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STATEMENT PRODUCT DISCLOSURE

PDS (*Product Disclosure Statement*)

QUALIFIED SERVICE OF ELECTRONIC TIME-STAMPING-TIMESTAMPING WITH BLOCKCHAIN TECHNOLOGY-



Security level

Important announcement

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Contact information of the Qualified Trust Services Provider



ANF Certification Authority (ANF AC), NIF G63287510, is the Certification Authority that, as a Qualified Trust Services Provider, issues qualified certificates under eIDAS.



Corporate management Paseo de la Castellana, 79



Electronic office:

https://www.anf.es



Administration - Legal Services - Engineering

Gran de les Vía Corts Catalanes, 996 08018 - Barcelona (Spain)



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ANF AC makes contact forms available to the public through the electronic headquarters of ANF AC

- General matters in https://www.anf.es/contacto/
- Press in https://www.anf.es/contacto/#prensa



Electronic time stamps, TSU certificate and validation procedures

The "Time Stamping Units" have TSU Certificates to create Qualified Electronic Time Stamps (QTST).

Electronic time stamps (TST - TimeStamp Token) are qualified in compliance with the requirements of Art. 42 of Regulation (EU) No. 910/2014, of the European Parliament and of the Advice, of July 23, 2014, regarding electronic identification and trust services for electronic transactions in the internal market (eIDAS).

Their inclusion in the trusted list of trusted service providers (TSL - Trusted Service List) in Spain can be verified through the link,



https://sede.serviciosmin.gob.es/Prestadores/TSL/TSL.pdf

The validation of the validity status of the TSU certificates, I know You can check through the online information and consultation service provided by ANF AC, using the OCSP protocol (*according to RFC 6960),* available at the OCSP responder location on the certificate itself.



Limits of use of TSU certificates



The TSA CAi certificate is "ANF High Assurance EV CA1" which is signed and TSU certificates are issued. The CAi certificate is submitted to the CPS of ANF AC OID 1.3.6.1.4.1.18332.1.9.1.1, TSU certificates are subject to the Time Stamping Policy (TimeStamping) OID 1.3.6.1.4.1.18332.15.1. The public key that allows the validation of TSU certificates and qualified electronic time stamps is published in the Spanish TSL.



TSU certificates include, **following the recommendations of the ETSI standards EN 319 421 and ETSI EN 319 422**, the privateKeyUsage extension, which limits the use of the **Private key** setting a date of cessation of use of the key, which is prior to the expiration of the public key, so that **sufficient time is ensured for the renewal of the TSTs issued by a TSU before the expiration of its certificate.**



TSU electronic certificates include the extension "id-kp-timestamping" what indicates that this certificate will be used for the exclusive purpose of issuing electronic time stamps.



The TSU certificate cannot be renewed and cannot be used when its period of validity. When its revocation is requested or any of the other causes of extinction of its validity established in the Practice Statement TSA and TimeStamping Policy OID 1.3.6.1.4.1.18332.15.1 and in the CPS ANF AC OID 1.3.6.1.4.1.18332.1.9.1.1

ANF AC registers and safeguards those significant events necessary to verify the activity of this Time Stamp Authority for a period that will never be less than 15 years.



Obligations of the subscriber and trusting third parties



Sections 5.2 and 5.3 of the TSA Practice Statement and Timestamping Policy OID 1.3.6.1.4.1.18332.15.1 define the obligations of all parties acting in relation to the use of qualified stamps of electronic time issued by the TSA of ANF AC.

In particular, the subscriber and the third parties who trust before placing their trust in the electronic time stamps, have the obligation to verify the validity of the TSU certificate and the Time Stamp, having to use a system of vqualified validation of signature and electronic seals that has TST verification that complies with the provisions of section 6.7.5 (Validation of the Time Stamp) of the aforementioned policy and OID practices 1.3.6.1.4.1.18332.15.1

TSA Obligations, Your Responsibilities, and Release

In section 5 TSA Practice Statement and Timestamping Policy OID 1.3.6.1.4.1.18332.15.1 The obligations, responsibilities and exemption of responsibility of the TSA are defined.

The Time Stamping Authority of ANF AC, in order to face the risk of liability for damages that may be caused by the time stamp service, has signed the corresponding civil liability insurance of CINCOMILLONES DE EUROS (€ 5,000,000.).



The "Limitations of Service" set forth in section 4.2.3 of TSA policy and practices apply.



Limitations of service

In section 4.2.3 TSA Practice Statement and Timestamping Policy, the "Limitations of the service" are defined.

Especially,

- ANF AC is responsible for the variation of the time reference, in relation to the time provided by the service of the Royal Institute and Observatory of the Navy, included in the qualified electronic time stamp at the time of the request, but in no case of the veracity or content of the electronic data sent by the subscribers of the service, which are the object of the electronic time stamp issued.
- ANF AC will not respond to subscribers or trusting third parties, whose behavior in the use of the qualified time stamping service electronic has been negligent, For these purposes, and in any case, the failure to comply with the provisions of the present must be considered negligence Time Stamp Policy and Practice Statement, in the Service Contract, in the Terms and Conditions, and in particular, in the provisions of the sections referring to the obligations and responsibility of the subscribers and the relying parties.
- ANF AC does not guarantee the cryptographic algorithms nor will it be liable for damages caused by successful external attacks on the cryptographic algorithms used, on special, if you kept due diligence according to the current state of the art, this document and its addendum, and the provisions of the eIDAS Regulation and Law 6/2020, of November 11, regulating certain aspects of electronic services of confidence.

• It will not be responsible for any software that has not been provided directly by ANF AC.

In the absence of specific regulation that is expressly accepted in the service provision contract, the subscriber of the service and the third parties who trust it will limit ANF AC's liability to a maximum of FIVE THOUSAND EUROS (€ 5,000). This amount It is set as the maximum enforceable for damages that ANF AC must satisfy by judicial imperative.



Privacy Policy

The electronic time stamping service does not process personal data, therefore, it is not affected by Regulation (EU) 679/2016 General Data Protection (RGPD), nor by Organic Law 3/2018 on Data Protection and Digital Rights Guarantee (LOPDyGDD)



ANF AC guarantees that it does not collect personal data nor does it have the opportunity to do so. Time stamps are requested without including the identity of the applicant (*be a natural person or legal*) nor the trusted third party. Information on the content of the document to which it is associated cannot be obtained from the time stamp, therefore, time stamps are anonymous.

Return policy



It does not apply to the electronic timestamp service.



Applicable law, inquiries and complaints

ANF AC's electronic time stamping service is carried out in accordance with,

- Regulation (EU) No. 910/2014, of the European Parliament and of the Council, of July 23 from 2014, on electronic identification and trust services for electronic transactions in the internal market (eIDAS).
- Law 6/2020, of November 11, regulating certain aspects of electronic trust services.

ANF AC, makes available to subscribers and third parties who trust online service for,

- Report problem with your certificate in, https://micertificado.anf.es/
- Report breach or misuse in, https://anf.es/sat-incumplimiento-uso-indebido/
- Open an incident in, https://www.anf.es/ac/abrir-incidencia

It also offers customer service through the following channels:

- In person, administrative address, legal and technical, arranging a previous interview days working days of 9 a.m. to 2 p.m. and 3 p.m. at 18 h.
- By phone, +34 932 661 614
- e-mail,
 - ♦ Administration: administracion@anf.es
 - Technical: support@anf.es
 - Ocmmercial: info@anf.es
 - ♦ Legal: mcmateo@anf.es
 - ♦ Data protection: delegadoprotecciondatos@anf.es



Applicable norms and standards

ANF AC's electronic time stamping service is carried out in accordance with internationally recognized standards, by way of example, it should be noted:

- **ETSI EN 319 421:** "Policy and Security Requirements for Trust Service Providers issuing TimeStamps."
- ETSI EN 319 422: "Time-stamping protocol and time-stamp token profiles."
- ETSI EN 319 401: "Electronic Signatures and Infrastructures (ESI); General Policy Requirements for Trust Service Providers "
- ETSI TS 119 312: "Electronic Signatures and Infrastructures (ESI); Cryptographic Suites "
- IETF RFC 3628: "Policy Requirements for Time-Stamping Authorities (TSAs)"
- IETF RFC 3161: "Internet X.509 Public Key Infrastructure Time-stamp Protocol"

Dispute resolution

EXTRAJUDICIAL PROCEDURE

ANF AC will endeavor to amicably resolve conflicts that arise with third parties for the exercise of their activity, only resorting to the procedure provided in the following section, when the agreement between the parties is unattainable.

JUDICIAL PROCEDEMENT

ANF AC submits voluntarily, for the solution of any litigious question that could arise from the exercise of their activity, to the institutional arbitration of the Arbitration Tribunal of the Distribution Business Council (TACED) https://www.taced.es, who is entrusted with the appointment of the Arbitrator - who will be the only one - and the administration of the arbitration - which will be fair - in accordance with its Regulations, binding itself from now on to comply with the arbitration decision.

If for any reason it is not possible to settle the controversy through the arbitration procedure outlined in the previous point, the Parties waive any other jurisdiction that may correspond to them and submit to the Courts for the resolution of any conflict that may arise between them. of the city of Barcelona, renouncing its own jurisdiction if it were different.



Safe source of time

ANF AC guarantees that the clock of the TSU servers is synchronized with the UTC time within the declared accuracy of more than (1) second, using secure time source (ROA) and the Network Time Protocol (NTP) synchronization protocol.

liempo Universal Coordinado

UTC tiempo		iniversal Coordinado) es uno de los nombres más conocidos IC+0, que es de 0h. antes de UTC (Tiempo Universal Coord hora estándar.	
Diferencia horaria GMT/UTC	Sin compensaciones UTC/GMT (UTC+00)		
Zonas horarias IANA donde UTC se observa actualmente	UTC		
Otras zonas horarias en	Abreviatura	Nombre	
UTC+00	AZOST	Hora De Verano De Las Azores	
	EGST	Hora De Verano De Groenlandia Oriental	
	GMT	Hora Del Meridiano De Greenwich	
	WET	Hora Estándar De Europa Occidental	



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THE TIME STAMPING SERVICE IS LOCATED IN SPAIN.

It is synchronized with a time signal through the ROA (Royal Navy Observatory), a laboratory recognized by the international public body Bureau International des Poids et Mesures (BIPM).

THE TIME ROA,

is declared for legal purposes as the National Pattern of said unit, as well as the maintenance and official dissemination of the scale "Coordinated Universal Time" (UTC (ROA)), considered for all purposes as the basis of legal time throughout the territory national (RD 23 October 1992, no. 1308/1992).

THE TIME SEALING SERVICE

uses NTP protocol to synchronize the TSU servers with the secure source of time (ROA). With that setting, an accuracy of +/- 100 ms or better is achieved with respect to UTC.



Hash chaining (BlockChain)

ANF AC's electronic time stamping service has been designed and developed with the principle of maximum security, whereby not even the TSA itself can create false time stamps.

To achieve this objective, the principles of Stuart Haber and W. Scott are followed and respected. Stornetta, which proposed for the first time (How to time-stamp, 1991) a block-encryption protection chain product (base of the Blockchain technological model), the only procedure that guarantees the security of a TSA and, in addition, allows it to be demonstrated.

Each ANF AC Time Stamping Unit manages a hash chaining service relative to all TSTs issued. Chaining is based on a chain of blocks in which:

- The incoming hash corresponds to the immediately preceding outgoing hash chronological.
- The current has corresponds to the hash of the document associated with the time stamp.
- The outgoing hash is the result of processing all the time stamp information.

By means of this procedure any modification attempt is impossible. Not the TSA itself could perform a time stamp outside of real time, since it would cause the chronological sequence of the blockchain to be broken.

This procedure is also the only one that allows to demonstrate the emissions of a TSA. What's more, **ANF AC** makes notarial deposit of the general summary minutes of the incoming-current-outgoing hashes associated with the issued TSTs. ANF AC TSA may ask the Trusting third party to cover the costs of checking the existence of hash, in case of request for evidence.



ANF AC official audits and accreditations

ANF AC, as a Qualified Trust Service Provider, has achieved official accreditation of its Public Key Infrastructure (PKI) in the following services:

- Issuance of qualified certificates of **Electronic signature**.
- Issuance of qualified certificates of **public employee**.
- Issuance of qualified certificates centralized.
- Issuance of qualified certificates **PSD2**.
- Issuance of qualified certificates of **electronic seal**.
- Issuance of qualified certificates of **electronic stamp PSD2**.
- Issuance of qualified certificates of **electronic seal and AAPP seal**.
- Issuance of qualified certificates of **SSL secure server**.
- Issuance of qualified certificates of SSL secure server Electronic Office.
- Electronic signature service **remote qualified**.
- Qualified service of **electronic time stamps**.
- Qualified service of **electronic delivery.**
- Qualified service of long-term preservation.
- Qualified service of validation of qualified electronic signatures and seals.

In addition, ANF AC has other accreditations and approvals for advanced IT services:

 Mozilla, Microsoft, Apple, Google approval for issuance of certificates SSL electronics: 	
◊ DV	
◊ ov	
♦ EV	
• Certification Entity (EC) in accordance with the Data Protection Agency Scheme for Data Protection Delegates.	
• Certified Scanning Services (LegalSnapScan) accredited by the Agency Spanish Tax Administration.	



In addition to ETSI audits (eIDAS services), ANF AC has achieved compliance audits against the standards:

- ISO 27001: 2013 Information Security Management System
- Iso 9001 Quality of service CA
- ISO 17024 Certification of Persons
- ISO 14001 Environmental Management System

Cryptographic Hardware Modules (HSM) used to provide the time stamping service,

- The private keys of CA, CAi, TSU, and centralized end-user certificates are generated and kept in a secure cryptographic device (HSM) certified as qualified electronic signature devices (QSCD). They meet the requirements detailed in FIPS PUB 140-2 level 3 or higher, or with an EAL level 4+ or higher in accordance with ISO / IEC 15408.
- The QSCD SmartCards supplied to end users are certified and meet the requirements detailed in FIPS PUB 140-2 level 3 or higher, or with an EAL level 4+ or higher in accordance with ISO / IEC 15408.

In the use of time stamps for low, medium or high level procedures of the National Security Scheme (ENS), the indications of the ICT Security Guide -CCN- STIC-807- will be followed.

Certifications of conformity published in,



https://www.anf.es/auditorias-de-conformidad/

Ámbito geográfico de interoperabilidad legal



ANF AC acreditación gubernamental.

Acuerdo de reconocimiento mutuo internacional.

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