - itu-t(0) identified-organization(4) etsi(0) other-certificate-policies(2042) policy-identifiers(1) ncplusplus (2)
- This CP.

1.3 PKI PARTICIPANTS

Refer to Clause 5.4 of ETSI EN 319 411-1 [2] and ETSI EN 319 411-2 [3].

1.3.1 Certification Authorities

No stipulation in addition to QCP-n-qscd, QCP-l-qscd, QCP-l, NCP+ and NCP.

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1.3.2 Registration Authorities

AK operates as a Registration Authority (RA) and has contracts with entities that operate as Registration Authorities. Refer to list of RAs at repo.audkenni.is.

RA is performing Subscriber Authentication and associate the Subscriber to the specific QSCD, eSeal or Non-qualified certificate in App and initiates creation of keypairs.

For certificates on SIM cards, the MO has issued the QSCD to the Subscriber beforehand. Subscriber can decide to register for a certificate at any time.

AK facilitates the registration / management of the QSCD for the App.

1.3.3 Subscribers

Subscriber can either be a natural person or legal person dependent on the certificate profile. The Subscriber is often the Subject of the Certificate issued under this CP.

1.3.4 Relying Parties

Relying Parties are legal or natural persons who are making decisions based on the Certificate and to authenticate subscribers and allow subscribers to sign.

1.3.5 Other Participants

QSCD for mobile certificates are procured by MOs. QSCD for Cards and QSCD Cryptosticks for eSeals are procured by AK from relevant suppliers (SCM, CM). MOs facilitate communication between the Subscriber's device and the QSCD in case of mobile certificates.

The creation of the App keys and storage of keys is facilitated by an external party.

1.4 CERTIFICATE USAGE

Refer to Clause 5.5 of [ETSI EN 319 411-1 \[2\]](#) and [ETSI EN 319 411-2 \[3\]](#).

1.4.1 Appropriate Certificate Uses

Subscriber Certificates are intended for the following purposes:

Qualified Electronic Signature Certificate is intended for:

- Creating Qualified Electronic Signatures compliant with eIDAS [1].
- Creating Qualified Electronic Seals compliant with eIDAS [1].
- In case of App on Smartphone where AK manages part of the QSCD, the private key SHALL NOT be used for signing except within the QSCD.

Authentication Certificate is intended for:

- Authentication.

CA Private Keys SHALL NOT be used to sign other types of Certificates except for the following:

- Subscriber Certificates compliant with QCP-n-qscd, QCP-I-qscd, QCP-I or NCP+.
- OCSP response verification Certificates.
- CRL signing Certificates.
- Internal Certificates for technical needs.

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1.4.2 Prohibited Certificate Uses

Subscriber's Certificates issued under this CP SHALL NOT be used for any of the following purposes:

- Unlawful activity (including cyber-attacks and attempt to infringe the Certificate or FA),.
- Issuance of new Certificates and information regarding Certificate validity.
- Enabling other parties to use the Subscriber's Private Key.
- Enabling the Certificate issued for electronic signature to be used in an automated way.

Subscriber's Authentication Certificate SHALL NOT be used to create Qualified Electronic Signatures compliant with eIDAS [1].

1.5 POLICY ADMINISTRATION

1.5.1 Organization Administering the Document

This document is administered by AK.

Organization name: *Auðkenni ehf.*

Registry code: *521000-2790*

Organization address: *Borgartún 31, 105 Reykjavik, Iceland*

Telephone: *+354 530 0000*

Email: fyrirspurnir@audkenni.is

Website: <http://www.audkenni.is/>

1.5.2 Contact Person

Company Executive Officer

Email: fyrirspurnir@audkenni.is

1.5.3 Person Determining CPS Suitability for the Policy

Not applicable.

1.5.4 CP Approval Procedures

Amendments which do not change the meaning of this CP, such as spelling corrections, translation activities and contact details updates, are documented in the Versions and Changes section of the present document. In this case the fractional part of the document version number SHALL be increased by one.

In the case of substantial changes, the new CP version SHALL be clearly distinguishable from the previous ones, and the version number SHALL be increased by one. The amended CP along with the enforcement date, which cannot be earlier than 10 days after publication, SHALL be published electronically on AK website.

This CP shall be reviewed annually.

All amendments to this CP SHALL be coordinated with RAs and other subcontractors as applicable.

All amendments changing the meaning of this CP SHALL be approved by the Security Committee.

1.6 DEFINITIONS AND ACRONYMS

1.6.1 Terminology

In this CP, the following terms have the following meaning:

Term	Definition
App	Mobile application that works as a QSCD. Used on smart devices only.
Authentication	Unique identification of a person (natural or legal) by checking the alleged identity.
Authentication Certificate	Certificate is intended for Authentication.
Certificate	Public key, together with some other information, laid down in the Certificate Profile [6], rendered unforgeable via encipherment using the Private Key of the Certificate Authority which issued it.
Certificate Authority	A part of Auðkenni's structure responsible for issuing and verifying electronic Certificates with its electronic signature.
Certificate Pair	A pair of Certificates consisting of one Authentication Certificate and one Qualified Electronic Signature Certificate.
Certificate Policy	A set of rules that indicates applicability of a specific Certificate to a community and/or PKI implementation with common security requirements.
Certificate Profile	Document that determines the information contained within a Certificate as well as the minimal requirements towards the Certificate.
Certification Practice Statement	One of the several documents that all together form the governance framework in which Certificates are created, issued, managed, and used.
Certification Service	In the context of this document, service related to issuing Certificates, managing revocation, modification, and re-key of the Certificates.
Distinguished name	Unique Subject name in the infrastructure of Certificates.
Fullgilt auðkenni	An intermediate certificate, the Certificates of which enabling electronic identification, electronic signature and electronic seals are connected to the SIM-card of Mobile phone or plastic cards or app.
Integrity	A characteristic of an array: information has not been changed after the array was created.
Object Identifier	An identifier used to uniquely name an object (OID).
PIN code	Activation code for a Private Key.
Private key	The key of a key pair that is assumed to be kept in secret by the holder of the key pair, and that is used to create electronic signatures or authenticate someone.
Public Key	The key of a key pair that may be publicly disclosed by the holder of corresponding Private Key or CA and that is used by Relying Party to verify electronic signatures created with the holder's corresponding Private Key.
PUK code	The unblocking of PIN codes when they have been blocked after number of allowed consecutive incorrect entries.
Qualified Certificate	A certificate for electronic signatures, that is issued by the qualified trust service provider and meets the requirements laid down in Annex I of the eIDAS Regulation [1].
Qualified Electronic Signature	Advanced electronic signature that is created by a qualified electronic signature creation device, and which is based on a Qualified Certificate for electronic signatures.
Qualified Certificate for Electronic Seals	Qualified Certificate for Electronic Seals according to eIDAS Regulation [1].
Qualified Certificate for Electronic Signatures	Qualified Certificate for Electronic Signatures according to the eIDAS Regulation [1].
Qualified Electronic Signature Creation Device (QSCD)	A Secure Signature Creation Device that meets the requirements laid down in eIDAS Regulation [1].
Registration Authority	Entity that is responsible for identification and Authentication of Subjects of Certificates. Additionally, the Registration Authority may accept Certificate applications, check the applications and/or forward the applications to the Certificate Authority.
Relying Party	Entity that relies upon the information contained within a Certificate or Certificate status information provided by Auðkenni.
Secure Cryptographic Device	Device which holds the Private Key of the user, protects this key against compromise and performs signing or decryption functions on behalf of the user.
Subject	Natural or legal person, or an organization or a device which the certificates are issued to.
Subscriber	Subscriber is a natural or legal person that is a subscriber at the CA for one or more subjects. Subscriber can also be a subject.

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Terms and Conditions	Document that describes obligations and responsibilities of the Subscriber with respect to using Certificates. The Subscriber must be familiar with the document and accept the Terms and Conditions [7] upon receipt the Certificates.
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1.6.2 Acronyms

Acronym	Definition
AK	Auðkenni ehf
AK CA	The system that processes the CSR from the App. This can be an external service provider such as SK
CA	Certificate Authority
CM	Card manufacturer
CP	Certificate Policy
CPS	Certification Practice Statement
CSR	Certificate Signing Request
eIDAS	Regulation (EU) No 910/2014 [1] 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 and Icelandic act nr. 55/2019
FA	Fullgilt auðkenni. Certificate used to issue certificates to subscribers. This is an intermediary root under Íslandsrót.
HSM	Hardware Security Module
MO	Mobile Operator
NCP+	Normalized Certificate Policy requiring a Secure Cryptographic Device
OCSP	Online Certificate Status Protocol
OID	Object Identifier, a unique object identification code
PKI	Public Key Infrastructure
QSCD	Qualified Electronic Signature Creation Device
QCP-n-qscd	Policy for EU qualified certificate issued to a natural person where the private key and the related certificate reside on a QSCD
QCP-l-qscd	Policy for EU qualified certificate issued to a legal person where the private key and the related certificate reside on a QSCD
RA	Registration Authority
SCM	SIM-card Manufacturer
SIM	SIM-card used in Mobile phones
SK	Provider of international e-identity solutions. SK provides support for the App for smart phones.
TSPS	Trust Service Provider Statement

2 PUBLICATION AND REPOSITORY RESPONSIBILITIES

Refer to Clause 6.1 of ETSI EN 319 411-1 [2] and ETSI EN 319 411-2 [3].

2.1 REPOSITORIES

AK SHALL make its repository of information available on its webpage. The repository SHALL contain this CP and associated CPS, Terms and Conditions, Trust Service Provider Statement, and other necessary documents.

AK SHALL also make sure that the systems publishing its service Certificates, the Certificate Repository and the revocation status information will be available 24/7.

2.2 PUBLICATION OF CERTIFICATION INFORMATION

2.2.1 *Publication and Notification Policies*

This CP, the Certification Practice Statement [11], the Certificate Profiles [6], as well as the Terms and Conditions [7] with the enforcement dates, SHALL be published on the website repo.audkenni.is no less than 10 days prior to taking effect.

2.2.2 *Items not Published in the Certification Practice Statement*

Information about service levels, fees and technical details laid out in mutual agreements between AK and RA MAY be left out of CPS.

2.3 TIME OR FREQUENCY OF PUBLICATION

No stipulation in addition to QCP-n-qscd, QCP-l-qscd, QCP-l, NCP+ and NCP.

2.4 ACCESS CONTROLS ON REPOSITORIES

No stipulation in addition to QCP-n-qscd, QCP-l-qscd, QCP-l, NCP+ and NCP.

3 IDENTIFICATION AND AUTHENTICATION

Refer to Clause 6.2 of ETSI EN 319 411-1 [2] and ETSI EN 319 411-2 [3].

3.1 NAMING

The Distinguished Name of the Certificate SHALL comply with conventions set in the [Certificate Profile \[6\]](#).

3.1.1 *Types of Names*

No stipulation in addition to QCP-n-qscd, QCP-l-qscd, QCP-l, NCP+ and NCP.

3.1.2 *Need for Names to be Meaningful*

All the values in the Subscriber information section of a Certificate SHALL be meaningful.

3.1.3 *Anonymity or Pseudonymity of Subscribers*

AK does not allow Certificates with Anonymity or Pseudonymity.

3.1.4 *Rules for Interpreting Various Name Forms*

No stipulation in addition to QCP-n-qscd, QCP-l-qscd, QCP-l, NCP+ and NCP.

3.1.5 *Uniqueness of Names*

AK SHALL ensure that each Subject will be issued a Certificate that uniquely identifies them using SerialNumber (S) or OrganisationIdentifier fields.

AK SHALL ensure that the Subject is entitled to use indicated names as recorded in the Icelandic National Registry or National business registry and AK is entitled to revoke the Certificate in question for the forbidden use of name or data.

3.1.6 *Recognition, Authentication, and Role of Trademarks*

Not applicable.

3.2 INITIAL IDENTITY VALIDATION

AK can use any communication channel within the limits provided by law, for the verification of the identity of the person or organization requesting the Certificate, and for checking the authenticity of the data provided.

AK may refuse the issuance of the required Certificate at its sole discretion, without any apparent justification.

3.2.1 *Method to Prove Possession of Private Key*

RA SHALL perform Subscriber Authentication and:

- for Mobile and Card initiate creation of key pairs;
- for App, the App itself initiates the creation of key pairs;
- for eSeal either the customer creates the key pairs in own HSM or AK provides a QSCD and initiates the creation.

For Mobile certificates, subscribers SHALL verify the possession of the QSCD by entering code received from the RA. In case of self-registration in the App the subscriber MUST have a Qualified Certificate issued by AK to proof possession.

For Certificates on Cards the private key is created on the Card at time of registration.

For certificates on App, subscribers SHALL confirm the possession of private key by giving the activation code to the RA. In case of online registration Subject MUST use a Certificate on Mobile to verify possession.

For Qualified eSeals the subscriber MUST either provide evidence that the key pair was generated using a FIPS 140-2 level 3 or Common Criteria certified HSM or use a secure token (Cryptostick) provided by AK.

For Non-qualified eSeals the subscriber IS NOT required to provide evidence of the key pair being generated using a FIPS 140-2 Level 3 or Common Criteria certified HSM.

3.2.2 *Authentication of Organization Identity*

RA SHALL verify the organizational identity by consulting the official organizational registry.

3.2.3 *Authentication of Individual Identity*

Authentication of Subject is carried out by RA as follows.

RA SHALL perform Subject Authentication when the Subject applies for a new Certificate to be issued to a natural person or a natural person is acting on behalf of an Organization or legal person.

RA SHALL Authenticate the Subject:

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- via physical presence checks or
- via self-registration using means of electronic authentication and Qualified Electronic Signature compliant with article 24.1.c of eIDAS [1].

3.2.4 *Non-Verified Subscriber Information*

Non-verified information is NOT allowed in the Certificate.

3.2.5 *Validation of Authority*

In general, the Subscriber SHALL apply for a Certificate on behalf of him or herself.

When the Subscriber does not have the legal capacity, a legal guardian SHALL sign the application.

When applying on behalf of an Organization the representative MUST be authorized to sign on behalf of the Organization.

3.2.6 *Criteria for Interoperation*

No stipulation

3.3 IDENTIFICATION AND AUTHENTICATION FOR RE-KEY REQUESTS

3.3.1 *Identification and Authentication for Routine Re-Key*

Re-key is NOT allowed.

3.3.2 *Identification and Authentication for Re-Key After Revocation*

Re-key after revocation is NOT allowed.

3.4 IDENTIFICATION AND AUTHENTICATION FOR REVOCATION REQUEST

No stipulation in addition to QCP-n-qscd, QCP-l, QCP-l-qscd and NCP+.

4 CERTIFICATE LIFE-CYCLE OPERATIONAL REQUIREMENTS

Refer to Clause 6.3 of ETSI EN 319 411-1 [2] and ETSI EN 319 411-2 [3].

4.1 CERTIFICATE APPLICATION

4.1.1 *Who Can Submit a Certificate Application*

AK SHALL accept certificate applications only from the subscriber.

Certificate application MAY be submitted via RA.

For qualified certificates on eSeals the Certificate application process SHALL ensure that the Subscriber has possession or control of the Private Key associated with the Public Key presented for certification.

4.1.2 *Enrolment Process and Responsibilities*

Subscriber WILL request Certificates via RA.

The enrolment process is as follows.

- RA SHALL Authenticate the Subscriber as stated in Clause 3.2.3 of this CP.
- RA SHALL perform additional checks related to the Subscriber's identity validation.
- RA SHALL verify compliance to the Subscriber's name with the Subscriber's name on his/her identity document and in the National Registry.
- Upon successful Authentication, the Subscriber SHALL accept the [Terms and Conditions \[7\]](#) and
 - confirm that the QSCD for Certificates on Mobile is in his/her possession by entering the Activation code provided by the RA,
 - confirm that the QSCD for Certificates on Card is in his/her possession by selecting PIN codes,
 - confirm that the QSCD for Certificates on App is in his/her possession by using Mobile Certificate or entering the Activation code provided by the RA.
 - confirm that the QSCD for Certificates on eSeal is in his/her possession by selecting PIN codes.
- For QSCD personalization, RA supplies CA with information that binds the Subject to the Private Keys on the QSCD in the subjects possession and the corresponding Public Keys, which CA uses for certification.
- RA SHALL apply for Certification at the CA on behalf of the Subscriber.
- RA SHALL archive the agreement signed by the Subscriber and return to the CA.
- CA SHALL verify validity of the QSCD, perform the necessary checks, sign the Public Keys and the Certificate SHALL be made available via mitt.audkenni.is or LDAP service and the OCSP SHALL start responding with „GOOD“.

RA is responsible for submitting correct identification data from the Icelandic National Registry to the CA.

4.2 CERTIFICATE APPLICATION PROCESSING

Certificates on Card, Mobile and App are finished as part of the enrollment process (clause 4.1.2). Issuance of eSeals is the content of the following clauses.

4.2.1 *Performing Identification and Authentication Functions*

After receiving a certificate application, the RA verifies the application information and other information in accordance with Section 3.2.3. The RA MUST create and maintain records enough to establish that it has performed its required verification tasks. RA evaluates the information presented and decides whether it is correct and reliable enough to issue the certificate. This process is applicable to all types of Certificates.

4.2.2 *Approval or Rejection of Certificate Applications*

CA SHALL refuse to issue a Certificate if:

- For QCP-n-qscd: the information about QSCD does not exist in the CA database in case of Certificate on Mobile;
- For QCP-l-qscd: the QSCD is not provided by AK in case Cryptostick is used;
- the application data does not validate;
- the Certificate application does not comply with the technical requirements set in applicable documents;
- the Subscriber lacks legal capacity and is not properly represented;
- the identification data does not match with the data in reliable source (National Registry).
- the Subjects ID on the application does not match with the Subjects ID on his/her identity document;

If the data contained in a Certificate application needs to be modified, the corresponding amendment SHALL be coordinated with subscriber.

If the CA refuses to issue a Certificate subscriber SHALL be notified.

4.2.3 *Time to Process Certificate Applications*

Certificate applications are processed in a timely manner when all conditions for the application have been fulfilled.

4.3 CERTIFICATE ISSUANCE

Applications for Certificates on Card, Mobile and App are finished as part of the enrollment process (clause 4.1.2).

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4.3.1 CA Actions During Certificate Issuance

No stipulation in addition to QCP-n-qscd, QCP-l-qscd and NCP+.

4.3.2 Notifications to Subscriber by the CA of Issuance of Certificate

Subscribers for Certificates issued on Mobile or in App are notified by a message on the mobile of the issuance.

Subjects for Certificates issued on Cards are notified verbally by the RA.

For e-seals the CA SHALL notify the Subscriber of the new Certificate issuance by email.

4.4 CERTIFICATE ACCEPTANCE

4.4.1 Conduct Constituting Certificate Acceptance

No stipulation in addition to QCP-n-qscd, QCP-l-qscd, QCP-l, NCP+ and NCP.

4.4.2 Publication of the Certificate by the CA

Certificates are published by CA in LDAP service. Certificate validity can be checked through Auðkenni OCSP service and CRL.

4.4.3 Notification of Certificate Issuance by the CA to Other Entities

No stipulation.

4.5 KEY PAIR AND CERTIFICATE USAGE

4.5.1 Subscriber Private Key and Certificate Usage

No stipulation in addition to QCP-n-qscd, QCP-l-qscd, QCP-l, NCP+ and NCP.

4.5.2 Relying Party Public Key and Certificate Usage

No stipulation in addition to QCP-n-qscd, QCP-l-qscd, QCP-l, NCP+ and NCP.

4.6 CERTIFICATE RENEWAL

Certificates on Mobile MAY be renewed. Certificates on Cards and in App SHALL NOT be renewed. eSeals SHALL NOT be renewed.

When renewing certificates on Mobile the information used to verify the identity and attributes of the subject must be verified to be still valid. Renewal of certificates on Mobile SHALL only be allowed once i.e. the renewed certificate cannot be used to renew again.

AK verifies that the Subjects cryptographic security is still sufficient for the new certificate's validity period by consulting the EU list of QSCDs.

4.7 CERTIFICATE RE-KEY

Certificate Re-Key not allowed.

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4.7.1 *Circumstances for Certificate Re-Key*

Certificate Re-Key not allowed.

4.7.2 *Who May Request Certification of a New Public Key*

Certificate Re-Key not allowed.

4.7.3 *Processing Certificate Re-Keying Requests*

Certificate Re-Key not allowed.

4.7.4 *Notification of New Certificate Issuance to Subscriber*

Certificate Re-Key not allowed.

4.7.5 *Conduct Constituting Acceptance of a Re-Keyed Certificate*

Certificate Re-Key not allowed.

4.7.6 *Publication of the Re-Keyed Certificate by the CA*

Certificate Re-Key not allowed.

4.7.7 *Notification of Certificate Issuance by the CA to Other Entities*

Certificate Re-Key not allowed.

4.8 CERTIFICATE MODIFICATION

Certificate modification IS NOT allowed.

4.8.1 *Circumstances for Certificate Modification*

Not applicable.

4.8.2 *Who May Request Certificate Modification*

Not applicable.

4.8.3 *Processing Certificate Modification Requests*

Not applicable.

4.8.4 *Notification of New Certificate Issuance to Subscriber*

Not applicable.

4.8.5 *Conduct Constituting Acceptance of Modified Certificate*

Not applicable.

4.8.6 Publication of the Modified Certificate by the CA

Not applicable.

4.8.7 Notification of Certificate Issuance by the CA to Other Entities

Not applicable.

4.9 CERTIFICATE REVOCATION AND SUSPENSION

4.9.1 Circumstances for Revocation

If the Subscriber loses control over one or more of the keys or PIN codes, the Subscriber SHALL apply for Certificate revocation immediately.

AK has the right to revoke FA Certificates if one or more of the following occurs:

- the Subscriber requests revocation via service portal of the RA;
- AK obtains evidence that Subscriber has lost control over Private Keys or PIN codes;
- the Subscriber notifies AK that the original Certificate request was not authorized and does not retroactively grant authorization;
- AK obtains evidence that the Subscriber's Private Key corresponding to the Public Key in the Certificate suffered a key compromise or no longer complies with the requirements;
- AK obtains evidence that the Certificate was misused;
- AK is made aware that a Subscriber has violated one or more of its obligations under the [Terms and Conditions \[7\]](#);
- AK is made aware of a material change in the information contained in the Certificate;
- AK is made aware that the Certificate was not issued in accordance with the CPS and/or CP;
- AK determines that any of the information appearing in the Certificate is inaccurate or misleading;
- AK ceases operations for any reason and has not planned for another CA to provide revocation support for the Certificate;
- AK's right to issue Certificates is revoked or terminated, unless AK has planned to continue maintaining the OCSP repository;
- AK is made aware of a possible compromise of the Private Key of the AK CA used for issuing the Certificate; revocation is required by the CP;
- AK determines that the cryptographic device used is no longer on the EU list of QSCDs or no longer deemed secure.

RA has the right to request revocation of FA Certificates if one or more of the following occurs:

- the Subscriber requests revocation via service portal of the RA;
- QSCD is replaced (for example QSCD is damaged, reset, migration to other MO, application for new Certificate);
- Subscriber's telecommunication service contract is terminated;
- RA obtains evidence that Subscriber has lost control over Private Keys or PIN codes (for example SIM-card has been transferred to another person);
- the Subscriber has violated one or more of its obligations to MO (for example the Subscriber has not fulfilled its financial obligations).

4.9.2 Who Can Request Revocation

Subscriber or Subject MAY request revocation of the Subscriber's Certificates any time.

RA and CA MAY request revocation for any of the reasons listed in Clause 4.9.1 of this CP.

Competent authority MAY request revocation of the Subscriber Certificates if such an obligation is foreseen by the Icelandic law.

4.9.3 Procedure for Revocation Request

The procedure for revocation SHALL be as described in AK CPS [11] and Revocation Procedure [13]

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4.9.4 *Revocation Request Grace Period*

No stipulation in addition to QCP-n-qscd, QCP-l-qscd, QCP-l, NCP+ and NCP.

4.9.5 *Time Within Which CA Must Process the Revocation Request*

No stipulation in addition to QCP-n-qscd, QCP-l-qscd, QCP-l, NCP+ and NCP.

4.9.6 *Revocation Checking Requirements for Relying Parties*

No stipulation in addition to QCP-n-qscd, QCP-l-qscd, QCP-l, NCP+ and NCP.

4.9.7 *CRL Issuance Frequency*

CRL SHALL be issued no less than every 24 hours.

4.9.8 *Maximum Latency for CRLs*

Not applicable.

4.9.9 *On-Line Revocation/Status Checking Availability*

No stipulation in addition to QCP-n-qscd, QCP-l-qscd, QCP-l, NCP+ and NCP.

4.9.10 *On-Line Revocation Checking Requirements*

No stipulation in addition to QCP-n-qscd, QCP-l-qscd, QCP-l, NCP+ and NCP.

4.9.11 *Other Forms of Revocation Advertisements Available*

No stipulation in addition to QCP-n-qscd, QCP-l-qscd, QCP-l, NCP+ and NCP.

4.9.12 *Special Requirements Related to Key Compromise*

No stipulation in addition to QCP-n-qscd, QCP-l-qscd, QCP-l, NCP+ and NCP.

4.9.13 *Circumstances for Suspension*

Suspension IS NOT allowed.

4.9.14 *Who Can Request Suspension*

Suspension is NOT allowed.

4.9.15 *Procedure for Suspension Request*

Suspension is NOT allowed.

4.9.16 *Limits on Suspension Period*

Suspension is NOT allowed.

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4.9.17 *Circumstances for Termination of Suspension*

Suspension is NOT allowed

4.9.18 *Who Can Request Termination of Suspension*

Suspension is NOT allowed.

4.9.19 *Procedure for Termination of Suspension*

Suspension NOT allowed.

4.10 CERTIFICATE STATUS SERVICES

4.10.1 *Operational Characteristics*

No stipulation in addition to QCP-n-qscd, QCP-l-qscd, QCP-l, NCP+ and NCP.

4.10.2 *Service Availability*

AK SHALL ensure that its Certificate Status Services are available 24/7.

4.10.3 *Operational Features*

No stipulation in addition to QCP-n-qscd, QCP-l-qscd, QCP-l, NCP+ and NCP.

4.11 END OF SUBSCRIPTION

No stipulation in addition to QCP-n-qscd, QCP-l-qscd, QCP-l, NCP+ and NCP.

4.12 KEY ESCROW AND RECOVERY

4.12.1 *Key Escrow and Recovery Policy and Practices*

Not allowed.

4.12.2 *Session Key Encapsulation and Recovery Policy and Practices*

Not applicable.

5 FACILITY, MANAGEMENT, AND OPERATIONAL CONTROLS

Refer to Clause 6.4 of ETSI EN 319 411-1 [2] and ETSI EN 319 411-2 [3].

Further information can be found in the AK Trusted Service Provider Statement.

6 TECHNICAL SECURITY CONTROLS

Refer to Clause 6.5 of ETSI EN 319 411-1 [2] and ETSI EN 319 411-2 [3].

6.1 KEY PAIR GENERATION AND INSTALLATION

6.1.1 Key Pair Generation

Private Key SHALL be generated in the QSCD or in a FIPS 140-2 Level 3 or CC EAL 4+ certified HSM.

For Mobile certificates, the private key SHALL be generated on the SIM-card (QSCD).

For certificates on Cards the private key SHALL be generated on the card (QSCD)

For eSeals the private key SHALL be generated on the Cryptostick (HSM) provided by Auðkenni or FIPS-140-2 level 3 or Common Criteria certified HSM at the customer site.

Non-qualified Certificates do not require HSM.

For the App the Key Pair Generation SHALL be as follows:

- The App Server and App SHALL generate RSA key pairs independently.
- The App Server's Private Key SHALL be generated on a FIPS 140-2 Level 3 or CC EAL 4+ certified HSM.
- The App SHALL further divide its Private Key into two parts. The two parts SHALL NOT be distinguished from random numbers.
- The App SHALL send one of these parts to the App Server over a secure communication channel.
- The App SHALL NOT store the key pair sent to the App Server and SHALL store the other part encrypted and protected with activation data.

6.1.2 Private Key Delivery to Subscriber

For Certificates on Mobile, App, and Card the private key is always within the QSCD.

For Certificate on eSeal the private key is either within the QSCD (Cryptostick) or within the customer HSM.

RA SHALL perform Subscriber Authentication in accordance with Clause 4.1.2 of this CP.

6.1.3 Public Key Delivery to Certificate Issuer

For Certificate on Mobile, App, or Card the RA SHALL hand Public Keys over to CA for registration.

For eSeals and Equipment authentication the Public Key is transferred securely to the CA.

6.1.4 CA Public Key Delivery to Relying Parties

No stipulation in addition to QCP-n-qscd, QCP-l-qscd, QCP-l, NCP+ and NCP.

6.1.5 Key Sizes

Allowed key sizes SHALL be as described in the [Certificate Profile \[6\]](#).

6.1.6 Public Key Parameters Generation and Quality Checking

No stipulation in addition to QCP-n-qscd, QCP-l-qscd, QCP-l, NCP+ and NCP.

6.1.7 Key Usage Purposes (as per X.509 v3 Key Usage Field)

Allowed key usage flags SHALL be set as described in the [Certificate Profile \[6\]](#).

6.2 PRIVATE KEY PROTECTION AND CRYPTOGRAPHIC MODULE ENGINEERING CONTROLS

6.2.1 *Cryptographic Module Standards and Controls*

Keys SHALL be generated by a FIPS 140-2 (Level 3) or CC EAL 4+ certified device or a QSCD.

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

No stipulation in addition to QCP-n-qscd, QCP-l-qscd, QCP-l, NCP+ and NCP.

6.2.3 *Private Key Escrow*

No stipulation in addition to QCP-n-qscd, QCP-l-qscd, QCP-l, NCP+ and NCP.

6.2.4 *Private Key Backup*

No stipulation in addition to QCP-n-qscd, QCP-l-qscd, QCP-l, NCP+ and NCP.

6.2.5 *Private Key Archival*

No stipulation in addition to QCP-n-qscd, QCP-l-qscd, QCP-l, NCP+ and NCP.

6.2.6 *Private Key Transfer into or From a Cryptographic Module*

No stipulation in addition to QCP-n-qscd, QCP-l-qscd, QCP-l, NCP+ and NCP.

6.2.7 *Private Key Storage on Cryptographic Module*

No stipulation in addition to QCP-n-qscd, QCP-l-qscd, QCP-l, NCP+ and NCP.

6.2.8 *Method of Activating Private Key*

Different solutions have different requirements for activating private key:

- SIM on mobile requires one PIN for both Authentication and Signature (at least 4 digits).
- App on smartphone requires two PINs, one for Authentication (at least 4 digits) and one for Signature (at least 5 digits).
- Cards require two PINS, one for Authentication (4 digits) and one for Signature (6 digits).
- eSeals require at least a 4-digit PIN when stored on Cryptostick.
- Equipment Authentication activation method is at the discretion of the Subscriber.

6.2.9 *Method of Deactivating Private Key*

No stipulation in addition to QCP-n-qscd, QCP-l-qscd, QCP-l, NCP+ and NCP.

6.2.10 *Method of Destroying Private Key*

No stipulation in addition to QCP-n-qscd, QCP-l-qscd, QCP-l, NCP+ and NCP.

6.2.11 *Cryptographic Module Rating*

No stipulation in addition to QCP-n-qscd, QCP-l-qscd, QCP-l, NCP+ and NCP.

6.3 OTHER ASPECTS OF KEY PAIR MANAGEMENT

6.3.1 *Public Key Archival*

No stipulation in addition to QCP-n-qscd, QCP-l-qscd, QCP-l, NCP+ and NCP.

6.3.2 *Certificate Operational Periods and Key Pair Usage Periods*

The validity period of the Subscriber Certificates SHALL NOT exceed the validity period stated in the Certificate Profile [6].

6.4 ACTIVATION DATA

6.4.1 *Activation Data Generation and Installation*

For certificates on Mobile and Card there is an Activation code used. At time of registration the RA asks the subscriber to enter the issued Activation code to verify the possession of the QSCD and following that to choose a PIN code to activate the private key.

For App certificates the App creates an Activation code that the RA MUST enter to activate the private key. If subscriber has Mobile Certificate, then he/she can use that to activate.

6.4.2 *Activation Data Protection*

The Subscriber SHALL memorize the PIN codes and not share them with anyone.

If the PIN codes are not under the control of the Subscriber, the Subscriber SHALL apply for Certification revocation immediately.

Copies of PIN codes SHALL NOT be stored anywhere.

6.4.3 *Other Aspects of Activation Data*

No stipulation in addition to QCP-n-qscd, QCP-l-qscd, QCP-l, NCP+ and NCP.

6.5 COMPUTER SECURITY CONTROLS

6.5.1 *Specific Computer Security Technical Requirements*

No stipulation in addition to QCP-n-qscd, QCP-l-qscd, QCP-l, NCP+ and NCP.

6.5.2 *Computer Security Rating*

No stipulation in addition to QCP-n-qscd, QCP-l-qscd, QCP-l, NCP+ and NCP.

6.6 LIFE CYCLE TECHNICAL CONTROLS

6.6.1 *System Development Controls*

No stipulation in addition to QCP-n-qscd, QCP-l-qscd, QCP-l, NCP+ and NCP.

6.6.2 *Security Management Controls*

No stipulation in addition to QCP-n-qscd, QCP-l-qscd, QCP-l, NCP+ and NCP.

6.6.3 *Life Cycle Security Controls*

No stipulation in addition to QCP-n-qscd, QCP-l-qscd, QCP-l, NCP+ and NCP.

6.7 NETWORK SECURITY CONTROLS

No stipulation in addition to QCP-n-qscd, QCP-l-qscd, QCP-l, NCP+ and NCP.

6.8 TIME-STAMPING

No stipulation in addition to QCP-n-qscd, QCP-l-qscd, QCP-l, NCP+ and NCP.

7 CERTIFICATE, CRL, AND OCSP PROFILES

Refer to Clause 6.6 of ETSI EN 319 411-1 [2] and ETSI EN 319 411-2 [3].

7.1 CERTIFICATE PROFILE

The Certificate SHALL comply with the profile described in the Certificate Profile [6].

7.2 CRL PROFILE

The CRL SHALL comply with the profile described in the Certificate Profile [6].

7.3 OCSP PROFILE

The OCSP responses SHALL comply with the profile described in the Certificate Profile [6].

8 COMPLIANCE AUDIT AND OTHER ASSESSMENTS

Refer to Clause 6.7 of ETSI EN 319 411-1 [2] and ETSI EN 319 411-2 [3].

9 OTHER BUSINESS AND LEGAL MATTERS

Refer to Clause 6.8 of ETSI EN 319 411-1 [2] and ETSI EN 319 411-2 [3].

9.1 FEES

9.1.1 *Certificate Issuance or Renewal Fees*

No stipulation in addition to QCP-n-qscd, QCP-l-qscd, QCP-l, NCP+ and NCP.

9.1.2 *Certificate Access Fees*

No stipulation in addition to QCP-n-qscd, QCP-l-qscd, QCP-l, NCP+ and NCP.

9.1.3 *Revocation or Status Information Access Fees*

No stipulation in addition to QCP-n-qscd, QCP-l-qscd, QCP-l, NCP+ and NCP.

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9.1.4 Fees for Other Services

No stipulation in addition to QCP-n-qscd, QCP-l-qscd, QCP-l, NCP+ and NCP.

9.1.5 Refund Policy

No stipulation in addition to QCP-n-qscd, QCP-l-qscd, QCP-l, NCP+ and NCP.

9.2 FINANCIAL RESPONSIBILITY

9.2.1 Insurance Coverage

No stipulation in addition to QCP-n-qscd, QCP-l-qscd, QCP-l, NCP+ and NCP.

9.2.2 Other Assets

No stipulation in addition to QCP-n-qscd, QCP-l-qscd, QCP-l, NCP+ and NCP.

9.2.3 Insurance or Warranty Coverage for End-Entities

No stipulation in addition to QCP-n-qscd, QCP-l-qscd, QCP-l, NCP+ and NCP.

9.3 CONFIDENTIALITY OF BUSINESS INFORMATION

No stipulation.

9.4 PRIVACY OF PERSONAL INFORMATION

No stipulation in addition to QCP-n-qscd, QCP-l-qscd, QCP-l, NCP+ and NCP.

9.5 INTELLECTUAL PROPERTY RIGHTS

AK obtains intellectual property rights to this CP.

9.6 REPRESENTATIONS AND WARRANTIES

9.6.1 CA Representations and Warranties

An employee of CA SHALL have a clean criminal record.

9.6.2 RA Representations and Warranties

An employee of RA SHALL have a clean criminal record and receive appropriate training to perform RA duties.

9.6.3 Subscriber Representations and Warranties

No stipulation in addition to QCP-n-qscd, QCP-l-qscd, QCP-l, NCP+ and NCP.

9.6.4 Relying Party Representations and Warranties

Relying Party SHALL verify the validity of the Certificate using validation services offered by AK prior to relying on the Certificate.

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Relying Party SHALL consider the limitations stated in the Certificate and SHALL ensure that the transaction to be accepted corresponds to this CP.

9.6.5 Representations and Warranties of Other Participants

An employee of App server SHALL have a clean criminal record.

9.7 DISCLAIMERS OF WARRANTIES

No stipulation in addition to QCP-n-qscd, QCP-l-qscd, QCP-l, NCP+ and NCP.

9.8 LIMITATIONS OF LIABILITY

No stipulation in addition to QCP-n-qscd, QCP-l-qscd, QCP-l, NCP+ and NCP.

9.9 INDEMNITIES

No stipulation in addition to QCP-n-qscd, QCP-l-qscd, QCP-l, NCP+ and NCP.

9.10 TERM AND TERMINATION

9.10.1 Term

Refer to Clause 2.2.1 Publication and Notification Policies of this CP.

9.10.2 Termination

This CP SHALL be in force until replaced by a newer version of the CP or when it is terminated due to the CA termination or when the service is terminated, and all the Certificates therefore become invalid.

This CP SHALL, even if replaced by a new version of the CP, remain in force for all Certificates issued while the CP was in force.

9.10.3 Effect of Termination and Survival

AK SHALL communicate the conditions and effect of termination of this CP.

9.11 INDIVIDUAL NOTICES AND COMMUNICATIONS WITH PARTICIPANTS

No stipulation in addition to QCP-n-qscd, QCP-l-qscd, QCP-l, NCP+ and NCP.

9.12 AMENDMENTS

9.12.1 Procedure for Amendment

Refer to Clause 1.5.4 of this CP.

9.12.2 Notification Mechanism and Period

Refer to Clause 1.5.4 of this CP.

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9.12.3 *Circumstances Under Which OID Must be Changed*

No stipulation..

9.13 DISPUTE RESOLUTION PROVISIONS

No stipulation in addition to QCP-n-qscd, QCP-l-qscd, QCP-l, NCP+ and NCP.

9.14 GOVERNING LAW

This CP is governed by the jurisdictions of the Republic of Iceland.

9.15 COMPLIANCE WITH APPLICABLE LAW

AK SHALL ensure compliance with the following requirements:

- Electronic Identification and Trust Services for Electronic Transactions Act no. 55/2019,
- Data Protection and processing of personal data Act no. 90/2018. [8]
- related European Standards:
 - ETSI EN 319 401 Electronic Signatures and Infrastructures (ESI); General Policy Requirements for Trust Service Providers [9],
 - ETSI EN 319 411-1 Electronic Signatures and Infrastructures (ESI); Policy and Security requirements for Trust Service Providers issuing certificates; Part 1: General requirements [2],
 - ETSI EN 319 411-2 Electronic Signatures and Infrastructures (ESI); Policy and security requirements for Trust Service Providers issuing certificates; Part 2: Policy requirements for certification authorities issuing qualified certificates [3],
 - CEN EN 419 211 Protection profiles for secure signature creation device [10].

9.16 MISCELLANEOUS PROVISIONS

9.16.1 *Entire Agreement*

No stipulation in addition to QCP-n-qscd, QCP-l-qscd, QCP-l, NCP+ and NCP.

9.16.2 *Assignment*

No stipulation in addition to QCP-n-qscd, QCP-l-qscd, QCP-l, NCP+ and NCP.

9.16.3 *Severability*

No stipulation in addition to QCP-n-qscd, QCP-l-qscd, QCP-l, NCP+ and NCP.

9.16.4 *Enforcement (Attorney's Fees and Waiver of Rights)*

No stipulation in addition to QCP-n-qscd, QCP-l-qscd, QCP-l, NCP+ and NCP.

9.16.5 *Force Majeure*

No stipulation in addition to QCP-n-qscd, QCP-l-qscd, QCP-l, NCP+ and NCP.

9.17 OTHER PROVISIONS

Not allowed.

10 REFERENCES

1. Electronic Identification and Trust Services for Electronic Transactions, Act no. 55/2019
2. ETSI EN 319 411-1 V1.2.2 (2018-04) Electronic Signatures and Infrastructures (ESI); Policy and security requirements for Trust Service Providers issuing certificates; Part 1: General Requirements
3. ETSI EN 319 411-2 V2.2.2 (2018-04) Electronic Signatures and Infrastructures (ESI); Policy and security requirements for Trust Service Providers issuing certificates; Part 2: Policy requirements for certification authorities issuing qualified certificates;
4. RFC 3647 – Request For Comments 3647, Internet X.509 Public Key Infrastructure, Certificate Policy and Certification Practices Framework, published: <https://www.ietf.org/rfc/rfc3647.txt>
5. Key Words for Use in RFCs to Indicate Requirement Levels, S.Bradner, RFC2119, March 1997
6. Certificate and OCSP Profiles for FA, published: repo.audkenni.is
7. Terms and Conditions for Use of Certificates of FA, published: repo.audkenni.is
8. Act no. 90/2018 on Data Protection and processing of personal data.
9. ETSI EN 319 401 V2.2.1 (2018-04) Electronic Signatures and Infrastructures (ESI); General Policy Requirements for Trust Service Providers;
10. CEN EN 419 211 Protection profiles for secure signature creation device;
11. AK Certification Practice Statement, published: repo.audkenni.is;
12. AK TSPS - AK Trust Service Practice Statement; repo.audkenni.is
13. Revocation Procedure. AK Security Handbook.