# Certification Practice Statement





# Hierarchy of documentation

In case of disputes between documentation, the following hierarchy exists:

- The privacy statement
- The certification practice statement
- The identity proofing service practice statement
- PKI disclosure statement
- The terms & conditions in Dutch
- The terms & conditions in English
- The product conditions in Dutch
- The product conditions in English
- Other public outings by Cleverbase

# **Table of Contents**

- 1 Introduction
  - 1.1 Overview
  - 1.2 Document Name and Identification
  - 1.3 PKI Participants
    - 1.3.1 Certification Authorities
    - 1.3.2 Registration Authorities
    - 1.3.3 Subscribers
    - 1.3.4 Relying Parties
    - 1.3.5 Other Participants
  - 1.4 Certificate Usage
    - 1.4.1 Appropriate Certificate Uses
    - 1.4.2 Prohibited Certificate Uses
  - 1.5 Policy Administration
    - 1.5.1 Organization Administering the Document
    - 1.5.2 Contact Person
    - 1.5.3 Person Determining CPS Suitability for the Policy
    - 1.5.4 CPS Approval Procedures
  - 1.6 Definitions and Acronyms
- 2 Publication and Repository Responsibilities
  - 2.1 Repositories
  - 2.2 Publication of Certification Information
  - 2.3 Time or Frequency of Publication
  - 2.3.1 Accessibility of repositories
  - 2.4 Access Controls on Repositories
- 3 Identification and Authentication
  - 3.1 Naming
    - 3.1.1 Types of Names
    - 3.1.2 Need for Names to be Meaningful
    - 3.1.3 Anonymity or Pseudonymity of Subscribers
    - 3.1.4 Rules for Interpreting Various Name Forms
    - 3.1.5 Uniqueness of Names
    - 3.1.6 Recognition, Authentication, and Role of Trademarks
  - 3.2 Initial Identity Validation
    - 3.2.1 Method to Prove Possession of Private Key
    - 3.2.2 Authentication of Organization Identity
    - 3.2.3 Authentication of Individual Identity
    - 3.2.4 Non-verified Subscriber Information
    - 3.2.5 Validation of Authority
    - 3.2.6 Criteria for Interoperation
  - 3.3 Identification and Authentication for Re-key Requests
    - 3.3.1 Identification and Authentication for Routine Re-key
    - 3.3.2 Identification and Authentication for Re-key After Revocation
  - 3.4 Identification and Authentication for Revocation Requests

- 4 Certificate Life-Cycle Operational Requirements
  - 4.1 Certificate Application
    - 4.1.1 Who Can Submit a Certificate Application
    - 4.1.2 Enrolment Process and Responsibilities
  - 4.2 Certificate Application Processing
    - 4.2.1 Performing Identification and Authentication Functions
    - 4.2.2 Approval or Rejection of Certificate Applications
    - 4.2.3 Time to Process Certificate Applications
  - 4.3 Certificate Issuance
    - 4.3.1 CA Actions During Certificate Issuance
    - 4.3.2 Notification to Subscriber by the CA of Issuance of Certificate
  - 4.4 Certificate Acceptance
    - 4.4.1 Conduct Constituting Certificate Acceptance
    - 4.4.2 Publication of the Certificate by the CA
    - 4.4.3 Notification of Certificate Issuance by the CA to Other Entities
  - 4.5 Key Pair and Certificate Usage
    - 4.5.1 Subscriber Private Key and Certificate Usage
    - 4.5.2 Relying Party Public Key and Certificate Usage
  - 4.6 Certificate Renewal
    - 4.6.1 Circumstance for Certificate Renewal
    - 4.6.2 Who May Request Renewal
    - 4.6.3 Processing Certificate Renewal Requests
    - 4.6.4 Notification of New Certificate Issuance to Subscriber
    - 4.6.5 Conduct Constituting Acceptance of a Renewal Certificate
    - 4.6.6 Publication of the Renewal Certificate by the CA
    - 4.6.7 Notification of Certificate Issuance by the CA to Other Entities
  - 4.7 Certificate Re-key
    - 4.7.1 Circumstance for Certificate Re-key
    - 4.7.2 Who May Request Certification of a New Public Key
    - 4.7.3 Processing Certificate Re-keying Requests
    - 4.7.4 Notification of New Certificate Issuance to Subscriber
    - 4.7.5 Conduct Constituting Acceptance of a Re-keyed Certificate
    - 4.7.6 Publication of the Re-keyed Certificate by the CA
    - 4.7.7 Notification of Certificate Issuance by the CA to Other Entities
  - 4.8 Certificate Modification
    - 4.8.1 Circumstance for Certificate Modification
    - 4.8.2 Who May Request Certificate Modification
    - 4.8.3 Processing Certificate Modification Requests
    - 4.8.4 Notification of New Certificate Issuance to Subscriber
    - 4.8.5 Conduct Constituting Acceptance of Modified Certificate
    - 4.8.6 Publication of the Modified Certificate by the CA
    - 4.8.7 Notification of Certificate Issuance by the CA to Other Entities
  - 4.9 Certificate Revocation and Suspension
    - 4.9.1 Circumstances for Revocation
    - 4.9.2 Who Can Request Revocation

- 4.9.3 Procedure for Revocation Request
- 4.9.4 Revocation Request Grace Period
- 4.9.5 Time Within Which CA Must Process the Revocation Request
- 4.9.6 Revocation Checking Requirement for Relying Parties
- 4.9.7 CRL Issuance Frequency (if applicable)
- 4.9.8 Maximum Latency for CRLs (if applicable)
- 4.9.9 On-line Revocation/Status Checking Availability
- 4.9.10 On-line Revocation Checking Requirements
- 4.9.11 Other Forms of Revocation Advertisements Available
- 4.9.12 Special Requirements Related to Key Compromise
- 4.9.13 Circumstances for Suspension
- 4.9.14 Who Can Request Suspension
- 4.9.15 Procedure for Suspension Request
- 4.9.16 Limits on Suspension Period
- 4.10 Certificate Status Service
  - 4.10.1 Operational Characteristics
  - 4.10.2 Service Availability
  - 4.10.3 Optional Features
- 4.11 End of Subscription
- 4.12 Key Escrow and Recovery
  - 4.12.1 Key Escrow and Recovery Policy and Practices
  - 4.12.2 Session Key Encapsulation and Recovery Policy and Practices
- 5 Facility, Management and Operational Controls
  - 5.1 Physical Controls
    - 5.1.1 Site Location and Construction
    - 5.1.2 Physical Access
    - 5.1.3 Power and Air Conditioning
    - 5.1.4 Water Exposures
    - 5.1.5 Fire Prevention and Protection
    - 5.1.6 Media Storage
    - 5.1.7 Waste Disposal
    - 5.1.8 Off-site Backup
  - 5.2 Procedural Controls
    - 5.2.1 Trusted Roles
    - 5.2.2 Number of Persons Required per Task
    - 5.2.3 Identification and Authentication for Each Role
    - 5.2.4 Roles Requiring Separation of Duties
  - 5.3 Personnel Controls
    - 5.3.1 Qualifications, Experience, and Clearance Requirements
    - 5.3.2 Background Check Procedures
    - 5.3.3 Training Requirements
    - 5.3.4 Retraining Frequency and Requirements
    - 5.3.5 Job Rotation Frequency and Sequence
    - 5.3.6 Sanctions for Unauthorised Actions
    - 5.3.7 Independent Contractor Requirements

- 5.3.8 Documentation Supplied to Personnel
- 5.4 Audit Logging Procedures
  - 5.4.1 Types of Events Recorded
  - 5.4.2 Frequency of Processing Log
  - 5.4.3 Retention Period for Audit Log
  - 5.4.4 Protection of Audit Log
  - 5.4.5 Audit Log Backup Procedures
  - 5.4.6 Audit Collection System (Internal vs. External)
  - 5.4.7 Notification to Event-causing Subject
  - 5.4.8 Vulnerability Assessments
- 5.5 Records Archival
  - 5.5.1 Types of Records Archived
  - 5.5.2 Retention Period for Archive
  - 5.5.3 Protection of Archive
  - 5.5.4 Archive Backup Procedures
  - 5.5.5 Requirements for Time-stamping of Records
  - 5.5.6 Archive Collection System (Internal or External)
  - 5.5.7 Procedures to Obtain and Verify Archive Information
- 5.6 Key Changeover
- 5.7 Compromise and Disaster Recovery
  - 5.7.1 Incident and Compromise Handling Procedures
  - 5.7.2 Computing Resources, Software, and/or Data are Corrupted
  - 5.7.3 Entity Private Key Compromise Procedures
  - 5.7.4 Business Continuity Capabilities After a Disaster
- 5.8 CA or RA Termination
- 6 Technical Security Controls
  - 6.1 Key Pair Generation and Installation
    - 6.1.1 Key Pair Generation
    - 6.1.2 Private Key Delivery to Subscriber
    - 6.1.3 Public Key Delivery to Certificate Issuer
    - 6.1.4 CA Public Key Delivery to Relying Parties
    - 6.1.5 Key Sizes
    - 6.1.6 Public Key Parameters Generation and Quality Checking
    - 6.1.7 Key Usage Purposes (as per X.509 v3 Key Usage Field)
  - 6.2 Private Key Protection and Cryptographic Module Engineering Controls
    - 6.2.1 Cryptographic Module Standards and Controls
    - 6.2.2 Private Key (n out of m) Multi-person Control
    - 6.2.3 Private Key Escrow
    - 6.2.4 Private Key Backup
    - 6.2.5 Private Key Archival
    - 6.2.6 Private Key Transfer Into or From a Cryptographic Module
    - 6.2.7 Private Key Storage on Cryptographic Module
    - 6.2.8 Method of Activating Private Key
    - 6.2.9 Method of Deactivating Private Key
    - 6.2.10 Method of Destroying Private Key

- 6.2.11 Cryptographic Module Rating
- 6.3 Other Aspects of Key Pair Management
  - 6.3.1 Public Key Archival
  - 6.3.2 Certificate Operational Periods and Key Pair Usage Periods
- 6.4 Activation Data
  - 6.4.1 Activation Data Generation and Installation
  - 6.4.2 Activation Data Protection
  - 6.4.3 Other Aspects of Activation Data
- 6.5 Computer Security Controls
  - 6.5.1 Specific Computer Security Technical Requirements
  - 6.5.2 Computer Security Rating
- 6.6 Life Cycle Security Controls
  - 6.6.1 System Development Controls
  - 6.6.2 Security Management Controls
  - 6.6.3 Life Cycle Security Controls
- 6.7 Network Security Controls
- 6.8 Time-stamping
- 7 Certificate, CRL, and OCSP Profiles
  - 7.1 Certificate Profile
  - 7.2 CRL Profile
  - 7.3 OCSP Profile
- 8 Compliance Audit and Other Assessments
  - 8.1 Frequency or Circumstances of Assessment
  - 8.2 Identity/Qualifications of Assessor
  - 8.3 Assessor's Relationship to Assessed Entity
  - 8.4 Topics Covered by Assessment
  - 8.5 Actions Taken as a Result of Deficiency
  - 8.6 Communication of Results
- 9 Other Business and Legal Matters
  - 9.1 Fees
    - 9.1.1 Certificate Issuance or Renewal Fees
    - 9.1.2 Certificate Access Fees
    - 9.1.3 Revocation or Status Information Access Fees
    - 9.1.4 Fees for Other Services
    - 9.1.5 Refund Policy
  - 9.2 Financial Responsibility
    - 9.2.1 Insurance Coverage
    - 9.2.2 Other Assets
    - 9.2.3 Insurance or Warranty Coverage for End-entities
  - 9.3 Confidentiality of Business Information
    - 9.3.1 Scope of Confidential Information
    - 9.3.2 Information Not Within the Scope of Confidential Information
    - 9.3.3 Responsibility to Protect Confidential Information
  - 9.4 Privacy of Personal Information
    - 9.4.1 Privacy Plan

- 9.4.2 Information Treated as Private
- 9.4.3 Information Not Deemed Private
- 9.4.4 Responsibility to Protect Private Information
- 9.4.5 Notice and Consent to Use Private Information
- 9.4.6 Disclosure Pursuant to Judicial or Administrative Process
- 9.4.7 Other Information Disclosure Circumstances
- 9.5 Intellectual Property Rights
- 9.6 Representations and Warranties
  - 9.6.1 CA Representations and Warranties
  - 9.6.2 RA Representations and Warranties
  - 9.6.3 Subscriber Representations and Warranties
  - 9.6.4 Relying Party Representations and Warranties
  - 9.6.5 Representations and Warranties of Other Participants
- 9.7 Disclaimers of Warranties
- 9.8 Limitations of Liability
- 9.9 Indemnities
- 9.10 Term and Termination
  - 9.10.1 Term
  - 9.10.2 Termination
  - 9.10.3 Effect of Termination and Survival
- 9.11 Individual Notices and Communications With Participants
- 9.12 Amendments
  - 9.12.1 Procedure for Amendment
  - 9.12.2 Notification Mechanism and Period
  - 9.12.3 Circumstances Under Which OID Must Be Changed
- 9.13 Dispute Resolution Provisions
- 9.14 Governing Law
- 9.15 Compliance With Applicable Law
- 9.16 Miscellaneous Provisions
  - 9.16.1 Entire Agreement
  - 9.16.2 Assignment
  - 9.16.3 Severability
  - 9.16.4 Enforcement (attorneys' fees and waiver of rights)
  - 9.16.5 Force Majeure
- 9.17 Other Provisions

# 1 Introduction

#### 1.1 Overview

PKloverheid is a public key infrastructure (PKI) set up at the initiative of the Dutch government, for the purpose of enabling and supporting electronic signatures, electronic authentication, and confidential electronic communication. Certificates issued within this PKI are highly reliable. Several trust service providers (TSPs) operate within this PKI, and are trusted to issue certificates. Root certificates in this PKI are signed by the Staat der Nederlanden (State of the Netherlands).

This CPS is applicable to the certificates issued within these G3 and G4 hierarchies:

- Staat der Nederlanden Root CA G3
  - Staat der Nederlanden Burger CA G3
    - Cleverbase ID PKIoverheid Burger CA G3
      - Authentication (2.16.528.1.1003.1.2.3.1)
      - Non-repudiation (2.16.528.1.1003.1.2.3.2)
      - Encryption (2.16.528.1.1003.1.2.3.3)
- Staat der Nederlanden G4 Root EUTL G-Sigs 2024
  - Staat der Nederlanden G4 Intm EUTL G-Sigs NP 2024
    - Cleverbase ID G4 PKIo EUTL G-Sigs NP 2025
      - Individual Validated eSignature (2.16.528.1.1003.1.2.44.14.11.5)

Cleverbase acts as a TSP within PKIoverheid. Cleverbase aims to provide citizens as well as businesses with the certificates they require to reliably and confidentially exchange information with each other, or with the government. To this end, Cleverbase is a Trust Service Provider (TSP) for certificate issuance. It uses a mobile app that it develops and provides itself.

Vidua is a registered trade name owned by Cleverbase ID B.V. Cleverbase uses Vidua as the public brand name for its products and in its product outings. All TSP operations are performed by Cleverbase in accordance with the provisions of this document. In order to provide the end users with a consistent experience, the service desk operated by Cleverbase also uses the Vidua brand name.

All certificate related key material is stored in a Trustworthy System Supporting Server Signing (TW4S) conform TS 119 431. Furthermore:

- The private key can only be used within a Hardware Security Module (HSM) in which it resides and assures SCAL 2:
- These HSMs are located in data centres, and are configured to grant exclusive control of keys to the respective certificate holder:
- The sole control can be exerted by means of a mobile application which is tied to the certificate holder's smartphone, and secured by a PIN of their choosing;
- The HSMs are operated by Cleverbase;
- The HSMs are physically and logically under Cleverbase's sole control.

#### 1.2 Document Name and Identification

This document is Cleverbase's Certification Practice Statement (CPS). It is based on the PKloverheid Programme of Requirements (PoR) (available at PKloverheid Programme of Requirements), ETSI standards EN 319 411-1 and EN 319 411-2 (both available at https://www.etsi.org/standards), Regulation (EU) 910/2014 (eIDAS) (32014R0910 - EN - EUR-Lex). Its structure is modelled after RFC 3647.

This CPS sets out the practices Cleverbase employs with regards to the issuance of certificates under both the G3 root and G4 roots of PKIOverheid. It falls under the scope of the Certificate Policy (CP) of the PKIoverheid Programme of Requirements. The PKIoverheid PoR assigns a separate Object Identifier (OID) to each combination of the target domain and intended certificate use:

The G3 Intermediate+TSP Civilian (2023) CP covers the following OIDs:

Use	Authenticity + OCSP responder	Non Repudiation	Encryption*
OID	2.16.528.1.1003.1.2.3.1	2.16.528.1.1003.1.2.3.2	2.16.528.1.1003.1.2.3.3

The G4 EUTL Generic Signatures NP TSP 2024 CP covers the following OIDs:

Us e	Individual validated eSignature	Regulated Profession Validated eSignature*	Sponsor Validated eSignature*	Regulated Profession with Sponsor Validated eSignature*	OCSP Delegated Responder**
OI	2.16.528.1.1003.	2.16.528.1.1003.1.2.44.	2.16.528.1.1003.	2.16.528.1.1003.1.2.44.14.14.5	2.16.528.1.1003.1
D	1.2.44.14.11.5	14.12.5	1.2.44.14.13.5		.2.44.14.19.10

<sup>\*</sup> Cleverbase does not currently issue these certificates.

<sup>\*\*</sup> Cleverbase does not issue OCSP delegated responder certificates to subscribers.

## 1.3 PKI Participants

The following participants in PKIoverheid are relevant here:

#### 1.3.1 Certification Authorities

Cleverbase is the Certification Authority (CA) responsible for issuing the certificates specified in section 1.2.

#### 1.3.2 Registration Authorities

Cleverbase is the Registration Authority (RA) responsible for evaluating applications for certificates, which includes establishing the identity of the certificate applicant. Once the RA has approved an application, the CA issues the requested certificate. Cleverbase's Registration Authority practices are described in its Identity Proofing Service Practice Statement (IPSPS).

#### 1.3.3 Subscribers

Within the scope of this document, a Subscriber is a natural person who has accepted Cleverbase's Terms and Conditions.

The certificate holder is the entity stated in the subject field of the certificate. The certificate holder is always the Subscriber.

#### 1.3.4 Relying Parties

A relying party may be any natural or legal person who, as a recipient of a certificate issued by Cleverbase, acts in reliance on that certificate and/or any digital signatures verified using that certificate. This CPS contains requirements for relying parties, please refer to section 4.5.2 and 4.9.6.

#### 1.3.5 Other Participants

Other participants under this CPS include regulatory and supervisory authorities, suppliers of hardware, software and equipment, as well as other supporting organisations. In particular, these include:

- The Policy Authority (PA). The PA's task is to develop and maintain the framework of standards that underlies PKloverheid, and to supervise, regulate and monitor its implementation. Logius fulfils this task on behalf of the State of the Netherlands.
- I4P, who manufacture the EN 419 221-5 certified Hardware Security Modules (HSMs) used to store Subscribers' private keys.

Cleverbase ensures that all participants meant under this paragraph act in accordance with the terms and policies laid down in this CPS. Cleverbase has appropriate controls in place to maintain adherence to said terms.

# 1.4 Certificate Usage

#### 1.4.1 Appropriate Certificate Uses

Certificate usage differs per certificate type. Before elaborating on each certificate type, the following general remarks must be made:

- Certificates must be used in accordance with the general terms and conditions that apply.
- No restrictions apply as to the value of the transaction for which the certificate is used.
- Certificates may be used in interactions with the State of the Netherlands as well as with other natural or legal persons.

Issued certificates may be used by individual natural persons. Different certificates are issued per type for authentication, confidential communication and electronic signatures. Certificates may only be used for the purpose for which they were issued. The table below shows these purposes per certificate. These purposes of use correspond to the keyUsage field in the certificate.

In G4 EUTL Natural Persons domain only certificates for electronic signatures (non repudiation) exist, authentication and Encryption are outphased.

	authenticity	encryption	signature
Citizen (G3) Domain (section 3c PoR)	digitalSignature	keyEncipherment dataEncipherment	nonRepudiation
EUTL Natural Persons (G4) Domain	-	-	nonRepudiation

#### 1.4.2 Prohibited Certificate Uses

All other certificate usage types than the ones stated in section 1.4.1 are prohibited.

#### 1.5 Policy Administration

#### 1.5.1 Organization Administering the Document

Cleverbase assesses this CPS and corrects any errors or omissions at least once a year.

Minor/administrative revisions will be done without prior announcement. Revisions that might affect the acceptance of the service or its terms will be communicated to subscribers and relying parties on the public website prior to them coming into force.

With minor revisions the version number will increase by 0.1, major revisions lead to a new version.

# 1.5.2 Contact Person

Please address any enquiries about the CPS or other communications to klantenservice@vidua.nl

Or, alternatively, to:

Cleverbase ID B.V. Maanweg 174 2516AB, 's-Gravenhage

# 1.5.3 Person Determining CPS Suitability for the Policy

The PA determines the suitability of this CPS in respect of their CP.

#### 1.5.4 CPS Approval Procedures

The TSP's management has the final authority for approval of the CPS. In case of minor changes, they have delegated approval authority.

# 1.6 Definitions and Acronyms

Abbrevi ation	Definition	
CA	Certificate Authority. The system entity that issues and manages digital certificates to authenticate the identity of users	
CPS	Certification practice statement. This document, outlining the policies, procedures, and practices employed by Cleverbae in issuing and managing digital certificates within the framework of trust services.	
CRL	Certificate Revocation list. A list of certificates that have been revoked by the issuing Certificate Authority.	
HSM	Hardware Security Module. Dedicated hardware device that securely generates, stores, and manages cryptographic keys used for digital signatures and other cryptographic operations to enhance the security of electronic transactions	
IPSPS	Identity Proofing Service Practice Statement	
OCSP	Online Certificate Status Protocol. A protocol which checks the status of a requested certificate.	
OID	Object Identifier. A unique number representing a certain object and/or name.	
PKI	Public Key Infrastructure. A digital framework for issuing and managing certificates.	
RA	Registration Authority. The system entity responsible for verifying the identity of individuals before the issuance of digital certificates by a Certificate Authority	
SIC	Signer's Interaction Component, the app that is bound to the Subscriber's phone and is used to prove possession of the private key	
TSP	Trust Service Provider. The entity that offers electronic trust services while adhering to regulatory standards and requirements	
TW4S	Trustworthy Systems Supporting Server Signing.	

# 2 Publication and Repository Responsibilities

# 2.1 Repositories

Cleverbase has an electronic repository holding:

- · Documentation dissemination;
- · Certificates;
- Certificate status service.

The CA public key is not part of Cleverbase's electronic repository but can be retrieved via https://cert.pkioverheid.nl/.

#### 2.2 Publication of Certification Information

This CPS is available 24 hours a day and 7 days a week via pki.cleverbase.com/cps.pdf. Subscribers can access their valid certificates 24 hours a day and 7 days a week. The maximum recovery time for availability of the CPS and certificates is 24 hours.

Other documents in the documentation dissemination service are available via vidua.nl/legal:

- the general terms and conditions;
- the PKI Disclosure Statement;
- test certificates;
- the privacy statement.

# 2.3 Time or Frequency of Publication

The publication frequency for the different documents in the Documentation Dissemination Service is as follows:

- The Certification Practice Statement is published after a revision and at least annually.
- The general terms and conditions are published after a revision.
- The PKI Disclosure Statement is published after a revision.
- The certificates are published immediately after a successful registration.
- The certificate status service is updated within 24 hours after a successful revocation.

#### 2.3.1 Accessibility of repositories

- Earlier versions of the CPS, the general terms and conditions and product conditions are available on the Cleverbase public website vidua.nl/legal.
- The (end user) certificates are accessible for certificate holders and can only be shared with relying parties with consent by the certificate holder.

## 2.4 Access Controls on Repositories

The electronic repository is accessible as described in the previous section. It is secured against unauthorised modifications. Only the TSP has writing permissions for the electronic repository.

# 3 Identification and Authentication

# 3.1 Naming

# 3.1.1 Types of Names

The certificate holder is identified in the subject field of the certificate with a distinguished name (DN) as meant in X.509. Required DN components differ for various certificate types:

	Citizen (G3) and EUTL Natural Persons (G4) Domain
serialNumber	personal number, uniquely identifying the certificate holder in Cleverbase's systems
commonName	certificate holder's name as listed by Cleverbase's identity proofing service
countryName	certificate holder's country of residence according to the nationality as listed by Cleverbase's identity proofing service
givenName	all given names of the certificate holder as listed by Cleverbase's identity proofing service
surname	the certificate holder's surname as listed by Cleverbase's identity proofing service

Please refer to the certificate profiles as described in Chapter 7 of this document for more information.

#### 3.1.2 Need for Names to be Meaningful

Each DN has a meaningful relation to the represented entity.

# 3.1.3 Anonymity or Pseudonymity of Subscribers

Pseudonymous or anonymous certificates are not allowed.

# 3.1.4 Rules for Interpreting Various Name Forms

All names are used as listed by the Identity Proofing Service.

# 3.1.5 Uniqueness of Names

Each DN is unique.

#### 3.1.6 Recognition, Authentication, and Role of Trademarks

No stipulation.

# 3.2 Initial Identity Validation

Initial identity validation is carried out by Cleverbase's Identity Proofing Service. Prior to Identity Validation, the following steps are completed:

- The user installs SIC app, which is bound to the user's phone
- The user accepts the Terms and Conditions
- The user chooses a PIN
- The user submits email address
- Cleverbase verifies email address

After successfully completing identity proofing, the certificate application is completed. A key pair is assigned to the user and corresponding certificates are issued.

#### 3.2.1 Method to Prove Possession of Private Key

The subscriber proves possession of their private key by entering their PIN into their SIC app.

#### 3.2.2 Authentication of Organization Identity

Not supported for certificates in the Citizen (G3) and EUTL Natural Persons (G4) domains.

#### 3.2.3 Authentication of Individual Identity

Authentication of individual identity is done by Cleverbase's Identity Proofing Service.

#### 3.2.4 Non-verified Subscriber Information

No stipulation.

# 3.2.5 Validation of Authority

Not supported for certificates in the Citizen (G3) and EUTL Natural Persons (G4) domains.

#### 3.2.6 Criteria for Interoperation

No stipulation.

# 3.3 Identification and Authentication for Re-key Requests

Re-key of certificates is not supported.

#### 3.3.1 Identification and Authentication for Routine Re-key

No stipulation.

# 3.3.2 Identification and Authentication for Re-key After Revocation

No stipulation.

# 3.4 Identification and Authentication for Revocation Requests

Certificate holders can identify for revocation requests in any of the following ways:

- Certificate holders use the revocation code provided to them through email and enter it in the public section of Cleverbase's website. The revocation is used as a means for identification and authentication.
- Certificate holders contact Cleverbase by phone and answer some questions relating to their personal data, by which the revocation officer establishes their identity.
- Certificate holders send an email to Cleverbase, providing their full name, date of birth, place of birth.

# 4 Certificate Life-Cycle Operational Requirements

# 4.1 Certificate Application

#### 4.1.1 Who Can Submit a Certificate Application

Certificate applications are submitted through Cleverbase's RA.

# 4.1.2 Enrolment Process and Responsibilities

The Subscriber is responsible for adhering to the requirements laid down in the Terms and Conditions and Certification Practice Statement. Certificate issuance is subject to the Terms and Conditions and the Certification Practice Statement that were actual and accepted at the beginning of the certificate application process. In the exceptional case that a new CPS or new Terms and Conditions are published within the timespan of the Subscriber accepting them and completing the process, the accepted versions remain the applicable ones.

If the Subscriber uses the Identity Proofing Service, they are also responsible for adhering to the requirements laid down in the Identity Proofing Service Practice Statement and the Product Terms and Conditions.

The Subscriber is responsible for providing Cleverbase with correct and actual information at all times. If there are indications that any information that is provided is not correct or actual, Cleverbase is responsible for denying the certificate application.

# 4.2 Certificate Application Processing

#### 4.2.1 Performing Identification and Authentication Functions

Please refer to section 4.1.

#### 4.2.2 Approval or Rejection of Certificate Applications

Please refer to section 4.1.

# 4.2.3 Time to Process Certificate Applications

The usual time to process the application is within a day. This can take up to 5 working days when additional personal identity validation is required.

#### 4.3 Certificate Issuance

# 4.3.1 CA Actions During Certificate Issuance

The CA only issues certificates after the RA has approved Identity Proofing.

#### 4.3.2 Notification to Subscriber by the CA of Issuance of Certificate

Subscriber receives an email notification after issuance of the certificates.

# 4.4 Certificate Acceptance

#### 4.4.1 Conduct Constituting Certificate Acceptance

Certificates in the Citizen (G3) and EUTL Natural Persons (G4) domains are accepted by implication.

#### 4.4.2 Publication of the Certificate by the CA

The certificates are published in the electronic repository, please refer to section 2.2.

#### 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

Any agreement entered into by a subscriber and a certificate holder entails their obligation to use the certificate in accordance with this CPS, the general terms and conditions, and the usage purposes described in the certificate (please refer to section 1.4).

#### 4.5.2 Relying Party Public Key and Certificate Usage

Before trusting a certificate, relying parties should check the:

- 1. certificate's validity and the entire certificate chain belonging to it up to the root certificate at the moment they trust it, by consulting certificate status information (please refer to section 4.1);
  - For a certificate to be relied upon as an EU qualified certificate, the CA/trust anchor for the validation of the
    certificate shall be as identified in a service digital identifier of an EU trusted list entry with the service type
    identifier https://uri.etsi.org/TrstSvc/Svctype/CA/QC/. ETSI TS 119 615 provides guidance for relying parties
    on how to validate a certificate against the EU trusted lists.
- 2. certificate usage in accordance with the usage purposes described in the certificate (please refer to section 1.4) and general terms and conditions and product conditions.

#### 4.6 Certificate Renewal

Certificate renewal is not supported. If a certificate holder applies for a new certificate with a new key pair, the same procedures as during initial certificate application are followed. Any changes in terms or conditions resulting from interim reviews are pointed out during application.

#### 4.6.1 Circumstance for Certificate Renewal

No stipulation, please refer to section 4.6.

#### 4.6.2 Who May Request Renewal

No stipulation, please refer to section 4.6.

## 4.6.3 Processing Certificate Renewal Requests

No stipulation, please refer to section 4.6.

#### 4.6.4 Notification of New Certificate Issuance to Subscriber

No stipulation, please refer to section 4.6.

# 4.6.5 Conduct Constituting Acceptance of a Renewal Certificate

No stipulation, please refer to section 4.6.

# 4.6.6 Publication of the Renewal Certificate by the CA

No stipulation, please refer to section 4.6.

#### 4.6.7 Notification of Certificate Issuance by the CA to Other Entities

No stipulation, please refer to section 4.6.

# 4.7 Certificate Re-key

Certificate re-key is not supported.

#### 4.7.1 Circumstance for Certificate Re-key

No stipulation, please refer to section 4.7.

# 4.7.2 Who May Request Certification of a New Public Key

No stipulation, please refer to section 4.7.

#### 4.7.3 Processing Certificate Re-keying Requests

No stipulation, please refer to section 4.7.

# 4.7.4 Notification of New Certificate Issuance to Subscriber

No stipulation, please refer to section 4.7.

# 4.7.5 Conduct Constituting Acceptance of a Re-keyed Certificate

No stipulation, please refer to section 4.7.

# 4.7.6 Publication of the Re-keyed Certificate by the CA

No stipulation, please refer to section 4.7.

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

No stipulation, please refer to section 4.7.

#### 4.8 Certificate Modification

Modification of certificate data is not included in the service. The general terms and conditions oblige certificate holders to have their certificates revoked if certificate data is no longer correct. They can apply for a new certificate with modified data if desired.

#### 4.8.1 Circumstance for Certificate Modification

No stipulation, please refer to section 4.8.

#### 4.8.2 Who May Request Certificate Modification

No stipulation, please refer to section 4.8.

## 4.8.3 Processing Certificate Modification Requests

No stipulation, please refer to section 4.8.

#### 4.8.4 Notification of New Certificate Issuance to Subscriber

No stipulation, please refer to section 4.8.

# 4.8.5 Conduct Constituting Acceptance of Modified Certificate

No stipulation, please refer to section 4.8.

# 4.8.6 Publication of the Modified Certificate by the CA

No stipulation, please refer to section 4.8.

### 4.8.7 Notification of Certificate Issuance by the CA to Other Entities

No stipulation, please refer to section 4.8.

# 4.9 Certificate Revocation and Suspension

A certificate can be revoked under certain circumstances. The TSP will then add it to the CRL and an OCSP request will return its status as revoked. This section describes under which circumstances, by whom and in which way a certificate can be revoked.

#### 4.9.1 Circumstances for Revocation

A certificate can be revoked under the following circumstances:

- 1. The subscriber requests a revocation;
- Confidentiality of the private key corresponding to the certificate's public key was presumably compromised.
   Cases include those in which a mobile phone on which the SIC app was installed was lost or stolen, or confidentiality of the PIN was compromised;
- 3. The certificate holder fails to comply with their obligations based on this CPS or the agreement closed with them:
- 4. Information in the certificate is not or no longer correct and up-to-date, or information in the certificate is misleading;
- 5. There are indications that the certificate is being misused;
- 6. The certificate appears not to have been issued following the proper procedures in retrospect;
- 7. The TSP terminates its activities with no other TSP taking over the CRL and OCSP services;
- 8. The TSP suspects the CA private key used to issue the certificate to be compromised;
- 9. The policy authority of PKloverheid determines that the certificate does not meet requirements;
- 10. Revoking the certificate can help prevent or fight a calamity;
- 11. Other circumstances occur which, in the TSP's view, justify revoking the certificate in order to sustain trust in the public key infrastructure;
- 12. The subscriber, who is a natural person, has passed away;
- 13. The subscriber indicates that the original certificate request was not authorized and does not retroactively grant authorization:
- 14. The certificate was issued in violation of the then-current version of these requirements;
- 15. The subscriber has successfully applied for new certificates; existing, valid certificates of the same type are automatically revoked.

#### 4.9.2 Who Can Request Revocation

A certificate may be revoked at the initiative of:

- 1. the TSP itself:
- 2. the certificate holder:
- 3. the subscriber.

As the TSP can itself initiate certificate revocation, anyone who is aware of a circumstance that could lead to revocation may inform the TSP without obligation. Revocation can then proceed if the TSP sees a reason for it.

#### 4.9.3 Procedure for Revocation Request

Certificate holders can revoke their own certificates through the TSP's web portal at any moment using the revocation code provided to them by email during application. Each of the parties mentioned in section 4.9.2 can request revocation by contacting the TSP's customer service by phone during opening hours. For non-urgent revocation requests outside office hours, an email can be sent to the customer service. These emails will be processed during opening hours. For office hours and contact details, please refer to the website, https://vidua.nl.

If the TSP revokes a certificate on its own initiative, it will explain why it does so.

If the revocation service is disrupted for whatever reason, the TSP ensures the disruption is corrected within 24 hours.

If the TSP receives information that in itself does not imply a revocation request but contains indications of a problem concerning a certificate, the TSP will set up an investigation that can possibly entail revocation within 24 hours, or as fast as possible during office hours.

Certificate holders who themselves revoke certificates by using the web portal, by phone or by email receive confirmation as soon as revocation is successful.

When a certificate holder issues a revocation request, they must identify and authenticate themselves. The method for this differs per method for revocation and is described in section 3.4.

#### 4.9.4 Revocation Request Grace Period

No stipulation.

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

Revocation is effectuated within a maximum of 24 hours after receipt of an authenticated request for revocation as specified in section 4.9.3.

If a revocation request cannot be confirmed within 24 hours, Cleverbase will determine a course of action in coordination with the supervisory body RDI.

#### 4.9.6 Revocation Checking Requirement for Relying Parties

The CRL and OCSP are publicly available at the repository (please refer to section 2.1).

#### 4.9.7 CRL Issuance Frequency (if applicable)

The CRL is updated at least every 24 hours. Please refer to section 2.3.

#### 4.9.8 Maximum Latency for CRLs (if applicable)

No stipulation.

#### 4.9.9 On-line Revocation/Status Checking Availability

Please refer to section 2.1.

#### 4.9.10 On-line Revocation Checking Requirements

Please refer to section 2.1.

# 4.9.11 Other Forms of Revocation Advertisements Available

No stipulation.

#### 4.9.12 Special Requirements Related to Key Compromise

Revocation of the TSP certificate will be considered if the signing key belonging to the certificate is compromised or suspected to be compromised. Indicators of private key compromise may include:

- Theft or loss of device holding a private key;
- · Audit findings indicating private key compromise;
- Incidents reported to Logius by third parties which may indicate key compromise.

All indicators are registered, analysed, and followed up accordingly. In case of a key compromise, the certificate holder must revoke their certificate immediately through one of the methods described in section 3.4 Identification and Authentication for Revocation Requests.

# 4.9.13 Circumstances for Suspension

The TSP does not support certificate suspension. Certificates cannot be revoked or deactivated temporarily or reinstated after revocation.

#### 4.9.14 Who Can Request Suspension

No stipulation, the TSP does not support certificate suspension.

#### 4.9.15 Procedure for Suspension Request

No stipulation, the TSP does not support certificate suspension.

#### 4.9.16 Limits on Suspension Period

No stipulation, the TSP does not support certificate suspension.

#### 4.10 Certificate Status Service

#### 4.10.1 Operational Characteristics

The TSP offers a certificate status service allowing to check the validity of certificates. The addresses for consulting this service are shown in the certificate and follow here:

- G3 Citizen Domain CRL: http://pki.cleverbase.com/cleverbase3c.crl
- G3 Citizen Domain OCSP: http://pki.cleverbase.com/ocsp/3c
- G4 EUTL Natural Person Domain CRL: [http://pki.cleverbase.com/cleverbase-g4-np.crl]
- G4 EUTL Natural Person Domain OCSP: [http://g4-np-ocsp.cleverbase.com]

The TSP uses both a CRL and the OCSP protocol.

Certificates are included in the CRL until their initial validity has expired. Under normal circumstances, response time is ten seconds or less.

The OCSP protocol is supported using the POST method. Under normal circumstances, response time is ten seconds or less. As a minimum, the OCSP response is always as up-to-date as the CRL, because it is updated real-time. The OCSP response is positive if and only if the TSP's administration confirms that the certificate was issued by the TSP and is still valid. The OCSP service supplies information on the certificate validity until at least six months after its expiration.

In case of a difference in CRL and OCSP response (for instance, when the CRL nears its update interval), the OCSP response prevails.

In the circumstance of a CA key compromise, the OCSP service will continue to be available.

# 4.10.2 Service Availability

The electronic repository is available 24 hours a day and 7 days a week.

#### 4.10.3 Optional Features

No stipulation.

# 4.11 End of Subscription

After expiration of a certificate's validity, the TSP invites the subscriber to renew the certificate. If the certificate is not renewed (timely), the agreement between the TSP and the subscriber ends as of right. The certificate expires automatically. The TSP retains the data regarding the certificate for another seven years.

If a certificate is revoked based on section 4.9, and the subscriber does not apply for a new certificate, the agreement between the TSP and the subscriber ends as of right. The TSP retains the data regarding the certificate for another seven years.

#### 4.12 Key Escrow and Recovery

The TSP does not support key escrow.

#### 4.12.1 Key Escrow and Recovery Policy and Practices

The TSP does not support key escrow.

#### 4.12.2 Session Key Encapsulation and Recovery Policy and Practices

The TSP does not support key escrow.

# 5 Facility, Management and Operational Controls

# **5.1 Physical Controls**

#### 5.1.1 Site Location and Construction

Cleverbase has multiple physical sites:

#### The Hague site

The TSP is based in a shared office building in The Hague. This office has a lockable door, the keycards of which are kept by Cleverbase.

#### **Delft and Rotterdam sites**

The TSP's data centers are based in Rotterdam and Delft and are administered by one and the same external party and are secured in the same way.

The data centers are guarded 24/7. All rooms in the datacenter have CCTV observation. Visitors must identify themselves and are escorted to their destinations. All visits are logged. The cabinet containing the equipment owned by the TSP is used exclusively by the TSP and is lockable.

Within the datacenter, controls are in place to ensure security in emergencies. For use during power outings, an emergency power unit is available, which is tested at least once every three months. A climate control system ensures stable air supply, temperature, and air humidity. The rooms are equipped with moisture detection sensors. A sophisticated fire extinction system is installed.

Storage is redundant by default with copies distributed over two different data centers as a minimum. Storage media that are no longer in use will be destroyed.

#### 5.1.2 Physical Access

Please refer to section 5.1.1.

## 5.1.3 Power and Air Conditioning

Please refer to section 5.1.1.

#### 5.1.4 Water Exposures

Please refer to section 5.1.1.

# 5.1.5 Fire Prevention and Protection

Please refer to section 5.1.1.

#### 5.1.6 Media Storage

Media is stored in on-site safes.

## 5.1.7 Waste Disposal

Adequate measures are taken to dispose of sensitive information.

#### 5.1.8 Off-site Backup

No stipulation.

#### 5.2 Procedural Controls

#### 5.2.1 Trusted Roles

The TSP's staff members are assigned various trusted roles with corresponding responsibilities. Their authorizations correspond to their roles. Roles include:

- 1. Security officers: overseeing that established security guidelines are implemented and observed.
- 2. System auditors: having a supervising role and assessing independently how business processes are arranged/organised and to what extent reliability requirements are met.
- 3. System administrators: administering the TSP systems, including installation, configuration, and maintenance of the systems.
- 4. System operators: responsible for the daily management of the TSP-systems.
- 5. Registration officers: responsible for manually processing revocation requests

#### 5.2.2 Number of Persons Required per Task

Cleverbase's critical processes are under dual control. What processes these are is defined in internal policy documents. When deciding the number of persons required for a task, the IPSP takes into account, at a minimum:

- Potential impact of genuine mistakes
- Yield of executing a task fraudulently on purpose

#### 5.2.3 Identification and Authentication for Each Role

No stipulation.

#### 5.2.4 Roles Requiring Separation of Duties

Cleverbase internally maintains a role separation matrix in which it clarifies what duties can and cannot be combined. The separation of duties considers at a minimum:

- Risk of commercial pressure compromising decisions for security personnel
- Separation of administration, operation, and evaluation tasks

#### **5.3 Personnel Controls**

#### 5.3.1 Qualifications, Experience, and Clearance Requirements

All organisation members undergo background screening before entering into service with Cleverbase. Clearance is, at a maximum, granted up to the level required for an organisation member to fulfil their role.

#### 5.3.2 Background Check Procedures

Please refer to section 5.3.1.

#### 5.3.3 Training Requirements

Organisation members have sufficient knowledge and expertise to fulfil their tasks within the TSP. In particular, the TSP ensures that they are trained in TSP-specific procedures.

# 5.3.4 Retraining Frequency and Requirements

Regular retraining is performed for the TSP roles.

#### 5.3.5 Job Rotation Frequency and Sequence

No stipulation.

#### 5.3.6 Sanctions for Unauthorised Actions

Unpermitted actions by organisation members may entail disciplinary measures by the TSP's management.

#### 5.3.7 Independent Contractor Requirements

Contractors are subject to the same requirements described in section 5.3.1.

# 5.3.8 Documentation Supplied to Personnel

The TSP provides the personnel with the documentation required in order to perform the TSP roles.

# 5.4 Audit Logging Procedures

#### 5.4.1 Types of Events Recorded

The TSP records various events for periodic audit purposes:

- CA key life-cycle events:
  - o Generation, backup, storage, recovery, archiving and destruction of the CA key
- Certificate life-cycle events:
  - Preparation of the keys in Vidua TW4S system
  - Certificate generation
  - o Certificate revocation
  - o Certificate acceptance and rejection
  - Generation of the CRL and OCSP entries
- System events:
  - o Software installations, updates or removal
  - o Installation or removal of storage media
  - Access to the physically secured room housing the systems
  - Hardware security module (HSM) installation, updates, or removal
- · Events involving:
  - Routers, firewalls, and network system components
  - Database activities and events
  - Transactions
  - Operating systems
  - Access control systems
  - Mail servers
  - Successful and unsuccessful attacks on PKI systems
  - o Activities of staff in PKI systems
  - System failure, hardware failure and other irregularities
  - Firewall and router activities
  - Physical entry to and exit from the CA room
  - o Reading, writing and deleting data
  - Profile modifications

The following data are included in the audit log, if applicable:

- Source IP address
- Target IP address
- Date and time
- User ID
- Name and description of the event

#### 5.4.2 Frequency of Processing Log

Audit logs are processed following previously mentioned events. Logs are provided with a timestamp using a clock that is synchronised at least once a day with a trusted time source.

#### 5.4.3 Retention Period for Audit Log

Audit logs are stored and accessible for ten years.

#### 5.4.4 Protection of Audit Log

The Audit Log is protected from modification. The Audit Log is subject to back-up procedures to ensure its continued availability. The Audit Log is protected against unauthorised consultation.

#### 5.4.5 Audit Log Backup Procedures

Audit Log backups are encrypted and stored at more than one location.

#### 5.4.6 Audit Collection System (Internal vs. External)

Audit logs are collected internally. Upon unavailability of the audit log, any process that requires audit logging is interrupted until the audit log is available again.

#### 5.4.7 Notification to Event-causing Subject

Audit logging is a standard process and event-causing subjects are, as a rule, not informed they are causing an event.

#### 5.4.8 Vulnerability Assessments

The audit log and components supporting the audit log are in scope of the TSP's vulnerability management policy and procedures.

#### 5.5 Records Archival

#### 5.5.1 Types of Records Archived

All data that can be relevant for the compliance audit is archived. As a minimum, this data includes the certificate life-cycle and private key usage. Data subject to archiving may be collected from audit logs, databases or in physical documents. These are all archived appropriately. Private keys are not archived.

#### 5.5.2 Retention Period for Archive

Archives are retained for ten years.

#### 5.5.3 Protection of Archive

Archives are secured against unauthorised access and are, as a rule, accessible only for management and internal and external auditors. These may, however, grant access to (part) of the archives to others, if, and only if, those others need this for their tasks.

Archives are secured against modification and deletion. To this end, both organisational and technical controls are in place. Archives are also protected against storage media deterioration. The archives are stored on monitored, redundant hard disks (at least N+1).

#### 5.5.4 Archive Backup Procedures

The entire archive is backed up off-site.

## 5.5.5 Requirements for Time-stamping of Records

Records are provided with a timestamp using a clock that is synchronised at least once a day.

#### 5.5.6 Archive Collection System (Internal or External)

Please refer to section 5.5.3 and 5.5.4.

#### 5.5.7 Procedures to Obtain and Verify Archive Information

No stipulation.

# 5.6 Key Changeover

The CA key has a validity term established by the policy authority of PKloverheid after which it expires. There is no key changeover of this CA key.

## 5.7 Compromise and Disaster Recovery

The TSP has processes in place for handling calamities. A calamity is a situation in which the integrity of certificates is impaired by a cause within the TSP's sphere of influence. Such situations include, among others:

- · Compromise of the CA key
- · Large-scale compromise of integrity or confidentiality of user data
- Service unavailability considerably exceeds service level agreements

#### 5.7.1 Incident and Compromise Handling Procedures

The TSP has processes in place for handling (security) incidents.

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

No stipulation.

#### 5.7.3 Entity Private Key Compromise Procedures

No stipulation.

#### 5.7.4 Business Continuity Capabilities After a Disaster

The TSP has a Business Continuity Plan in place describing the measures to prevent a disruptive incident or disaster from occurring. If such an event were to take place, the measures and services to return to the default situation are described.

#### 5.8 CA or RA Termination

Should the TSP decide to terminate its CA activities, the termination plan becomes effective, ensuring that termination proceeds in a controlled way. As a minimum, the plan provides measures to inform the supervisors (Rijksinspectie Digitale Infrastructuur and Logius), subjects, suppliers and other parties involved; to ensure certificate revocation remains possible for as long as unrevoked certificates are in use. The certificate status will be available for as long as is minimally required: after all certificates in its scope are either expired or revoked a last CRL will be issued with its nextUpdate value set to 99991231235959Z, the OCSP service will go offline. All data collected by the TSP for registration purposes will be archived in such a way that its confidentiality remains ensured, and that continues to enable the necessary retrieval of records.

At termination the TSP will try to transfer the service CA provision to another TSP, in order to minimise inconveniences for Subscribers.

The termination plan is revised annually.

RA termination is covered by the IPSPS.

# **6 Technical Security Controls**

# 6.1 Key Pair Generation and Installation

#### 6.1.1 Key Pair Generation

#### The CA key pair

The key pair of each TSP CA are generated in a cryptographic module (HSM) belonging to the TSP CA. The public part of the TSP CA key is physically transferred to the intermediate CA in the form of a certificate signing request (PKCS#10), on the basis of which the intermediate CA generates the TSP CA certificate. The HSM of the TSP CA is configured in such a way that the TSP CA private key can exclusively be used for CRL generation or certificate generation by the CA system.

#### The personal certificate key pair

The key pair of personal certificate is generated inside the EN 419 221-5 certified HSM.

The public part of the key of a personal certificate is presented to the CA in the form of a certificate signing request, on the basis of which the HSM signs the certificate. This procedure is executed in the secured environment of the TSP's datacenter.

#### 6.1.2 Private Key Delivery to Subscriber

Please refer to section 6.1.1.

#### 6.1.3 Public Key Delivery to Certificate Issuer

Please refer to section 6.1.1.

#### 6.1.4 CA Public Key Delivery to Relying Parties

The Cleverbase CA public key is published through the TSP Dissemination Service.

## 6.1.5 Key Sizes

The TSP CA uses a key length of 2048 or 4096 and cryptographic algorithm SHA256 with RSA encryption.

#### 6.1.6 Public Key Parameters Generation and Quality Checking

No stipulation.

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

Key usage is in accordance with the certificate profile, as described in Chapter 7.

# 6.2 Private Key Protection and Cryptographic Module Engineering Controls

#### 6.2.1 Cryptographic Module Standards and Controls

The G3 CA private key is generated within a Cryptographic Module that meets the requirements identified in FIPS 140-2 level 3 certified HSM. The G4 CA private key is generated in EN 419 221-5 certified device (CC EAL4+).

The subject private keys in a EN 419 221-5 certified device and usage is enforced using EN 419 241-2 certified SAM.

The certification status of the Cryptographic Module is actively monitored. In the case of modification of the status, the necessary actions will be taken to ensure the Cryptographic Module in use meets the applicable requirements.

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

All operations performed on the cryptographic module are under dual control.

#### 6.2.3 Private Key Escrow

The TSP does not support key escrow.

#### 6.2.4 Private Key Backup

The CA private key is backed up by authorised personnel within strict procedures onto multiple secure storage system which are stored in a safe.

#### 6.2.5 Private Key Archival

The TSP does not support private key archival.

#### 6.2.6 Private Key Transfer Into or From a Cryptographic Module

Please refer to section 6.2.4.

# 6.2.7 Private Key Storage on Cryptographic Module

Please refer to section 6.2.8.

## 6.2.8 Method of Activating Private Key

End user private keys are stored in a trustworthy system supporting server signing (TW4S), therefore their protection is ensured.

The private keys are generated inside a CEN EN 419 221-5 certified HSM device. The private keys activation in ensured by CEN EN 419 241-2 certified SAM device. The SIC mobile app generates SAD based on PIN and sends to SAM for private key activation using SAP.

The CA signing key can only be activated and used within the CA operational environment.

# 6.2.9 Method of Deactivating Private Key

No stipulation.

#### 6.2.10 Method of Destroying Private Key

Destroying a Private Key comprises of removing it from both active and back-up HSMs.

# 6.2.11 Cryptographic Module Rating

Please refer to section 6.2.1.

# 6.3 Other Aspects of Key Pair Management

#### 6.3.1 Public Key Archival

Public keys are available to the subject via the TSP's user portal and archived for ten years.

#### 6.3.2 Certificate Operational Periods and Key Pair Usage Periods

User certificate operational periods are as follows:

- G3 User certificates issued prior to 11/11/2025 have an active operational life cycle of three years after which they automatically expire.
- G3 User certificates issued after 11/11/2025 have an active operational life cycle of two years after which they
  automatically expire.
- G4 User certificates have an active operational life cycle of three years after which they automatically expire.

Keys are only usable during the operational period of the user certificate and as such their usage period is the same as the operation period of the certificate.

#### 6.4 Activation Data

#### 6.4.1 Activation Data Generation and Installation

End user keys are stored in a trustworthy system supporting server signing (TW4S), therefore their protection is ensured. The end user keys can be used in the HSM, which is configured in such a way that usage is only possible after users enter their PIN in the SIC app.

The cryptographic module containing the CA keys is activated according to the hardware manufacturer's specifications and meets the security requirements of FIPS 140-2 Level 3 (G3) or Common Criteria EAL 4 (G4). This ensures a high level of protection against unauthorized access and tampering.

#### 6.4.2 Activation Data Protection

Please refer to section 6.4.1.

# 6.4.3 Other Aspects of Activation Data

No stipulation.

# 6.5 Computer Security Controls

#### 6.5.1 Specific Computer Security Technical Requirements

The TSP has a great number of security controls (based on the TSPs security policies) in place

- Two-factor authentication for systems,
- Cryptographically secured connections,
- Cryptographically secured audit logs
- Separation in development, acceptance and production environments
- Network zoning, physical and logical access control, hardening of systems
- Risk based logging, monitoring and alerting implemented
- Trusted roles assigned and training for operating these systems
- Security assessments; including vulnerability scanning and penetration testing

With significant changes or at least once per year, the configuration of the security controls of the TSP systems and compliance to the TSP security policies is assessed based on a risk assessment.

Taken together, these security controls ensure that the systems used by TSP can be considered 'trustworthy systems' as meant in CEN/TS 419261. An IT audit statement was issued to this effect. Furthermore the security processes comply with the specific requirements in ETSI EN 319 411-1, ETSI EN 319 411-2 and ISO/IEC 27001 to which Cleverbase is certified against.

#### 6.5.2 Computer Security Rating

Please refer to section 6.5.1.

# 6.6 Life Cycle Security Controls

## 6.6.1 System Development Controls

Please refer to section 6.5.1.

#### 6.6.2 Security Management Controls

Please refer to section 6.5.1.

# 6.6.3 Life Cycle Security Controls

Please refer to section 6.5.1.

# 6.7 Network Security Controls

Please refer to section 6.5.1.

#### 6.8 Time-stamping

Please refer to section 5.4.2.

# 7.1 Certificate Profile

The Citizen Domain (G3) certificate has the following profile:

field		crit ical	Citizen (G3) Domain (3c)
The Citizen Doma the following prof			2 (version 3)
SerialNumber			[number unique to the CA, including at least 64 bits of unpredictable random data created by a Cryptographically Secure Pseudo Random Number Generator]
Signature			Sha-256WithRSAEncryption (1.2.840.113549.1.1.11)
	commonName (2.5.4.3)		Cleverbase ID PKIoverheid Burger CA - G3
lssuer*	organizationId entifier (2.5.4.97)		NTRNL-67419925
	organizationN ame (2.5.4.10)		Cleverbase ID B.V.
	countryName (2.5.4.6)		NL
Validity	notBefore		[date of issue] (Time stamps mentioned here may deviate a few minutes, cf. RFC 4270, [section 5.1])
	notAfter		[date of issue + 730 days or date of issue + 1095 days]
	serialNumber		
	commonName		See [section 3.1]
Subject*	countryName		Cleverbase does not apply size limits to the givenName and surName attributes; the total number of characters of both attributes is limited to 64 characters. This limit is also applied to the commonName attribute.
	givenName		
	surName		
	algorithm		rsaEncryption (1.2.840.113549.1.1.1)
subjectPublicK eyInfo	subjectPublic Key		[certificate holder's public key]
authorityKeyld entifier (2.5.29.35)	keyldentifier	No	[sha1 hash of CA's public key]
subjectKeylden tifier (2.5.29.14)	keyldentifier	No	[sha1 hash of the public key in the certificate]
			Authenticity certificate: digitalSignature (1000 0000 0)
keyUsage (2.5.29.15)		Yes	Encryption certificate: keyEncipherment dataEncipherment (0011 0000 0)
			Non-repudiation certificate: nonRepudiation (0100 0000 0)
certificatePolici es (2.5.29.32)	policyldentifie r	No	Authenticity certificate: 2.16.528.1.1003.1.2.3.1

field		crit ical	Citizen (G3) Domain (3c)
			Encryption certificate:
			2.16.528.1.1003.1.2.3.3
			Non-repudiation certificate: 2.16.528.1.1003.1.2.3.2
	cPSuri (1.3.6.1.5.5.7. 2.1)		https://pki.cleverbase.com/cps.pdf
	userNotice (1.3.6.1.5.5.7. 2.2)	_	Reliance on this certificate by any party assumes acceptance of the relevant Cleverbase Certification Practice Statement and other documents in the Cleverbase repository.
subjectAltNam e (2.5.29.17)	otherName	No	MS UPN: [Subject.serialNumber]@2.16.528.1.1003.1.3.3.4.1
CRLDistributio nPoints (2.5.29.31)	FullName	No	http://pki.cleverbase.com/cleverbase3c.crl
			Authenticity certificate:
			clientAuthentication (1.3.6.1.5.5.7.3.2)
			documentSigning (1.3.6.1.4.1.311.10.3.12)
			emailProtection (1.3.6.1.5.5.7.3.4)
E (2.5	- 20 27)		Encryption certificate:
ExtKeyUsage (2.5	5.29.37)	No	emailProtection (1.3.6.1.5.5.7.3.4)
			encryptingFileSystem (1.3.6.1.4.1.311.10.3.4)
			Non-repudiation certificate:
			documentSigning (1.3.6.1.4.1.311.10.3.12)
			emailProtection (1.3.6.1.5.5.7.3.4)
			AccessMethod: id-ad-ocsp (1.3.6.1.5.5.7.48.1)
authorityInfoAcce	ess	No	AccessLocation: http://pki.cleverbase.com/ocsp/3c
(1.3.6.1.5.5.7.1.1)		110	AccessMethod: id-ad-calssuers (1.3.6.1.5.5.7.48.2)
			AccessLocation: http://pki.cleverbase.com/CleverbaseBurgerG3.cer
			Only for the non-repudiation certificate:
			id-etsi-qcs-QcCompliance (0.4.0.1862.1.1)
			id-etsi-qct-esign (0.4.0.1862.1.6.1)
QcStatement (1.3	3.6.1.5.5.7.1.3)	No	id-etsi-qcs-QcSSCD (0.4.0.1862.1.4)
			id-etsi-qcs-QcPDS (0.4.0.1862.1.5)
			PDS URL = https://pki.cleverbase.com/pki-disclosure-statement.pdf
			PDS Lang = en

# The EUTL Natural Person (G4) certificate has the following profile:

field	crit ical	The EUTL Natural Person (G4)
The EUTL Natural Person (G4) certificate has the following profile:Version		2 (version 3)
SerialNumber		[number unique to the CA, including at least 64 bits of unpredictable random data created by a Cryptographically Secure Pseudo Random Number Generator]
Signature		SHA512withRSA/PSS (1.2.840.113549.1.1.10)

field		crit ical	The EUTL Natural Person (G4)			
	commonName (2.5.4.3)		Cleverbase ID - G4 PKIo EUTL G-Sigs NP - 2025			
Issuer*	organizationId entifier (2.5.4.97)		NTRNL-67419925			
	organizationNa me (2.5.4.10)		Cleverbase ID B.V.			
	countryName (2.5.4.6)		NL			
Validity	notBefore		[date of issue] (Time stamps mentioned here may deviate a few minutes, cf. RFC 4270, [section 5.1])			
	notAfter		[date of issue + 1095 days]			
	serialNumber					
	commonName		See [section 3.1]			
Subject*	countryName		Cleverbase does not apply size limits to the givenName and surName attributes; the total			
	givenName		number of characters of both attributes is limited to 64 characters. This limit is also applied to the commonName attribute.			
	surName					
	algorithm		rsaEncryption (1.2.840.113549.1.1.1)			
subjectPublicKe yInfo	subjectPublicK ey		[certificate holder's public key]			
authorityKeylde ntifier (2.5.29.35)	keyldentifier	No	[sha1 hash of CA's public key]			
subjectKeyldent ifier (2.5.29.14)	keyldentifier	No	[sha1 hash of the public key in the certificate]			
keyUsage (2.5.29.	15)	Yes	Non-repudiation certificate: nonRepudiation (0100 0000 0)			
			EUTL (G4) Natural Persons Individual Validated eSig 2.16.528.1.1003.1.2.44.14.11.5 cPSuri (1.3.6.1.5.5.7.2.1) https://pki.cleverbase.com/cps.pdf			
certificatePolici es (2.5.29.32)	policyldentifier	No	ETSI NCP+: 0.4.0.2042.1.2			
			ETSI QCP-n-qscd 0.4.0.194112.1.2			
CRLDistribution Points (2.5.29.31)	FullName	No	http://pki.cleverbase.com/cleverbase-g4-np.crl			
ExtKeyUsage (2.5.29.37) No		No	szOID_KP_DOCUMENT_SIGNING (1.3.6.1.4.1.311.10.3.12) id-kp-documentSigning (1.3.6.1.5.5.7.3.36)			
authorityInfoAccess No. (1.3.6.1.5.5.7.1.1)		No	AccessMethod: id-ad-ocsp (1.3.6.1.5.5.7.48.1) AccessLocation: http://gd-np-ocsp.cleverbase.com AccessMethod: id-ad-calssuers (1.3.6.1.5.5.7.48.2)			

field	crit ical	The EUTL Natural Person (G4)
		AccessLocation: http://pki.cleverbase.com/CleverbaseG4IVNP.cer
QcStatement (1.3.6.1.5.5.7.1.3)	No	id-etsi-qcs-QcCompliance (0.4.0.1862.1.1) id-etsi-qct-esign (0.4.0.1862.1.6.1) id-etsi-qcs-QcSSCD (0.4.0.1862.1.4) id-etsi-qcs-QcPDS (0.4.0.1862.1.5)
		PDS URL = https://pki.cleverbase.com/pki-disclosure-statement.pdf PDS Lang = en

The Cleverbase OCSP for G3 Citizen domain has the following certificate profile:

<b>field</b> Version		criti cal	Citizen (G3) Domain (3c)
			2 (version 3)
SerialNumber			[number unique to the CA, including at least 64 bits of unpredictable random data created by a Cryptographically Secure Pseudo Random Number Generator]
Signature			Sha-256WithRSAEncryption (1.2.840.113549.1.1.11)
	commonName (2.5.4.3)		Cleverbase ID PKloverheid Burger CA - G3
lacuar*	organizationIden tifier (2.5.4.97)		NTRNL-67419925
lssuer*	organizationNa me (2.5.4.10)		Cleverbase ID B.V.
	countryName (2.5.4.6)		NL
Validity	notBefore		[date of issue]
Validity	notAfter		[date of issue + 397 days]
	commonName (2.5.4.3)		OCSP Signing Cleverbase ID Burger CA - G3
Subject*	organizationIden tifier (2.5.4.97)		NTRNL-67419925
oubject"	organizationNa me (2.5.4.10)		Cleverbase ID B.V.
	countryName (2.5.4.6)		NL
	algorithm		rsaEncryption (1.2.840.113549.1.1.1)
subjectPublicKeyI nfo	subjectPublicKe y	No	Contains the public key
authorityKeyldent ifier (2.5.29.35)	keyldentifier	No	[sha1 hash of the CA's public key]
SubjectKeyldentif ier (2.5.29.14)	keyldentifier	No	[sha1 hash of the public key in the certificate]
KeyUsage (2.5.29.15)		Yes	digitalSignature (1000 0000 0)
CertificatePolicies	policyldentifier	No	2.16.528.1.1003.1.2.3.1
(2.5.29.32)	cPSuri (1.3.6.1.5.5.7.2.		https://pki.cleverbase.com/cps.pdf

field		criti cal	Citizen (G3) Domain (3c)
	1)		
	userNotice (1.3.6.1.5.5.7.2. 2)		Reliance on this certificate by any party assumes acceptance of the relevant Cleverbase Certification Practice Statement and other documents in the Cleverbase repository.
CRLDistributionP oints (2.5.29.31)	FullName	No	http://pki.cleverbase.com/cleverbase3c.crl
ExtKeyUsage (2.5.2	9.37)	Yes	id-kp-OCSPSigning (1.3.6.1.5.5.7.3.9)
OCSPNoCheck (1.3.6.1.5.5.7.48.1.5)		No	
authorityInfoAccess (1.3.6.1.5.5.7.1.1) No		No	AccessMethod: id-ad-calssuers (1.3.6.1.5.5.7.48.2) AccessLocation: [http://pki.cleverbaseBurgerG3.cer] (http://pki.cleverbase.com/CleverbaseBurgerG3.cer)

## The Cleverbase OCSP for G4 EUTL NP has the following certificate profile:

field		criti cal	EUTL Natural Person Domain (G4)	
Version			2 (version 3)	
SerialNumber			[number unique to the CA, including at least 64 bits of unpredictable random data created by a Cryptographically Secure Pseudo Random Number Generator]	
Signature			SHA512withRSA/PSS (1.2.840.113549.1.1.10)	
	commonName (2.5.4.3)		Cleverbase ID - G4 PKIo EUTL G-Sigs NP - 2025	
Issuer* _	organizationIdent ifier (2.5.4.97)		NTRNL-67419925	
issuei –	organizationNam e (2.5.4.10)		Cleverbase ID B.V.	
_	countryName (2.5.4.6)		NL	
Validity -	notBefore		[date of issue]	
valuity	notAfter		[date of issue + 397 days]	
	commonName (2.5.4.3)		Cleverbase ID - G4 PKIo EUTL G-Sigs N-OCSP - 2024	
Subject*	organizationNam e (2.5.4.10)		Cleverbase ID B.V.	
_	countryName (2.5.4.6)		NL	
subjectPublicKeyI	algorithm	- No	rsaEncryption (1.2.840.113549.1.1.1)	
nfo	subjectPublicKey	- 140	Contains the public key	
authorityKeyldenti fier (2.5.29.35)	keyldentifier	No	[sha1 hash of the CA's public key]	
SubjectKeyldentifi er (2.5.29.14)	keyldentifier	No	[sha1 hash of the public key in the certificate]	
KeyUsage (2.5.29.15)		Yes	digitalSignature (1000 0000 0)	

field	criti cal	EUTL Natural Person Domain (G4)
CRLDistributionPo ints (2.5.29.31) FullName	No	http://pki.cleverbase.com/cleverbase-g4-np.crl
ExtKeyUsage (2.5.29.37)	Yes	id-kp-OCSPSigning (1.3.6.1.5.5.7.3.9)
OCSPNoCheck (1.3.6.1.5.5.7.48.1.5)	No	
authorityInfoAccess (1.3.6.1.5.5.7.1.1)		AccessMethod: id-ad-calssuers (1.3.6.1.5.5.7.48.2) AccessLocation: http://pki.cleverbase.com/CleverbaseG4IVNP.cer

<sup>\*</sup> In accordance with RFC 4514, the order in which distinguished names in this CPS are represented is an inversion of their occurrence in the underlying ASN.1 structure.

## 7.2 CRL Profile

The Cleverbase CRL for G3 Citizen domain has the following profile:

field		critical	contents
Version			1 (version 2)
Signature			sha-256WithRSAEncryption
	commonName (2.5.4.3)		Cleverbase ID PKloverheid Burger CA - G3
lssuer*	organizationIdentifier (2.5.4.97)		NTRNL-67419925
issuer -	organizationName (2.5.4.10)		Cleverbase ID B.V.
	countryName (2.5.4.6)		NL
ThisUpda	te		[time of issue of the CRL]
NextUpdate			[time of issue of the CRL + 24 hours]
revokedCertificates			[revoked certificates]
CRLNumber (2.5.29.20)		No	[subsequent number]
AuthorityKeyldentifier (2.5.29.35)		No	[sha1 hash of Cleverbase Organisatie Persoon CA public key]

The Cleverbase CRL for G4 EUTL Natural Persons domain has the following profile:

field		critical	contents
Version			1 (version 2)
Signature	2		sha-256WithRSAEncryption
	commonName (2.5.4.3)		Cleverbase ID - G4 PKIo EUTL G-Sigs NP - 2025
lssuer*	organizationIdentifier (2.5.4.97)		NTRNL-67419925
issuer"	organizationName (2.5.4.10)		Cleverbase ID B.V.
	countryName (2.5.4.6)		NL
ThisUpda	ThisUpdate		[time of issue of the CRL]
NextUpdate			[time of issue of the CRL + 24 hours]
revokedCertificates			[revoked certificates]
CRLNumber (2.5.29.20)		No	[subsequent number]
AuthorityKeyldentifier (2.5.29.35)		No	[sha1 hash of Cleverbase Organisatie Persoon CA public key]

# 7.3 OCSP Response Profile

The Cleverbase OCSP response for the Citizen Domain (G3) has the following profile:

·	, ,
Field	Attribute / Value
responseStatus	OCSPResponseStatus INTEGER status code as described in RFC 6960
responseBytes:responseType	ocspBasic (OID: 1.3.6.1.5.5.7.48.1.1)
responseBytes:response:tbsResponseData:vers ion	1 (0x0)
responseBytes:response:tbsResponseData:resp onderId	byName: $C = NL$ , $O = Cleverbase ID B.V.$ , organizationIdentifier = NTRNL-67419925, $CN = OCSP$ Signing Cleverbase ID PKloverheid Burger CA - G3
responseBytes:response:tbsResponseData:pro ducedAt	The time at which the OCSP responder signed the response in UTC
responseBytes:response:tbsResponseData:resp onses:singleResponse:certId:hashAlgorithm	sha1, parameters field with value NULL
responseBytes:response:tbsResponseData:resp onses:singleResponse:certld:issuerNameHash	OCTETSTRING of the issuer's Name Hash
responseBytes:response:tbsResponseData:resp onses:singleResponse:certld:issuerKeyHash	OCTETSTRING of the issuer's Key Hash
responseBytes:response:tbsResponseData:resp onses:singleResponse:certId:serialNumber	INTEGER of the certificate's Serial Number
responseBytes:response:tbsResponseData:resp onses:singleResponse:certStatus	certStatus INTEGER status code as described in RFC 6960
responseBytes:response:tbsResponseData:resp onses:singleResponse:thisUpdate	The most recent time at which the status being indicated is known by the responder to have been correct in UTC (Universal Time Coordinated) encoded GeneralizedTime
responseBytes:response:tbsResponseData:resp onses:singleResponse:nextUpdate	thisUpdate value +4 days in UTC (Universal Time Coordinated) encoded GeneralizedTime
responseBytes:response:tbsResponseData:resp onseExtensions:ocspNonce	nonce octet string
responseBytes:response:signatureAlgorithm	sha256WithRSAEncryption, parameters field with value NULL
responseBytes:response:signature	Signature BITSTRING (160 bits for SHA1)
responseBytes:response:certs	Certificate used to sign the OCSP Response and its issuer certificate are included.
ne Cleverbase OCSP response for the EUTL	. Natural Persons (G4) domain has the following profile:
Field	Attribute / Value
responseStatus	OCSPResponseStatus INTEGER status code as described in RFC 6960
responseBytes:responseType	ocspBasic (OID: 1.3.6.1.5.5.7.48.1.1)
responseBytes:response:tbsResponseData:vers ion	1 (0x0)
responseBytes:response:tbsResponseData:resp onderId	byName: C = NL, O = Cleverbase ID B.V., organizationIdentifier = NTRNL-67419925, $CN = OCSP$ Cleverbase ID - G4 PKIo EUTL G-Sigs NP - 2025
responseBytes:response:tbsResponseData:pro ducedAt	The time at which the OCSP responder signed the response in UTC
responseBytes:response:tbsResponseData:resp onses:singleResponse:certId:hashAlgorithm	sha1, parameters field with value NULL

Field	Attribute / Value
responseBytes:response:tbsResponseData:responses:singleResponse:certId:issuerNameHash	OCTETSTRING of the issuer's Name Hash
responseBytes:response:tbsResponseData:responses:singleResponse:certId:issuerKeyHash	OCTETSTRING of the issuer's Key Hash
responseBytes:response:tbsResponseData:responses:singleResponse:certId:serialNumber	INTEGER of the certificate's Serial Number
responseBytes:response:tbsResponseData:responses:singleResponse:certStatus	certStatus INTEGER status code as described in RFC 6960
response Bytes: response: tbs Response Data: response: single Response: this Update	The most recent time at which the status being indicated is known by the responder to have been correct in UTC (Universal Time Coordinated) encoded GeneralizedTime
responseBytes:response:tbsResponseData:responseExtensions:ocspNonce	nonce octet string
responseBytes:response:signatureAlgorithm	sha256WithRSAEncryption, parameters field with value NULL
responseBytes:response:signature	Signature BITSTRING (160 bits for SHA1)
responseBytes:response:certs	Certificate used to sign the OCSP Response and its issuer certificate are included.

## 7.3.1 Version number(s)

Both G3 and G4: Version = 1

## 7.3.2 OCSP extensions

Both G3 and G4 use the extension id-pkix-ocsp-nonce (OID: 1.3.6.1.5.5.7.48.1.2)

## 8 Compliance Audit and Other Assessments

## 8.1 Frequency or Circumstances of Assessment

Cleverbase is a trust service provider as meant in the eIDAS Regulation (EU) 910/2014. For this reason, it is subject to supervision by the Rijksinspectie Digitale Infrastructuur. Compliance certificates have a validity of two years, with annual interim audits. Moreover, internal audits are performed regularly.

## 8.2 Identity/Qualifications of Assessor

Cleverbase is certified by a conformity assessment body that is accredited as described in Article 2 of Implementing Regulation (EU) 2025/2162.

## 8.3 Assessor's Relationship to Assessed Entity

The external auditor performing the compliance audit functions independently from Cleverbase.

## 8.4 Topics Covered by Assessment

The scope of the compliance audit includes the following CA-services:

- Certificate generation service
- Revocation management service
- · Revocation status service
- Dissemination service
- Server Signing Application service

## 8.5 Actions Taken as a Result of Deficiency

If, unexpectedly, deviations are found, a Corrective Action Plan is drafted to correct the deviations. The Corrective Action Plan is agreed upon with the external auditor and is given to the disposal of the Rijksinspectie Digitale Infrastructuur and the Policy Authority Logius.

#### 8.6 Communication of Results

Compliance audit certificates can be consulted on Cleverbase's website: https://vidua.nl/legal/qualifications/. The underlying audit reports are confidential, and are confidentially shared with the Rijksinspectie Digitale Infrastructuur and the Policy Authority Logius.

## 9 Other Business and Legal Matters

#### 9.1 Fees

#### 9.1.1 Certificate Issuance or Renewal Fees

Certificate issuance may be either charged or free of charge. The TSP enters into detailed agreements with subscribers for single or periodic payments.

#### 9.1.2 Certificate Access Fees

No compensation is required for the provision of certificate status information or other information on certificates. Only if exceptional efforts are required to answer an information request, reasonable costs can be charged. In such a case, the requester of this information is informed about the costs before committing to any expenditures.

#### 9.1.3 Revocation or Status Information Access Fees

Please refer to section 9.1.2.

#### 9.1.4 Fees for Other Services

No stipulation.

#### 9.1.5 Refund Policy

No stipulation.

## 9.2 Financial Responsibility

#### 9.2.1 Insurance Coverage

The TSP shall not be liable for any damage caused by the TSP, unless in cases and insofar as described in Article 13 of Regulation (EU) 910/2014 (eIDAS) and its amendment Regulation (EU) 2024/1183. The TSP's general terms and conditions contain the same limitation of liability. In order to cover this liability, the TSP has arranged liability insurance covering up to at least 2,500,000.- euro.

The TSP is not liable if certificates are not used as described in the certificates themselves.

## 9.2.2 Other Assets

No stipulation.

## 9.2.3 Insurance or Warranty Coverage for End-entities

No stipulation.

## 9.3 Confidentiality of Business Information

#### 9.3.1 Scope of Confidential Information

The TSP considers all data provided within the framework of the certification service as confidential.

## 9.3.2 Information Not Within the Scope of Confidential Information

No stipulation.

#### 9.3.3 Responsibility to Protect Confidential Information

Any party having confidential information at its disposal is responsible for ensuring its confidentiality.

## 9.4 Privacy of Personal Information

The TSP has an Information Security Management System (ISMS) in place, ensuring confidentiality of personal data processed by the TSP. Furthermore the TSP's Privacy Statement is applicable to all the provided services.

#### 9.4.1 Privacy Plan

Please refer to the Cleverbase Privacy Statement available on the public website.

#### 9.4.2 Information Treated as Private

Please refer to the Cleverbase Privacy Statement available on the public website.

#### 9.4.3 Information Not Deemed Private

Please refer to the Cleverbase Privacy Statement available on the public website.

#### 9.4.4 Responsibility to Protect Private Information

Please refer to the Cleverbase Privacy Statement available on the public website.

### 9.4.5 Notice and Consent to Use Private Information

Please refer to the Cleverbase Privacy Statement available on the public website.

#### 9.4.6 Disclosure Pursuant to Judicial or Administrative Process

Please refer to the Cleverbase Privacy Statement available on the public website.

#### 9.4.7 Other Information Disclosure Circumstances

No stipulation.

## 9.5 Intellectual Property Rights

All documents, products and services made public by the TSP are subject to the TSP's copyright and/or its suppliers/licenses. It must be stressed here that this does not apply to documents that are signed by certificate holders using a TSP-issued certificate. The TSP indemnifies clients against claims by third parties regarding possible violations of intellectual property rights by the TSP.

## 9.6 Representations and Warranties

The TSP hereby warrants that it:

- 1. observes the procedures described in this CPS;
- 2. has performed all reasonable actions in order to ensure that information included in the issued certificates is correct at the time of issuance;
- 3. will revoke certificates if it presumes that data in the certificates is not or no longer accurate, or that the private key correlating to the certificate was compromised.

## 9.6.1 CA Representations and Warranties

No stipulation, please refer to section 9.6.

#### 9.6.2 RA Representations and Warranties

No stipulation, please refer to section 9.6.

#### 9.6.3 Subscriber Representations and Warranties

No stipulation, please refer to section 9.6.

### 9.6.4 Relying Party Representations and Warranties

No stipulation, please refer to section 9.6.

#### 9.6.5 Representations and Warranties of Other Participants

No stipulation, please refer to section 9.6.

#### 9.7 Disclaimers of Warranties

No limitations of warranties apply other than those mentioned in section 9.6.

## 9.8 Limitations of Liability

No limitations of liability apply other than those mentioned in section 9.2.

#### 9.9 Indemnities

No stipulation.

#### 9.10 Term and Termination

#### 9.10.1 Term

The TSP's CPS becomes effective immediately after publication in the public repository and remains effective until a new version is published.

## 9.10.2 Termination

No stipulation.

#### 9.10.3 Effect of Termination and Survival

No stipulation.

## 9.11 Individual Notices and Communications With Participants

The TSP can be contacted via mail, electronic mail and telephone. The TSP publishes information on its public website and contacts individual subjects via electronic mail or telephone.

#### 9.12 Amendments

#### 9.12.1 Procedure for Amendment

Amendments to this CPS are made using the pre-defined, regular procedures for changing components of the TSP services.

#### 9.12.2 Notification Mechanism and Period

Please refer to section 9.10.1.

## 9.12.3 Circumstances Under Which OID Must Be Changed

No stipulation.

## 9.13 Dispute Resolution Provisions

If a dispute arises between the TSP and a customer, or between the TSP and a third party, the TSP's management, having heard all involved and considered all interests at stake, decides. Such a decision is written down and delivered within a reasonable period of time. This procedure does not limit the possibility to submit disputes to the civil court in The Hague.

## 9.14 Governing Law

All the TSP's activities are subject to Dutch law.

## 9.15 Compliance With Applicable Law

No stipulation.

## 9.16 Miscellaneous Provisions

## 9.16.1 Entire Agreement

No stipulation.

## 9.16.2 Assignment

No stipulation.

#### 9.16.3 Severability

No stipulation.

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

No stipulation.

## 9.16.5 Force Majeure

No stipulation.

## 9.17 Other Provisions

No stipulation.

# **Annex: Issuing Certificates Fingerprints**

Cleverbase ID PKIoverheid Burger CA - G3

Fingerprint: de0a92e5435b613208dc435ecc7158bf28f420a93e0a91d5965972053f523549

CN=Cleverbase ID PKIoverheid Burger CA - G3, OID.2.5.4.97=NTRNL-67419925, O=Cleverbase ID B.V., C=NL

Cleverbase ID - G4 PKIo EUTL G-Sigs NP - 2025

Fingerprint: 1818ccd472ed6568731c8daca28b60787c27378630c6f333d132ae5da9ed65c1

CN=Cleverbase ID - G4 PKIo EUTL G-Sigs NP - 2025, OID.2.5.4.97=NTRNL-67419925, O=Cleverbase ID B.V., C=NL