Certification Practices Statement (CPS)

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1. INTRODUCTION

ANF Certification Authority (hereinafter, ANF AC) is a corporate entity, constituted under Spanish Organic Law 1/2002 of March 22nd, and registered in the Spanish Ministry of Internal Affairs with national number 171.443 and VAT number G-63287510.

The Public Key Infrastructure (PKI) of ANF AC follows the directives of Regulation (EU) No 910/2014 of the European Parliament and of the Council of 23 July 2014 on electronic identification and trust services for electronic transactions in the internal market and repealing Directive 1999/93/EC (hereinafter eIDAS), and Spanish Law 6/2020, de 11 de noviembre, reguladora de determinados aspectos de los servicios electrónicos de confianza.

ANF AC, as a Qualified Trust Service Provider, manages a Public Key Infrastructure to provide the following qualified services:

- **Service of certification, issuance, revocation and renewal of qualified certificates**, and ordinary certificates without the legal consideration of qualified certificates, in accordance with Spanish Law 6/2020, of November 11th.
- **Website authentication service**, issuance of web site authentication certificates.
- **Electronic time-stamp service**, which allows its users to obtain a guarantee that determines with complete certainty that the information existed at a specific moment of the time.
- **Service of creation, verification, and validation of electronic seals.**
- **Certificate Validation Service,** which allows its users and relying parties to verify the validity, integrity and authenticity of the certificates issued.
- **Electronic signature conservation service**, which aims to increase the reliability of electronic signature data beyond the technological validity period.
- **Certified electronic delivery service**, which allows the transmission of data between third parties by electronic means.

1.1. Overview

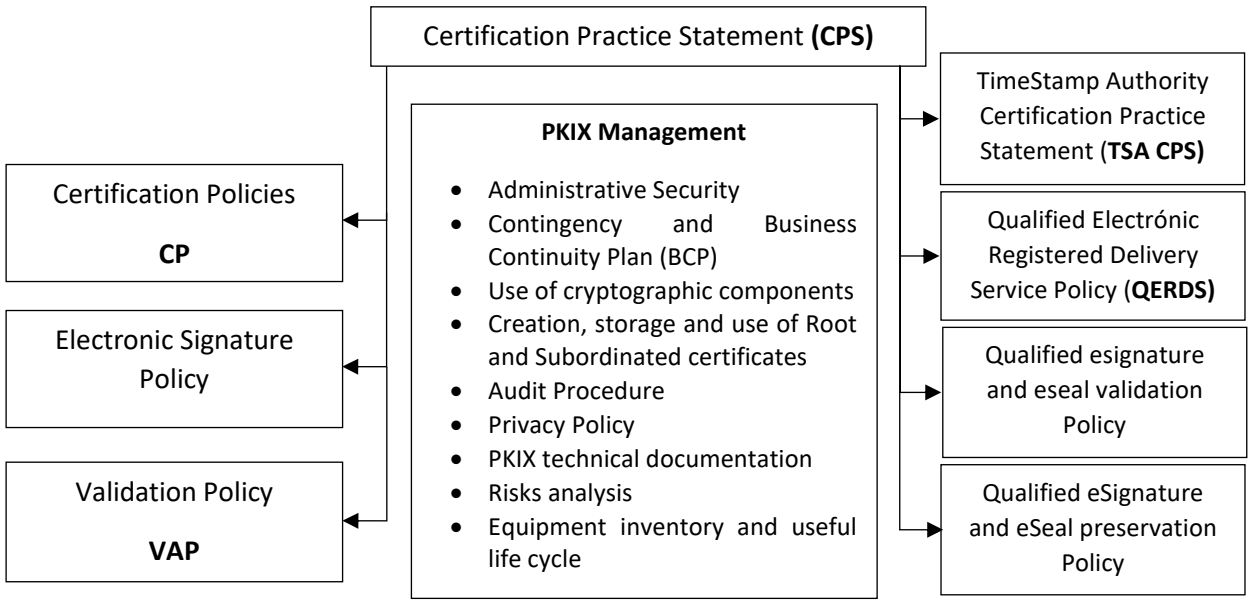
This document is ANF AC's Certification Practice Statement (CPS). This document details the means and procedures that ANF AC uses to meet the requirements and security levels imposed for the various types of certificates it issues, in their respective Certification Policies.

The conditions of use, limitations, responsibilities, properties, and any other information that is considered specific of each type of certificate, is reflected in each of the Certification Policies to which its respective issuance is submitted. The subscriber of any type of certificate must know this CPS and the CP that in each case is applicable for him/her to be able to request and use correctly the electronic certificate and the trust services provided by ANF AC. The provisions of the specific Certification Policies shall prevail over what is stated in this CPS. These can be found published on ANF AC website:

https://anf.es/en/legal-repository/

In accordance with article 9 of Spanish Law 6/2020, de 11 de noviembre, reguladora de determinados aspectos de los servicios electrónicos de confianza, this CPS details the general terms and conditions of ANF AC's certification services in relation to the management of the creation data, signature verification and extinction of certificates' validity; technical and organizational security measures; profiles and information mechanisms regarding the validity of certificates; and especially the verification processes to which data provided by subscribers is subjected in order to establish its veracity. Furthermore, this CPS and related CPs establish the delimitation of responsibilities of the different parties involved, as well as the limitations of liabilities before potential damages.

The document structure of the Policies, the CPS and other documents related to ANF AC's certification services is described in the following scheme:



ANF AC's services are in accordance with the following reference standards:

- ETSI EN 319 401 (General Policy Requirements for Trust Service Providers)
- ETSI EN 319 411-1 (Policy and security requirements for Trust Service Providers issuing certificates; Part 1: General requirements)
- ETSI EN 319 411-2 (Policy and security requirements for Trust Service Providers issuing certificates; Part 2: Requirements for trust service providers issuing EU qualified certificates)
- ETSI EN 319 412-1 (Certificate Profiles; Part 1: Overview and common data structures)
- ETSI EN 319 412-2 (Certificate Profiles; Part 2: Certificate profile for certificates issued to natural persons)
- ETSI EN 319 412-3 (Certificate Profiles; Part 3: Certificate profile for certificates issued to legal persons)
- ETSI EN 319 412-4 (Certificate Profiles; Part 4: Certificate profile for web site certificates)
- ETSI EN 319 412-5 (Certificate Profiles; Part 5: QCStatements)
- ANF AC conforms to the current version of the *Baseline Requirements for the Issuance and Management of Publicly-Trusted Certificates* published at https://cabforum.org/baseline-requirements-documents/. In the event of any inconsistency between this document and those Requirements, those Requirements take precedence over this document, as long as these requirements do not contradict legal standards.
- ANF AC conforms to the current version of the *CA/Browser Forum Guidelines for Issuance and Management of Extended Validation Certificate* published at https://cabforum.org/extended-validation/. In the event of any inconsistency between this document and those Requirements, those Requirements take precedence over this document, as long as these requirements do not contradict legal standards.
- For the hierarchies included in Root Store Programs, ANF AC declares its compliance with the current version of the Chrome Root Program Policy, the Mozilla Root Store Policy, and the CCADB Policy, committing to maintain such compliance in accordance with their updates.

This Certification Practice Statement is structured in accordance with the specification of the RFC 3647 standard (Internet X.509 Public Key Infrastructure: Certificate Policy and Certification Practices Framework) and assumes that the reader

understands the PKI, certification, and electronic signature concepts. If this is not the case, the reader is recommended to study the above-mentioned concepts before continuing with this document.

1.2. Document name and identification

Document name	Certification Practices Statement of ANF AC
Version	3.15
Policy status	APPROVED
OID	1.3.6.1.4.1.18332.1.9.1.1
Approval date	16/11/2026
Publication date	16/11/2026
Location	https://www.anf.es/en/repositorio-legal/

1.2.1. Revisions

Version	Changes	Approval	Publication
3.15	Review of the OCSP description and profile (7.3).	16/11/2026	16/11/2026
3.14	Update to the Mass Revocation Plan (Section 5.7.1.1) and OCSP Profile (Section 7.3)	15/10/2026	15/10/2026
3.13	Update of corporate logo and corporate colors. 1.2.2. Withdrawal of the following certificate profiles: QSealC AAPP Medium Level (Software with distributed key management), Electronic Headquarters EV (Medium Level Cryptographic Software), and Electronic Headquarters (High Level Cryptographic Software). 1.3.1.1. Designation of the following Intermediate CAs as historical (deprecated): ANF High Assurance EV CA1, ANF High Assurance AP CA1, and ANF Global CA1. 4.10. Criterion added establishing OCSP precedence over CRL in case of temporary discrepancy.	01/06/2026	01/06/2026
3.12	Reference to compliance with Chrome, Mozilla, and CCADB policies.	23/02/2026	23/02/2026
3.11	5.7.1 Inclusion of the implementation of the Mass Revocation Plan, including the requirement to perform annual testing and maintain evidence, in accordance with the Mozilla Root Store requirements. Update of supported RSA key lengths for end-user certificates, adding RSA 3072-bit and RSA 4096-bit options.	28/11/2025	28/11/2025
3.10	4.9.5. Greater clarification of the scenario where confirmation of revocation within 24 hours is not possible 9.14. Reference to eIDAS Regulation 2.0	20/02/2025	20/02/2025
3.9	1.2.2. Withdrawal of SSL DV profiles, PSD2 Seal on QSCD, and DC support 1.3.1.2. Inclusion of ANF AC Qualified TSA 2.1. Repository link updated 3.2.1. Greater specification in the content 4.9.2. Inclusion of the email address soporte@anf.es as the designated address for NCA (PSD2)	15/01/2025	15/01/2025

	4.9.3. Classification between immediate and non-immediate revocations 4.9.4. Greater specification on the grace period 4.9.5. Inclusion of the scenario where confirmation of revocation within 24 hours is not possible 4.10.1. Clarification: OCSP retains information about the revocation status of expired certificates. 7.1.3. Withdrawal of the SHA1 algorithm Other minor changes and corrections.		
3.8	Hierarchy update after expiration of Intermediate CA.	29/05/2024	29/05/2024
3.7	Section 3.2.3. Inclusion of remote video identification method.	06/05/2024	06/05/2024
3.6	Clarification on limits of use of certificates	07/08/2023	07/08/2023
3.5	Review and update of contact information.	23/05/2023	23/05/2023
3.4	Withdrawal of the concept of "Cross-Certification" Unification of date format to day/month/year (widely used in spain) QSCD/SSCD list link update Inclusion of the new Intermediate Certification Authorities: • ANF AC Qualified Certificates for eSignature • ANF AC Qualified Certificates for eSeal	16/12/2022	16/12/2022
3.3	Indication of revocation of Intermediate Certification Authorities: • ANF Global Subordinate EV CA1 • ANF Global Subordinate EV Change in document versioning system to *major.minor* Inclusion of Corporate Natural Person Certificates	25/02/2022	25/02/2022
32	Section 4.9.12 updated, method to report and demonstrate key compromise. Revocation of ICA *"ANF High Assurance Server CA"*	31/03/2021	31/03/2021
31	Language clarifications and replacement of LFE by new Law 6/2020	01/02/2021	01/02/2021
30	Inclusion of the new subordinate *ANF Secure Server CA* and corrections to align with Mozila's Root Store Policy	09/11/2020	09/11/2020
29.1	Review and update of links	30/10/2020	30/10/2020
29	Update and clarification of section 5.4.1.	10/10/2020	10/10/2020
28	Annual review, and update according to BR 1.7.1.	27/09/2020	27/09/2020
27	Review and clarification on the non-issuance of SSL / TLS test certificates	05/12/2019	05/12/2019
26	New CA certificate issuance	13/09/2019	13/09/2019
25	Improved adaptation to RFC 3647	19/07/2019	19/07/2019
24	Contemplation of the assumption of loss of QSCD accreditation and review	18/03/2019	18/03/2019
23	Annual review. Clarification of the explanation of the Identity Verification Offices (IVO)	22/03/2018	22/03/2018
22	Annual review without changes	22/03/2017	22/03/2017
21	Adaptation to the eIDAS Regulation	08/11/2016	08/11/2016
20	Renewal of Hierarchies	20/05/2016	20/05/2016
19	Review	25/09/2015	25/09/2015
18	Review	01/02/2015	01/02/2015
17	Creation of subordinated CA: ANF SSL Headquarters CA1	21/11/2014	21/11/2014
16	Renewal subordinate hierarchies 4096 bits.	26/03/2014	26/03/2014
15	Review	12/03/2014	12/03/2014

14	Creation of the Root Hierarchy ANF Global Root CA	09/01/2014	09/01/2014
13	Annual review	31/07/2013	31/07/2013
12	Annual review	30/07/2012	30/07/2012
11	Compliance audit	30/12/2011	30/12/2011
10	Creation of the Ecuador subordinate Hierarchy	20/12/2010	20/12/2010
9	Renewal of hierarchy	01/12/2009	01/12/2009
8	Review	02/03/2008	02/03/2008
7	Review	26/11/2006	26/11/2006
6	Renewal of hierarchy	05/04/2005	05/04/2005
5	Creation of the Root Hierarchy ANF Root CA	28/02/2005	28/02/2005
4	Review	12/12/2004	12/12/2004
3	Review	01/07/2003	01/07/2003
2	Review	01/03/2003	01/03/2003
1	Review	01/07/2002	01/07/2002
1.0	Creation of the root Hierarchy ANF Server CA	01/02/2000	01/02/2000

1.2.2. OIDs

ANF Certification Authority uses Object Identifiers (OID) defined in the ITU-T Rec. X.660 and ISO/IEC 9834-1:2005 standards. ANF AC has been assigned the company private code (SMI Network Management Private Enterprise Codes) **18332** by the international organization IANA (Internet Assigned Numbers Authority), under the branch iso.org.dod.internet.private.enterprise. The meaning of the OID arc "1.3.6.1.4.1.18332.1.9.1.1" is the following:

- Iso (1)
- Org (3)
- Dod (6)
- Internet (1)
- Private (4)
- Enterprise (1)
- ANF Certification Authority (18332)

To individually identify each type of certificate issued in accordance with the present CPS and CP to which it is subjected, an OID is assigned to it. This OID appears in the corresponding section of the "CertificatePolicies":

ANF AC issues the following types of certificates:

Type	Storage	OID
Natural Person Class 2	Cryptographic software.	1.3.6.1.4.1.18332.3.4.1.2.22
	QSCD	1.3.6.1.4.1.18332.3.4.1.4.22
	QSCD. Centralised service.	1.3.6.1.4.1.18332.3.4.1.5.22
Corporate Natural Person	Cryptographic software.	1.3.6.1.4.1.18332.3.4.1.6.22
	QSCD	1.3.6.1.4.1.18332.3.4.1.7.22
	QSCD. Centralised service.	1.3.6.1.4.1.18332.3.4.1.8.22
Legal Representative of Legal Person	Cryptographic software.	1.3.6.1.4.1.18332.2.5.1.3
	QSCD	1.3.6.1.4.1.18332.2.5.1.10
	QSCD. Centralised service.	1.3.6.1.4.1.18332.2.5.1.14
Legal Representative of Entity without Legal Personality	Cryptographic software.	1.3.6.1.4.1.18332.2.5.1.6
	QSCD	1.3.6.1.4.1.18332.2.5.1.11
	QSCD. Centralised service.	1.3.6.1.4.1.18332.2.5.1.15
	Cryptographic software.	1.3.6.1.4.1.18332.2.5.1.9

Legal Representative for Sole and Joint Directors	QSCD		1.3.6.1.4.1.18332.2.5.1.12
	QSCD. Centralised service.		1.3.6.1.4.1.18332.2.5.1.13
Public Employees	High Level	QSCD	1.3.6.1.4.1.18332.4.1.3.22
	Medium Level	Cryptographic software.	1.3.6.1.4.1.18332.4.1.2.22
Electronic seal *(QSealC)*	Cryptographic software.		1.3.6.1.4.1.18332.25.1.1.1
	QSCD		1.3.6.1.4.1.18332.25.1.1.4
	QSCD. Centralised service.		1.3.6.1.4.1.18332.25.1.1.9
	Software with distributed key management		1.3.6.1.4.1.18332.25.1.1.10
Electronic seal Public Administration *(QSealC AA.PP.)*	Cryptographic software.		1.3.6.1.4.1.18332.25.1.1.3
	QSCD		1.3.6.1.4.1.18332.25.1.1.2
	QSCD. Centralised service.		1.3.6.1.4.1.18332.25.1.1.11
	Software with distributed key management		1.3.6.1.4.1.18332.25.1.1.12
Electronic seal for PSD2 *(QSealC PSD2)*	Cryptographic software.		1.3.6.1.4.1.18332.25.1.1.5
Qualified Secure Server SSL *(QWAC)*	PSD2	Cryptographic software.	1.3.6.1.4.1.18332.55.1.1.8.22
	Qualified EV *(QWAC)*		1.3.6.1.4.1.18332.55.1.1.2.22

For technical certificates issued by the hierarchy **ANF Secure Server Root CA**:

ANF Secure Server CA			
Secure Server SSL	OV	Cryptographic software.	1.3.6.1.4.1.18332.55.1.1.7.322
Qualified Secure Server SSL *(QWAC)*	PSD2	Cryptographic software.	1.3.6.1.4.1.18332.55.1.1.8.322
	Qualified EV *(QWAC)*		1.3.6.1.4.1.18332.55.1.1.2.322
Electronic Headquarters EV	Medium Level	Cryptographic software.	1.3.6.1.4.1.18332.55.1.1.5.322
	High Level	Cryptographic software.	1.3.6.1.4.1.18332.55.1.1.6.322

The specifics related to each type of certificate, per its OID, are regulated in the Specific Policy for each certificate, published on the corporate website of ANF AC.

The identification mechanisms offered by ANF AC are defined following the guidelines of Commission Implementing Regulation (EU) 2015/1502 of 8 September 2015 on setting minimum technical specifications and procedures for assurance levels for electronic identification means pursuant to Article 8(3) of Regulation (EU) No 910/2014 of the European Parliament and of the Council on electronic identification and trust services for electronic transactions in the internal market.

1.3. PKI participants

1.3.1. Certification Authority (CA) and Qualified Trusted Services Provider (QTSP)

ANF Autoridad de Certificación (hereinafter, ANF AC) with registered office in Paseo de la Castellana, 79, Madrid (28046) Spain, and VAT number G-63287510, is the Qualified Trust Service Provider (QTSP) of this PKI, which provides qualified trust services to which this CPS is applied. ANT AC is, as well, the Certification Authority of the users of the certification services (for example, subscribers, subjects and relying parties), which creates and assigns certificates, and it's called

Certification Authority (CA). The CA has the overall responsibility for providing trusted services, which is identified in the certificate as issuer, and whose private key is used to sign certificates.

ANF AC, as a QTSP, has a hierarchy of CAs that make up its public key infrastructure, and guarantees that they comply with regulatory requirements, both technical and legal, and with the provisions of this CPS and its addendum.

The CA may use other parties to provide certification services. However, the CA always maintains the overall responsibility and ensures that regulatory requirements, both technical and legal, are met.

ANF AC has the following Root and Intermediate Certification Authorities:

1.3.1.1. Root Certification Authorities (Root CA)

In the scope of the PKI, it is the part in which ANF AC currently has the following Root Certification Authorities:

ANF Secure Server Root CA, which expires on January 10th 2039, with the following identification data:

ANF Secure Server Root CA			
Subject	CN = ANF Secure Server Root CA	**Serial number**	0d d3 e3 bc 6c f9 6b b1
	SERIALNUMBER = G63287510		
	O = ANF CA Raiz	**Public Key**	RSA (4096 Bits)
	C = ES	**Signature Algorithm**	Sha256RSA
Validity period	From 04/09/2019 to 30/08/2039		
Comment	Renewed without rekeying for the correction of a field.		
Fingerprint SHA-1	5B6E68D0CC15B6A05F1EC15FAE02FC6B2F5C6F74		
Fingerprint SHA-256	FB8FEC759169B9106B1E511644C618C51304373F6C0643088D8BEFFD1B997599		

ANF Global Root CA, which expires on May 15th 2036, with the following identification data:

ANF Global Root CA *(expires **2036**)*			
Subject	CN = ANF Global Root CA	**Serial number**	01 64 95 ee 61 8a 07 50
	SERIALNUMBER = G63287510		
	O = ANF Autoridad de Certificación	**Public Key**	RSA (4096 Bits)
	C = ES	**Signature Algorithm**	Sha256RSA
Validity period	From 20/05/2016 to 15/05/2036		
Comment	Issued to replace the Root Certificate with CN = **ANF Global Root CA** issued with SHA-256, serial number 01 3f 2f 31 77 e6 that expires on 2033-06-05. The certificate was issued without renewal of keys, and it's valid until its expiration date.		
Fingerprint SHA-1	FC9843CC9922615001A17374CE8A3D79580FEA51		
Fingerprint SHA-256	E0AFBD2C0EE95A68CD9A3C590B2D3FE07C0A6D0BE796AE5291E424D47792178E		

1.3.1.1.1. Historic Root Certification Authorities (Root CA)

ANF Global Root CA *(expires **2033**)*			
Subject	CN = ANF Global Root CA	**Serial number**	01 3f 2f 31 77 e6
	SERIALNUMBER = G63287510		
	O = ANF Clase 1 CA	**Public Key**	RSA (4096 Bits)
	C = ES	**Signature Algorithm**	Sha256RSA
Validity period	From 10/06/2013 to 05/06/2033		

Fingerprint SHA-256	E3268F6106BA8B665A1A962DDEA1459D2A46972F1F2440329B390B895749AD45
Comment	It was deprecated replaced by ANF Global Root CA with serial number 01 64 95 ee 61 8a 07 50

CN = ANF Secure Server Root CA			
Serial number	0d d3 c0 74 76 71 c7 f4	**Public Key**	RSA (4096 Bits) – SHA256
Validity period	From 15/01/2019 to 10/01/2039		
Fingerprint SHA-1	0EFF0535E0D82BF718A6C40E67EEB5CACA0525D8		
Comment	It was deprecated when being renewed without rekeying, replaced by ANF Secure Server Root CA with serial number 0d d3 e3 bc 6c f9 6b b1.		

ANF Server CA, hierarchy that expired on January 1st 2021, with the following identification data:

CN = ANF Server CA *(Renewal with key change)*			
Serial number	01 34 4b	**Public Key**	RSA (2048 Bits) – SHA256
Validity period	From 01/12/2009 to 01/12/2021 (Expired)		
Fingerprint SHA-1	CEA9890D85D80753A626286CDAD78CB566D70CF2		
CN = ANF Server CA *(Renewal with key change)*			
Serial number	29	**Public Key**	RSA (2048 Bits) – SHA1
Validity period	From 05/04/2005 to 03/04/2015 (Expired)		
Fingerprint SHA-1	B5F884ADEB80D69B203EE39101211F47FA774459		
CN = ANF Server CA			
Serial number	01	**Public Key**	RSA (2048 Bits) – SHA1
Validity period	From 01/02/2000 to 01/02/2010 (Expired)		
Fingerprint SHA-1	A30594E93CF39049537137E25DCF8DC0C6909DB1		

ANF Root CA, which expired on February 26th 2015, with the following identification data:

ANF Root CA			
Serial number	05	**Public Key**	RSA (2048 Bits) – SHA512
Validity period	From 25/02/2005 to 28/02/2015 (Expired)		
Fingerprint SHA-1	d6 06 de eb 90 05 f5 f0 8c de d2 a9 5e 46 37 24 d6 90 8a b5		

ANF Global Root CA, with **SHA1** signature algorithm, has never been used beyond internal tests. At the same time as its generation and exploit was planned, the agreements that prevented its use were published.

ANF Global Root CA *(expires **2033**)* SHA 1			
Serial number	01 3f 2f 31 53 6f	**Public Key**	RSA (4096 Bits) – SHA1
Validity period	From 10/06/2013 to 05/06/2033		
Fingerprint SHA-1	5BB59920D11B391479463ADD5100DB1D52F43AD4		

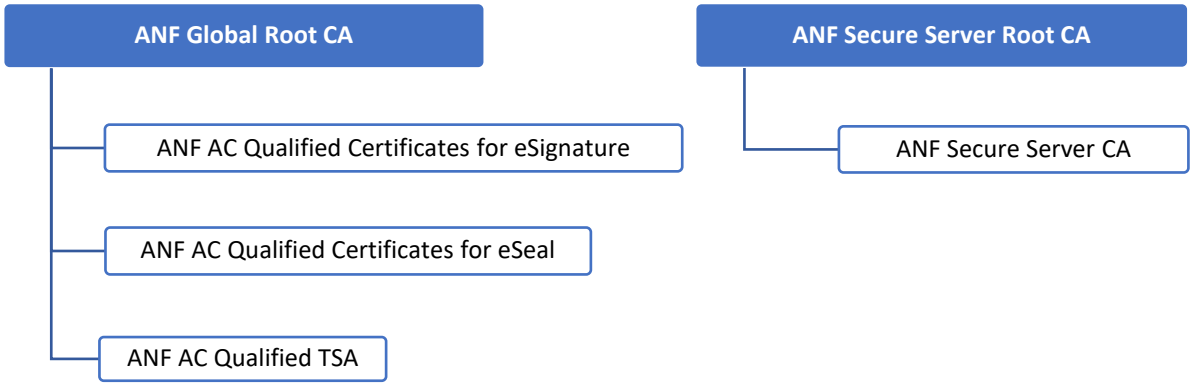
1.3.1.2. Intermediate Certification Authorities (CA IA)

The entities, that within the certification hierarchy, issue end-entity certificates, and whose public key certificate has been digitally signed by the Root Certification Authority.

All Intermediate Certification Authorities (CA IA) can issue OCSP Responder certificates. This certificate is used to sign and verify the responses of the OCSP service on the status of the certificates issued by these CAs. The OID of the certificates

issued by each Intermediate Certification Authority for the issuance of OCSP responder certificates is 1.3.3.1.4. 1.18332.56.1.1.

As a graphical description of the current ANF AC hierarchies:



ANF Secure Server Root CA, which expires on 2039, has the following Intermediate Certification Authorities:

ANF Secure Server CA *(SHA-256)*			
Subject	CN = ANF Secure Server CA	**Serial number**	20 30 79 93 0a e0 6e 76 40 bF 55 6b
	SERIALNUMBER = G63287510	**Public key**	RSA (4096 Bits)
	OU = ANF Autoridad Intermedia Tecnicos		
	O = ANF Autoridad de Certificación	**Signature algorithm**	Sha256RSA
	C = ES		
Validity period	From 05/09/2019 to 02/09/2029		
EKU (extendedKeyUsage)	Server Authentication (1.3.6.1.5.5.7.3.1) Client Authentication (1.3.6.1.5.5.7.3.2)		
Comment	Issues technical electronic certificates for SSL authentication services, SSL EV, electronic headquarters.		
Fingerprint SHA-1	3FB48D045FB6A19C147149FC10664D89E117AD22		
Fingerprint SHA-256	306BF8099636A44FFFB5EEDCE6E30C0F36C7D43F6CCA5A2CA3AB71668F353320		

ANF Global Root CA, which expires 2036, currently has the following Intermediate Certification Authorities:

ANF AC Qualified Certificates for eSignature			
Subject	CN = ANF AC Qualified Certificates for eSignature	**Serial number**	0345C5CDEA742EC405553CA7
	OI = VATES-G63287510	**Public key**	RSA (4096 Bits)
	OU = Certificados Cualificados de Firma Electronica		
	O = ANF Autoridad de Certificación	**Signature algorithm**	Sha256RSA
	C = ES		
Validity period	From 11/11/2022 to 08/11/2035		
Comment	Issues qualified certificates for electronic signature.		
Fingerprint SHA-1	EFC4AFF549DB9CAA8649B243435C6831437BFAFA		
Fingerprint SHA-256	B7CDF23A73A2DA1B515A64403E90A3B90C45DDFBB2558BC1C12FB9BCFA2E5A23		

ANF AC Qualified Certificates for eSeal			
Subject	CN = ANF AC Qualified Certificates for eSeal	**Serial number**	03476F81A0FD402201DAD85D
	OI = VATES-G63287510	**Public key**	RSA (4096 Bits)
	OU = Certificados Cualificados de Firma Electronica		
	O = ANF Autoridad de Certificación	**Signature algorithm**	Sha256RSA
	C = ES		
Validity period	From 11/11/2022 to 08/11/2035		
Comment	Issues qualified certificates for electronic seal.		
Fingerprint SHA-1	EB4A2EDC4F9467454610FCAF80B6C9A87B0387DC		
Fingerprint SHA-256	3431292A66FB3EA53F8B706EA4D980381CB865DF6C99F0524536545B58CF9FFF		

ANF AC Qualified TSA			
Subject	CN = ANF AC Qualified TSA	**Serial number**	339E1CBEC831D897DA7FEE5
	OI = VATES-G63287510	**Public key**	RSA (4096 Bits)
	OU = Sellado de tiempo cualificado		
	O = ANF Autoridad de Certificación	**Signature algorithm**	Sha256RSA
	C = ES		
Validity period	From 13/11/2024 to 11/11/2035		
Comment	Issues certificates for qualified time stamping service.		
Fingerprint SHA-1	379152B84C0E3DB83C85D54FD9692388096BE702		
Fingerprint SHA-256	AFBC8E2D546CA7499D8A8104A765B00D2A30F3B0275394D67A8D60C03D0163B5		

1.3.1.2.1. Historic Intermediate Certification Authorities (CA IA)

The intermediate **ANF High Assurance Server CA** with serial number 0d d5 7d 26 d7 54 87 7b was deprecated when renewed without rekeying, replaced by ANF High Assurance Server CA with serial number 0d d4 26 ed 51 12 00 da, also revoked after the update of Baseline Requirements 1.7.1:

CN = ANF High Assurance Server CA			
Serial number	0d d5 7d 26 d7 54 87 7b	**Public key**	RSA (4096 Bits) – SHA 256
Validity period	From 2019-01-15 to 2029-01-12		
Fingerprint SHA-1	026DC9F2C8C7E865D08968D45785E1E14B6C9207		
CN = ANF High Assurance Server CA			
Serial number	01 62 10 35 9f ab 8a e2	**Public key**	RSA (4096 Bits) – SHA 256
Validity period	From 05/09/2019 to 02/09/2029		
EKU (extendedKeyUsage)	Server Authentication (1.3.6.1.5.5.7.3.1), Client Authentication (1.3.6.1.5.5.7.3.2), Code Signing (1.3.6.1.5.5.7.3.3)		
Fingerprint SHA-1	84ED2589E4B3D3DDADC83BA1870CF8A6A35474E6		

ANF Global Root CA, which expires on 2036, has the following obsolete Intermediate Certification Authorities:

CN = ANF Global Subordinate EV CA1			
Serial number	01 62 09 1c 66 29 b4 23	**Public key**	RSA (4096 Bits) – SHA-1
Validity period	From 05/09/2016 to 02/09/2029		
Revocation date	25/02/2022		
EKU (extendedKeyUsage)	Server Authentication (1.3.6.1.5.5.7.3.1), Client Authentication (1.3.6.1.5.5.7.3.2), Code Signing (1.3.6.1.5.5.7.3.3)		
Fingerprint SHA-1	013062B095081C4B952F0A78246860675C6CE564		

CN = ANF Assured ID CA			
Serial number	07 71 c1 14 00 1a e5 00	**Public key**	RSA (4096 Bits) – SHA-1
Validity period	From 20/05/2016 to 18/05/2026		
Comment	Obsolete		
Fingerprint SHA-1	CBDF3E0686F1B1C1F883494169EFED52F69414B9		
CN = ANF High Assurance AP CA1			
Serial number	0c 68 fc 7d c4 8d 83 80	**Public key**	RSA (4096 Bits)
Validity period	From 20/05/2016 to 18/05/2026		
Comment	Deprecated. Issues qualified certificates for electronic signature and seal.		
Fingerprint SHA-256	4DC54F4C5BDAC19557066E32F62F8C486B155B00F53D102DE78C98EE61A2C317		
CN = ANF High Assurance EV CA1			
Serial number	06 5d 66 65 46 a4 59 00	**Public key**	RSA (4096 Bits)
Validity period	From 20/05/2016 to 18/05/2026		
Comment	Deprecated. Issues TSU for Electronic Time Stamping.		
Fingerprint SHA-256	1C28A8C009F25850B9155533D4A9A14C534B24DA84756E82D6150B5062D63704		
CN = ANF Global CA1			
Serial number	06 6b 6d 11 a4 5f c1 80	**Public key**	RSA (4096 Bits)
Validity period	From 20/05/2016 to 18/05/2026		
Comment	Deprecated. Issues electronic certificates for the management and administration of ANF AC's PKI.		
Fingerprint SHA-1	bb a1 aa 14 07 d4 1f 68 d3 e0 39 78 a3 de 20 d8 95 40 61 b2		

ANF Global Root CA, which expires on 2033, has the following obsolete Intermediate Certification Authorities:

CN = ANF Assured ID CA1			
Serial number	06 40 0c a5 29 ce 79 80	**Public key**	RSA (4096 Bits) – SHA256
Validity period	From 03/03/2014 to 29/02/2024		
Comment	Issued end entity electronic certificates of identity in accordance with what is established in the Spanish Law 6/2020, de 11 de noviembre, reguladora de determinados aspectos de los servicios electrónicos de confianza.		
Fingerprint SHA-1	ABDA0379F02EBAE82EFB9341F2ADD6C0149B5814		
CN = ANF Global CA1			
Serial number	00 ba 8e 3c 10 62 ff 18	**Public key**	RSA (4096 Bits) – SHA256
Validity period	From 03/03/2014 to 29/02/2024		
Comment	Issues electronic certificates for the management and administration of the ANF AC PKI.		
Fingerprint SHA-1	50 95 4d 42 a9 5e 39 e7 d6 1f a0 7a 6f 9c 5f 46 50 06 e9		
CN = ANF High Assurance EV CA1			
Serial number	0b e6 86 56 59 db bc 00	**Public key**	RSA (4096 Bits) – SHA256
Validity period	From 03/03/2014 to 29/02/2024		
Comment	Renewed without key change		
Fingerprint SHA-1	CEE5C66F66217B2FECBAE40487663A5B5A0C2A49		
CN = ANF High Assurance AP CA1			
Serial number	0a aa dc 2e eb a2 92 00	**Public key**	RSA (4096 Bits) – SHA256
Validity period	From 03/03/2014 to 29/02/2024		
Comment	Renewed without key change		
Fingerprint SHA-1	68D15DA01C93DC542A3C7B6DC019356878BD3161		
CN = ANF Assured ID CA1			
Serial number	01 40 15 8c d1 bc	**Public key**	RSA (4096 Bits) – SHA-1
Validity period	From 25/07/2013 to 23/07/2023		
Fingerprint SHA-1	60 14 72 d6 58 ce 79 25 fd 81 ae 46 05 4c a3 42 de 11 2e 8b		

CN = ANF High Assurance AP CA1			
Serial number	01 40 15 92 25 0a	**Public key**	RSA (4096 Bits) – SHA-1
Validity period	From 25/07/2013 to 23/07/2023		
Fingerprint SHA-1	e9 cd c2 dd 9a 82 38 c2 46 35 90 d9 46 49 47 ef 56 52 da d0		
CN = ANF High Assurance EV CA1			
Serial number	01 40 15 93 1e 6b	**Public key**	RSA (4096 Bits) – SHA-1
Validity period	From 25/07/2013 to 23/07/2023		
Fingerprint SHA-1	b6 80 2f ad b3 e6 f9 fc 06 89 20 79 c6 af 35 0a f9 b7 a4 bf		
CN = ANF Global CA1			
Serial number	01 40 15 8f 88 d6	**Public key**	RSA (4096 Bits) – SHA-1
Validity period	From 25/07/2013 to 23/07/2023		
Fingerprint SHA-1	18 21 7f f3 df 4e af 55 56 82 01 75 4c 83 83 97 da 38 71 9e		
CN = ANF Global Subordinate EV			
Serial number	0d d4 2c 2d 8e 3c a6 7c	**Public key**	RSA (4096 Bits) - Sha256RSA
Validity period	From 05/09/2019 to 02/09/2029		
Revocation date	February 25th 2022		
EKU (extendedKeyUsage)	Server Authentication (1.3.6.1.5.5.7.3.1), Client Authentication (1.3.6.1.5.5.7.3.2), Code Signing (1.3.6.1.5.5.7.3.3)		
Fingerprint SHA-1	7FF9DEFC0E00509921A6D16430C4AE1BC6B119D0		

ANF Server CA, hierarchy expired in 2021, had the following Intermediate Certification Authorities:

CN = ANF EC 1			
Serial number	01 6a d0	**Public key**	RSA (4096 Bits) – SHA-1
Validity period	From 20/12/20100 to 27/11/2021		
Fingerprint SHA-1	8d eb ff fb 15 66 c6 2b e2 e4 46 7b b7 07 10 41 3d d6 b1 bd		
ANF SSL Sede CA1 *(SHA-1)*			
Serial number	07 ae 2d	**Public key**	RSA (4096 Bits) – SHA-1
Validity period	From 21/11/2014 to 29/11/2021		
Fingerprint SHA-1	c1 5a 0c f3 be e2 25 f0 78 aa b2 41 8b da 98 ab 36 81 9d 49		
CN = ANF High Assurance EV CA1			
Serial number	03 8b 16	**Public key**	RSA (4096 Bits) – SHA-1
Validity period	From 20/12/2010 to 17/12/2020		
Fingerprint SHA-1	a2 ee 86 d1 88 2c 29 23 10 49 59 8b 19 f5 05 bc 95 35 c7 8b		

1.3.2. Registration Authorities

This Certification Practice Statement applies to the RA that ANF AC employs to attend in-situ subscribers of certificates.

The RA carry out the tasks of the identification of the subscribers and holders of the keys of the certificates, the verification, and the certified digitization of the supporting documentation of the circumstances that appear in the certificates, as well as the revocation and the procedures of the renewal of certificates.

ANF AC since the beginning of its activity has separated the identification (registration) activity itself, from the valuation of that identification. The only work carried out by its Registration Authorities is the on-site verification of the certificate subscriber and collation of documents, transmitting this documentation to ANF AC for verification and assessment of the documents and circumstances required for the issuance of the electronic certificates requested. Service performed by the internal figure of ANF AC, attached to its Legal Department.

Taking into account the previous background, ANF AC, has arranged to adapt to the reality of its effective functioning the word terminology of its Registration Authorities:

- **Recognised Registration Authorities (RRA):**
  - ANF AC itself
  - Representative organizations such as professional associations, professional groups, etc. *(Formerly known as Level 1 Registration Authorities).*
- **Identity Verification Offices (IVO):**
  Are dependent on an RRA. (Formerly known as Level 2 Registration Authorities). The contracts subscribed under the previous name will be considered as equivalent to the figure of IVO, without the need for modification.
- **Collaborating Registration Authorities (CRA):**
  Persons with legal attributions of public notaries: Notaries, Lawyers of the Administration of Justice, Municipal Secretaries, etc.

In any case, the work of all the previous agents, is confined to the verification of the face-to-face recognition of the subscriber and of the original character of the documents that accredit their identity and representation, always under the responsibility of ANF AC the validation of the identification processes.

1.3.2.1. Recognised Registration Authorities (ARR)

They are legal persons with the condition of representative entities of professionals colectives, such as Professional Associations or Professional groups.

They can have their dependency and subscribe Identity Verification Office (IVO) of ANF AC agreements with their members or associates.

These functions will also be carried out directly by ANF AC, which may have it under its control and subscribe with third parties agreements of Identity Verification Offices (IVO) of ANF AC to support the work of identifying the subscribers of electronic certificates of ANF AC.

In advance of the start of its Registration Authority activity of ANF AC, they will have signed the corresponding assumption of responsibilities and collaboration agreement.

To perform their duties. The registration entities carrying out these functions use natural persons who have completed the training course of “RA Operator” of ANF AC, and have passed the training tests as “RA Operator”; it is a mandatory requirement for the performance of these duties. The RA Operators of the Recognized Registration Authority are under the supervision, control, and management thereof, and are of their sole responsibility.

ANF AC entrusts these officially recognized operators with identifying and verifying the personal circumstances of certificate subscribers.

With this objective, the operators:

- Guarantee that the application is made in person by the persons involved in the application, custody of use of the certificate requested.
- Guarantee that the documents provided for identifying and verifying the representation capacity are originals and sufficient for performing this process.
- To the extent of their possibilities, they ensure that the subscriber, and any other intervening party in the application process:
  - perform it without coercion;
  - are of legal age and have mental capacity to act;
  - have sufficient intellectual capacity to assume the responsibility and correct use of the certificates and associated instruments that are requested.
- Deal with requests and clarify doubts on any queries in relation that are asked.

- Put at the disposal of the subscriber, and any other intervening party in the application process, the CPS, the corresponding Certification Policies, Electronic Signature Policy, and service fees, as well as information related with the renewal and revocation processes: causes, obligations and procedure.
- Inform the subscribers of the exact conditions for the usage of the certificate and its limitations.
- Verify that the data owner gives his consent to the use of the personal data, and is informed about the purpose it is going to be given and regarding its storage in the file declared by ANF AC, as well as his/her rights of access, rectification, cancellation, and opposition, and how to exercise said rights.
- Physically provide the Electronic Signature Cryptographic Device to the subscriber, among other utilities, for:
    - The generation of the key pair,
    - The generation of the activation data;
    - The generation of the request certificate;
    - The connection to the trusted ANF AC servers through a secure communications protocol;
    - The certificate download once it has been issued, the generation of electronic signature;
    - The electronic signature and the carrying out of verification processes;
    - The authentication processes before computer applications, and encryption processes;

  This device gives the user access, storage, control and management of their certificates and private keys. As such, its destruction implies the destruction of the certificate and its keys.

- Deliver to the subscriber their identification certificate, electronically signed by the RA operator.
- Verify that all documentation submitted by the subscriber, and any other intervening party in the application process, is original, obtaining a copy of the same which is signed electronically by the RA operator. This documentation, along with other information collected and compiled by the RA operator (application form, statement of identity, biometrics...etc.), constitutes the "application file". The application file is sent, by electronic means, to ANF AC's trusted servers.
  The process of digitalization and transmission of the application file is made by the "RA Manager" application of ANF AC, which guarantees the security and privacy of information. The RA Manager incorporates the following security measures:
    - The RA operator uses a qualified electronic signature certificate issued to them and subject to the RA Certificate Policy, to prove its identity before the program.
    - The RA operator uses its qualified electronic signature certificate to authenticate with PAdES LT signature, all the documents associated with the processing of the application it carries out.
    - RA Manager verifies the validity of the certificate and that the holder is an operator authorized by ANF AC.
    - RA Manager, prior to the acceptance of the transaction, performs validation of the electronic signatures prepared by the RA operator.
    - It verifies that e-mail addresses given are properly formatted, and its validity is verified.
    - It does not allow the e-mail address of the certificate to be the same as the RA Operator.
    - It verifies that the tax identification number is properly formatted.
    - It verifies that the National/Foreign Citizens ID card is properly formatted, and if appropriate, the Passport number.
    - It verifies that the bank accounts listed are properly formatted.
    - It verifies that the necessary documents are attached, per the certificate type requested.
    - All alphanumeric fields are capitalized, except for electronic mail addresses and URLs.
    - It is not allowed the introduction of blanks at the beginning or end of any displayed value, as well as several blank spaces in a row.
- At the end of the application process, the RA Operator generates and signs the Identification Minute, transferring it to the Electronic Signature Cryptographic Device, and generating in paper the Activation Letter; all of which is given to the certificate subscriber. These documents contain:

  - The Identification Minute incorporates in a structured manner, all the information that enables the subscriber to elaborate the PKCS #10 Certificate petition. This Minute is previously encrypted with double key.
  - The Activation Letter contains one of the passwords necessary to decipher the Identification Act. The second password is sent by e-mail to the account given in the application.
- Based on the accredited data, they proceed to:
  - Complete the certificate application form and the subscription agreement.
  - Print these documents, which will be signed in manuscript form by the RA operator who performs the process and by the subscriber; one of these documents is the Certificate Application Form.
  - Submit to ANF AC all the documentation for the processed application.
  - Generate the Identification Minute.

Once documents are formalized, the subscriber must be provided with:

- Signature Creation Data Generation Device.
- Electronic Signature Creation Device.
- Verification Device.
- Identification Minute which allows the generation of the "requested certificate".
- Activation Keys of the minute.

The certificate application form is a document in which the subscriber agrees to an explicit statement of his knowledge on the use of the Electronic Signature Device and Electronic Certificate, as well as the duties, limitations, and obligations as a user of the same. The obligations referred to are:

Generating the signature creation data without third party mediation, and that only the user knows the activation password.

Understanding the obligations of safeguarding the signature data creation and activation password.

Knowing the means for reporting the loss or potential misuse of certificate data and electronic signature, as well as the obligation to revoke the certificate if such event occurs.

Understanding how to use the certification device that has been delivered.

The Certificate Application forms, of the corresponding certificates can be found on the following link:

https://www.anf.es/en

In the case of delivery of a cryptographic device that incorporates biometric reader, the Recognized Registration Authority must ensure that, in its presence, the subscriber proceeds to identify himself/herself before the device with his/her fingerprints. With this method, the device becomes activated and personalized. Only the subscriber may, after undergoing the corresponding biometric verification, activate the certification system.

It should also be required, prior to the execution of the request for issuance of the certificate, that a reading of their Rights and Obligations be performed, answering any doubts the subscriber may have. The certificate issuance request cannot be formalized until the subscriber considers that he/she has full understanding of the documents. With the signing of the certificate application form, the subscriber acknowledges that he/she understands and accepts all the Rights and Obligations set forth in this PKI.

In any case, if the RA Operator deems that the consultations held by the subscriber fall outside the scope of his/her knowledge or obligations, or fails to resolve the doubts that may arise, he/she will instruct the subscriber to contact ANF AC's Customer Service Office, which shall freely assist and provide the advice required.

The RRA assumes the obligation to revoke the certificates processed, or to deny a pending certificate whenever:

- It is known that the circumstances of the holder or legal representative, where appropriate, have changed.
- It is known that there has been a breach affecting the safety of the signature creation data.
- In any case where he/she considers that its validity can adversely affect the reliability of ANF AC's PKI; its use is not framed in good faith; or it is used to the detriment of third parties or in illegal operations.

The assessment criteria that follows the RRA on the documentation submitted by the subscriber to prove his/her identity or other data to be included in the certificate, are those normally accepted in Law. The Recognized Registry Authority always requires the physical presence of the subscriber.

All processing made by the RRA are electronically signed by the operators performing them, thus taking full responsibility for the process.

The RRA have the authorization to charge the fees of identification, application, activation, and inclusion of attributes in the requested certificate.

The final assessment of the adequacy or otherwise of the investigation carried out by the RRA, as well as the documents provided, shall be always be performed by staff of ANF AC.

Once the certificate is issued, the Registration Authority receives an acknowledgment of the issuance via e-mail.

1.3.2.2. Identity Verification Ofices (IVO)

They are dependent on a Recognized Registration Authority, it being a representative entity (Professional Association, Professional group or similar) or the Certification Authority itself, ANF AC. They will sign the corresponding contract prior to the start of their activity.

They have the necessary capacity to determine the identity, capacity and freedom of action of the subscribers and compare the original documents submitted by the subscriber, scan them and make them available to their RRA or the Certification Authority through the technological tool provided for this purpose. They will also ensure that the subscriber signs the application form and contract for the provision of certification services and makes these documents available to the Certification Authority.

Operators of the IVO must pass the "RA Operator" course through the virtual campus of ANF AC, prior to the start of activity of the IVO. They are equipped with a qualified electronic signature certificate and access to the AR Manager application. They follow the same procedures and apply the same security measures outlined in the previous section.

They will act as a link between the subscriber and the Certification Authority, delivering, where appropriate, to the subscriber the signature creation device appropriate to the type of certificate requested.

The contracts subscribed under the previous denomination "AR level 2" will be understood as equivalent to the figure of IVO, without the need for modification.

1.3.2.3. Collaborating Registration Authorities (CRA)

These are persons who, in accordance with the applicable legislation, have the powers of a public notary.

1.3.3. Subscribers

1.3.3.1. Subscriber

These are the natural persons, with full legal capacity to act, in their own name or on behalf of third parties, that request to the Certification Authority the issuance of a certificate and with whom they sign the subscription agreement. In case of assuming the representation of a third party, this representation must be supported with powers of attorney, with the sufficient scope for legal purposes, and in case of being the representative of a legal person, the powers of attorney must be inscribed in the corresponding registry.

Article 6.2 of the Spanish Law 6/2020, de 11 de noviembre, reguladora de determinados aspectos de los servicios electrónicos de confianza, alludes to the signatory, who, in agreement with ETSI EN 319 411, is the subscriber.

> *"The signatories are those persons who have a signature creation device and acts in their own name or on behalf of the natural or legal person they represent."*

The Subscribers are responsible before the CA for the use of the private key associated with the public key certificate, their identity will be included in the certificate and only the issuance of a certificate can be requested in the following cases:

a) To request a certificate of natural person, the subscriber is:
    i. The same natural person requesting the certificate. When the subscriber and the subject are the same person, this person shall be held directly responsible for the breach of obligations.
    ii. A natural person with sufficient powers of attorney to represent the natural person.
b) To request a certificate of a legal representative of a legal person or entity without legal personality, the subscriber is:
    i. A legal representative of the legal person or entity without legal personality with sufficient powers of attorney.
c) To request a system, server, or web certificate, for example SSL, the subscriber is:
    i. The natural person legal representative of the interested entity.

1.3.3.2. Subject

The subject is the entity or person to which the certificate is applied, and which is authenticated with the private key. The subject can be:

a) The Subscriber in case of requesting the certificate for himself the certificate.
b) A natural person to whom the Subscriber requests the certificate acting as his/her legal representative.
c) A legal entity, for example, electronic seal, web authentication, etc. to whom the Subscriber requests the certificate.
d) The public employee of a Public Administration to whom the subscriber with sufficient powers of representation, requests for, the issuance of the certificate to be authenticated in their telematic relations and be used for the generation of electronic signatures as officer, employee, or temporary personnel of the Public administration.

1.3.3.3. Certificate Responsible

The certificate responsible is in possession of the signature creation device and is responsible for its use and custody. The certificate responsible must have an express authorization from the subscriber and his identity will be included in the certificate.

The certificate responsible must be a natural person of legal age, with full capacity to act and must state his/her consent to assume this responsibility.

1.3.4. Relying parties

In general, they are all the natural or legal persons, entities, organizations, Public or Corporate Administrations that voluntarily trust in the electronic certificates, in the electronic signatures generated by them, electronic signature service in centralized certificate device of ANF AC, in the electronic time stamps and in the authentication processes performed in the scope of this PKI.

The third-party recipient of certificates or time stamps, assumes its responsibility as a "relying party" when he/she accepts in its relations with subscribers the use of these instruments.

When this use has been made, the third-party receiver assumes that there is no declaration by which it intends to assert that he/she does not trust in the certificates, in the electronic signatures or time stamps, if he/she effectively trusted them and, therefore, acquired the corresponding responsibilities and obligations.

These "relying parties" must perform public key operations satisfactorily to trust in the certificate, as well as assuming the responsibility of verifying the status of the certificate, the authorized scope of use, as well as the limitations of responsibility contained in the certificates and policies to which they are subjected; for this purpose, they must use the means established in this CPS and Policies that make up its addendum.

Relying parties must act on principles of good faith and loyalty, refraining from performing fraudulent or negligent conduct intended to repudiate the processes of identification, electronic signature or time stamp, or any manipulation of electronic certificates.

1.3.5. Issuance Reports Manager (IRM)

These are staff assigned to ANF AC's Legal Department, responsible for verifying the documentation provided by the Registration Authorities. They determine whether the documents are sufficient or not, they verify the reliability of the information provided by the subscriber, and, if they consider it necessary, order further investigations.

The Issuance Report Managers will determine the need for completing these verifications in each case through telecommunication consultations directly with the registries, or through third party services.

1.3.6. Certificate Issuance Responsibles

There is a minimum of three operators who have the capacity to access and activate ANF AC's certificate issuance devices.

To activate the issuance service, the presence of at least two of these operators is required.

1.3.7. Validation Authority

A Validation Authority is a Certification Services Provider which provides certainty on the validity of electronic certificates.

ANF AC is a Validation Authority (VA) which acts as a trusted third party, validating electronic certificates.

ANF AC manages an IT system formed by a combination of Trusted Servers, that access in real time the status of all certificates issued by ANF AC.

These servers are known as OCSP responders and handle queries regarding the revocation status of certificates issued by ANF AC using the Online Certificate Status Protocol (OCSP), in accordance with RFC 6960. Certificate status information is kept up to date as specified in Section 4.10 of this CPS.

OCSP requests can be performed 24/7/365 completely free. These requests must be made in accordance with IETF RFC 6960. This validation process is complementary to the publication of the Certificate Revocation Lists (CRLs) and the Agencia Estatal de la Administración Tributaria (AEAT) web service.

1.3.8. Time Stamping Authority (TSA)

A Time Stamp Authority is a Certification Services Provider which provides certainty about the existence of certain electronic documents before a given moment in time. The Time Stamping Authority signs the time stamp of such moment, along with the hash of the associated document.

ANF AC is a Time Stamp Authority (TSA) which manages an IT System formed by a combination of Trusted Services whose time system is synchronized with a safe time source.

These servers are given the name Time Stamp Units (TSU), and their function is to stamp electronic time stamps on requests made by ANF AC's users. They allow to determine the existence of a certain object in time.

The ANF AC Time Stamping Services are specified in the TSA CPS with OID 1.3.6.1.4.1.18332.5.1.1, and comply with the IETF RFC 5816, updated by RFC 5816, Internet X.509 Public Key Infrastructure Time-Stamp Protocol (TSP) and RFC 3339 Date and Time on the Internet: Timestamps standards.

1.3.9. PKI Governing Board

The Governing Board of ANF AC's PKI is the body that manages executively the PKI and is responsible for the approval of this Certification Practice Statement and Policies that conform its addendum, as well as their compliance to applicable law, technical standards that affect this subject, and their harmonization with the Certification Policies.

1.4. Certificate usage

Certification Policies corresponding to each type of certificate issued by ANF AC are those documents in which the uses and limitations of each certificate are specified and published in

https://www.anf.es/en/repositorio-legal/

Nonetheless, in general, the permitted and prohibited uses of the certificates issued by ANF AC are established hereunder.

1.4.1. Appropiate certificate uses

Regarding their usage scope, the following situations are considered:

- Certificates issued by ANF AC and intended for the public, private companies and corporations, are intended to be used by subscribers for any use not prohibited, respecting the limitations established in the certificate or in the corresponding CP, assuming, and therefore accepting the liability limitations stated by the issuer in the certificate itself, in this CPS and CPs.
- Certificates issued by ANF and intended for persons belonging to public administration bodies, or within the scope of the competencies of the administrative body and of the position or position held in a Public Administration. The key holders must use these certificates for the uses determined in the application, and always within the limits of use indicated in section a) .

Certificates must be used for their own function and established purpose, without being able to be used for other functions and for other purposes. Likewise, certificates must be used only in accordance with applicable law, especially considering the existing import and export restrictions on cryptography.

Specifications on the usage scope of each certificate must be consulted in their corresponding Certification Policy.

1.4.1.1. Appropiate uses of qualified certificate

The **electronic signature** qualified certificates ensure the identity of the subscriber and the holder of the private signature key. With the intervention of secure signature creation devices, they are ideal for providing support to the qualified signature, which in accordance to Spanish Law 6/2020, de 11 de noviembre, reguladora de determinados aspectos de los servicios electrónicos de confianza, and with eIDAS, it is compared to handwritten signature by legal effect, without having to meet any additional requirements.

Qualified certificates can also be used, if it is defined in the type of certificate, to sign authentication messages, particularly SSL or TSL client challenges, S/MIME Secure Email, encryption without key recovery among other. This digital signature has the effect of guaranteeing the identity of the subscriber of the signature certificate.

The qualified certificates for **electronic seal** *(QSealC)* links the validation data of a seal with a legal person and confirms the name of such person. They allow the generation of electronic seals, which serve as proof that a legal person has issued an electronic document, providing certainty as to the origin and integrity of the document. ANF AC's electronic seal certificates comply with the requirements of Annex III of eIDAS, in order be considered qualified.

Qualified **Website authentication** certificates *(QWAC)* allow the authentication of a website and link the website with the natural or legal person to whom the certificate has been issued. The website certificates issued by ANF AC comply with the requirements of annex IV of eIDAS, in order to be considered qualified.

Electronic Headquarters and Seal certificates are issued for identifying **administrative offices** and sealing electronic documents. Electronic Headquarters certificates in the scope of public administration, per the Spanish Law 39/2015, of October 1st, of the Common Administrative Procedure of Public Administrations.

In the case of **centralized certificates** to sign electronically (no repudiation and commitment with the signed), to carry out processes of identification and authentication before computer systems.

1.4.1.2. Appropiate uses of non qualified certificates

Regarding the employment of non-qualified certificates:

- Non-qualified certificates do not guarantee the identity of the subscriber and, where appropriate, the holder of the signature key. In this case, it is not equivalent to the handwritten signature of the signer.
- Non-qualified certificates can also be used, if so is defined in the certificate type, to sign authentication messages, client challenges including SSL or TLS, Secure Email S/MIME encryption without key recovery, or others.
- In addition, such certificates can support various forms of authentication and advanced electronic signature.
- ANF AC guarantees that they have been issued in accordance with the standard ETSI EN 319 411-1.

1.4.1.3. Computer device certificates

Secure Server SSL and Electronic Headquarter certificates are issued.

This type of certificates follow the standards approved by the CA / Browser Forum and are audited per the ETSI EN 319 411-1 technical standard, both for its extended validation policy as for the basic one.

1.4.2. Prohibited certificate uses

Certificates issued by ANF AC and services rendered as VA or TSA, are to be used exclusively for the purpose and functions set forth in the corresponding Policies, and in compliance with applicable law, and agreements with current regulations, taking into consideration current import and export restrictions on cryptography.

Certificates, except where specified by the CP, cannot be used to act as a Registration Authority or Certification Authority, neither can they be used to sign other public key certificates, nor certificate revocation lists (CRLs), OCSP validation queries, issuance of time stamps, or for the provision of validation or delegated signature services.

Certificates have not been designed nor can be assigned to hazardous situations control equipment or uses that require fail-safe performances, such as the operation of nuclear installations, navigation systems or air communications, weapons control systems, where a failure could directly lead to death, personal injury, or severe environmental damage; their use or resale is not authorized for such uses.

The Certification Policies corresponding to each type of certificate may determine additional prohibitions on the use of certificates.

1.5. Policy administration

The evolution of the certification services of ANF AC implies that this Certification Practice Statement, and the Certification Policies are subject to modifications. A system of numbered versions is established for the correct differentiation of successive editions of these documents.

Any need for modification must be justified from a technical, environmental, legal, or commercial point of view. All technical and legal implications of the new version of specifications should be considered.

Modifications control will be established to ensure, in any case, that the resulting specifications meet the requirements that were intended to comply and that led to the change. In the case that the changes might affect the acceptance of the service by the subject, subscriber or relying parties, ANF AC will give due notice of changes to subscribers and relying parties.

The publication of a new document entails the repeal of the previous one. The Governing Board of the PKI reviews every 3 months the CPS, or when any new applicable regulations become valid, changes in the structure or the provision of services occur that affect directly the present document.

1.5.1. Organisation administering the document

The Governing Board of the PKI is responsible for the administration of this CPS and the Certification Policies of ANF AC. The date of publication is the date of entry into force.

Department	PKI Governing Board
Email	juntapki@anf.es
Address	Paseo de la Castellana, 79
Locality	Madrid
Postal code	28046
Telephone number	+34 932 66 16 14

1.5.2. Contact person

Department	Legal Department
Email 1	soporte@anf.es
Email 2	mcmateo@anf.es
Address	Gran vía de les corts catalanes 996, 4º 2ª
Locality	Barcelona
Postal code	08018
Telephone number	+34 932 66 16 14

1.5.2.1. Revocation Reporting Contact Person

Subscribers, Relying Parties, Application Software Suppliers, and other third parties can submit Certificate Problem Reports informing ANF AC of reasonable cause to revoke a certificate:

- By means of the contact person in this section 1.5.2.
- Directly filing the form found at https://www.anf.es/en/report-breach-misuse/
- Any other method specified in section 4.9.3. of this CPS.

This includes reporting suspected Private Key Compromise, Certificate misuse, other types of fraud, compromise, misuse, inappropriate conduct, or any other matter related to ANF AC's Certificates or PKI.

1.5.3. Person determining CPS suitability for the policy

ANF AC determines the suitability and applicability of each policy and compliance with the CPS based on the results and recommendations received from an independent auditor (see Section 8). ANF AC is also responsible for evaluating and acting on the results of compliance audits.

1.5.4. CPS approval procedures

Final modifications as well as aspects related to publication and notification are approved by the PKI's Governing Board, after verifying the compliance with the requirements set herein.

The Head of the Legal Department and the Head of the Technical Department will analyze that the changes proposed in the CPS and Policies are aligned with the latest versions of the "Baseline Requirements for the Issuance and Management of Publicly-Trusted Certificates" drafted by the CA/B Forum, and that they meet the requirements that gave rise to the proposed modification. They also undertake an annual control of updating the CPS, Certification Policies, and other associated documents, issuing the corresponding version maintenance report or modifications proposals.

All reports are subject to approval by the Governing Board of the PKI, which assumes the responsibility of verifying their conformity and, if applicable, issuing order of application of the same.

1.6. Definitions and acronyms

1.6.1. Definitions

Activation data (PIN): Secret key which the subscriber uses to activate signature creation data.

Authentication: The procedure of verifying the identity of a subscriber or holder of a certificate.

Authority Revocation List (ARL): List which exclusively includes all revoked or suspended intermediate or subordinate CA certificates (not including expired ones).

Certificate Revocation List (CRL): List which exclusively includes all revoked or suspended end-entity certificates (not including expired ones).

Certificate serial number: Unique integer number unequivocally associated with a certificate issued by ANF AC.

Certification Authority (CA): The Certification Authority is the entity that issues electronic certificates.

Certification Services Provider (CSP, CA): Natural or legal person which issues electronic certificates or renders other services in relation with the electronic signature.

Device: An instrument which is used to apply signature creation data.

Directory: Information repository which follows the ITU-T X.500 standard.

Electronic certificate: A certificate signed electronically by ANF AC which links signature verification data (public key) to the holder and confirms their identity.

Hardware Security Module (HSM): Hardware module used to carry out cryptographic functions and securely store keys.

Hash function (hash or digital fingerprint): Operation run on a group of data of any size, such that the result obtained is another group of data of a fixed size, independent of the original size, which has the property of guaranteeing the integrity of the original data and making its falsification impossible.

Holder: Natural/legal person or computer component for which an electronic certificate is issued and is accepted by himself/herself or legal representative or responsible in case of certificates of technical nature.

Identification: The procedure of recognizing the identity of a subscriber or holder of an ANF AC certificate.

IT component (or component): Any software or hardware device suitable for using electronic certificates.

Non-qualified certificates: they are ordinary certificates, without the legal consideration of qualified certificate.

PKCS#10 (Certification Request Syntax Standard): Standard developed by RSA Labs, internationally accepted, which defines the syntax for a certificate request.

Public key and private key: ANF AC's PKI cryptography is based on asymmetrical cryptography. This uses a key pair: whatever is encrypted by one can only be decrypted by the other, and vice versa. One of these keys is called public and is kept in the electronic certificate, while the other is called private and is kept by the certificate's holder.

Public Key Infrastructure (PKI): Group of persons, policies, procedures, and IT systems necessary for providing authentication, encryption, integrity, and non-repudiation services using public and private key cryptography and electronic certificates.

Qualified certificate: A qualified certificate issued by ANF AC as a Qualified Trust Services Provider which complies with the requirements set in eIDAS and allows to guarantee the identity of the subscriber and the holder of the private key of the certificate.

Qualified electronic signature: Advanced electronic signature based on a qualified certificate and generated by a qualified signature creation device.

Qualified signature creation device: Electronic signature creation device that meets the requirements listed in Annex II of eIDAS.

Registration Authority (RA): It is the entity in charge of performing the tasks of identification of the subscribers.

Relying party: Person or entity, different from the holder, who decides to accept and trust in a certificate issued by ANF AC.

Root Certificate: Self-signed certificate whose subscriber is a Certification Authority (CA) belonging to the hierarchy of ANF AC, and which contains the signature verification data of said CA, signed with the signature creation data of the same as Qualified Trust Services Provider.

Session key: Key which establishes encryption for communication between two entities. The key is established specifically for every communication or session; its lifespan lasts until this communication or session ends.

Signature Creation Data (Private Key): It is the private key par associate to the public key pair. It is unique data, private cryptographic key, which the subscriber uses to create the electronic signature.

Signature verification data: This is the public key pair associated with the private key pair. They are unique data, public cryptographic key, used to verify an electronic signature.

Subject: It is the entity and person to whom the certificate is applied, is authenticated with the private key, and has control over it.

Subscriber: Natural person who requests to ANF AC the issuance of a certificate, and who has ratified a Subscription Agreement.

Time Stamping Authority (TSA): It is the entity that issues electronic time stamps.

Trusted hierarchy: Group of certification authorities which keep trust relationships and, thus, a higher-level CA guarantees the reliability of one or more lower-level CAs.

X.500: Standard developed by UIT which defines directory recommendations. It corresponds with the ISO/IEC 9594-1 standard: 1993. This gives rise to the following recommended standards: X.501, X.509, X.511, X.518, X.519, X.520, X.521 and X.525.

X.509: Standard developed by UIT which defines the basic format for electronic certificates.

1.6.2. Acronyms

CA	Certification Authority
RA	Registration Authority
ARL	Authority Revocation List
AV	Validation Authority
CRL	Certificate Revocation List
C	Country
CDP	CRL Distribution Point
CEN	Comité Européen de Normalisation
CN	Common Name
CSR	Certificate Signing Request
CWA	CEN Workshop Agreement
DN	Distinguished Name
CPS	Certification Practices Statement
eIDAS	Regulation (EU) No 910/2014 of the European Parliament and of the Council
ETSI	European Telecommunications Standard Institute
HSM	Hardware Security Module in accordance with the standar ISO 15408: EAL 4 (o higher), and CEN CWA 14169
IETF	Internet Engineering Task Force
LDAP	Lightweight Directory Access Protocol
O	Organization
OCSP	Online Certificate Status Protocol.
OID	Object Identifier
OU	Organizational Unit
CP	Certification Policy
PIN	Personal Identification Number. Signature activation data.
PKCS	Public Key Infrastructure Standards. PKI standards developed by RSA Laboratories, internationally accepted.
PKI	Public Key Infrastructure

PKIX	Working group of IETF (Internet Engineering Task Group) created with the aim of developing the PKI & Internet related specifications.
QTSP	Qualified Trust Services Provider
RFC	Request For Comments (Standard issued by IETF)
UUID	Universally Unique Identifier

2. PUBLICATION AND REPOSITORY RESPONSIBILITIES

2.1. Repositories

Repositorio	Dirección
Root CA certificates	https://crl.anf.es
Intermediate CA certificates	
CRLs / ARLs	
OCSP Responder Certificates	
Documental structure	https://www.anf.es/en/repositorio-legal/
Certification Practices Statement	
Certification Policies	
eIDAS Services Policies	
Published documentation	

2.2. Publication of certification information

ANF AC's publishing service is a system where all the documents drafted by ANF ACA, in relation to their trust services and complementary ones are published. It also publishes the certificates obtained by the entity and available credentials.

- Ensures availability of information online: http://www.anf.es/en
- It is available for anyone interested a paper version of all the document.
- Issues Certificate Revocation Lists (CRLs) and (ARL's), which are accessible to the public. In addition, it provides real-time verification services for certificates, through Online Certificate Status Protocol (OCSP).

The signatory (or, the subscriber to the certificate if they are not the same person) shall be responsible for the disclosure of their certificate to any relying parties wishing to authenticate a user or verify the validity of a signature. The delivery will usually be automatic, attaching the certificate to any electronically signed document.

2.2.1. Publication of status of issued certificates

In the publication of CRLs, safe and quick access to users and subscribers is guaranteed, as indicated in the relevant section of this CPS.

Furthermore, ANF AC provides real-time verification of certificates in the following modalities:

- Through Online Certificate Status Protocol (OCSP) consultation. Information on: https://www.anf.es/en/servicios-ocsp/
- Web service permanently available for querying the status of a given certificate status.

Unless expressly authorized in writing by the PKI Governing Board of ANF AC, it is prohibited to use any of these publishing service to provide validation services to third parties or to use the information for purposes other those specifically authorized herein.

2.3. Time and frequency of publication

Root CAs will issue a List of Revoked CAs (ARL) at least every 90 days or extraordinarily, when the revocation of a certificate of authority occurs.

Each Intermediary CA will issue a List of Revoked Certificates (CRL) daily, and in an extraordinary manner, each time a certificate is revoked.

The certificates issued by the CA are published immediately following their issuance. ANF AC adds the revoked certificates to the relevant CRL within the period stipulated in the "Next Update" field.

OCSP requests are performed on permanently updated states.

Any change in the policies and practices of certification, as well as any change in the specifications or in the conditions of the service will be communicated by ANF AC to the subscribers and to the relying parties through ANF AC website,

https://www.anf.es/

2.4. Access controls on repositories

The information published in a public repository is public information. ANF AC provides unrestricted read access to these repositories.

ANF AC's Publishing Service has a security system that allows to adequately control access to information per the Document Classification and Operators Security Level. This system also prevents unauthorized persons from adding, modifying, or deleting records of this Service, and protects the integrity and authenticity of the information stored, so that:

- Only authorized persons can make entries and modifications.
- The authenticity of the information can be verified.
- The certificates are only available for consultation if the subscriber has formally given consent in the corresponding subscription agreement.
- Any technical change affecting the safety requirements can be detected. ANF AC only allows access to classified information to persons who are specifically authorized. We have implemented security measures that allow to protect, in a reasonable manner, access to information, determining at each visit:
    - Identity of the applicant
    - Accredited Security Level accredited
- Servers managed a Log system which:
    - Manages an access log
    - Manages a denial access log

3. IDENTIFICATION AND AUTHENTICATION

3.1. Naming

3.1.1. Types of names

All certificates contain a DN (DistinguishedName) X.500, in the Subject Name field. A distinguished name which has been used in a certificate by it shall never be re-assigned to another entity. Additionally, all names of qualified certificates are consistent with the provisions of section 7.1. Certificate Profile.

Article 6.1.a) of Law 6/2020 of November 11, regulating certain aspects of trusted electronic services, expressly contemplates that qualified electronic signature certificates may record the passport number of its holder, when This person lacks, for lawful reasons, a National Identity Document number, a foreigner's identity number or a tax identification number.

For its part, article 27.1 of Royal Decree 203/2021, of March 30, which approves the Regulations for the action and operation of the public sector by electronic means, establishes that "Systems based on qualified electronic signature certificates accepted by Public Administrations for the electronic identification of individuals referred to in article 9.2.a) of Law 39/2015, of October 1, issued under Law 6/2020, of November 11, must contain as attributes, at least, your name and surname and your National Identity Document number, Foreigner Identification Number or Tax Identification Number that is unequivocally stated as such."

Consequently, qualified electronic signature certificates in which the passport number of the certificate holder is entered as an identifier ARE NOT SUITABLE for use in electronic relations with Public Administrations. THEY ARE SUITABLE for any other permitted use.

3.1.2. Need for names to be meaningful

The fields of the DN referring to the Name and Surnames will correspond with the legally registered data of the signer, expressed exactly in the format that appears in the National Identity Document, residence card, passport or other recognized means in law.

In the event that the data entered in the DN is fictitious or its disability is expressly indicated (e.g. "TEST"), the certificate will be considered without legal validity, only valid for performing interoperability technical tests. References to test certificates do not apply to SSL / TLS certificates. ANF AC does not issue SSL / TLS test certificates out of publicly trusted roots.

3.1.3. Anonymity or pseudonymity of subscribers

In general, certificates do not allow the use of a pseudonym of signatory, except and only in certificates of the type "natural person with pseudonym". If it is a certificate issued with a pseudonym, the mention (PSEUDONYM) will be included. Specified in the corresponding Certification Policies.

3.1.4. Rules for interpreting various name forms

ANF AC attends in all cases to the format marked by the standard X.500 reference in ISO / IEC 9594.

ANF AC ensures that the subject name attributes are entered exactly as they appear in the official documentation submitted by the applicant, in compliance with the applicable regulations. Consequently, in certain cases, some fields related to the names of natural or legal persons may exceed the limits established in IETF RFC 5280. These situations are unavoidable when the official data exceed those limits, and ANF AC prioritizes the accuracy of the official data provided by the applicant, even if they exceed the technical limits defined by the standard.

3.1.5. Uniqueness of names

The DN of the certificates must be unique.

Within a same hierarchy, it cannot be reassigned a subscriber name that has been used by another subscriber. To avoid duplication of names between different people it shall be incorporated the unique tax identification into the chain of the name that distinguishes the certificate holder.

In the Common Name (CN) the uniqueness and space requirements must be met in the name. In no case are anonymous certificates issued, although ANF AC may issue pseudonym certificates, but these cannot be CA or subordinate CA certificates.

The Certification Policy to which each certificate is submitted sets out the detailed profile of each certificate.

3.1.6. Recognition, authentication, and role of trademarks

The distinguished names are the property of the persons who own the corresponding trademark rights on them, if any. Subscribers may not request Certificates with any content that infringes the intellectual property rights of another entity. If this circumstance is not known, ANF AC will use the name proposed by the user, under the full responsibility and liability of the user.

ANF AC reserves the right to refuse a certificate request because of name conflict.

Certificate subscribers will not include names in applications that may involve infringements of third-party rights.

Conflicts of names of certificate responsible that are identified in certificates with their real name are solved by including, in the certificate's name, the National/Foreign Citizen ID Card of the certificate responsible or other identifier assigned by the subscriber.

3.2. Initial identity validation

3.2.1. Method to prove possession of private key

The keys for end-user certificates can be generated in different ways depending on the selected modality. The possession of the private key is demonstrated in all cases through the verification of a Certificate Signing Request (CSR) in compliance with the RSA PKCS#10 standard.

When the keys are generated by the subscriber, they independently define the activation data for the signature (PIN) without any third-party intervention. The possession of the private key is demonstrated by signing the public key included in the CSR with the associated private key. This confirms that the subscriber possesses the key pair and has the ability to use it.

In cases where ANF AC generates the key pair for the subscriber, these keys can be stored in a cryptographic device (in the case of centralized certificates) or delivered to the subscriber in software in encrypted PKCS#12 (PFX) format. When the certificate is delivered in software, the possession of the private key is internally ensured by the creation and signing of the CSR within ANF AC's controlled environment before being transmitted to the subscriber. This modality does not apply to web authentication certificates (QWAC / SSL), for which the subscriber always generates their own key pair.

In all cases, ANF AC processes the CSR by verifying its integrity, authenticity, and compliance with applicable standards. This includes validating that private keys are generated using appropriate algorithms and key lengths, and that the CSR's

signature demonstrates the subscriber's exclusive control over the private key. Furthermore, this process helps identify any inconsistencies or errors in the CSR content.

3.2.2. Authentication of organization and domain identity

ANF AC is based on the specifications of the Commision Implementing Regulation (EU) 2015/1502 of 8 September 2105 on setting minimum technical specifications and procedures for assurance levels for electronic identification means pursuant to Article 8(3) of Regulation (EU) No 910/2014 of the European Parliament and of the Council on electronic identification and trust services for electronic transactions in the internal market.

Each Certification Policy establishes the procedure for authenticating the identity of a legal person, generally determining the following aspects:

- Types of documents valid for identification.
- Identification procedure to be carried out by the RRA.
- Necessity or not to process identification in-situ.
- Form of attesting the membership to a given organization and sufficient legal powers of attorney.

The SSL Secure Server Certificate CP, OID 1.3.6.1.4.1.18332.55.1.1, details the procedure followed in the authentication process of a Domain.

3.2.3. Authentication of individual identity

ANF AC is based on the specifications of the Commision Implementing Regulation (EU) 2015/1502 of 8 September 2105 on setting minimum technical specifications and procedures for assurance levels for electronic identification means pursuant to Article 8(3) of Regulation (EU) No 910/2014 of the European Parliament and of the Council on electronic identification and trust services for electronic transactions in the internal market.

Each Certification Policy establishes the procedure for authenticating the identity of a legal person, generally determining the following aspects:

- Types of documents valid for identification.
- Identification procedure to be carried out by the RRA.
- Necessity or not to process identification in-situ.
- Form of attesting the membership to a given organization and sufficient legal powers of attorney.

Likewise, the remote video identification method may be used as provided in article 7.2 of Ley 6/2020, de 11 de noviembre, reguladora de determinados aspectos de los servicios electrónicos de confianza and in article 24.1.d) of the Regulation (EU) 910/2014, of the European Parliament and of the Council, of 23 July 2014, relating to electronic identification and trust services for electronic transactions in the internal market (eIDAS), complying with the conditions, technical requirements and conformity assessment established by Order ETD/465/2021, of May 6, which regulates remote video identification methods for the issuance of qualified electronic certificates.

For qualified electronic signature and seal certificates, the initial identity validation will have a maximum validity of five years, during which certificates may be issued provided that there are no changes in the identity or other circumstances of the applicant that affect the validity of the previously validated information, in accordance with Law 6/2020 regulating certain aspects of electronic trust services. In the case of SSL or QWAC certificates, the initial identity validation will have a maximum validity of 398 days.

3.2.4. Non-verified subscriber information

Non-verified information is not included on certificates issued by ANF AC.

3.2.5. Validation of authority

The Issuance Reports Manager is responsible for verifying the powers of attorney, determining their validity in the public records where they must be registered, and assessing their sufficiency.

3.2.6. Criteria for interoperation

No stipulation.

3.3. Identification and authentication for re-key requests

3.3.1. Identification and authentication for routine re-key

Each Certification Policy establishes the authentication procedure of a subscriber's identity.

ANF AC verifies the existence and validity of the certificate for which the re-key is solicited, and that the information used to verify the identity and attributes of the subscriber/subject are still valid. On the other hand, if the terms and conditions governing the relationship between the subscriber/subject and the CA have been modified at the date of re-key, the valid terms and conditions must be transmitted.

3.3.2. Identification and authentication for re-key after revocation

Not applicable. The re-key of revoked certificates is not authorized.

3.4. Identification and authentication for revocation request

ANF AC authenticates all revocation requests. Applicants for the revocation authorized in section 4.9.2. of this document have the following available procedures to request the revocation of their certificate:

- Complete and sign the revocation request form, available in electronic format, and paper for on-site events.
- Use *ANF Certificate Manager*® application of ANF AC, which has an online revocation option with authentication through valid electronic certificates.
- By means of a telephone call to 932 66 16 14, answering the questions that are required to guarantee identity, and that is carried out by the Head of the Legal Department of ANF AC.

4. CERTIFICATE LIFE-CYCLE OPERATIONAL REQUIREMENTS

This section establishes the common operational requirements to the different types of certificates issued by ANF AC. If ANF AC performs "cross-certification" with an external Certification Service Provider, ANF shall require compliance with all requirements defined in this Certification Practice Statement and related Certificate Policies.

The specific regulations for each type of certificate should be consulted in the corresponding Policy.

4.1. Certificate Application

4.1.1. Who can submit a certificate application

Each Certification Policy specifies who can be a certificate holder, who can apply for one and the documentation that must be submitted.

4.1.2. Enrollment process and responsibilities

Once the identity of the subscriber is attested before the Registration Authority, or having his/her signature been authenticated by a public notary, any subscriber desiring a certificate must:

- Complete the certificate application form with all required information and proceed in signing it. Nonetheless, not all required information will be written in the certificate; it is only required for various obligations which ANF AC must meet to correctly issue the certificate and manage its PKI. This information will be kept confidentially by ANF AC in accordance with the applicable law regarding Personal Data Protection.
- Sign the corresponding subscription agreement, adhering to the contractual terms and conditions, and paying the appropriate fees. The signing of these documents presupposes the acceptance of the electronic certificate, and of all obligations and responsibilities specified in this CPS and in the corresponding Certification Policy.

A new "Issue Request" will not be necessary in the case of emissions made because of a revocation due to technical failures in the issuance and/or distribution of the certificate or related documentation.

The data that identifies the key holder in the certificate and in the request, is the one appearing in the required identification documents. This information is accurately recorded, within the limits of length derived from the technical conditions established in the content of the certificate.

Any modification relating to the information contained in the certificate or documents filled out to process the request, produced after the issuance of the certificate, must be communicated to ANF AC, as it may lead to a revocation of the certificate.

On the other hand, in the scope of electronic certificates of centralized signature, the identification and authentication functions described in this section will also be performed by an operator of a Registration Authority or by authentication of signature performed by a public notary.

The Recognized Registration Authority will advise the subscribers on the adequacy of the type of certificate to the characteristics of use and profile of the holder. The Recognized Registration Authority may authorize or deny an application.

Using the technical means provided by ANF AC to the Recognized Registry Authority, the certificate request is registered online on ANF AC's Trust Servers. If the Recognized Registry Authorities do not intervene, the certificate subscriber assumes the responsibility of processing the documentation, authenticating it, and registering it before ANF AC, per the procedure specified in the corresponding Certification Policy.

ANF AC has a customer service. Anyone interested in requesting an electronic certificate can receive support through:

- Telephone call 902 901 172
- Email info@anf.es

4.2. Certificate application processing

4.2.1. Performing identification and authentication functions

The Issuance Reports Managers are responsible for evaluating the sufficiency of the documentation provided by the subscribers and for ordering the necessary verifications to determine the veracity of the information that is requested to be included in the certificate.

In addition, it has the power to modify changes in the request for the certificate, at the request of the RA and/or subscriber, if this is done prior to issuance of the certificate, and the data has been previously verified by the RA, or by the same Issuance Reports Manager.

Likewise, they are entitled to correct the material errors that they detect in the application, which are derived from the verification of the documents provided.

The Issuer Reports Manager, based on the verification procedures performed, will issue a report of approval, denial, or request for further documents to the subscriber.

4.2.2. Approval or rejection of certificate applications

The Issuance Report Managers' responsibilities are to:

- Ensure that the certificate application contains verifiable and complete information.
- Verify that the application meets all the corresponding CP requirements per the certificate requested.
- Verify the powers of attorney and public deeds.
- Verify that all the documents have been signed, and that all formalities demanded by this CPS and its corresponding certification policies have been met.
- Analyze powers of attorney and other public documents.
- Verify that information contained in the certificate is exact and that no typing errors have been made.
- Verify that all the information included in the certificate is exact, and no typewriting errors have been made.
- Verify that all the information required has been included and, if information which is not required is included, that the subscriber authorizes its inclusion in the certificate.
- Apply the corresponding cryptographic verification process on the requested certificated to verify the integrity of the certificate's contents and that the signing party is in possession of the signature creation details.

Based on all the tasks performed, the Issuance Report Managers decides:

- To issue the certificates, generating and signing a favorable issuance report, or
- Refuse to the issuance, generating an unfavorable report, or
- requesting further accrediting documents or the signature of complementary certificates.

4.2.2.1. Denial

In addition to the result of refusal that may be issued by the Issuance Reports Manager, ANF AC reserves the right to freely refuse the issuance or renewal of certificates and when it deems appropriate.

A PKI system is developed within a framework of mutual trust and in a bona fide relationship. Those persons who maintain or have directly maintained any type of conflict of interest with this entity providing certification services, or with the members of its Governing Board, cannot process any request for the issuance of certificates, nor urge third parties to do so. Neither can they process certificate applications to persons belonging to or dependent on entities that are a competition to ANF AC.

On the other hand, in the scope of electronic certificates of centralized signature, the same procedure detailed in this section shall be followed.

4.2.3. Time to process certificate applications

A maximum period of 15 days is established for the processing of the certificate requests. ANF AC does not assume any liability for any delays that may arise, but in case of exceeding the maximum term established, it must inform the subscriber of the causes that caused the delay, and the subscriber becoming released to cancel the request and ANF AC reimbursing any fees that may have had perceived.

4.3. Certificate issuance

The issuance of a certificate means the complete and final approval of an application by the Issuance Reports Manager. Depending on the type of certificate, the issuance may be made on a cryptographic device or software support.

4.3.1. CA actions during certificate issuance

The Issuer Reports Manager issues a certificate of compliance in which the certificate of petition sent by the subscriber is incorporated, as well as the identification minute issued by the Registration Authority that intervened in the identification process, or authentication performed by a public notary. Notifies the subscriber via signed email of the conformity of their request.

These documents are processed automatically by ANF AC's certificate issuing service. This service proceeds in performing the security integrity verification of the documents received, verifying their consistency and their correspondence with the Certification Policy to which the requested certificate will be submitted. In case of conformity, the certificates are issued.

Prior to issuing the certificate, the issuing system proceeds to validate the certificate format using linting tools.

Once the certificate is issued, ANF AC informs the subscriber via email, proceeds to activate the necessary computer mechanisms so that the certificate is registered in the corresponding repository and is available for download. The subscriber, using the same electronic signature cryptographic device that he used to generate the key pair and request certificate, can download, and install it.

In case of technical certificates (SSL, Electronic Seal, Public Administration, Application, or Code Signature), ANF AC will deliver the certificate, through a secure mean (for example, signed e-mail, in person delivery, etc.) to the certificate responsible.

ANF AC signs the public keys of the certificates it issues with its private key.

On the other hand, in the scope of electronic certificates of centralized signature, the same procedure detailed in this section shall be followed, considering that the certificate once issued is loaded in the centralized signature device in which the public key pair was generated. At that time, the subscriber receives an e-mail informing that the certificate has been issued and is available for use in the centralized electronic signature system.

4.3.2. Notification to subscriber by the CA of issuance of certificate

The electronic signature cryptographic devices of ANF AC incorporate a procedure that automatically proceeds to the connection with the trusted server, establishing a secure communication, which allows the downloading of the certificate once it has been issued.

In addition, an e-mail is sent to the subscriber, informing of the issuance and publication of the issued certificate, including the case of electronic certificates of centralized signature.

4.4. Certificate acceptance

4.4.1. Conduct constituting certificate acceptance

It is established that:

- The certificate acceptance is formalized by the subscriber by signing the Subscription Agreement, as stated in section 4.1 of this document. Furthermore, ANF AC will be able to request the perfection of the certificate acceptance by requesting the subscriber to sign a Certificate Reception and Acceptance Minute. This requirement must be attended by the subscriber within 15 days. After that time, if the subscriber has not attended it, ANF AC will be able to revoke the Certificate.
- In the corresponding CP, it will be possible to detail or to extend the form in which the certificate is accepted.
- ANF AC guarantees the correct operation of the instruments supplied, which operate per the characteristics that are required. The subscriber has 7 calendar days to verify the certificate, software, and cryptographic device.
- In the event of technical defects (among others: certificate storage malfunction, program compatibility problems, technical error in the certificate, etc.) or errors in the data contained in the certificate, ANF AC will revoke the certificate issued and proceed to issue a new one within a maximum period of 72 hours.

On the other hand, in the scope of electronic certificates of centralized signature, the same procedure detailed in this section shall be followed.

ANF AC is not responsible for monitoring, investigating or confirming the accuracy of the information contained in the certificate after its issuance. In case of receiving information regarding the inaccuracy or the current non-applicability of the information contained in the certificate, it shall be revoked as stated in section 4.9.1.

4.4.2. Publication of the certificate by the CA

ANF AC, once the certificate is issued, proceeds to publish it in the corresponding repositories.

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

Only in case of PSD2 certificates, if ANF AC has been notified about the e-mail address of the National Competent Authority (NCA) identified in the new certificate issuance, ANF AC will send to this e-mail address the information of the certificate content as well as contact information and instructions for revocation requests.

4.5. Key pair and certificate usage

4.5.1. Subscriber private key and certificate usage

The responsibilities and limitations of use of the key pair and the certificate, including in the scope of electronic certificates of centralized signature, are established in the corresponding CP.

In general, the subscriber of the certificate, in any case, must:

- Upon receipt of the electronic certificate issued by the CA, shall not use it until he/she verifies the correspondence of the data included in the certificate with the information provided by himself/herself, as well as the adequacy of the certificate to the request that it made. The use of the electronic certificate by the subscriber presupposes its full acceptance and conformity.
- Shall ensure the proper use and conservation of the storage of the certificates.
- Shall properly use the certificate and comply with the limitations of use.
- Shall be diligent in the custody of their private key, and will maintain the privacy of signature activation data to avoid unauthorized use.
- Shall notify ANF and any person the subscriber believes may rely on the certificate, without unreasonable delays:
    - The loss, theft or any risk that compromises the private key.
    - Loss of control of signature activation data.
    - The inaccuracies or changes related to the information contained in the certificate, requesting the revocation of the certificate when said modification constitutes cause of revocation.
- Shall no longer use the private key after the validity period of the certificate expires, or when a certificate has been revoked.
- Shall transfer to the holders of keys their specific obligations.
- Shall not monitor, manipulate, or reverse engineer the technical implementation of certification services without the prior written permission of ANF AC.
- Shall not intentionally compromise the security of certification services.
- Shall not use the private keys corresponding to the public keys contained in the certificates, for signing any certificate, as if they were a Certification Entity.
- The qualified certificate subscriber who generates digital signatures using the private key corresponding to the public key listed in the certificate must recognize in the legal instrument that such electronic signatures are equivalent to handwritten signatures, whenever a cryptographic device is used, In accordance with the provisions of eIDAS Regulation.

4.5.2. Relying party public key and certificate usage

Relying Parties may only place their trust in the certificates for what the corresponding CP establishes and in accordance with the "Key Usage" and "Extended Key Usage" field of the certificate.

Relying Parties must perform public key operations satisfactorily to trust the certificate, as well as assume responsibility for verifying the status of the certificate using the means set forth in this CPS and the corresponding CP.

In any case, they must:

- Verify that the certificate is appropriate for the intended use, and if they do not have sufficient knowledge to fully understand it, it is their responsibility to be advised independently.
- Know the conditions of use of the certificates per the provisions of the Certification Practices Statement and Certification Policies to which the issuance and use of each type of certificate is submitted.
- Verify the validity or revocation of the certificates, for which it will use information on the status of the certificates in accordance with the ANF AC's Validation Policy.
- Verify the integrity and authenticity of electronic certificates in accordance with the ANF AC's Validation Policy.
- Verify all certificates in the certificate hierarchy, before relying on the electronic signature or any of the certificates in the hierarchy in accordance with ANF AC's Validation Policy.
- Be aware of any limitations on the use of the certificate, regardless of whether it is on the certificate itself or in the verifier agreement.
- Keep in mind any precautions established in an agreement or other instrument, regardless of their legal nature.
- Notify any fact or anomalous situation related to the certificate and that can be considered a cause of revocation of the same.

- Not monitoring, manipulating, or reverse engineering the technical implementation of certification services without the prior written permission of ANF.
- Not intentionally compromising the security of certification services.
- Recognize that qualified electronic signatures are equivalent to handwritten signatures, according to eIDAS Regulation.

4.6. Certificate renewal

With sufficient time, the certificate user shall be informed by electronic mail to the address indicated on the electronic certificate, that the certificate is close to its expiry date. The same e-mail will indicate the steps to follow for the renewal of the electronic certificate.

4.6.1. Circumstance for certificate renewal

In any case, the renewal of a certificate is subject to:

- That it be requested in due time and in accordance with the instructions and regulations established in ANF AC's CPS.
- That ANF AC or the RA that intervened in the request processing has not had certain knowledge of the concurrence of any cause of revocation of the certificate.
- That the request for renewal for the provision of services refers to the same type of certificate issued initially.
- The key pair is still cryptographically reliable and there are no indications that the subject's private key has been compromised.
- That the certificate to be renewed is valid at the time of the request.
- If a period of more than 5 years has elapsed since the identification was made in-situ by the subscriber, it is necessary to formalize the request by handwritten signature of the subscriber, a process performed in-situ by the interested party and using sufficient original documentation before a RRA, a Collaborating RA or a Certification Authority.

If the legal conditions of provision of the service have varied since the issuance of the certificate, ANF AC shall inform this to the subscriber.

4.6.2. Who may request renewal

Any subscriber may request the renewal of his certificate if the circumstances described in the previous section are met. The renewal application form must be signed by the same natural person or legal representative that processed the certificate request. In case of legal representative, the personal circumstances of the subscriber should not have changed, especially its legal representation capacity.

4.6.3. Processing certificate renewal requests

It will be verified that the registration data remains valid and, if any data has changed, it must be verified, stored and the subscriber must agree with it, as specified in the corresponding section of this policy.

The applicable procedure for the renewal, without re-keying, requires the safe recovery of the cryptographic devices where the keys reside, before, if necessary, proceeding to the safe deletion of the device and the generation of the new certificate.

On the other hand, in the scope of electronic certificates of centralized signature, the same procedure detailed in this section shall be followed.

In case the Terms and Conditions for the Certificates and Services Usage have been modified, the new version shall be provided to the subscriber.

4.6.4. Notification of new certificate issuance to subscriber

Once the process for renewal of the certificate is finished, the user will receive an email notification that will indicate that ANF AC has already issued the renewed certificate and that by entering the activation PIN it can be downloaded to the device. The end user can now use the renewed certificate.

4.6.5. Conduct constituting acceptance of a renewal certificate

In accordance with section 4.4.1. of this CPS.

4.6.6. Publication of the renewal certificate by the CA

In accordance with section 2 of this CPS.

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

No stipulation.

4.7. Certificate re-key

4.7.1. Circumstance for certificate re-key

If the reason for the renewal application is:

- Keys compromised or loss of reliability of the same.

In the following circumstances:

- The certificate is neither expired nor revoked.
- The data contained in the certificate is still valid and if any data has changed, it must be verified, saved and the subscriber must agree with it, as specified in the corresponding section of this policy.
- In the case of qualified certificates, less than 5 years have elapsed since their last appointment and identification before an RA or an IVO.

If the legal conditions for the provision of the service have varied since the issuance of the certificate, ANF AC or the Recognized Registry Authority shall inform the subscriber of this fact.

An email is sent to the email account that appears on the electronic certificate indicating the steps to follow in order to renew the certificate. After generating the new certificate and assigning it an activation PIN, the validation and issuance process is exactly the same as a new certificate.

On the other hand, in the scope of electronic certificates of centralized signature, the same procedure detailed in this section shall be followed.

4.7.2. Who may request certification of a new public key

Any subscriber may request renewal with a change of passwords for their certificate if the circumstances described in the previous point are met. The subscriber is identified and it is verified that he is authorized to request the renewal with a change of certificate keys.

4.7.3. Processing certificate re-keying requests

The applicable procedure for the renewal of the certificate shall be the same as for the issuance of a completely new certificate. Verifications of omission or error in the application shall be verified by ANF AC.

In any case, the renewal of a certificate is subject to:

- That it be requested in due time and in accordance with the instructions and regulations established in ANF AC's CPS.
- That ANF AC or the RA that intervened in the request processing has not had certain knowledge of the concurrence of any cause of revocation of the certificate.
- That the request for renewal for the provision of services refers to the same type of certificate issued initially.
- That the certificate to be renewed is valid at the time of the request.

If a period of more than 5 years has elapsed since the identification was made in-situ by the subscriber, it is necessary to formalize the request by handwritten signature of the subscriber, a process performed in-situ by the interested party and using sufficient original documentation before a RRA, A Collaborating RA or a Trustworthy Entity.

On the other hand, in the scope of electronic certificates of centralized signature, the same procedure detailed in this section shall be followed.

In case the Terms and Conditions for the Certificates and Services Usage have been modified, the new version shall be provided to the subscriber.

4.7.4. Notification of new certificate issuance to subscriber

Once the certificate renewal process is finished, the user will receive a notice in their email indicating that ANF AC has already issued the renewed certificate and that by entering the activation PIN they can download it to the device. The end user will now be able to use the renewed certificate.

4.7.5. Conduct constituting acceptance of a re-keyed certificate

In accordance with section 4.4.1. of this CPS.

4.7.6. Publication of the re-keyed certificate by the CA

In accordance with section 2 of this CPS.

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

No stipulation.

4.8. Certificate modification

Not applicable.

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 the certificate issuance by the CA to other entities

4.9. Certificate revocation and suspension

4.9.1. Circumstances for revocation

The revocation causes the loss of validity of a certificate before its expiration. The effect of the revocation is final. Revocation, including in the scope of electronic certificates of centralized signature, is performed due to the following:

1. Circumstances affecting the information conatined in the certificate:
    a. M Modification of any of the data contained in the certificate.
    b. Discovery that some of the information provided in the certificate request is incorrect, as well as the alteration or modification of the circumstances verified for the issuance of the certificate.
    c. Discovery that some of the data contained in the certificate is incorrect.

2. Circumstances affecting the security of the key or certificate:
    a. Compromise of the private key or the infrastructure or systems of the Certification Entity that issued the certificate, as long as it affects the reliability of the certificates issued from this incident.
    b. Infringement, by the Certification Entity, of the requirements provided in the certificate management procedures, established in ANF AC's DPC.
    c. Compromise or suspicion of compromise of the key security or the certificate of the subscriber or subject.
    d. Unauthorized access or use by a third party of the private key of the subscriber or subject
    e. Irregular use of the certificate by the subscriber or subject, or lack of diligence in the custody of the private key.
    f. The cryptography used does not ensure the relationship between the subject and the public key.

3. Circumstances affecting the security of the cryptographic device:
    a. Compromise or suspicion of compromise of security device.
    b. Loss or disablement due to damage of the cryptographic device.
    c. Unauthorized access by a third party to the activation data of the subscriber or certificate manager.
    d. See section 9.1.1.

4. Circumstances that affect the subscriber or the certificate responsible.
    a. Termination of the relationship between the subscriber and the subject.
    b. Modification or termination of the underlying legal relationship or cause that produced the issuance of the certificate to the subscriber or certificate responsible.
    c. Infringement by the subscriber of the certificate of the pre-established requirements for the latter's request.
    d. Infringement by the subscriber or certificate responsible of their obligations, responsibilities and guarantees, established in the corresponding legal instrument or in the CPS of the Certification Authority that issued the certificate.
    e. Supervening disability of the subscriber or certificate responsible.
    f. Extinction of the legal entity represented or subject of the certificate, as well as the termination of the powers of attorney of subscriber, cessation of the authorization of the subscriber to the certificate responsible or the termination of the relationship between the subscriber and the certificate responsible.
    g. Request of the subscriber for revocation of the certificate, in accordance with what is established in section 3.4 of this policy.

5. Other circumstances:

a. The termination of the service of this electronic certification service provider, in accordance with the provisions of section 4.16 of this policy.

The legal instrument that links the Certification Entity with the subscriber establishes that the subscriber must request the revocation of the certificate in the event of being aware of any of the circumstances indicated above.

4.9.1.1. Loss of QSCD accreditation

The secure signature creation devices provided by ANF AC to its subscribers are QSCD or SSCD devices officially published by the European Commission.

ANF AC, periodically, at least once a year, check the official list in,

https://esignature.ec.europa.eu/efda/notification-tool/#/screen/browse/list/QSCD_SSCD

In the event that a QSCD or SSCD device suffers a loss of its accreditation ANF AC, in compliance with current legal regulations, will proceed to,

- Revoke all certificates whose private keys were generated in that model of QSCD or SSCD.
- The token model of your list of secure devices will be revoked.
- Suite Critical Access® software will be modified, preventing its use in this application.
- They will destroy the tokens that are stored or, in case the manufacturer accepts their return, they will be shipped.

Since the revocation of the certificate and device is due to force majeure not attributable to ANF AC, the subscriber will not receive financial compensation for the loss. In case the cryptographic token manufacturer assumes the cost of the exchange, ANF AC will provide administrative support to its subscribers so that they can carry it out, but it will be limited to the replacement of the token, not the re-issue of the certificate or the costs of transport.

4.9.2. Who can request revocation

- ANF AC
- The subscriber itself, and if applicable, the certificate responsible.
- The legal representative of the subscriber.
- The Registration Authority that processed the petition, may request ex officio the revocation of the certificate if they had knowledge or suspicion of compromise of the holder's private key or any other determining factor that recommends taking such action.
- In the case of certificate revocation for PSD2, the revocation request can be submitted by the Bank of Spain or the National Competent Authority (NCA) by sending the revocation form stamped with a qualified electronic seal certificate in the name of the NCA to the email address soporte@anf.es. The NCA may specify the reason for requesting the revocation.

ANF AC will verify the authenticity of requests for revocation of PSD2 certificates requested by said ANC. If the ANC has notified ANF AC of an email address where it can contact, ANF AC will inform the ANC how it can authenticate itself to request the revocation of a PSD2 certificate.

Furthermore, the email address soporte@anf.es is available for NCAs to notify any changes in the information of payment service providers that may affect the validity of the issued certificates. These notifications will be reviewed and processed on a priority basis, ensuring the timely update of the certificate status information as applicable.

4.9.3. Procedure for revocation request

The entity that needs to revoke a certificate, including in the scope of electronic certificates of centralized signature, must request it to ANF AC or, as the case may be, the Registration Authority with which it processed the certificate request.

ANF AC has a 24x7 service to answer revocations.

- **Immediate revocation** via the following pages:
  - https://revocarcertificado.anf.es/
  - The personal area at https://myaccount.anf.es
  - https://reportarproblema.anf.es/key-compromise (in case of key compromise)
- **Non-immediate revocation:**
  - **During office hours**: By calling +34 932 661 614, sending the signed revocation request form to soporte@anf.es, or by appearing in person at the company's premises.
  - **Outside office hours**: By calling +34 930 502 397.

The Certificate Revocation Application Forms published on ANF AC's website: www.anf.es/en.The revocation request must contain at least the following information:

- Date of request for revocation.
- Identity of the subscriber or, as the case may be, the certificate responsible
- Detailed reason for the request for revocation.
- Name and title of the person requesting the revocation.
- Contact information of the person requesting the revocation.

4.9.4. Revocation request grace period

Requests for revocation will be processed reasonably immediately upon becoming aware of the cause of revocation, and having authenticated the subscriber and verified their ability to act. Therefore, there is no grace period associated with this process during which the revocation request can be annulled.

The request for revocation will be processed upon receipt. It must be authenticated in accordance with the requirements set forth in the corresponding section of this policy. Once the request is authenticated, ANF AC may directly revoke the certificate.

4.9.5. Time within which CA must process the revocation request

There is no delay associated with the immediate revocation methods, as the revocation is performed at the time of the verified receipt of the revocation request.

For revocation requests submitted through "non-immediate" methods, they will be processed upon receipt, following the established procedure for their verification and authentication. Responsibility for this verification lies with the Issuance Decision Officer. The maximum time between the receipt of the request and the update of the certificate's status, making it accessible to all relying parties, will be 24 hours.

If revocation confirmation is not possible within 24 hours, ANF AC will activate an internal escalation procedure to prioritize case resolution. This procedure includes the immediate notification of the Security Officer and the documentation of all actions taken. The cause of the delay will be recorded, and corrective measures will be implemented to prevent similar incidents in the future. Under no circumstances may a revocation subject to the CA/B Forum Baseline Requirements exceed the maximum allowed time.

If the revocation request requires a revocation to a future date, the agreed date will be considered as the confirmation date.

When a certificate is revoked, all instances are revoked. The subscriber and, as the case may be, the certificate responsible, through the e-mail address on the revoked certificate, is informed of the change of status of the revoked certificate. ANF AC shall not reactivate the certificate once revoked.

Likewise, in the Critical Access Cryptographic Device it will be possible to consult that the certificate has been revoked.

4.9.6. Revocation checking requirements for relying parties

Relying parties must verify the status of those certificates that they wish to trust.

ANF AC makes available to relying parties a status information service for certificates based on the OCSP protocol, and access and download of Certificate Revocation Lists (CRLs).

4.9.7. CRL issuance frequency

Each certificate will specify the address of the corresponding CRL, using the CRLDistributionPoints extension.

The CRLs are issued when a revocation occurs or at least every 24 hours, even when there are no changes or updates, in order to ensure the validity of the published information. The CRL specifies the time programmed as the limit for issuing a new CRL. In its elaboration, it follows what is established in the RFC 5280.

ANF AC issues an ARL every six months, even when there are no changes or updates, or when a revocation occurs.

On the other hand , in the scope of electronic certificates of centralized signature, the same procedure detailed in this section shall be followed.

4.9.8. Maximum latency for CRLs and ARLs

The change of status of the validity of a certificate must be indicated in the CRL or, where applicable, in the ARL, less than sixty minutes after the change occurred. Based on this, ANF will publish a new CRL or ARL in its repository at the time of any revocation.

All CRLs and ARLs published by ANF AC will be available in a history available on the web.

In any case, ANF will issue a new CRL in its repository at intervals not exceeding 7 days, and ARL at intervals not exceeding one year.

4.9.9. On-line revocation/status checking availability

Relying parties will be able to consult the certificates published in ANF AC's Repository by means of a certificate status information service based on the OCSP protocol, or by consulting the CRL and ARL Revocation Lists.

Both services are available 24 hours a day, 7 days a week, accessible by secure protocol.

4.9.10. On-line revocation checking requirements

Relying parties must verify the status of those certificates they wish to trust. The verification of the status of the certificates can be done by consulting the most recent CRL and ARL issued by ANF AC or by OCSP query.

For the use of CRLs:

- Always check the last issued CRL. This can be downloaded at the URL contained in the "CRL Distribution Point" extension of the certificate.
- Check additionally the relevant ARL(s) of the certification chain.
- Make sure the revocation list is signed by the CA that issued the certificate being checked.
- The CRL does not include revoked certificates that have expired.

For OCSP use:

- It can be used by GET or POST methods.

If for any circumstance, it is not feasible to obtain information on the status of a certificate, the system that must use it must disregard its use or, depending on the risk, the degree of responsibility and the consequences that might occur, use it without guaranteeing its authenticity in the terms and standards set forth in this policy.

4.9.11. Other forms of revocation advertisements available

In addition to the on-line consultation service through Online Certificate Status Protocol (OCSP) and the Revocation List (CRL)/(ARL) consultation, ANF AC makes available to the public:

- **SOAP service**
  Enables the computer incremental update of the certificate revocation list. This service has been developed following the requirements of the Spanish State Tax Administration. Its access is restricted to authorized entities.

- **Web service**
  It allows the verification of the validity status through consultation on the website of ANF AC:
  https://www.anf.es/en

4.9.12. Special requirements re key compromise

In case of compromise of the private key of an end user certificate, any person can notify ANF AC of the circumstance so that the certificate can be revoked. It can be notified at https://reportarproblema.anf.es/ section "*Report key compromise*" by providing a CSR that is created with a Common Name "Evidence of key compromise for ANF AC" (or similar) or the private key itself. ANF AC will begin the investigation within 24 hours of receipt, and decide if the revocation or other appropriate action is justified based on the current applicable regulations.

In case of compromise of the private key of the CA, the key compromise will be notified to all participants of that Hierarchy, especially to:

- the Governing Board of the PKI;
- all the RRAs;
- all holders of certificates issued by that CA
- Known relying parties.

In addition, it will be published on ANF AC's website, and will be immediately revoked.

The Root CA will publish the certificate revoked in the ARL (Authority Revocation List).

After resolving the factors that led to the revocation, ANF AC may:

- Generate a new certificate for the issuing CA.
- Ensure that all new certificates and CRLs issued by the CA are signed using the new key.
- The issuing CA may issue certificates to all affected subscribers who so require

On the other hand, in the scope of electronic certificates of centralized signature, ANF AC as custodian of the certificate, must notify this to the subscriber of the certificate and be responsible for its revocation. It shall also:

- Notify the PKI's Governing Board and the members of the Security Committee, a detailed report of the incident, and
- Issue a new free certificate to the subscriber who requires it.

4.9.13. Circumstances for suspension

Not applicable. ANF AC does not authorize temporary suspension of certificates.

4.9.14. Who can request suspension

Not applicable.

4.9.15. Procedure for suspension request

Not applicable.

4.9.16. Limits on suspension period

Not applicable.

4.10. Certificate status services

4.10.1. Operational characteristics

ANF AC offers the free web publishing service of Revocation Certificate Lists (CRL) without access restrictions and free access to online certificate validation through the OCSP protocol.

ANF AC's OCSP responses conform to RFC6960. OCSP responses are signed by an OCSP Responder whose Certificate is signed by the CA that issued the certificate whose revocation status is being checked. The OCSP signing Certificate contains an extension of type id-pkix-ocsp-nocheck, as defined by RFC6960.

ANF AC supports an OCSP capability using the GET method for Certificates issued in accordance with the Baseline Requirements.

For end-entity certificates, ANF AC OCSP responses have a validity interval [1]greater than or equal to 8 hours, and less than 10 days.

- For OCSP responses with validity intervals greater than or equal to 16 hours, then ANF AC shall update the information provided via an Online Certificate Status Protocol at least 8 hours prior to the nextUpdate, and no later than 4 days after the thisUpdate.
- For OCSP responses with validity intervals less than 16 hours, then ANF AC shall update the information provided via an Online Certificate Status Protocol prior to one-half of the validity period before the nextUpdate.

For intermediate CA certificates, ANF AC updates the information provided via an OCSP at least every 12 months; and within 24 hours after revoking a intermediate CA certificate.

The serial number of a certificate remains on the CRL until the certificate expires. However, information regarding the certificate's revocation status, including confirmation of whether it has been revoked, remains available through the OCSP service even after its expiration. This ensures the ability to verify the certificate's status beyond its validity period.

In the event of a temporary discrepancy between the revocation status information provided by OCSP and CRL, due to differences in their update times, the information obtained via OCSP shall be considered prevailing, and both mechanisms shall converge to a consistent status.

4.10.2. Service availability

Certification status checking services are available 24x7. The use of the OCSP service is public and free.

[1] *The validity interval of an OCSP response is the difference in time between the thisUpdate and nextUpdate field, inclusive. For purposes of computing differences, a difference of 3,600 seconds shall be equal to one hour, and a difference of 86,400 seconds shall be equal to one day, ignoring leap-seconds*

ANF AC operates and maintains its CRLs and OCSP with sufficient resources to provide a response time of five seconds or less under normal operating conditions.

In case of system failure, or any other factor that is not under the control of the CA as stipulated in section 9.16.5. of this document, ANF AC will make every effort to ensure that this information service is not unavailable for longer than the maximum period of 24 hours.

In the event of termination of activities, expiration, or compromise of the Certification Authority's (CA) keys, a final Certificate Revocation List (CRL), referred to as the *lastCR*[2]*L*, will be issued. This final CRL will remain intact and accessible for consultation, ensuring the availability of certificate status information services for at least 15 years from its publication date.

The availability of revocation status information for the Certificates, in the event that ANF AC ceases its activity as a Trusted Service Provider, will be ensured through the transfer of all information related to the Certificates, especially data regarding their revocation status, to the supervisory body or another Provider with which an appropriate agreement is reached.

4.10.3. Optional features

No stipulation.

4.11. End of suscription

The certificate when its term expires or when it has been revoked, ceases to be valid for its use. Each Certification Policy specifies the expiration of the different certificates.

4.12. Key escrow and recovery

4.12.1. Key escrow and recovery policy and practices

In the case of electronic certificates stored on personal devices, cryptographic software token or HSM token, ANF AC does not generate the keys of its subscribers. In the scope of electronic certificates of centralized signature, ANF AC will back up the signature creation data provided that the security of the duplicate data is the same as that of the original data and that the number of data duplicates does not exceed the minimum necessary to guarantee the continuity of the service. Signature creation data will not be duplicated for any other purpose.

4.12.2. Session key encapsulation and recovery policy and practicies

No stipulation.

[2] *A lastCRL is a Certificate Revocation List (CRL) where the nextUpdate field is set to 99991231235959Z, as specified in IETF RFC 5280, indicating that no further CRLs will be issued.*

5. FACILITY, MANAGEMENT, AND OPERATIONAL CONTROLS

5.1. Physical controls

Controls are maintained in all places in which ANF AC provides services.

5.1.1. Site location and construction

The buildings where the ANF AC's infrastructure is located have access control security measures, so that entry is not allowed unless the persons have been duly authorized.

Facilities in which information is processed meet the following physical requirements:

a) The building containing the information processing units is physically solid, the outer walls of the site are solidly constructed and only access to duly authorized persons is allowed.
b) All doors and windows are closed and protected against unauthorized access.
c) The generation of the keys and the issuance of CA certificates is done in a Data Processing Center with adequate protection measures per the requirements established in the ANF AC's ISMS policies. This property has a physical structure that fully guarantees that the place is free of electromagnetic radiation, has 24x7x365 security service and multiple barriers that prevent access to unauthorized persons.
d) The computer equipment that serves the public (main and mirrors) are installed in a Data Processing Center belonging to a national communications company, with adequate facilities for such purpose, and that has adequate infrastructure to guarantee a stable, secure, and continued service.
e) The building where the central infrastructure of ANF AC is installed, it's a physically secure enclosure, equipped with up to six security levels to be able to access critical machines and applications.
The systems are physically separated from other existing ones in the place, so that only authorized personnel of ANF AC can access them, thus guaranteeing the independence of other equipment and third-party systems housed in the place.
f) Among the protection measures that these facilities have, it should be noted that:
    - The facilities have an independent surveillance service to ANF AC of 24 hours and control by permanent closed circuit television. Cameras are not able to view the operations performed on ANF AC's servers to avoid any risk of displaying the activation PINs when they are entered or other confidential data.
    - Their location is far from basements, to prevent possible flooding.
    - The building is a modern building, built for the purpose and for the exclusive use of the operator. Located in a business area of recognized prestige, of an easy and quick access, if necessary, for the services of Public Order and Firefighters.
    - The building is in an area of low seismic activity and without a history of natural disasters.
    - The building is in an area of low levels of delinquency.
    - Neither the building nor the area where it is located are considered terrorist targets.
    - The facilities do not have windows to the exterior.
    - The premises are constantly protected by personnel belonging to a security company authorized by the Ministry of Interior.
      This staff has a detailed and up-to-date list of the people that ANF AC authorizes to access the central core (where ANF AC computers are located), and make a record of the date and time of entry and exit, identity and signature of the person that access and of each one of the people that accompany him/her, delivering card of personal access. In no case, it allows the extraction of computers without express authorization.
    - Access to the central core is performed by overcoming different controls. The personnel that access is at all times accompanied by personnel responsible for the administration of the data center and any work

that is done on the computer equipment of ANF AC is carried out in the constant presence of a technician belonging to the personnel responsible for the administration of the center of data.

- All facilities have redundant power and air conditioning systems that meet industry standards to create a proper operating environment.
- All facilities have prevention mechanisms to reduce the effect of contact with water.
- All facilities have fire prevention and protection mechanisms. These mechanisms comply with industry standards.
- All wiring is protected against damage or electromagnetic interception or interception of both data and telephony transmission.
- The screens that protect the central areas of the core are transparent and have permanent illumination, to allow observation from surveillance cameras or from corridors or even administrative offices, thus preventing illegal activities inside the Center Data Processing (Datacenter).

5.1.2. Physical access

- **Physical security perimeter:**
  In addition to the measures outlined above, customized access control systems have been implemented, which record the passage of people through each zone. Likewise, it has been established that the visiting staff must be permanently supervised by a person in charge of the data center.
- **Physical access controls:**
  There is an exhaustive physical control system for people at the entrance and exit that forms several safety rings, and is regularly checked.
  Various safety systems, human and technical, are combined in the realization of the physical access controls:
  - Access to the entrance identified with their the National/Foreign Citizens ID card by the security service, monitoring and registering the person, time of arrival, departure, authorization, and a personal identification number.
  - Use of their personal number for identification before the security devices, verifying authorization and registering access.
  - Entry is not allowed unless the persons have been duly authorized by a member of the PKI Board, the Security Manager, the Technical Director, or the Legal Officer.
- **Introduction or removal of equipment:**
  - Authorization of the Security Manager is required for carrying out these operations, taking an inventory of the existing material and the inputs and outputs that have occurred.
  - ANF AC implements controls to prevent losses, damages or compromise of assets, and disruption of activity, in accordance with the Business Continuity and Disaster Recovery Plan.
- **Security against intruders**
  - The facilities where the certification servers are located, and where the process of issuing certificates of final entity and CA is performed, have fire doors, intrusion detection systems are installed and are regularly tested to cover all exterior doors of the building.
  - The facilities that host the servers are permanently operational, 24 hours 365 days a year.
  - Likewise, the installations where the processes of generation of keys of the CA, and emission of certificates are performed, have security measures and alarms to avoid any type of raid.

5.1.3. Power and air conditioning

The rooms, where the equipment that makes up the ANF AC's certification systems are located, have sufficient electricity and air conditioning to create a reliable operating environment. The installation is protected against power failure or any power anomaly by means of an auxiliary line independent of the main electrical source.

Mechanisms have been installed that keep the heat and humidity controlled at levels corresponding with the equipment installed on site.

Those systems that require it, have uninterruptible power and generator sets.

The facilities where the certification servers are located, and where the process of issuing certificates of final entity and CA is performed, have the following features:

- Servers providing certification services have a system to protect against power failure and other electrical anomalies, and the entire wiring system is protected against interception and damage.
- The equipment for issuing certificates is permanently disconnected from the power supply, and for its activation only autonomous power supplies are used, free of any possible anomalies.

5.1.4. Water exposures

Suitable measures have been taken to prevent water exposure to all equipment and cabling.

5.1.5. Fire prevention and protection

The rooms have the appropriate means - detectors - for the protection of their content against fires. The wiring is in false floor or ceiling and the appropriate means are available - detectors in floor and ceiling -for the protection of the same against fires.

5.1.6. Media storage

ANF AC has established the necessary procedures to have backup copies of all the information of its productive infrastructure.

Plans have been established for the backup of all sensitive information and of that considered as necessary for the persistence of its activity.

ANF AC stores and holds all the certificates it has issued for a period never less than 15 years after the loss of validity thereof.

5.1.7. Waste disposal

ANF AC has developed a policy that guarantees the destruction of any material that might contain information, as well as a policy for the management of portable media.

Media containing confidential information is destroyed in such a manner that the information is irrecoverable after its disposal.

5.1.8. Off-site backup

The storage of the backups outside the premises, is done in bank bunker. Each storage device has a unique identifier, description, model, and brand.

ANF AC has contracted, in a Spanish bank, a safety security box in which copies of the devices that allow the regeneration of the system in case of loss are deposited.

Access to the Security Box is restricted to authorized personnel of ANF AC, who have in their possession one of the keys that allows the opening of the safety security box.

Among the protection measures that these banking facilities have, the following are stated:

- The facilities have a 24-hour surveillance service and is controlled by permanent internal TV circuit.
- The architecture and armor of the building correspond to the design commonly used in establishments called "banking bunker".

- The premises are constantly protected by personnel belonging to a security company authorized by the corresponding department of the Ministry of Interior.
- The personnel to which the bank entrusts with the administration of the accesses makes a record of the day and time of entry and exit, identity and signature of the person who accesses.
- Access to the central core is performed by overcoming different controls. The personnel that access is at all times accompanied by the staff responsible for the administration of the bank bunker and the operation of opening the bank is done by double key: one held by the staff of ANF AC and another by the staff of the bank.
- All facilities have energy and air conditioning systems, which comply with the applicable regulations.
- All facilities have fire prevention and protection mechanisms. These mechanisms comply with industry standards.
- Access to the safety security box requires the presence of at least two authorized operators and the use of the master key of the bunker supervisor.

5.2. Procedural controls

ANF AC manages access to information processing systems, to duly authorized operators, administrators, and auditors of the system. These controls include the management of user accounts, modification, or timely removal of access.

5.2.1. Trusted roles

ANF AC has a policy to control access to information. The functions of the application system are restricted by its Information Security Management System (ISMS).

- The ISMS define sufficient security controls and establishes separation of roles, identifies responsibilities, performs a separation between security management and operations functions. It establishes rules that restrict and control the use of system utility programs.
- All staff of ANF AC is identified and authenticated before using critical applications related to the service.
- System operators are responsible for their activities, for example, retention of event logs. ANF AC has a personnel policy that includes disciplinary measures and procedures.
- The Safety Committee contemplates and supervises the adoption of appropriate measures in the treatment of risks, considering from commercial to technical personnel, ensuring that the level of information security is proportional to the level of risk.

The following persons are responsible for the control and management of the system:

Responsible for issuing certificates
There is a minimum of three operators that have the capability to access and activate ANF AC's certificate issuing devices. To activate the keys, the presence of at least two persons is required per the dual control requirement.
Area Directors
They are the people who assume the management of each section of ANF AC. Under their control and supervision, the personnel assigned to them are located. It's their responsibility: • Receive and follow up on complaints for infractions that may affect their staff, proposing appropriate disciplinary measures. • Conduct a permanent control of the adequacy of material and human resources that the Department has, to meet the service needs it has been entrusted with. • Managers must have experience or training in relation to the trust service provided.
System administrators
It is staff assigned to the area of Computer Technology and Telecommunications. None of them are involved in internal audit tasks. It's their responsibility:

- Installation and configuration of operating systems, software products and maintenance and updating of installed products and programs. They can install, configure, and maintain reliable TSP systems, but without access to data.
- Activate CRL, OCSP and Timestamping services through specific certificates.
- Establish and document the procedures for monitoring the systems and the services they provide, as well as the control of the tasks performed by the Certification Authority Operators.
- The design of the programming architectures, the control and supervision of the developments entrusted and the correct documentation of the applications.
- To supervise the correct execution of the Copy Policy to maintain sufficient information to be able to restore any of the systems in the shortest possible time, to ensure that local backups are carried out and per the provisions of the Security Plan.
- Maintain the inventory of servers and other components of ANF AC certification systems.
- Management of router services and of firewall rules, management and maintenance of intrusion detection systems, and other related tasks.
- The installation or removal of cryptographic hardware from the CA.
- Maintenance or repair of CA's cryptographic equipment (including installation of new hardware, firmware or software), and removal of disposables.
- PKI operators involved in day-to-day management of systems, are authorized to perform backups and recoveries for the proper functioning of the CA infrastructure.

Operators of the Certification Authority

- They work in the administrative area.
- They perform administrative tasks which require no physical access to Certification Servers.
- They carry out traditional administrative tasks: filling, data entry, reception and sending of mail, receiving visitors and telephone calls, etc.
- Essentially, they collaborate in all those functions that are required by the area managers, under whose criteria their work is organized and delegation of responsibilities.
- They must have undergone specific training in data protection and computer security, passing the corresponding tests. A minimum of one year's experience in administrative duties is required.

Responsible for selection and training

- Assigned to the legal area.
- Keeps up-to-date the training plans of the personnel that provides their services in ANF AC.
- Supervises the performance of the training and degree of confidence of the personnel and carries out the tests necessary to be able to evaluate the appropriate level of assimilated knowledge.
- Manages the selection of new personnel, controlling the obtaining of references and compliance with established levels.
- Minimum experience of one year is required in this type of duties.

Security Manager

As defined in the ISMS Policy:

- General responsibility for managing the implementation of security practices.
- Controls the formalization of agreements between staff and ANF AC.
- Communicates agreed disciplinary measures, monitoring their compliance.
- Must enforce ANF AC's security policies, and must take care of any aspect of the PKI's security, from physical security to application security, to network security.
- He/she is responsible of managing the perimeter protection systems and of verifying the correct management of the rules of the firewalls.
- He/she is responsible for verifying the correct installation, configuration, and management of intrusion detection systems (IDS) and associated tools.
- He/she is responsible for solving or having resolved security incidents, eliminating detected vulnerabilities, and other related tasks.
- He/she is responsible for the management and control of physical security systems, and material movements outside the premises of the CA.

• Must make the selection and determine the contracting of third party specialists who can collaborate in improving the safety of ANF AC. • Minimum experience of one year is required in these functions. • Should be familiar with security procedures, information security and risk assessment.
Auditors
• Assigned to the legal area and to the area of Computer Technology and Telecommunications. • Perform internal audit functions. • Assume the responsibility of performing the internal audit in accordance with the Standards and Audit Criteria of the Certification Services (ANF AC). • They can access the (records and files) of the system. • A minimum of being assigned one year to the legal area and/or to the Computer Technology and Telecommunications area is required.
Responsible for the elaboration of issuance reports and revocation of certificates
Responsible for validating the petitions, and for ruling on the issuance of a certificate. A minimum of being assigned to the legal area is required.
Documentation responsible
• Assigned to the administrative area. • Controls that the ANF AC's electronic documentation repository and paper documentation files are up to date. • Supervises document updating when necessary. • It is the only one allowed to store, delete, or modify documents in ANF AC's documentation repository. • A minimum of being assigned to the administrative area is required.

5.2.2. Number of persons required per task

ANF AC guarantees at least two people to perform the tasks that require multi-person control and are detailed below:

- The generation of the key of the root and intermediate CA.
- The recovery and backup of the private key of the root and intermediate CA.
- Ceremony of issuance of certificates of the root and intermediate CA.
- Control over any activity performed on the hardware and software resources that support root CAs.

5.2.3. Identification and authentication for each role

The QTSP personnel must be formally appointed for the functions of trust by senior management responsible for safety

ANF AC has a Roles Policy that determines the minimum privileges that an area manager must have to grant and configure access privileges.

5.2.4. Roles requiring separation of duties

The tasks of the Auditor are incompatible over time with the tasks of the other trusted roles. These functions will be subordinated and reported to the Governing Board of the PKI.

The people involved in Systems Administration will not be able to exercise any activity in the Audit or Certification tasks.

5.3. Personnel controls

5.3.1. Qualifications, experience, and clearance requirements

In accordance with the provisions of the Administrative Security Plan.

The Administrative Security Policy and the CPS establish the personnel configuration necessary to adequately carry out CA operations. It always follows the principle of certain necessity to grant an access authorization in a transactional CA. The area managers are the people in charge of establishing in each moment the number of operators, the qualification that they must possess per the work to realize, and to select the identity of the same ones.

In particularly sensitive operations, redundant personnel will always be available. These are personnel who have received the training necessary to deal with this type of operations, and whose number is always higher than what is necessary to deal with any incidence.

ANF AC has a Personnel Policy that supervises that the operators of the PKI, are free of conflicts and personal interests, that can damage the impartiality in the functions that are entrusted to them. Prior to the engagement of any person in the Certificate Management Process, whether as an employee, agent, or an independent contractor of the CA, ANF AC verifies the identity and trustworthiness of such person.

5.3.2. Background check procedures

In accordance with the provisions of the Administrative Security Plan, it should be noted that contractors performing functions of trust are subject to the same plan.

Staff will not have access to trusted functions, until the controls defined in the Personnel Policy are completed.

5.3.3. Training requirements

ANF AC regularly develops, at least every twelve months, training exercises aimed at personnel involved in CA systems. This training may include a combination of training, credentials, or experience in the development of the functions entrusted to it. Maximum attention is given to training on the following aspects:

- Access control.
- Storage management.
- Record of incidents.
- User Registration.
- Identification and authentication.
- Backup and recovery.
- Analysis of files, data, and computer systems.
- Security system access to computer terminals.
- Administrative Security. Security plan.

The following aspects are included in the training:

- Delivery of a copy of the Certification Practice Statement.
- Awareness of physical, logical, and technical security.
- Software and hardware operation for each specific role.
- Security procedures for each specific role.
- Operating and administration procedures for each specific role.
- Procedures for recovery of PKI operation in case of disasters.
- Security and protection of personal data. .

ANF AC maintains the evidence of such training and ensures that the personnel in charge maintain a level of ability that allows them to perform such duties satisfactorily. ANF AC has evidence that IRM possess the skills required by a task before allowing them to perform their tasks. ANF AC requires all IRM to pass an examination on the application verification requirements applicable to each type of certificate.

5.3.4. Retraining frequency and requirements

In accordance with ANF AC's Anual Training Plan. All personnel in Trusted Roles shall maintain skill levels consistent with the ANF AC's training programs.

5.3.5. Job rotation frequency and sequence

No stipulation.

5.3.6. Sanctions for unauthorised actions

The personnel are subject to a process of disciplinary regime previously noticed and known by all the operatives of the organization. The operation of the procedure followed is documented in the Sanctions Policy (OID: 1.3.6.1.4.1.18332.39.14.2).

The performance of unauthorized operations, breach of policies or procedures is subject to disciplinary measures. The sanction can lead to dismissal, regardless of what is established in the legislative framework that can lead to a claim before Judicial Authority.

5.3.7. Independent contractor requirements

All personnel with access to ANF AC certification services sign a confidentiality agreement as part of the terms and conditions of their incorporation. ANF AC verifies that said personnel complies with the training requirements of section 5.3.3. and the document retention and event registration requirements of section 5.4.1.

This agreement provides information on the work of control and inspection that ANF AC's security officers permanently carry out on personnel, software, and hardware.

The purpose of this activity is to guarantee the highest degree of security of the services that this CA provides, and of the assets that it has the obligation to protect.

5.3.8. Documentation supplied to personnel

Access to the mandatory security regulations will be facilitated, which the employee will sign, together with this CPS and the regulations contained in the CPs that are applicable.

5.3.9. Unauthorised activities

Unless expressly authorized, he/she is not allowed to install, use or request information on instruments that can be used to evaluate or compromise the safety of ANF AC certification systems. The installation or use, without express authorization, of instruments that have as an end any attempt to evaluate the services used or received by ANF AC is not allowed.

This prohibition extends to any attempt to verify or attempt to compromise ANF AC's safety measures, even if no instrument is used. In the same way, it extends to the unauthorized evaluation of the services provided or received from ANF AC, whether or not devices are used to that effect.

It is also expressly prohibited the use of software or hardware that is not expressly authorized by the company, as well as the installation, storage, or distribution by any means.

It is forbidden to communicate to another person the user ID and password. If the user suspects that another person knows his/her identification and access data, he/she must activate the mechanisms of change of password.

The user is obliged to use the data, corporate network and/or intranet of the entity and/or third parties without incurring in activities that may be considered illegal or illegal, that infringe the rights of the company and/or third parties or which may violate the morality or etiquette rules of computer networks.

Also, it is not allowed:

- Share or facilitate the user ID and password provided by the Entity to another natural or legal person. In case of non-compliance with this prohibition, the user will be solely responsible for the acts performed by the natural or legal person that uses their user identification in an unauthorized way.
- Try to decrypt the encryption key, systems or algorithms and any other security element that intervenes in the Entity's computer processes.
- Attempting to read, delete, copy, or modify e-mail messages or other users' files.
- Attempt to distort or falsify system log records.
- Use the system to try to access restricted areas of the Entity's computer systems and/or third parties.
- Attempt to increase the level of privileges of a user in the system.
- Destroying, altering, rendering useless or otherwise damaging the data, programs, or electronic documents of the Entity or third parties.
- The user must not store personal data on the computer's hard disk, but use the assigned corporate network folders for this purpose.
- Voluntary obstruct the access of other users to the network through the massive consumption of the computer resources of the organization, as well as actions that damage, interrupt or generate errors in these systems.
- E-mail massively for commercial or advertising purposes without the consent of the recipient.
- Voluntarily introduce programs, viruses, macros, applets, ActiveX components or any other logical device or sequence of characters that causes or is likely to cause any type of alteration in the company's computer systems or third parties. In this regard, it should be remembered that the system itself automatically runs anti-virus programs and their updates to prevent entry into the system of any element intended to destroy or corrupt computer data.
- Introduce, download from the Internet, reproduce, use, or distribute computer programs not expressly authorized by the company. This prohibition includes any other type of work or material whose intellectual or industrial property rights belong to third parties, when authorization is not available.
- Install illegal copies of any program, including those that are standardized.
- Delete any legally installed programs.
- Send or forward messages in chain or pyramid type.
- Use the company's computer resources, including the Internet, for activities that are not directly related to the user's workstation.
- Introduce obscene, immoral, or offensive content and, in general, not useful for the objectives of the company.
- Encrypt information without being expressly authorized to do so.
- Physical or logical access to ANF AC's facilities outside of their working hours.

5.4. Audit logging procedures

Log files are used to reconstruct significant events that have been performed by ANF AC's software, Recognized Registry Authorities, the subscriber, or the event that originated them. Logs are evidence that can be used as a means of arbitration in potential disputes.

5.4.1. Types of events recorded

For all events identified in this section, the audit record shall contain at least:

- The type of event recorded.
- The date and time it was produced.
- Description of the record
- For messages from the Registration Authorities requesting actions from the Certification Authority, the identification of the origin of the message, the recipient, and the content.

- For requests for issuance or revocation of certificates, an indicator of the grant or denial of the request.

5.4.1.1. Types of events recorded in the CA certificate and key lifecycle

- Key generation ceremony and key management databases.
- Key backup, storage, recovery, archival, and destruction.
- The installation of manual cryptographic keys and their results (with the identity of the operator).
- The use of CA keys.
- Removal of key material from the service.
- The identity of those responsible for manipulating any material associated with the keys (such as key components, portable devices that store keys, or means of transmission).
- Custody of keys, devices or means of use of keys and possible compromise of a private key.
- Generation of Certificate Revocation Lists and OCSP entries;
- Introduction of new Certificate Profiles and retirement of existing Certificate Profiles
- Possession of activation data, for operations with the CA private key.

5.4.1.2. Types of events recorded about the subscriber certificate life cycle

- Receipt of certificate requests, renewal, re-key, and revocation requests.
- How the keys were generated.
- Evidence of validation of the requests by the IRM, both for approval and rejection.
- Issuance of certificates.
- Distribution of the public key.
- Generation and publication of certificate revocation lists and OCSP entries.
- Changes in certificate issuance policies.

ANF AC does not record information about reactivation of certificates, since the temporary suspension is not authorized, and the revocation is permanent.

5.4.1.3. Types of events recorded about cryptographic devices

- Reception and installation of the device.
- Connecting or disconnecting a storage device.
- Activation of the device and use.
- The installation and uninstallation process.
- The designation of a device for service and repair.
- The end of the device's life cycle.

5.4.1.4. Types of security events recorded

- Starting and stopping of the systems.
- Start and termination of the certificate issuance application.
- Successful and unsuccessful PKI system access attempts;
- Security profile changes.

- Installation, update and removal of software on a Certificate System.
- System failures, hardware failures, and other anomalies.
- Attempts to create, delete, change passwords or user permissions within the system.
- Generation and changes in the keys of the certification service provider.
- Unauthorized attempts to enter the network of the certification service provider.
- Unauthorized attempts to access system files.
- Failed read attempts on a certificate, and read and write attempts on the certificate repository.

Whether manually or electronically, ANF AC records the following information:

- Physical access records, entries and exits.
- Maintenance and system configuration changes.
- Changes in staff.
- Incidents.
- Records of the destruction of material containing key information, activation data or personal information.
- Agreements with the subscriber and any specific choices made in accordance with the subscriber. They are held by the Registration Authorities, available to the CA.
- Use of authentication and authentication mechanisms, both authorized and denied (including multiple authentication attempts denied).
- Measures taken by individuals in trusted roles, computer operators, system administrators, and system security officers.

5.4.2. Frequency of processing log

The auditor periodically reviews audit records.

The processing of audit records consists of a review of the records (verifying that they have not been manipulated), a random inspection of all the registry entries and a deeper investigation of any alert or irregularity in the records.

The incidents detected are documented, detailing the measures taken and the personnel involved in the decision-making process.

There is an access control to the audit tools, thus avoiding the use or abuse of these. The use or access to these tools is only performed by the responsible persons with special authorization.

5.4.3. Retention period for audit log

Audit logs specified in 5.4.1 are retained for 15 years. These are made available to ANF AC's Qualified auditor upon request.

5.4.4. Protection of audit log

Log files, both manual and electronic, are protected from readings, modifications, deletions, or any other type of unauthorized manipulation, applying logical and physical access controls. The private keys used for the audit log are only intended for this purpose.

These protection measures preclude the elimination of audit records prior to the expiration of their storage period.

5.4.5. Audit log backup procedures

Backups of the audit logs are done per the measures established for the backups of the Databases.

5.4.6. Audit collection system (internal vs. external)

Log files are stored on internal systems by a combination of automatic and manual processes executed by PKI applications.

List of risks covered:

- Insertion or fraudulent alteration of a session record.
- Fraudulent suppression of intermediate sessions.
- Insertion, alteration, or fraudulent suppression of a historical record.
- Insertion, alteration, or fraudulent deletion of the record of a table of queries.

5.4.7. Notification to event-causing subject

Not applicable. Automatic notification of the action of the audit log files to the cause of the event is not provided.

5.4.8. Vulnerability assessments

A periodic vulnerability analysis is carried out on all ANF AC internal systems. Additionally, the ANF AC's security program includes an annual Risk Assessment that:

1. Identifies foreseeable internal and external threats that could result in unauthorized access, disclosure, misuse, alteration, or destruction of any Certificate Data or Certificate Management Processes;
2. Assesses the likelihood and potential damage of these threats, taking into consideration the sensitivity of the Certificate Data and Certificate Management Processes; and
3. Assesses the sufficiency of the policies, procedures, information systems, technology, and other arrangements that ANF AC has in place to counter such threats.

5.5. Records archival

All information regarding certificates is kept for an appropriate period of time, as set forth in section 5.5.2 of this document.

It should be noted that in relation to confidential documentation, ANF AC does not use paper documents in its work activity. All documents are dematerialized, coded per their security level, and stored in secure repositories created for such purpose.

The paper support is stored in closed warehouses, only accessible to expressly authorized personnel, and they have permanent security 24/7/365, with monitoring system and alarms.

5.5.1. Types of records archived

ANF AC saves all events that occur during the life cycle of a certificate, including renewal.

The certification service provider must keep a record of at least the following information:

- Data related to the registration procedure and the request for certificates.
- The audit records specified in this document.
- Incidents detected.

El RA or IVO, in the certificate request program registers and requires the following information:

- The method of identification applied.
- Registration of unique identification data (e.g. National/Foreign Citizens ID card or other identification documents, if applicable).

- Digitized and signed copy of the documents submitted by the subscriber.
- Identity of the AR operator who processes the request.
- Place of storage of copies of applications and identification documents.
- The identity of the operator accepting the request.
- Method used to validate identification documents.
- Name and identifier of the RA that performs the processing.
- The acceptance of the subscriber of the Subscription Agreement, the consent of the subscriber to allow the CA to maintain in its repositories the records containing personal data, the possible authorization for third party access to these records, and the publication of the certificate.
- Place of storage of copies of applications and identification documents.

5.5.2. Retention period for archive

ANF AC retains all records specified in the previous section in their entirety for a minimum of 15 years from the expiration, revocation of the certificate, or termination of the service, and always in accordance with the period established by applicable legislation.

5.5.3. Protection of archive

Potection measures of the archive are adopted, so that its content can not be manipulated or destroyed. ANF protects its personal data files in accordance with the provisions of section 9.4.1 of this document.

5.5.4. Archive backup procedures

ANF AC makes daily incremental backup copies of all its electronic documents, complete weekly backups, and monthly historical copies are safeguarded.

There is a backup policy that defines the criteria and strategies for action against an incident.

5.5.5. Requirements for tiem-stamping of records

The information systems used by ANF AC guarantee the registration of the time in which they are made. The instant of time of the systems comes from a reliable source that verifies the date and time.

The clock signal is synchronized with the Royal Institute and Observatory of the Navy - San Fernando (Cadiz), "ROA", which is responsible for maintaining the basic unit of Time, declared for legal purposes as the Spanish National Patron of such unit, as well as the maintenance and official dissemination of the "Coordinated Universal Time" (UTC (ROA)) scale, considered for all purposes as the basis of the legal time in the entire Spanish national territory (Spanish Royal Decree 23 October 1992, number. 1308/1992).

This lab maintains several servers that distribute the time through the NTP protocol. This system of high stability and precision uses a set of cesium atomic patterns, which allow to know the UTC time with a precision superior to the microsecond, and with a stability of 32 s/year.

At least once a day all systems are synchronized with this source.

5.5.6. Archive collection system (internal or external)

The information collection system is internal and belongs to ANF AC.

5.5.7. Procedures to obtain and verify archive information

Access to this information is restricted to authorized personnel for this purpose, protecting against physical and logical access.

5.6. Key changeover

Prior to the expiration of the validity period of the certificate of a root or subordinate CA, a new corresponding root or subordinate CA will be created, through the generation of a new pair of keys. Changes may be made to the content of the certificate that better conform to current legislation, to the PKI of ANF AC and to the reality of the market. The old CAs and their associated private keys will only be used for signing CRLs and ARLs while there are active certificates issued by said CA.

The procedures for providing, in the event of a CA key change, the new CA public key to the holders and third parties accepting its certificates are the same as those for providing the current public key. It will be published on the website https://crl.anf.es/

The CA security and technical documentation details the CA rekeying process.

5.7. Compromise and disaster recovery

5.7.1. Incident and compromise handling procedures

There is a Business Continuity and Disaster Recovery Plan, OID 1.3.6.1.4.1.18332.13.1.1, which defines the actions to be performed, resources and personnel to be used in the event of an intentional or accidental event that would render useless or degrade the resources and certification services of ANF AC. The main objectives of the Business Continuity and Disaster Recovery Plan are:

- Maximize the effectiveness of recovery operations by establishing three phases:
  - Notification/Evaluation/Activation Phase to detect, evaluate damages and activate the plan.
  - Recovery Phase to restore services temporarily and partially until the recovery of damages caused in the original system is done.
  - Reconstitution Phase to restore the system and processes to their normal operation.
- Identify the activities, resources, and procedures necessary for the partial provision of certification services.
- Assign responsibilities to the personnel designated by the Safety Committee and provide a guide for the recovery of normal operations.
- Ensure coordination of all operators involved in the planned contingency strategy.

The damage assessment and action plan are described in the Business Continuity and Disaster Recovery Plan.

It will be informed to the subscribers and other entities with which ANF AC has agreements or relationship in case of compromise.

In the event of weakness of the cryptographic system: the algorithm, the combination of the key sizes used or any other technical circumstance that significantly weakens the technical security of the system, will be applied as defined in the Business Continuity Plan and Disaster Recovery.

5.7.1.1. Mass Revocation Plan

ANF AC maintains a documented, comprehensive and actionable Mass Revocation Plan to manage events requiring the revocation of a large number of certificates within a short period of time.

ANF AC tests the Mass Revocation Plan at least annually through appropriate operational exercises that do not involve the revocation of active Subscriber Certificates.

Following each test or live mass revocation event, ANF AC reviews the results and incorporates identified lessons learned and improvements into the plan in order to continually improve its preparedness for mass revocation events.

The Mass Revocation Plan is reviewed and updated at least annually. ANF AC retains evidence of the tests performed and makes the plan available to its auditors upon request.

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

When an event of corruption of resources, applications or data takes place, a procedure will be activated that would allow to initiate the necessary steps, per the Business Continuity and Disaster Recovery Plan that includes the strategy of action in this type of situations.

5.7.3. CA private key or cryptographic suite compromise procedures

ANF AC's Business Continuity Plan contemplates compromise or suspicion of compromise of a CA's private key as a disaster.

In case of an intermediate or subordinate CA compromise, the following actions must be performed:

- Verify the compromise and, in case of confirmation, inform all subscribers.
- Indicate that certificates and revocation status information that have been delivered using the CA key are no longer valid.
- Proceed in accordance with section 4.9.11

If the compromised key is the root CA, the certificate will be removed from all applications and a new one will be distributed.

ANF AC's Business Continuity Plan establishes that, in case of compromise of the CA key, the associated certificate shall be immediately revoked, and all certificates issued with that certificate will also be revoked, offering to the final entities the possibility of having a new certificate issued by a new CA, free of charge and for a period of time equal to the remainder of life.

In addition, a free reissuing service will be offered for signed documents with revoked certificates.

In case of **revocation** of one of ANF AC's Hierarchies, the following will be carried out:

- Notify this fact, when it occurs, to the General State Administration.
- Report the event by publishing an ARL.
- Make every effort to report the revocation to all subscribers to whom the certification service provider issued certificates, as well as third parties wishing to rely on those certificates.
- Perform a re-key and carry out an electronic transmission of it, in the event that the revocation was not due to the termination of the service by the certification service provider, as established in this CPS.

The causes of revocation contemplated in this section can be by compromise of key, technical reasons, organizational reasons, or disaster.

ANF AC has a Business Continuity and Disaster Recovery Plan that will be applied in case the advances of the technique put at risk the technical safety of the algorithms, the size of the key used or any other technical circumstance. In case of possible risk, an impact analysis will be carried out. This analysis will study the criticality of the security problem, its scope, and the strategy of recovery from the incidence.

The minimum points to be included in the impact analysis report are:

- Detailed description of the contingency, temporal scope, etc.
- Criticality, scope.
- Proposed solutions.
- Deployment plan for the chosen solution, which will include at least:
    - Notification to users, both subscribers and relying parties.

- It will be informed on the website of the contingency produced
- Revocation of affected certificates
- Renewal strategy

5.7.4. Business continuity capabilities after a disaster

ANF AC's Business Continuity and Disaster Recovery Plan develops, maintains and contemplates the possibility of testing and, if necessary, executing an emergency plan in the event of a disaster, whether due to natural or human causes, on the facilities, which indicates how to restore information systems services.

The systems and facilities defined in the Business Continuity Plan and Disaster Recovery have the physical protection required.

ANF AC's Business Continuity and Disaster Recovery Plan establishes the capacity to restore the normal operation of revocation services and, if necessary, suspension, within 24 hours after the disaster, and at least the following actions may be executed:

- Revocation of certificates (if applicable).
- Publication of revocation information.

The disaster recovery database used by the certification service of ANF AC is synchronized with the production database within the time limits specified in the security plan.

The disaster recovery systems of the certification service of ANF AC have the physical security measures specified in the security plan.

5.8. CA or RA termination

5.8.1. CA termination

In accordance with article. 24.2.a (i) of Regulation (EU) 910/2014, ANF AC follows the recommendations expressed in the reference standards.

To minimize the effects to the Recognized Registry Authorities, to the subscribers and to third parties because of the cessation in the provision of services. ANF AC undertakes to carry out, as a minimum, the following procedures:

- Notify at least ninety days in advance to the holders of electronic signature certificates and regulatory control bodies on the termination of its activities.
- Inform all subscribers and relying parties of the certificates they have issued. To do so, during a period of ninety days, there shall be a publication, in this sense, on the main page of the corporate website.
- Remove any authorization to subcontractors acting on behalf of the certification service provider in the process of issuing certificates.
- Execute the necessary tasks to transfer the maintenance obligations of the registration information and the event log files, during the respective periods of time indicated to the subscriber and to relying parties.
- Destroy the private keys of all CAs.
- Revoke all issued CA certificates.
- In accordance with Article 9.3(c) of Law 6/2020, take the necessary measures to ensure the continuity of certification services by transferring the management of certificates that remain valid on the termination date to another provider, informing subscribers and the supervisory body in advance about the identity and characteristics of the new provider, and obtaining the express authorization of the certificate holder.

If the activity is not transferred to another certification entity or the holder does not authorize this process:

- The certificate will be revoked in advance.
- The lists of revoked certificates will be kept online for a period of not less than five years.
- An escrow in a notary public will be made of the certificate revocation lists and of the necessary means to verify the validity of the certificates and electronic signatures made with them.
- Termination of the Recognized Registry Authority, pursuant to the provisions of section "4.17 Termination of the Registration Authority".

5.8.2. RA termination

The framework of collaboration of ANF AC with its Recognized Registry Authorities [RRAs] is formalized through the corresponding agreement that states their "Obligations and Responsibilities". The ARR, formally undertakes among other issues to:

- Notify at least thirty days in advance to ANF about the termination of its activity.
- To cease its activity as RRA at the same moment in which it communicates its intention to cease its activity, or at the moment in which ANF AC notifies the revocation of its accreditation as RRA. Immediately, it will communicate the corresponding order of cessation of the activity to all its RA Operators.
- Within thirty days from the notification of cessation of activity, the RRA will proceed to deliver to ANF AC all material related to the activity developed as ARR, removing from its physical and computer files any information and content related to its work as ARR.
- Provide maximum collaboration and transparency in case it is required to carry out an internal security audit to ensure that all obligations such as RRA have been adequately addressed.

5.8.2.1. RA Operator termination

The framework of collaboration of ANF AC with the RA Operators, is formalized by means of the corresponding agreement that states their "Obligations and Responsibilities". The RA Operator, formally undertakes among other issues to:

- Notify at least fifteen days in advance to the RRA Office to which it is attached, on the termination of its activity as an RA Operator.
- To cease its activity as an R Operator at the same moment in which it communicates its intention to cease its activity, at the moment in which the RRA Office so orders, or when ANF AC communicates the revocation of its accreditation as an RA Operator.
- Within fifteen days from the notification of cessation of activity, the AR Operator will proceed to deliver to the AR Office to which all the material related to the activity developed as AR Operator is attached.
- Provide maximum collaboration and transparency in case it is required to perform an internal security audit to ensure that all obligations as an RA Operator have been adequately addressed.

6. TECHNICAL SECURITY CONTROLS

ANF AC uses reliable systems and products, which are protected against any alteration and that guarantee the technical and cryptographic security of the certification processes that they support.

For the development of its activity as a Certification Services Provider, ANF AC has a R&D Department, and a cryptographic section that determines the security status of all cryptographic elements used in its PKI.

6.1. Key pair generation and installation

6.1.1. Key pair generation

6.1.1.1. CA / VA / TSA Key Pair Generation

The root and subordinate CA cryptographic keys must be generated in a cryptographic hardware module (HSM) that complies with FIPS 140-2 level 3 (or higher) and Common Criteria EAL 4+ on the corresponding protection profile.

The cryptographic keys of the VA must be generated in a cryptographic hardware module (HSM) that complies with FIPS 140-2 level 3 (or higher) and Common Criteria EAL 4+ on the corresponding protection profile.

The cryptographic keys of the TSA must be generated in a cryptographic hardware module (HSM) that complies with FIPS 140-2 level 3 (or higher) and Common Criteria EAL 4+ on the corresponding protection profile.

ANF AC guarantees that the cryptographic hardware module used, in accordance with the previous sections, has not been manipulated during the sending, reception, or storage. On the other hand, the installation, activation, backup, and recovery of the keys in the cryptographic hardware module requires the simultaneous control of two trusted employees of ANF AC. Also, ANF AC guarantees that the CA signature keys stored in the cryptographic hardware are destroyed when the device is removed; This destruction does not affect all copies of the private key, only the key stored in the cryptographic hardware in question.

Cryptographic keys of CA, VA, TSA, and end users must be generated following the minimum algorithm and key length recommendations defined in ETSI TS 119 312.

6.1.1.2. Subscriber Key Pair Generation

In Public Key Infrastructure (PKI) systems, all the robustness of the system weighs on the protection of the private key, ensuring that it is only in the hands of the subscriber, unlike the public key, which as its name indicates, can be freely distributed and by means of which the third parties will be able to verify the signatures of the subscriber, and to encrypt messages that only the subscriber will be able to read. The private key performs the reverse functions, allows one to sign documents and decrypt data, which is why one must protect its security.

For the criptographic software modality certificates, ANF AC delivers to its subscibers the necessary cryptographic software to generate, in private and without third party intervention, its key pair and the activation data of the same. This ensures compliance with the secure key parameters and sizes. In cases in which ANF AC generates the cryptographic keys of its users (only applicable to software modality and never SSL certificates), ANF AC guarantees confidentiality during the process of generating said data, and the safety in its transmission to the subject.

For the QSCD modality certificates, ANF AC provides its subscribers with a Qualified Signature Creation Device (QSCD) that meets the requirements set out in Annex II of the Regulation (EU) 910/2014 and the necessary criptographic software to generate, in private and without third party intervention, its key pair and the activation data of the same. In cases ANF

AC can guarantee the cryptographic keys of the signatory were created on the QSCD, ANF AC will include the corresponding OID identifier in the "Certificate Policies" extension.

In the scope of electronic certificates of centralized signature, ANF AC for the generation of the keys, their storage and later use in the scope of centralized signature, exclusively uses devices certified specifically in accordance with the applicable requirements per Article 30.3 of the eIDAS Regulation, and therefore included in the list of qualified devices maintained by the European Commission in compliance with articles 30, 31 and 39 of the eIDAS Regulation.

Https://ec.europa.eu/futurium/en/content/compilation-member-states-notification-sscds-and-qscds

In addition, ANF provides subscribers with secure communication channels and specific management and administrative security procedures.

6.1.2. Private key delivery to subscriber

The subscriber generated and is in possession of the private key.

In cases where ANF AC generates the cryptographic keys of its users, the procedure of delivery of the private key varies per the type of certificate and device. Each Certification Policy specifies the method used. This does not apply to SSL website authentication certificates.

6.1.3. Public key delivery to subscriber

The public key is generated by the subscriber and is delivered to ANF AC by sending a certificate request in CSR (Certificate Signing Request) format, which follows the PKCS#10 specification.

6.1.4. Public key delivery to certificate issuer

The public key of the Root CA and the Intermediate CA is available to relying parties, ensuring the key integrity and authenticating its source.

The public key of the Root CA is published in the Repository, in the form of a self-signed certificate in the case of Root CA and certificate issued by the Root CA in the case of the Intermediate CA, together with a statement that specifies that the key is authentic to ANF AC.

Additional measures are included to rely on the self-signed certificate, such as the fingerprint verification of the certificate that appears published in this CPS. Users can access the Repository to obtain the public keys of ANF AC through the web https://www.anf.es.

6.1.5. Key sizes

The algorithm used is the RSA with SHA256. The size of the keys, depending on the cases, is:

Certificate Type	RSA Key Length (bits)
Root CA	4096
Intermediate CA	4096
End user	3072 o 4096
OCSP Responder	2048, 3072 o 4096
TSU	2048, 3072 o 4096

6.1.6. Public key parameters generation and quality checking

The recommended parameters in the ETSI TS 119 312 standard are used. Specifically:

Signature Suite	Hash function	Padding method	Signature Algorithm

sha256-with-rsa	sha256	emsa-pkcs1-v1.5	rsa

ANF AC employs appropriate cryptographic algorithms and parameters in accordance with the recommendations of the CA/B Forum and the standards ETSI TS 119 312. The public keys of the certificates are encoded in compliance with RFC 5280 and PKCS#1, ensuring their security and interoperability.

6.1.7. Key usage purposes (as per X.09 v3 key usage field)

All certificates include the Key Usage extension and Extended Key Usage, indicating the enabled uses of the keys.

Root CA keys are used to sign the subordinate CAs certificates, the ARLs and certificates for OCSP Response verification, NEVER end entity certificates. The subordinate or issuing CA keys are only used to sign end-user certificates and CRLs.

Supported key uses for final certificates are defined in the corresponding Certification Policies.

6.2. Private Key Protection and Cryptographic Module Engineering Controls

6.2.1. Cryptographic modle standards and controls

ANF AC requires that the HSM tokens be qualified signature creation devices (QSCD or SSCD), officialy recognized by the regulatory body.

The cryptographic security module (HSM token) is a certified device that generates and protects cryptographic keys. ANF AC maintains protocols to verify that the HSM module has not been tampered with during transport and storage.

The European reference standard for subscriber devices used is Commission Implementing Decision (EU) 2016/650 of 25 April 2016.

ANF AC maintains control over the preparation, storage, and distribution of end-user devices, but the generation of keys is done by the user himself.

There is a document of Key Generation Ceremony of the Root CA and Intermediate CAs, which describes the processes of generation of the private key and the use of the cryptographic hardware.

ANF AC, for CA key generation, complies with ETSI recommendations EN 319 411-1, and CABForum Baseline Requirement Guidelines. On the other hand, ANF AC guarantees that the keys used to generate certificates, and/or to issue information on revocation states, will not be used for any other purpose, and once they reach the end of their life cycle, all private keys of signature of the CA shall be destroyed or rendered useless.

Furthermore, the use of the private key of the CA will be limited to that which is compatible with the hash algorithm, signature algorithm and signature key length used in the generation of certificates, in accordance with ETSI TS 102 176 " Technical Specification Electronic Signatures and Infrastructures (ESI); Algorithms and Parameters for Secure Electronic Signatures ".

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

The use of the CA's private keys requires the intervention of at least two of the authorized operators.

6.2.3. Private key escrow

The private key of the root CA and intermediate CA are deposited in a hardware cryptographic device ertified with FIPS 140-2 level 3 and/or CC EAL4 + (or superior), ensuring that the private key is never outside the cryptographic device.

The private keys of the root CA will be maintained and physically isolated used from normal operations in such a way that only designated trusted personnel have access to the keys for use in the subordinate CA certificate signing.

End-user devices are under their custody, and the latter will be responsible for keeping it under its sole control.

On the other hand, in the socpe of electronic certificates of centralized signature, ANF AC for the generation of the keys, their storage and later use in the scope of centralized signature, exclusively uses devices certified specifically in accordance with the applicable requirements per Article 30.3 of the eIDAS Regulation, and therefore included in the list of qualified devices maintained by the European Commission in compliance with articles 30, 31 and 39 of the eIDAS Regulation.

Https://ec.europa.eu/futurium/en/content/compilation-member-states-notification-sscds-and-qscds

In addition, ANF provides subscribers with secure communication channels and specific management and administrative security procedures.

6.2.4. Private key backup

There is a key recovery procedure for the CA (root or intermediate) cryptographic modules that can be applied in case of contingency, and that is applied during the CA Certificate Issuing Ceremony.

There is a key recovery procedure for the cryptographic modules of the subscribers who have contracted ANF AC custody of keys, which can be applied in case of contingency.

6.2.5. Private key archival

See section 6.2.3.

6.2.6. Private key transfer into or from a cryptographic module

See section 6.2.7.

6.2.7. Private key storage on cryptographic module

Only in the case of contingency, the procedure indicated in section 6.2.4 is used to enter the private key in the cryptographic modules.

6.2.8. Method of activating private key

In all cases, the use of signature activation data (PIN) is required to use the private keys of the cryptographic devices. It is delivered by a system that allows to maintain the necessary confidentiality.

CA Root and subordinate CA keys are triggered by a process that requires the simultaneous use of at least two HSM cryptographic devices (SmartCards).

Access to the subscriber's private key depends on the device on which it is generated. Each user receives a user manual.

6.2.9. Method of deactivating private key

The removal of the cryptographic device from the issuer’s equipment implies the completion of any ongoing operation action.

The root CA, and the subordinate Cas key are disabled when the session is idle for a certain time.

In end user devices, it depends on the device in which it is generated, but as a rule it is the subscriber's responsibility to disable access to the private key.

6.2.10. Method of destroying private key

ANF AC has a CA key destruction procedure according to the instructions of the manufacturer of the security cryptographic module.

In the case of private keys on end-user devices, cryptographic devices containing the private keys created by subscribers incorporate a key destruction procedure.

On the other hand, in the scope of electronic certificates of centralized signature, ANF AC has a procedure of destruction of the private key of the subscribers that so request it. The subscriber who requires the destruction of his private key must personally identify himself before ANF AC, or one of its Registration Authorities, notary public or make the petition through an electronically signed document.

6.2.11. Cryptographic Module Rating

See section 6.2.1.

6.3. Other aspects of key pair management

6.3.1. Public key archival

The certificates generated by the CA are stored during the period of time required by current legislation, and in any case for a minimum period of 15 years.

6.3.2. Certificate operational periods and key pair usage periods

It is the period of validity of each of the certificates, and is specified in each one of them.

6.4. Activation data

6.4.1. Actiation data generation and installation

The activation data for the Root CA and the Subordinate CAs keys are generated during the Root CA and subordinate CA Creation Ceremony.

The generation and installation of the activation data of the subscriber's private key depends on the device:

- **Identity certificates issued in a cryptographic device:** In all cases,
    - It is given to the authorized operator to use the cryptographic device, a system that allows to maintain the confidentiality and free choice of the signature activation data (PIN).
    - The authorized operator of the cryptographic device generates the PIN, during the process of creating the keys.
    - The cryptographic device employs a security logic that only allows the choice of activation data (PIN) that meets basic security requirements.
    - The cryptographic device incorporates a function that allows the authorized operator to change the PIN.
    - The PIN is never stored, nor is it noted in any form.

- **End-user technical certificates**

Issued in software: the installation and start-up of the private key associated with the certificates, requires the use of security systems that the user has defined. ANF AC does not control and cannot define the private key access mode in these cases.

In the scope of electronic certificates of centralized signature, ANF AC requires users to have a double authentication control plus their signature activation PIN.

6.4.2. Activation data protection

The activation data of the root CA and intermediate CA keys are distributed over multiple physical cards, with at least two persons being required to perform any operation. The keys of the cards are guarded in the safe of ANF AC.

The TSA and VA keys are generated and managed on an HSM device and the same rules apply as in the case of Root CA and Intermediate CA.

End users are required to keep their activation data secret.

6.4.3. Other aspects of activation data

The lifetime of the activation data is not stipulated.

See Specific Policy for each type of certificate.

6.5. Computer security controls

6.5.1. Specific computer security technical requirement

For the identification of terminals and, in particular, laptops, a model has been established per the location of the terminal, and in accordance with the sensitivity of the services to which it is intended:

- **Local access:** The identification is made by authentication based on electronic signature technology, accessing by internal IP and prior authorization control of the MAC of the terminal.
- **Remote access:** Only equipment configured for this purpose can be accessed, and depending on the sensitivity of the service, access to certain previously authorized IPs is restricted.

There are several controls in the location of the different elements of ANF AC's certification service provision system (CA, Databases, Telecommunication Services, CA Operation, and Network Management):

- There is a Business Continuity and Disaster Recovery Plan.
- Operational controls:
    - All operating procedures are duly documented in the corresponding operating manuals.
    - Virus and malicious code protection tools are implemented.
    - Continued maintenance of the equipment is carried out to ensure its continued availability and integrity.
    - There is a procedure for saving, erasing and safe disposal of information media, removable media, and obsolete equipment.
- Data exchanges. The following exchanges of data are encrypted to ensure proper confidentiality:
    - Transmission of data between ANF AC Trust Servers and the Recognized Registry Authorities (RRA).
    - Data transmission between ANF AC's Trust Servers and ANF AC's subscribers.
- The revocation publishing service has the necessary functionality to guarantee operations 24x7x365.
- Access control:

- Identity certificates will be used, so that users are related to the actions they perform and can be held responsible for their actions.
- The allocation of rights is carried out in accordance with the principle of minimum privilege.
- Immediate elimination of the access rights of users who change their job or leave the organization.
- Periodic review of the level of access assigned to users.
- The assignment of special privileges is done "on a case-by-case basis" and is deleted once the cause that led to its assignment is terminated.
- Guidelines exist to ensure quality in passwords.

ANF AC has a Security Policy and specific procedures to ensure security at different levels.

On the other hand, in the scope of electronic certificates of centralized signature, the same procedure detailed in this section shall be followed.

6.5.2. Computer security rating

The products used for the issuance of certificates have at least FIPS 140-2 Level 3 or Common Criteria EAL 4+ compliance certification for the corresponding protection profile.

6.6. Life cycle technical controls

For the development of its activity, ANF AC has implemented an information security management system for the operation processes and maintenance of the infrastructure, issuance, validation, and revocation of electronic certificates per the ISO 27001 standard. ANF AC has the certifications ISO/IEC 27001 “Information technology - Security techniques - Information security management systems - Requirements”, and ISO 9001:2015“Quality Management System”.

ANF AC has an Information Security Policy, approved by the Governing Board of the PKI and which establishes the organization's approach to managing its information security. The maximum interval between two checks in this document is one year. Changes in the information security policy will be communicated to third parties, when appropriate.

6.6.1. System development controls

ANF AC performs analysis of safety requirements during the design and specification phases of any component used in the applications of this PKI, to ensure that the systems are safe.

Modification control procedures are used for new releases, upgrades, and emergency patches for these components. It controls the implementation of software in production systems.

To avoid possible incidents in the systems, the following controls are established:

- There is a formal authorization procedure for updating software libraries (including patches) in production.
- Before the software is put into operation, it is installed in a test environment, where the relevant tests are carried out.
- A log file is kept of all the updates of the libraries.
- Previous versions of the software are maintained.
- In processes that affect the security of the certification systems, no software is installed without the Engineering Department having its source code, and has performed the corresponding security verification in the presence of the Technical Manager.

6.6.1.1. Controls in testing environments

ANF AC performs analysis of business requirements during the design and specification phases of any component used in the applications of this PKI, to ensure that the systems are safe.

Modification control procedures are used in the test environment, and a procedure strictly controlled by the system manager in the test environment is followed.

Each user is identified when accessing the environment in the same way as in the production environment. New versions, updates and emergency patches of these components are always previously run in the test environment and are reviewed under the modification control procedure.

To avoid possible incidents in the systems, the following controls are established:

- There is a formal authorization procedure for updating software libraries (including patches) on test.
- The test environment is a replica of the production environment, both in hardware and software.
- There are the same access controls to the environment that exist in the real environment.
- The data in the test environment is test data, generated by the engineering department.
- Prior to the implementation of the software, it is validated in the test environment, where the relevant tests are performed.
- A log file is kept of all the updates of the libraries.
- The previous versions of the software are maintained, in case there is a need for system recovery.
- In processes that affect the security of the certification systems, software is not installed of which the Engineering Department does not have the source code, and has performed the corresponding security verification in the presence of the Technical Manager.

6.6.1.2. Change control procedures

Procedures are used to control modifications in the development of access to libraries that maintain application software (through version control). Each employee is identified by a unique ID and any modification, reading, downloading, or uploading of code is recorded in the library.

This keeps a control over access to the source code of the program. Also, to avoid possible incidents, the following controls are established:

- There is a formal authorization procedure for updating software libraries (including patches) on test.
- Before the software is placed into operation, it is installed in a test environment, where the relevant tests are carried out.
- Modification to files or independent developments that do not follow the ANF AC's business policies are discarded.
- The purchase or modification of the software is controlled, its procedure is authenticated and is versioned in the version control application.
- A log file is kept of all the updates of the libraries.
- Previous versions of the software are maintained.
- In processes that affect the security of the certification systems, software is not installed of which the Engineering Department does not have the source code, and has performed the corresponding security verification in the presence of the Technical Manager.

6.6.2. Security management controls

- ANF maintains an inventory of all information assets and classifies them per their protection needs and consistent with the risk analysis carried out.
- Capacity needs are monitored and procedures are planned to ensure availability.

- ANF AC continuously monitors computer systems and communications to ensure they operate in accordance with ANF AC's Security Policy. All processes are logged and audited in accordance with current legislation and regulations.

ANF AC maintains the following criteria in relation to the information available for audits and analysis of incidents that may exist with the certificates issued and the treatment thereof. Certificate users can communicate to ANF AC complaints or suggestions through the following means:

- Telephone: 932 661 614 (from Spain) International (+34) 933 935 946
- Via e-mail: soporte@anf.es
- In-situ: Headquarters address on the web https://www.anf.es/en/contacto/
- By completing the form available on the web https://www.anf.es/en
- Completing the forms of complaints or claims available at the registration authorities.

There is an internal record of incidents that have occurred with the certificates issued (security incidents managed by ANF AC's Security Committee). These incidents are logged, analyzed, and solved per ANF AC's ISMS procedures.

In accordance with the corresponding ISMS policy, it will be updated in a timely and coordinated manner to respond to incidents as soon as possible and limit their impact. Reliable personnel will be assigned to monitor critical events and incidents.

In the annual audit planning, the issuance operation of the certificates is audited with a minimum sample of 2% of the certificates issued.

The CPS defines the period of conservation of documentation.

6.6.3. Life cycle security controls

ANF AC performs controls to provide security to the device that performs the generation of the keys. To avoid possible incidents in the systems, the following controls are established:

- Key generation software/hardware is tested prior to production.
- Key generation occurs within cryptographic modules that meet the requirements of technology and business.
- Procedures for secure storage of cryptographic hardware and activation materials occur after the key generation ceremony.

The products used for issuing certificates have the international "Common Criteria" or ISO / IEC 15408:1999 standard, or equivalent. These products will be replaced in case of loss of certification.

Certificates generated in development processes or tests, since they have not been placed into production, can be discarded without the need for revocation, notification to third parties or activation of the Business Continuity and Disaster Recovery Plan.

6.7. Network security controls

ANF AC conforms to CAB Forum Network Security Guidelines.

Access to the different networks of ANF AC is limited to duly authorized personnel:

- Controls are implemented to protect the internal network of external domains accessible by third parties. Firewalls are configured to prevent access and protocols that are not required for service operations.
- Sensitive data is encrypted when exchanged over non-secure networks (including subscriber registration data).

- Ensures that local network components are in secure environments, as well as periodically auditing their configurations.
- VPN communication channels are used, and confidential information transmitted over non-secure networks is encrypted using SSL/TLS protocols.

6.8. Time-stamping

ANF AC obtains the time of its systems from a connection to the Spanish Royal Observatory of the Navy following the protocol NTP. The description of the NTP v.3. protocol can be found in the IETF RFC 1305 standard. Based on this service, ANF AC offers an electronic time stamp (TSA) service that can be used to create time stamps on documents, per IETF RFC 3161 updated by IETF RFC 5816 and ETSI EN 319 421. More information in ANF AC's Time-Stamping Authority Policy and Practice Statement.

7. CERTIFICATE, CRL AND OCSP PROFILES

7.1. Certificate profile

All certificates issued by ANF AC are in accordance the following technical standards:

- Internet X.509 Public Key Infrastructure Certificate and CRL Profile (RFC 5280 (updated by RFC 6818)) April 2002
- Internet X.509 Public Key Infrastructure Authority Information Access Certificate Revocation List (CRL) Extension (RFC 5280) December 2005
- Update to DirectoryString Processing in the Internet X.509 Public Key Infrastructure Certificate and Certificate Revocation List (CRL) Profile (RFC 5280) August 2006
- ITU-T Recommendation X.509 (2005): Information Technology – Open Systems Interconnection – The Directory: Authentication Framework

All certificates issued with the consideration of qualified:

- ETSI EN 319 412: Electronic Signatures and Infrastructures (ESI); Certificate Profiles
- RFC 3739: Internet X.509 Public Key Infrastructure – Qualified Certificate Profile

The common profile in all certificates is the following:

Field	Description
Version	V3 (standard version X509)
Serial	non-sequential number, greater than zero (0) containing at least 64 bits of output from a CSPRNG.
Issuer	DN of the CA issuing the certificate
notBefore	Validity start date, UTC time
notAfter	Validity end date, UTC time
Subject	Subscriber DN
Extensions	Certificate extensions

7.1.1. Version number(s)

Electronic certificates issued under this Certification Practice Statement use the X.509 version 3 standard.

7.1.2. Certificate extensions

7.1.2.1. Root CA Certificate

Extension	Critical	Value
basicConstraints	YES	cA field TRUE pathLenConstraint is not present
keyUsage	YES	Bit positions for keyCertSign and cRLSign MUST be set. If the Root CA Private Key is used for signing OCSP responses, then the digitalSignature bit MUST be set.
certificatePolicies	-	Not present
extendedKeyUsage	-	Not present

7.1.2.2. Subordinate CA Certificate

Extension	Critical	Value
basicConstraints	YES	cA field TRUE pathLenConstraint may be present
keyUsage	YES	Bit positions for keyCertSign and cRLSign MUST be set. If the Subordinate CA Private Key is used for signing OCSP responses, then the digitalSignature bit MUST be set.
certificatePolicies	NO	certificatePolicies:policyIdentifier
extendedKeyUsage	NO	Optional
cRLDistributionPoints	NO	HTTP URL of ANF AC's CRL service
authorityInformationAccess	NO	HTTP URL of the issuing CA's OCPS responder (accessMethod=1.3.6.1.5.5.7.48.1) HTTP URL of the Issuing CA's certificate (accessMethod = 1.3.6.1.5.5.7.48.2)

7.1.2.3. Subscriber Certificate

ANF AC qualified certificates meet the ETSI EN 319 411-2 technical standard.

The Certification Policy to which each certificate is submitted establishes the detailed profile of each certificate

Extensión	Possible values
Authority key Identifier	id of the public key of the CA certificate, obtained from its hash
subjectKeyIdentifier	id of the public key of the certificate, obtained from its hash
basicConstraints	CA:FALSE
keyUsage	According to the type of certificate (see profiles)
certificatePolicies	OID of ANF AC's own certification policy corresponding to the certificate. CPS URI User Notice When applicable, OID of the European policy. When applicable, OID of the CA/B forum policy. When applicable, OID of the Spanish policy (public employee, etc.)
subjectAltName	According to the type of certificate (see profiles)
issuerAltName	(optional)
extKeyUsage	According to the type of certificate (see profiles)
cRLDistributionPoints	CRL URI
Subject Directory Attributes	According to the type of certificate (see profiles)
Authority Information Access	CA certificate URI OCSP service URI
QcStatements *(qualified certificates, ETSI EN 319 412-5)* *OID 1.3.6.1.5.5.7.1.3*	QcCompliance *(OID 0.4.0.1862.1.1)*: qualified certificate per eIDAS
	QcSSCD *(OID 0.4.0.1862.1.4)*: certificate issued in a qualified signature creation device
	QcRetentiodPeriod *(OID 0.4.0.1862.1.3)*: retention period of all information relevant to the use of a certificate. In case of ANF AC, it is 15 years.
	QcPDS *(0.4.0.1862.1.5)*: route to the usage conditions
	Qctype *(0.4.0.1862.1.6)*: indicates the type of signature per eIDAS (seal, signature, web)
	QcLimitValue *(OID 0.4.0.1862.1.2)* informs of the monetary limit assumed by the CA as a liability in the loss of imputable transactions.

7.1.3. Algorithm object identifiers

The algorithm identifier (AlgorithmIdentifier) that employs ANF AC to sign the certificates is SHA-256/RSA.

OID	Name	Description
1.2.840.113549.1.1.11	SHA256withRSAEncryption	Signature algorithm OID
1.2.840.113549.1.1.1	RSAEncryption	Public key OID

ANF AC does not use ECDSA.

7.1.4. Name forms

All certificates contain a DN (DistinguishedName) X.500, in the Subject Name field. A distinguished name which has been used in a certificate by it shall never be re-assigned to another entity.The subject and the issuer identify the person (natural or legal) or device, and must have meaning in the sense that the Issuing Entity has evidence of the association between these names or pseudonyms and the entities to which they are assigned. Names cannot be misleading.

The content of the Certificate Issuer Distinguished Name field matches the Subject DN of the Issuing CA to support Name chaining as specified in RFC 5280, section 4.1.2.4.

The attributes that make up the distinguished name of the subject field are those included in the section corresponding to the profile of the certificate.

On some types of certificates the subjectAltName field includes information about the subject

In all end-entity certificates of identity, the Common Name field contains the full name of the certificate subscriber.

The profile is based on the IETF RFC 5280 recommendations, and the ITU-T X.509 standard. ETSI has developed European standards in compliance with the European Commission Mandate M/460 to rationalize the standards for electronic signatures. The ETSI EN 319 412 family specifies the content of the certificates issued to natural persons, legal or web sites certificates.

The Certification Policy to which each certificate is submitted determines precise specificities in this respect.

7.1.5. Name constraints

Not applicable. o aplicable No name restrictions are established.

7.1.6. Certificate policy object identifier

The OIDs of each certificate included in the certification policies of each type of certificate are detailed in the first section of this document.

7.1.7. Usage of Policy Constraints extension

No policy restrictions are established.

7.1.8. Policy qualifiers syntax and semantics

The Certificate Policies extension contains the following “PolicyQualifier”:

- Policy Identifier: Identifies the type of certificate profile within a certification policy to which it is associated.
- Policy Qualifier ID: Identifies the applicable Certification Policy.
- CPS Pointer: contains a pointer to the Certification Practices Statement and Policies published by ANF AC.
- User Notice: A statement made by the issuing CA is expressed, which refers to certain legal rules.

7.1.9. Processing semantics for the critical Certificate Policies extension

The Certificate Policy extension allows one to identify the policy to which the certificate is submitted and where the Certification Policy can be found.

7.1.10. Certificate field filling guide

As recommended in RFC 5280 (updated by RFC 6818), the fields will be encoded in UTF8. Based on this, international character sets are encoded, including characters from the Latin alphabet with diacritical marks ("Ñ", "ñ", "Ç", "ç", "Ü", "ü", etc.), for example, the character eñe (ñ), which is represented in Unicode as 0x00F1.

Furthermore, and to establish a common framework in all certificates issued in the scope of ANF AC's PKI, the following recommendations will be followed when issuing certificates:

- All literals are entered in uppercase, except for the domain name/subdomain and email, which will be in lowercase.
- Names will be coded as they appear in the supporting documentation.
- In relation to the surnames of natural persons, the FIRST AND SECOND SURNAME must be included, separated only by a blank space, per what is indicated in the National/Foreign Citizens ID card. In case the second surname does not exist, it will be left blank (without any character).
- Include the National/Foreign Citizens ID card number, together with the control letter, in accordance with the National/Foreign Citizens ID card.
- The literal "ID" can be optionally included before the National/Foreign Citizens ID card number.
- It can be included a literal that identifies the type of the certificate, for example (AUTHENTICATION), (SIGNATURE) or (ENCRYPTION). This identifier will always be at the end of the CN and in parentheses.
- Do not include more than one space between alphanumeric strings.
- Do not include blank characters at the beginning or end of alphanumeric strings.
- The inclusion of abbreviations based on a simplification is allowed, provided they do not imply difficulty in the interpretation of the information.
- The "User Notice" field will not be longer than 200 characters.
- Each Certification Policy may define specific rules and limitations.

7.1.11. Proprietary fields

Univocal ObjectId identifiers have been assigned internationally. Specifically:

- Fields referenced with object identifier (OID) 1.3.6.1.4.1.18332.x.x are proprietary extensions of ANF AC.
- Fields with ISO/IANA of MPR 2.16.724.1.3.5.xx * 1, are proprietary extensions required and identified in the Electronic Signature and Identification Scheme v.1.7.6 published by the Superior Council of Electronic Administration.
- The fields with OID 1.3.6.1.4.1.18838.1.1 are proprietary extensions of the Spanish State Tax Administration Agency (AEAT).

The following are the proprietary extensions that ANF AC can enter in the issued certificates. Together with the assigned OID, it specifies what value it contains.

OID	Value contained
1.3.6.1.4.1.18332.10.1	Name of legal representative (subscriber)
1.3.6.1.4.1.18332.10.2	First Surname of legal representative (subscriber)
1.3.6.1.4.1.18332.10.3	Second surname of legal representative (subscriber)
1.3.6.1.4.1.18332.10.4	Tax identification number of legal representative (subscriber)
1.3.6.1.4.1.18332.10.5	Document accrediting the legal representative (subscriber)
1.3.6.1.4.1.18332.10.6	Joint powers (only in case of existing)
1.3.6.1.4.1.18332.10.7	E-mail address of legal representative (subscriber)

1.3.6.1.4.1.18332.10.8	Identity card type submitted by the subscriber
1.3.6.1.4.1.18332.10.9	Nationality (subscriber)
1.3.6.1.4.1.18332.10.10	Hash of the mandate document or powers of attorney, digitized from the original.
1.3.6.1.4.1.18332.10.10.1	Link for the download of the mandate document or powers of attorney, digitized from the original.
1.3.6.1.4.1.18332.11	Full name of a natural or legal person, who grants a representation to the subscriber
1.3.6.1.4.1.18332.12	First name of the individual granting representation to the subscriber
1.3.6.1.4.1.18332.13	Surnames of the individual granting representation to the subscriber
1.3.6.1.4.1.18332.14	VAT number / National/Foreign Citizens ID Card of the natural or legal person granting representation to the subscriber
1.3.6.1.4.1.18332.19	Locator of the application (sequential of process - RA Operator or IRM identifier that processed it)
1.3.6.1.4.1.18332.19.1	Identifier of the RA Operator who processed the request. NOTE: In case of Operator RA, IRM or PKI Operator certificates, this OID corresponds to the operator identifier of the certificate, outlined in the first part of the code)
1.3.6.1.4.1.18332.20.1	Corporate name(subscriber)
1.3.6.1.4.1.18332.20.2	VAT number (subscriber)
1.3.6.1.4.1.18332.20.3	Name (subscriber)
1.3.6.1.4.1.18332.20.4	First surname (subscriber)
1.3.6.1.4.1.18332.20.5	Second surname (subscriber)
1.3.6.1.4.1.18332.20.6	Tax identification number (subscriber)
1.3.6.1.4.1.18332.20.7	Address (subscriber)
1.3.6.1.4.1.18332.20.8	Identity card type submitted by the subscriber
1.3.6.1.4.1.18332.20.13	Numeric code that defines the treatment to be addressed to the subscriber
1.3.6.1.4.1.18332.20.10	Test certificate identifier, with three possible status values ("active", "revoked" or "expired")
1.3.6.1.4.1.18332.20.11	Nationality (subscriber)
1.3.6.1.4.1.18332.29.1	Name of certificate responsible
1.3.6.1.4.1.18332.29.2	First surname of certificate responsible
1.3.6.1.4.1.18332.29.3	Second surname of certificate responsible
1.3.6.1.4.1.18332.29.4	Tax identification number of certificate responsible
1.3.6.1.4.1.18332.29.5	E-mail of certificate responsible
1.3.6.1.4.1.18332.29.6	Position, title, role of certificate responsible
1.3.6.1.4.1.18332.29.7	Department to which the certificate responsible belongs to
1.3.6.1.4.1.18332.29.8	Identity card type submitted by certificate responsible
1.3.6.1.4.1.18332.29.9	Nationality of the certificate responsible
1.3.6.1.4.1.18332.29.10	Address where the certificate responsible resides
1.3.6.1.4.1.18332.29.11	Locality where the certificate responsible resides
1.3.6.1.4.1.18332.29.12	Province/state/area where the certificate responsible resides
1.3.6.1.4.1.18332.29.13	Postal Code where the certificate responsible resides
1.3.6.1.4.1.18332.29.14	Country where the certificate responsible resides
1.3.6.1.4.1.18332.29.15	Phone number of certificate responsible
1.3.6.1.4.1.18332.29.16	Mobile phone number of certificate responsible
1.3.6.1.4.1.18332.29.17	E-mail address of certificate responsible
1.3.6.1.4.1.18332.29.18	Mail of the certificate responsible
1.3.6.1.4.1.18332.30.1	Country to which the certificate issuance corresponds to
1.3.6.1.4.1.18332.40.1	Qualification with which the certificate was issued
1.3.6.1.4.1.18332.41.1	Limit of liability assumed by the CA
1.3.6.1.4.1.18332.41.2	Limitation of use of the certificate by concept

1.3.6.1.4.1.18332.41.3	Limitation of use of the certificate by amount
1.3.6.1.4.1.18332.41.4	Limitation of use of the certificate by currency type
1.3.6.1.4.1.18332.42.1	Identifier of the Recognized Registration Authority to which the operator belongs.
1.3.6.1.4.1.18332.42.2	Determines that it is a RA Operator Level 1 "Recognized Registration Authority Level 1"
1.3.6.1.4.1.18332.42.3	Determines that it is an Issuance Reports Manager "Issuance Reports Manager "
1.3.6.1.4.1.18332.42.4	Determines that it is a RA Operator Level 2 "Recognized Registration Authority Level 2"
1.3.6.1.4.1.18332.42.4.1	Determines if it is a RRA with the capacity to process short term certificates of validity "RA authorized to issue short term validity"
1.3.6.1.4.1.18332.42.8	PKI Operator security level
1.3.6.1.4.1.18332.42.9	Determines that it is a PKI Operator "PKI Authorized Operator"
1.3.6.1.4.1.18332.42.11	Name of the Holder of the RA Office to which the RA Operator is assigned
1.3.6.1.4.1.18332.42.13	Department in which the RA Operator works in the RA Office.
1.3.6.1.4.1.18332.43	Automation of limitations for automatic processes
1.3.6.1.4.1.18332.45.1	Tax identification of second representative (joint powers)
1.3.6.1.4.1.18332.45.2	Name of second representative (joint powers)
1.3.6.1.4.1.18332.45.3	First surname of second representative (joint powers)
1.3.6.1.4.1.18332.45.4	Second surname of second representative (joint powers)
1.3.6.1.4.1.18832.45.5	Accreditation document of the legal representation
1.3.6.1.4.1.18332.46	It determines that it is a certificate of short duration. Reference value 1.
1.3.6.1.4.1.18332.47	Determines the valid days of electronic certificates to personalize issuance
1.3.6.1.4.1.18332.47.1	UUID of the Electronic Signature Device that stores the certificate
1.3.6.1.4.1.18332.47.3	If active indicates that the signature generation data is contained in a cryptographic device
1.3.6.1.4.1.18332.56.2.1	Black list of persons and entities
1.3.6.1.4.1.18332.60.1	Micropayment system activated
1.3.6.1.4.1.18332.60.4	Electronic Payment System activated
1.3.6.1.4.1.18332.85.1	Incoming Hash of the chaining of a Digital Time Stamp
1.3.6.1.4.1.18332.85.2	Outgoing Hash of the chaining of a Digital Time Stamp
1.3.6.1.4.1.18332.90	Business descriptive aspects of the activity
1.3.6.1.4.1.18332.90.1	Other aspects related to the quality of service
1.3.6.1.4.1.18332.90.2	Other aspects related to the quality of service
1.3.6.1.4.1.18332.90.3	Other aspects related to the quality of service
1.3.6.1.4.1.18332.91	Company creation date
1.3.6.1.4.1.18332.91.1	Legal form of subscriber
1.3.6.1.4.1.18332.91.2	Year of origin of the activity
1.3.6.1.4.1.18332.92	Own trademarks
1.3.6.1.4.1.18332.92.1	Trademarks that distribute suffix 1
1.3.6.1.4.1.18332.92.2	Trademarks that distribute suffix 2
1.3.6.1.4.1.18332.92.3	Trademarks that distribute suffix 3
1.3.6.1.4.1.18332.93	Geographical area in which it operates
1.3.6.1.4.1.18332.94	Headquarters address, phone, fax, website location
1.3.6.1.4.1.18332.94.1	Delegations suffix 1
1.3.6.1.4.1.18332.94.2	Delegations suffix 2
1.3.6.1.4.1.18332.94.3	Delegations suffix 3
1.3.6.1.4.1.18332.95	Companies with which it maintains relations
1.3.6.1.4.1.18332.95.1	Companies with which it is related suffix 1

1.3.6.1.4.1.18332.95.2	Companies with which it is related suffix 2
1.3.6.1.4.1.18332.95.3	Companies with which it is related suffix 3
1.3.6.1.4.1.18332.96	Bank entities with which it maintains relations
1.3.6.1.4.1.18332.96.1	Bank accounts, SWIFT codes
1.3.6.1.4.1.18332.97	Financial information relating to its activity
1.3.6.1.4.1.18332.97.1	Financial information relating to its activity suffix 1
1.3.6.1.4.1.18332.97.2	Financial information relating to its activity suffix 2
1.3.6.1.4.1.18332.97.3	Financial information relating to its activity suffix 3
1.3.6.1.4.1.18332.98	Number of employees
1.3.6.1.4.1.18332.99	Number of distributors
1.3.6.1.4.1.18332.600	Contains the version of the AR Manager application used to process the certificate request.

- **Qualified certificates**

The certificates issued with the consideration of qualified, additionally incorporate the object identifier (OID) defined by ETSI EN 319 412-5, of the European Telecommunications Standards Institute, on profiles of qualified certificates qcStatement – QcCompliance. Furthermore, the value "Qualified Certificate" is included in the proprietary extension of OID 1.3.6.1.4.1.18332.40.1.

QcLimitValue (OID 0.4.0.1862.1.2) informs of the monetary limit assumed by the CA as a liability in the loss of imputable transactions. This OID contains the sequence of values: currency (coded per ISO 4217), quantity and exponent. E.g. EUROS 100x10 raised to 1, which presupposes monetary limit of 1000 EUROS.

In addition, to facilitate the consultation of this information, the limit of liability is included in the proprietary extension of OID 1.3.6.1.4.1.18332.41.1, which summarizes in an absolute manner directly. E.g. 1000 euros. In the event of doubt or discrepancy, preference should always be given to the reading value outlined in OID 1.3.6.1.4.1.18332.41.1

7.2. CRL profile

The CRLs issued by ANF AC are in conformity with the following standards:

- Internet X.509 Public Key Infrastructure Certificate and CRL Profile (RFC 5280) April 2002
- Internet X.509 Public Key Infrastructure Authority Information Access Certificate Revocation List (CRL) Extension (RFC 4325) December 2005
- Update to DirectoryString Processing in the Internet X.509 Public Key Infrastructure Certificate and Certificate Revocation List (CRL) Profile (RFC 4630) August 2006.

7.2.1. Version number(s)

Version 2.

7.2.2. CRL and CRL entry extensions

The fields and extensions used are as follows:

Field	Value	Mandatory	Critic
Version	V2 (X.509)	YES	NO
Authority key Identifier	Issuer key identifier	YES	NO
CRL serial number	Unique code with respect to that particular hierarchy of the issuer	YES	NO

Signature algorithm	Sha1WithRSAEncryption	YES	NO
Hash algorithm	Sha1	YES	NO
Issuer	CN = of the Issuing CA SERIALNUMBER = Issuing CA VAT number OU = Organizational unit of the issuing CA O = Name of the Issuing CA C = Country of th Issuing CA	YES	NO
Issuance effective date	CRL issuing date	YES	NO
Next update	Next CRL issuance	YES	NO
Distribution point	URL of the distribution point and type of certificates it contains	YES	NO
CRL entries	Certificate serial number	YES	NO
	Revocation date	YES	NO
	Reason code	NO	NO

7.3. OCSP profile

Certificates issued by ANF AC for OCSP Responder are compliant with RFC 6960 *"Internet X.509 Public Key Infrastructure Online Certificate Status Protocol-OCSP*" and the "Baseline Requirements for the Issuance and Management of Publicly-Trusted TLS Server Certificates" published by the CA/Browser Forum.

7.3.1. Version number(s)

Version 3.

7.3.2. OCSP extensions

The extensions of OCSP responder certificates are specified in Section 5 of the "Certificate Profiles" document (OID 1.3.6.1.4.1.18332.3.1.1), published in ANF AC's document repository. That section is incorporated into this CPS by reference.

8. COMPLIANCE AUDIT AND OTHER ASSESSMENTS

ANF AC performs internal audit processes periodically, and hires independent auditors of maximum prestige to review its public key infrastructure.

Verification of compliance with safety requirements is defined in the document published by ANF AC "Standards and Audit Criteria for Certification Services" (OID 1.3.6.1.4.1.18332.11.1.1)

On-site verifications are carried out to determine whether operating personnel follow established procedures.

8.1. Frequency or circumstances of assessment

ANF AC submits its PKI annually to an audit process, in addition to the on-demand audits it may carry out in its sole discretion, because of a suspected breach of a security measure or a compromise of keys.

- ISO 27001 Audit, cycle of 3 years with annual revisions.
- ISO 9001 Audit, cycle of 3 years with annual revisions.
- Conformity assessment: EN 319 401, EN 319 411-1, EN 319 411-2, EN 319 421. As stated in the eIDAS Regulation, biannual. And review audits annually.
- Spanish Data Protection Audit, annual.
- PCI DSS Audit, annually.
- RRA Audit, in a discretionary manner.
- Systems Audit, in a discretionary manner.
- Internal ISO 26000 Audit, annually.

8.2. Identity/qualifications of assessor

The PKI Governing Board determines for each control, and per the area under review, the personnel in charge of carrying out this operation, making sure that it has the necessary experience and that it is an expert in digital certification systems.

Audits based on ISO norms and standards, and eIDAS audit, must be performed by auditors who have the necessary accreditation.

Conformity assessments: EN 319 401, EN 319 411-1, EN 319 411-2, EN 319 421. The auditor must be accredited in accordance with ISO 17065 applying the requirements specified in ETSI EN 319 403.

8.3. Assessor's relationship to assessed entity

The Governing Board of the PKI may entrust control to internal or external auditors, but, in any case, functionally independent to the area under audit.

8.4. Topics covered by assessment

The scope of ANF AC's annual eIDAS conformity assessment includes:

- Policies and practices,
- Conformity of the CPS with published Policies,

- CA key life cycle management,
- Certificate life cycle management,
- TimeStamping,
- Management and operation,
- Security and access controls,
- Information systems,
- Incident management,
- Risk Assessments,
- Collection of evidence,
- Business continuity management,
- Termination plans,

ANF AC performs a correct security management through the implementation of an Information Security Management System in accordance with the principles established by ISO / IEC 27001 which includes, among others, the following measures:

1. Regularly carry out security verifications, to check compliance with established standards.
2. Carry out a complete management of the security events, to guarantee their detection, resolution, and optimization.
3. Maintain appropriate contacts and relationships with groups of special interest in security matters, such as specialists, security forums and professional associations related to information security.
4. To adequately plan the maintenance and evolution of the systems, to guarantee at all times an adequate performance and a service that meets with all the guarantees the expectations of the users and clients.

8.5. Actions taken as a result of deficiency

After receiving the report of the compliance audit carried out, ANF AC analyzes, together with the entity that carried out the audit, any deficiencies found, designing a corrective plan that solves these deficiencies and establishing their execution.

Once the deficiencies are corrected, a new audit is carried out to confirm their implementation and the effectiveness of the solutions taken.

8.6. Comunication of results

ANF AC communicates the audit results to the Spanish Supervisory Body and to to any third party entities entitled by law, regulation, or agreement to receive a copy of the audit results. ANF AC makes its eIDAS – ETSI annual Audit Attestation Letters publicly available no later than three (3) months after the end of the audit period. In the event of a delay greater than three months, ANF AC shall provide an explanatory letter signed by the Conformity Assessment Body (CAB).

The audit reports will be submitted to the PKI's Governing Board for analysis. The Board will adopt the appropriate measures per to the type of incidence detected.

8.7. Self-Audits

ANF AC will conduct periodic internal audits of its operations, personnel and compliance with this CPS using a random sample of the Certificates issued since the last internal audit, at least once a year. In the annual planning of audits, the issuance of certificates is audited specifically with a minimum sample of 100 issued certificates of each type.

At least once a quarter, ANF AC performs regular internal audits against a randomly selected sample of at least 3% of its SSL Server Certificates issued since the last internal audit. The audits are carried out in accordance with the Guidelines adopted by CA / Browser Forum.

9. OTHER BUSINESS AND LEGAL MATTERS

9.1. Fees

ANF AC charges the subscribers of the certificates, and the persons or entities that contract its certification services regulated in this CPS, the fees that at any moment are valid.

9.1.1. Certificate issuance or renewal fees

Issuing and renewal fees for each certificate are published on the website

https://www.anf.es/en/tasas-oficiales/

9.1.2. Certificate access fees

Free service.

9.1.3. Revocation or status information access fees

The revocation service is free of charge.

Regarding the status information access:

- **Free of charge:** Access to the information on the status of certificates (OCSP, revoked certificate publication service from a date and time) when they do not exceed 50 queries per day.
- **Applicable rate:** When a volume of more than 50 queries per day is expected, an agreement should be established specifying the estimated volume of queries, the resources that ANF AC will allocate to adequately address such workload, and the price applicable to the service.

9.1.4. Fees for other services

9.1.4.1. Time-Stamping

Fees published at https://www.anf.es/en/tasas-oficiales/

9.1.4.2. Re-issuing

Fees published at https://www.anf.es/en/tasas-oficiales/

9.1.4.3. Signature verification certifciate

Fees published at https://www.anf.es/en/tasas-oficiales/

9.1.4.4. Signature devices

Fees published at https://www.anf.es/en/tasas-oficiales/

9.1.4.5. Other services and solutions of ANF AC

Fees published at https://www.anf.es/en/tasas-oficiales/

9.1.5. Refund policy

Fees published at https://www.anf.es/en/tasas-oficiales/

9.2. Financial responsibility

9.2.1. Insurance coverage

In accordance with the provisions of article 9.3,b) of the Spanish Law 6/2020, November 11th, reguladora de determinados aspectos de los servicios electrónicos de confianza, ANF AC, to undertake the risk of liability for damages caused by the use of the certificates issued, has signed the corresponding liability insurance, and per the guidelines of issuance and management of extended validation SSL certificates published by CA/Browser Forum, has increased the amount required by current legislation, up to the amount of FIVE MILLION EUROS (€ 5,000,000).

The data related to the policy are as follows:

- **Underwriting Entity:** HISCOX, S.A., SUCURSAL EN ESPAÑA. Paseo de la Castellana, 60, 7º planta 28046 Madrid. C.I.F.: W0185688I. Registered in the Mercantile Registry of Madrid, *tomo* 37388, *folio* 160, *hoja* M-666589 and in the registry of insurance companies of DGSFP with *Clave* E231.
- **Policy number:** HD IP6 2056529

The coverage of this insurance polity reaches the Registration Authorities Recognized by ANF AC.

9.2.2. Other assets

No stipulation.

9.2.3. Insurance or warranty coverage for end-entities

In accordance with section 9.2.1.

9.3. Confidentiality of business information

9.3.1. Scope of confidential information

The following information is considered confidential and protected against disclosure using a reasonable degree of care:

1. Private Keys;
2. Activation data used to access Private Keys or to gain access to the CA system;
3. Business continuity, incident response, contingency, and disaster recovery plans;
4. Other security practices used to protect the confidentiality, integrity, or availability of information;
5. Information held by ANF AC as private information in accordance with Section 9.4;
6. Audit logs and archive records; and
7. Transaction records, financial audit records, and external or internal audit trail records and any audit reports (with the exception of an auditor's letter confirming the effectiveness of the controls set forth in this CPS).

9.3.2. Information not within the scope of confidential informataion

Any information not listed as confidential is considered public information. Published Certificate and revocation data is considered public information.

9.3.3. Responsibility to protect confidential information

ANF AC's employees, agents, and contractors are responsible for protecting confidential information and are contractually obligated to do so. Employees receive training on how to handle confidential information.

9.4. Privacy of personal information

9.4.1. Privacy Policy

ANF AC has Privacy Policy published at: https://www.anf.es/en/politica-de-privacidad/

ANF AC protects its personal data files in accordance with the provisions of Ley Orgánica 3/2018 , de 5 de diciembre de Protección de Datos de Carácter Personal de Garantía de los derechos digitales, and Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016, on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation). In accordance with article 8 of the Spanish Law 6/2020, this CPS is the security document for the purposes provided in the applicable legislation on data protection.

9.4.2. Information treated as private

It is expressly declared as confidential information and may not be disclosed to third parties, except in cases where the law requires otherwise:

- The identity of the holders of certificates that have been issued under a pseudonym.
- Any information or data, which, having been submitted by the subscriber to the Certification Authority or the Registration Authority, does not appear on the electronic certificate.
- All information related to safety parameters.
- Information or documents that ANF AC has classified as confidential.
- Transaction records, including complete records and audit records of transactions.
- Internal and external audit records, created and/or maintained by ANF AC or the Registration Authorities and their auditors.

9.4.3. Information not deemed private

The following information is considered non-confidential and in this form, it is recognized by those affected in the binding agreements with ANF AC:

- Certificates issued or in the process of being issued.
- The linking of a subscriber to a certificate issued by ANF AC.
- The identity of the subscriber of the certificate, or of the subject, as well as any other circumstance or personal data of the same, if it is significant in function of the purpose of the certificate, and that it is recorded in the same.
- The uses and economic limits outlined in the certificate, as well as any other information contained therein.
- The different status or situations of the certificate and the starting date of each of them, namely: pending generation and/or delivery, valid, revoked, suspended, or expired and the reason that caused the change of status.

- Certificate Revocation Lists (CRLs), as well as any revocation status information.
- The information contained in the Publication Service of ANF AC classified as Public.

9.4.4. Responsibility to protect private information

ANF AC complies at all times with current regulations on data protection. It has adapted its procedures to the **Regulation (EU) 2016/679 General of Data Protection (GDPR).**

Thus, this Certification Practices Declaration (CPS), in accordance with the provisions of article 24.2 of the eIDAS Regulation, serves as a security document.

The reference document for the protection of data and privacy of ANF AC is the Privacy Policy (OID 1.3.6.1.4.1.18332.101.20.1) hosted on the website www.anf.es

9.4.5. Notice and consent to use private information

The certificates will be published in accordance with what is established in article 9 of the Spanish Law 6/2020, November 11th, reguladora de dterminados aspectos de los servicios electrónicos de confianza.

In addition, the owner of the information may require ANF AC to issue a report of the information of his property, which is stored or deposited with the Certification Authority or the Recognized Registry Authority. ANF AC will provide the budget for the fee for such service, and upon acceptance, will issue the aforementioned report.

On the exchange of registration data with the subscriber or subject or other parties involved in the PKI, security measures are taken to ensure the confidentiality and integrity of the information.

9.4.6. Disclosure pursuant to judicial or administrative process

As a rule, no document or registration belonging to ANF AC is sent to judicial or police authorities, except when:

- The agent of the law is properly identified.
- Provide a properly drafted court order.
- The Certification or Registration Authority is aware that the certificates issued, or any of the instruments belonging to this PKI, are being used for the commission of a crime.

ANF AC shall disclose the confidential information only in the cases legally provided for it.

Specifically, records that guarantee the reliability of the data contained in the certificate shall be disclosed should it be required to provide evidence of certification in the event of legal proceedings, even without the consent of the certificate subscriber.

9.4.7. Other information disclosure circumstances

No stipulation.

9.5. Intellectual property rights

Under the terms established in the Spanish Royal Decree-Legislative 1/1996, of April 12, approving the Revised Text of the Intellectual Property Law, ANF AC holds exclusive rights of all electronic certificates issued in the scope of its PKI in any of the types or modalities of certificates, including the CRL and ARL certificate revocation lists.

The object identifiers (OIDs) used are owned by ANF AC or its affiliates and have been registered on the Internet Assigned Number Authority (IANA) under the branch iso.org.dod.internet.private.enterprise 1.3.6.1.4.1-IANA -Registered Private Enterprises, having been assigned the following numbers:

- 1.3.6.1.4.1.18332
- 1.3.6.1.4.1.18333
- 1.3.6.1.4.1.18339
- 1.3.6.1.4.1.37442

Http://www.iana.org/assignments/enterprise-numbers

It is prohibited, outside the scope of the ANF AC PKI, the total or partial use of any of the OID assigned to ANF AC or its subsidiaries.

- **Property of certificates and revocation information:** The issuance and delivery of the certificates issued by ANF AC does not presuppose any waiver of the intellectual property rights that they hold over them.ANF AC, unless expressly authorized, prohibits the storage of the data of its certificates in repositories outside the PKI of ANF, and especially when it has as purpose the provision of information services on the validity or revocation. Certificates and status information can only be used for the purposes of use specified in this document.

- **Property of PKI related documents:** ANF AC owns all the documents that it publishes in the scope of its PKI.

- **Property of information relating to names:** The subscriber retains any right, if any, relating to the trademark, product or trade name contained in the certificate. The subscriber is the owner of the Distinguished Name of the certificate.

- **Property of keys:** The certificate subscribers own key pairs. When a key is fractioned into parts, the subscriber owns all parts of the key.

9.6. Representations and warranties

9.6.1. CA representations and warranties

By issuing a Certificate, ANF AC makes the certificate warranties listed herein to the following Certificate Beneficiaries:

1. The Subscriber that is a party to the Subscriber Agreement or Terms of Use for the Certificate;
2. All Application Software Suppliers who have agreed to include its Root Certificate in software distributed by such Application Software Supplier; and
3. All Relying Parties who reasonably rely on a Valid Certificate.

ANF AC represents and warrants to the Certificate Beneficiaries that, during the period when the Certificate is valid, the CA has complied with the governing law, applicable guidelines, standards, requirements and its Certificate Policy and/or Certification Practice Statement in issuing and managing the Certificate. ANF AC assumes the following obligations:

9.6.1.1. On provison of service

ANF AC provides its certification services in accordance with this CPS, being responsible for the fulfillment of all its obligations as Trust Service Provider. These obligations of the Certification Entity are as follows:

- Not storing or copying the signature creation data of the person to whom services have been rendered.

- Maintaining a system in which the issued certificates are indicated and if they are valid or if their validity has been suspended or extinguished.
- Keeping, for at least 15 years from the date of issuance of the certificate, all information and documentation related to the qualified certificates and valid CPS in every moment, and of the rest of the certificates for 5 years.
- Verify that the signer is in possession of the signature creation data corresponding to the verification data contained in the certificate.

9.6.1.2. On reliable operation

ANF AC guarantees:

- That the identity contained in the certificate corresponds uniquely to the public key contained in the certificate.
- The use of a fast and secure service to verify the validity of the certificates in accordance with the provisions of this CPS is permitted. This service is permanently available 24x7x365.
- Compliance with the technical and personnel requirements required by current legislation on electronic signature:
    1. Demonstrate the reliability necessary to provide certification services.
    2. Ensure that the date and time of issuance of a certificate can be accurately determined, or when it was terminated or suspended.
    3. To employ the personnel with the necessary qualifications, knowledge, and experience to provide the certification services offered and the appropriate security and management procedures in the electronic signature scope.
    4. Use reliable systems and products that are protected against any alteration and that guarantee the technical and, as the case may be, cryptographic security of the certification processes they serve as support, in accordance with the Security Policy.
    5. To take measures against the falsification of certificates, to guarantee the confidentiality in the process of generation according what is stated in section 6 and to provide it through a safe procedure to the signer.
    6. Use reliable systems to store qualified certificates, that allow to verify their authentication and prevent unauthorized persons from altering the data, restricting their accessibility in the cases or persons that the signatory has indicated and that allow to detect any changes that affect these conditions of security.
- The correct management of its security, thanks to the implementation of an Information Security Management System in accordance with the principles established in ISO/IEC 27001 and which includes, among others, the following measures:
    1. Regularly carry out security verifications, to verify compliance with established standards.
    2. Carry out a complete management of the security events, to guarantee their detection, resolution, and optimization.
    3. Maintain appropriate contacts and relationships with groups of special interest in security matters, such as specialists, security forums and professional associations related to information security.
    4. To adequately plan the maintenance and evolution of the systems, to guarantee at all times an adequate performance and a service that meets with all the guarantees the expectations of the users and clients.

9.6.1.3. On identification

ANF AC identifies the subscriber of the certificate, in accordance with articles 6 and 7 of the Spanish Law 6/2020 of November 11th, reguladora de determinados aspectos de los servicios electrónicos de confianza, and this CPS.

9.6.1.4. On information to users

Prior to the issuance and delivery of the certificate to the subscriber, ANF AC or the Registration Authority on behalf of ANF AC, informs the users of the terms and conditions regarding the use of the certificate, its price, its limitations of use and provides them with documentation regarding the rights and obligations inherent in the use of ANF AC's certification

services, in particular, the custody and privacy of electronic instruments and signature activation data. The terms and conditions can be downloaded by third parties by accessing ANF AC's website.

This requirement is fulfilled through the formalization of the corresponding subscription agreement.

ANF AC undertakes to notify the signatories of the termination of its activities of providing certification services two months in advance and inform, where appropriate, the characteristics of the provider to whom the transfer of the management of the certificates is proposed. Communications to the signatories are carried out in accordance with the provisions of this document.

ANF AC has a termination plan of its activity, which specifies the conditions under which it would be carried out.

All this public information regarding the certificates is available to the public in ANF AC's repositories indicated in this CPS.

9.6.1.5. On verification programs

ANF AC offers mechanisms to verify the validity of electronic certificates and signatures, through the systems described in this document.

9.6.1.6. On the legal regulation of the certification service

ANF AC assumes all obligations incorporated directly in the certificate or incorporated by reference. Incorporation by reference is achieved by including in the certificate an object identifier or another form of link to a document.

The legal instrument that links ANF AC and the subscriber or subject and relying party is in writing and understandable language, having the following minimum contents:

- Indication that enables the subscriber to know and enable the fulfillment of their obligations and rights.
- Indication of the applicable Certification Practice Statement, specifying, where appropriate, that the certificates are issued with the need to use a secure signature creation or decryption device approved by ANF AC.
- Clauses relating to the issue, revocation, and renewal of certificates.
- Manifestation that the information contained in the certificate is correct, except notification by the subscriber.
- Consent for the storage of the information used for the registration of the subscriber, for the provision of a cryptographic device and for the transfer of such information to third parties, in case of termination of ANF AC operations without revocation of current certificates.
- Limits of use of the certificate.
- Information on how to validate a certificate, including the requirement to verify the status of the certificate, and the conditions under which the certificate can reasonably be relied upon.
- Applicable liability limitations, including the uses for which ANF AC accepts or excludes its liability.
- Period of storage of certificate request information.
- Applicable dispute resolution procedures.
- Applicable law and jurisdiction.
- The manner in which the liability of ANF AC is guaranteed.

9.6.2. RA representation and warranties

The Spanish Law 6/2020 recognizes the possibility that the issuing entities may collaborate with third parties in the provision of their services, but nevertheless establishes that the sole responsibility of the certification services lies entirely with the Certification Services Provider. The Recognized Registry Authorities are responsible to ANF AC for damages caused in the exercise of their functions, in accordance with the obligations established in the corresponding agreement, and with the following:

- Transcribe accurately, in the request forms of the AR Manager device, the information collected from the original documents provided by the subscribers.
- Admit only original documentation in the identification process, obtaining a copy of the documentation provided by the subscribers. This documentation will be sent to the certification authority for custody.
- Not providing third parties with a copy of the documentation obtained from the subscribers, nor any information of the same or the subjects.
- Safeguarding the AR Manager device, not allowing its use or the revision of it by unauthorized third parties and, in case of loss, immediately inform ANF AC.
- Transmit to the Spanish Data Protection Agency the existence and activation of the AR Manager device, which contains personal data. It will use the form that automatically generates the system.
- Apply the official rates without increasing or applying any charges for any other concept than those stipulated by ANF AC.
- In the event of terminating its activity as a RRA, proceed in returning the AR Manager device, as well as any documentation or material in its possession derived from the activity performed as a Recognized Registry Authority.
- Report any judicial or extrajudicial claim that occurs in the scope of its activity as ARR.
- In relation to the information contained in the certificate or personal characteristics that qualified them at the time to obtain accreditation as a Recognized Registry Authority, they must report any changes that occur in their personal circumstances.
- Protect and personally guard the Private Keys of the RRA and the password of activation against the danger of usurpation or misuse. In the event of any suspicion of a breach of security, they must immediately notify it and proceed with its revocation.
- Be diligent in the attention of the subscribers, facilitating, if possible, information of the original documents that will be required and avoiding unnecessary waits.
- Not using copies that the subscriber accompanies with the original documentation. The Registration Authority shall directly obtain any hard or digitized copy.
- Communicate diligently to ANF AC the existence of requests for the issuance of Certificates, especially those that it has rejected.
- Not mediating in the generation of the signature creation data of the users, nor allowing to be informed of the activation PIN chosen by the subscriber.
- Storing, in a secure and permanent manner, a copy of the documentation provided by the user to make their request, as well as the documentation generated by the AR Manager, during the process of request, registration, or revocation.
- Collaborate with the audits directed by ANF AC to validate the renewal of their own keys.
- Respect the privacy of subscribers and certificate holders in accordance with the Spanish Organic Law 15/1999 of 13 December on the Protection of Personal Data and other applicable regulations.

9.6.3. Subscriber representations and warranties

The responsibilities of the holders of the certificates are established in the corresponding Certification Policies. In addition, in a general and complementary way it is established that:

- ANF AC certificate subscribers are responsible for complying with all obligations derived from this document, the Electronic Signature Policy, Certification Policies, Subscription Agreement and Terms and Conditions, limiting and adapting the use of the certificate and electronic signature systems contemplated in the scope of this PKI for licit purposes and in accordance with an honest and loyal action with the whole community: ANF AC, Recognized Registry Authorities, users and relying parties. The following list is merely illustrative and not limiting.

The subscriber agrees to:

- Ensure that all information contained in the Certificate is true.

- Ensure that the documentation provided in the processing of the certificate application is truthful and authentic.
- At the time of receiving their electronic certificate, urgently verify the correspondence of the same with the request made. To do this, they will use the certificate verification option that is included in the signature creation data generation device. In case the verification proves negative, it shall immediately be informed to ANF AC.
- Use the certificate respecting the restrictions that are imposed per its Certification Policy and the Electronic Signature Policy.
- If the certificate states "Declaration of the Issuer, Attributes, and Limitations of use", it must comply with what is stated therein.
- Carefully custody the container of the signature creation data and the activation secret key, as well as the user name and secret password for accessing the General Registry.
- Use only ANF AC devices, both for the storage of signature generation data and for the creation of electronic signatures, as well as their subsequent verification.
- Keep ANF AC cryptographic devices up to date, following ANF AC's instructions for their installation and maintenance, and ensure that the devices have not been omitted by the protection provided by ANF AC.
- Before creating an electronic signature using an ANF AC's Cryptographic device, verify the signature attributes that will be included in the electronic signature, and only activate the signature process if they are satisfied with all of them.
- Accept all electronic signatures linked to the certificate holder, provided they have been created using a valid certificate.

The essential activation of signature creation data, by the signatory through the use of his secret code, presupposes:

- Full consent to the creation of the electronic signature, and acceptance of the Electronic Signature Policy associated with that signature.
- The request for revocation of the Certificate when the security of the signature creation data or the activation secret key is compromised or when their personal data have undergone any modification.
- In case of revocation of the Certificate, the subscriber's obligation to cease its use.
- Users guarantee that the nominations, corporate names, or domains described in the certificate application form and in the subscription agreement do not infringe the rights of third parties in any jurisdiction in relation to intellectual property rights and trademarks, that they will not use the domain and Distinguished Name for illicit purposes; among them, unfair competition, impersonation, usurpation and acts of confusion in general.
- The subscribers and, in general, the users of certificates, shall indemnify ANF AC for the damages that it can cause in the execution of this activities. They also undertake to:
- Provide RRAs with original documentation and information they deem accurate and complete. As well as to notify any modification that it occurs.
- To pay the fees of the services rendered to them by the CA, or by the RRA.
- Not processing a certificate request in case of any conflict of interest with ANF AC or members of the Governing Board.
- Making the certificate request under the principle of good faith, and with the sole interest of making use of it for the purposes that are commonly accepted.
- In general, all those derived from the Spanish Law 6/2020 of 11th November.

9.6.4. Relying party representations and warranties

It has the consideration of a good faith relying party the receiver of an electronic file which has been electronically signed by a user of ANF AC's trust services, and that has deposit its trust in that electronic signature. This relying party has the following obligations:

- Verifying the signature using an ANF AC's electronic signature verification device.
- Verify the validity of the certificate using one of the means authorized by this CPS.

- Act diligently. It will be considered that the action has been negligent if it incurs in any of the cases contemplated in article 23 section 4 a) and b) of the Spanish Law 6/2020, of November 11th, reguladora de dterminados aspectos de los servicios electrónicos de confianza, in its article 11, section 2.
- Evaluate the adequacy of the certificate associated to the electronic signature, according to: the type of certificate, the issuer's declaration, the limitations of use that are stated in it, and those declared in this CPS and the corresponding Certification Policy.
- Request advice from ANF AC's "Customer Service Office" in case of doubt.

The Spanish State Tax Administration Agency will manage the verification of the status of the certificates of the users of this Certification Authority, through the use of the corresponding web service that ANF AC has implemented for this purpose. This service uses the SOAP protocol per the technical specifications related to the O.M. HAC/1181/2003.

ANF AC puts at the disposal of relying parties the certificate revocation lists. Third parties may access this information with the sole use and personal purpose of verifying the validity of a certificate of their interest, and in no case, shall it be used for the provision of services to other third parties.

Recipients who do not meet the above requirements shall not be considered good faith parties.

9.6.5. Representations and warranties of other participants

No stipulation.

9.7. Disclaimers of warranties

ANF AC can reject any guarantee of service that is not linked to the obligations established by the current the Spanish Law 6/2020, of November 11th, reguladora de dterminados aspectos de los servicios electrónicos de confianza, and by Regulation (EU) 910/2014 (eIDAS).

9.8. Limitations of liability

9.8.1. Limitations of liability of the CA

- ANF AC does not assume any liability derived from denials of service, except in those cases in which the subscription agreement establishes a penalty in this regard.
- ANF AC assumes no liability for the transactions made by its subscribers using its certificates.
- ANF AC does not assume any liability when the holder makes use of the certificates using instruments that are not homologated by ANF AC.
- ANF AC accepts other exemptions established in the Certification Policy corresponding to the type of certificate in question.
- Except as provided in this document, ANF AC does not assume any other commitment or provide any other guarantee, nor does it assume any other liability before certificate holders, their legal representatives, and/or the certificate responsible.

9.8.2. Limitation of liability with Relying parties

- ANF AC assumes no liability when the relying parties does not assume its obligation to verify the status of the certificate, using ANF AC's verification instruments.
- ANF AC accepts other exemptions established in the Certification Policy corresponding to the type of certificate in question.

- Except as set forth in this document, ANF AC does not assume any other commitment or provide any other guarantee, nor does it assume any other liability to relying parties.

9.9. Indemnities

ANF AC, in this document, in the Certification Policies and in the agreements, that link it with the subscriber, the Registration Authorities, and the relying parties, includes indemnity clauses in case of breach of its obligations or of the applicable legislation.

ANF AC states that:

- Certificates issued without the consideration of qualified cannot be used for operations that carry financial risk, and therefore the compensation limit is zero euros.

- Certificates issued with the consideration of qualified the limit assumed by the CA is established in the certificate itself, specifically in the extension "QcStatements" in the field "QcLimitValue" OID 0.4.0.1862.1.2. and in the proprietary extension OID 1.3.6.4.1.18332.41.1.

- If no amount is fixed, it should be interpreted that the CA does not assume the use of that certificate for transactions that entail financial risk, and therefore the indemnity limit is zero.

9.9.1. Indemnification by CAs

ANF AC will respond of those damages that are derived, in general from:

- Failure to comply with the obligations contained in the Spanish Law 6/2020, of November 11th, reguladora de dterminados aspectos de los servicios electrónicos de confianza and development regulations, in this CPS and in the corresponding Certification Policies.

And specifically:

- As provided in article 9 section 2 of the Spanish Law 6/2020, of November 11th, reguladora de dterminados aspectos de los servicios electrónicos de confianza, ANF AC will respond for damages caused to any person by the lack or delay of the inclusion, in the consultation service, of the validity of the certificates or of the extinction or suspension of the validity of the certificates.
- ANF AC assumes all responsibility towards third parties for the actions of the persons in which it delegates the necessary functions for providing certification services.

In any case, the following situations are excluded, in general:

- ANF AC shall not be liable for any direct, indirect, special, incidental, consequential damages of any loss of profit, loss of data, punitive damages, whether or not foreseeable, arising in connection with the use, delivery, license, performance or otherwise of the certificates, electronic signatures, or any other transaction or service offered or contemplated in the Certification Practice Statement in case of misuse, or when used in transactions that carry a risk higher than the indemnity limit stated by ANF AC.
- In all the cases provided in article 11 of the Spanish Law 6/2020, of November 11th, reguladora de dterminados aspectos de los servicios electrónicos de confianza.
- ANF AC assumes no other commitment or responsibility than those detailed in this CPS.

Specifically, with the **subscribers and certificate responsible:**

- When they fail to comply with the obligations contained in the Spanish Law 6/2020, of November 11th, reguladora de dterminados aspectos de los servicios electrónicos de confianza and development regulations, in this CPS and in the corresponding Certification Policies. Especially the obligations outlined in section 9.5.3 of this CPS.

And specifically, with **relying parties**:

- When they fail to comply with the obligations contained in the Spanish Law 6/2020, of November 11th, reguladora de dterminados aspectos de los servicios electrónicos de confianza and development regulations, in this CPS and in the corresponding Certification Policies. Especially the obligations outlined in section 9.5.4 of this CPS.
- ANF AC shall indemnify each Application Software Vendor against any claim, damage, or loss suffered by an Application Software Vendor related to an EV Certificate issued by ANF AC, regardless of the cause of action or legal theory involved, except where the claim, damage, or loss suffered by the Application Software Vendor was directly caused by the Application Software Vendor's software displaying either (1) a valid and trustworthy EV Certificate as not valid or trustworthy or (2) displaying as trustworthy (i) an EV Certificate that has expired or (ii) a revoked EV Certificate where the revocation status is available online but the Application Software Vendor's software failed to check or ignored the status.

9.9.2. Indemnification by Subscribers

The subscriber is responsible for all authenticated electronic communications and documents, in which an electronic signature generated using his/her private key has been used, and the certificate has been validly confirmed through ANF AC's verification services.

Within the period of validity of the certificate, or as long as the revocation of the certificate is not recorded in ANF AC's records, liability that may arise from unauthorized and/or improper use of the Certificates, shall in any case correspond to the subscriber.

Upon acceptance of the Certificate, the subscriber undertakes to indemnify and hold ANF AC, Recognized Registry Authorities, and Relying Parties harmless of any act or omission that causes damages, losses, debts, procedural expenses or of any kind, including professional fees, in which they may be incurred. Especially when it comes to:

- breach of the terms foreseen in requesting certificates and contracting certification services that links them with ANF AC;
- the use of the Certificates in operations in which the limit of use has not been respected or that are prohibited, as expressed in this CPS and corresponding Certification Policies;
- The subscriber falsifies or intentionally errors;
- any omission done negligently or with the intention to deceive of a fundamental fact in the Certificates;
- breach of the duty to safeguard private keys, and to take reasonable precautions to prevent the loss, disclosure, alteration, or unauthorized use of private keys;
- breach of the duty to maintain the confidentiality of signature creation data and protect them from access or disclosure;
- breach of the duty to request the suspension or revocation of the certificate in case of doubt as to the maintenance of the confidentiality of their signature creation data;
- failure to comply with the duty to refrain from using signature creation data from the time the certificate validity period expires or the service provider notifies them of their loss of validity;
- breach of the obligation to communicate without delay any change in the circumstances reflected in the certificate;

9.9.3. Indemnification by Relying Parties

The relying parties of a non-valid certificate or electronic signature that has not been verified with the devices that ANF AC has developed and approved for this purpose, assumes all risks related to it and cannot demand any liability to ANF AC, to the Registration Authorities, or to the subscribers for any concept derived from their trust in such certificates and signatures.

In this sense, ANF AC will not be responsible for damages caused to the subscriber or relying parties, if the recipient of the electronically signed documents fails to comply with any of the obligations established in the Spanish Law 6/2020, of November 11th, reguladora de dterminados aspectos de los servicios electrónicos de confianza and development regulations, in this CPS, in the corresponding Certification Policies, and especially for non-compliance with the responsibilities outlined in section 9.5.4 of this document.

9.9.4. Indemnification by RAs

In the event that the Recognized Registry Authority (RRA) fails to comply with the obligations contained in the Spanish Law 6/2020, of November 11th, reguladora de determinados aspectos de los servicios electrónicos de confianza and development regulations, in this CPS, in the Certification Policies corresponding to the certification procedures in which it intervenes, and in the terms established in the agreement that formalizes its activity as an RRA of ANF AC, shall be liable to ANF AC for damages caused in the exercise of the functions it assumes.

When the functions of identification are carried out by the Public Administrations subscribing to the certificates, the liability of the Public Administrations, shall be the one established in article 139 and subsequent of the Spanish Law of Legal Regime of Public Administrations and Common Administrative Procedure.

ANF and the Registry Authorities have sufficient resources to maintain their operations and perform their tasks. The Registration Authorities are reasonably capable of assuming the risk of liability to subscribers and relying parties.

9.10. Term and Termination

9.10.1. Term

This Declaration of Certification Practices and all the Certification and Signature Policies of ANF AC enter into force on the date indicated in the "Publication Date" field of section 1.2.

9.10.2. Termination

It will be repealed the day a new version of said ANF AC policy comes into force.

9.10.3. Effect of termination and survival

The obligations, rights and restrictions established in this Certification Practices Statement, and in the respective Certification and Electronic Signature Policies, born during its period of validity, will last after its repeal.

9.11. Individual notices and communications with participants

ANF AC is committed to fully operational a free service for users and recipients.

9.11.1. Customer Service

This service will attend to all commercial, legal, and technical consultations related to:

- Current legislation on trust services.

- This CPS, Certification Policies, and certificate request document.
- The installation and use of devices related to electronic signatures.
- Installation and use of the approved software.
- The generation and use of approved containers and, in general, everything related to the provision of certification services that this CA performs.
- General queries on the basic concepts of the Public Key Infrastructure, electronic certificates, electronic signature, and trust services.

It will also perform on behalf of the user or the person it represents, the different operations that this CPS, and Certification Policies entrust to him.

9.11.2. Consultation procedure

The consultations will be carried out by electronic mail addressed to: soporte@anf.es

In them, the identifier of the user who is consulting or, in case of being a receiver, the identifier of the received signature will be reviewed. The queries are answered through the same means to the email address of the sender.

A personal assistance service is also available by telephone at +34 932 661 614.

9.11.3. Complaint procedure

If a claim is to be filed, this certification service provider has a form found at:

https://www.anf.es/en/complaints-and-claims-procedure/

Every notification, demand, request, or other communication required under the practices described in this CPS shall be made by document or electronic message electronically signed, in accordance with the CPS or by certified mail to any of the address contained on the Section 1.5.1 Trust Service Provider

It is also possible to visit the Customer Service Office in person.

ANF AC will answer the claim form in writing in a period of no more than 15 working days. If the answer is not satisfactory, that specified under the "Dispute Resolution Provisions" section will be followed.

9.11.4. Procedimiento de Identificación

The people who appear before the Customer Service Office must be clearly identified by ID or original passport. Those persons acting on behalf of third parties must submit sufficient powers of attorney.

9.12. Amendments

9.12.1. Procedure for amendment

ANF AC may carry out modifications of this document without the need to publish a new document and, therefore, apply a version change as long as they are not material changes, such as:

- Corrections for typographical errors in the document
- Modifications to URLs
- Modifications in contact information

Any modification not contemplated in the previous section, entails the publication of a new document and its change of version.

9.12.2. Notification mechanism and period

As stablished in section 2 of this CPS.

9.12.3. Circumstances under which OID must be changed

The object identifier of the documents of ANF AC will only be changed if there are substantial changes that affect its applicability.

9.13. Dispute resolution provisions

9.13.1. Extrajudicial procedure

ANF AC will endeavor to resolve in a friendly manner the 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.

9.13.2. Judicial procedure

ANF AC voluntarily submits, for the resolution of any contentious issue that may arise from the exercise of its activity, to the institutional arbitration of the Business Distribution Council Arbitration Court (TACED Tribunal Arbitral del Consejo Empresarial de la Distribución), which undertakes the designation of the sole Arbitrator and the administration of the arbitration - that will be of equity - in accordance with its Regulation, becoming obliged from now, to the fulfillment of the arbitration decision.

If for any reason it is not possible to settle the dispute through the arbitration procedure outlined in the previous paragraph, the Parties, renouncing any other jurisdiction that may correspond to them, submit to the courts of the city of Barcelona for the resolution of any conflict that may arise between them, , waiving their own jurisdiction if it were different.

9.14. Governing Law

The governing law applicable to this document, as well as to the different CPs, and to the operations that derive from them, are the following:

- Regulation (EU) 2024/1183 of the European Parliament and of the Council of 11 April 2024 amending Regulation (EU) No 910/2014 as regards establishing the European Digital Identity Framework
- Spanish Law 6/2020, of November 11th, reguladora de dterminados aspectos de los servicios electrónicos de confianza
- Law 39/2015, of October 1, on the Common Administrative Procedure for Public Administrations.
- Law 40/2015, of 1 October, of the Legal Regime of the Public Sector.
- Royal Decree 1720/2007, of 21 December, approving the Regulation implementing Organic Law 15/1999 of 13 December on the protection of personal data.
- Regulation (EU) 2016/679 of the european parliament and of the council, of 27 April 2016, on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation).
- Organic Law 3/2018, of 5 December, of the protection of personal data and the guarantee of digital rights (OL 3/2018).

- Directive (EU) 2015/2366 of the European Parliament and of the Council of 25 November 2015 on payment services in the internal market, amending Directives 2002/65/EC, 2009/110/EC and 2013/36/EU and Regulation (EU) No 1093/2010, and repealing Directive 2007/64/EC
- Commission Delegated Regulation (EU) 2018/389 of 27 November 2017 supplementing Directive (EU) 2015/2366 of the European Parliament and of the Council with regard to regulatory technical standards for strong customer authentication and common and secure open standards of communication

9.15. Compliance with applicable law

ANF AC declares compliance with the applicable legislation outlined in the previous point.

This CPS should be interpreted in accordance with valid legislation, its development regulations and the specific legislation affecting its services, especially in the area of personal data protection and consumer protection legislationNF AC manifiesta el cumplimiento de la legislación aplicable reseñada en el punto anterior.

All parties expressly submit to the Courts and Tribunals of the city of Barcelona, waiving their own jurisdiction if it were another.

9.16. Miscellaneous provisions

9.16.1. Entire agreement

None of the terms of this CPS that directly affect the rights and obligations of ANF AC and that does not affect the rest of the parts, can be corrected, renounced, supplemented, modified or eliminated if it is not through an authenticated written document of ANF AC, which in no case implies extinctive novation, but merely modification, and does not affect the other rights and obligations of the other parties.

Notifications should be addressed to:

ANF Certification Authority

Address: Paseo de la Castellana, 79

28046 Madrid (Spain)

Notifications can be made personally or through written notification, in any case, the identity of the person involved in the communication must be reliably guaranteed. In case of representing a third party, it shall also sufficiently attest its capacity of representation.

9.16.2. Assignment

It is the responsibility of third parties who trust in the certificates issued by ANF AC, and in the signatures / seals generated with them, or in other trusted services provided by ANF AC, to verify them prior to granting their confidence, especially checking the validity status of the certificate at the time of its use. To carry out this obligation, a qualified validation service must be used.

The OCSP online consultation services that allow determining the validity status of a certificate, are freely available to trusted third parties, and multi-qualification platforms with which ANF AC has signed the corresponding collaboration agreement. Access is prohibited to provide validation intermediation services, this access will cost 1 euro per consultation.

9.16.3. Severability

If any of the sections of this document or of the Policies is considered null or legally unenforceable, it will be considered as not having been granted, the remaining obligations, rights and restrictions established in this document remaining.

The invalid or incomplete clause can be substituted by another equivalent and valid by agreement of the parties.

The rules contained in the sections: Obligations, Indemnities and Confidentiality, will remain in force after the end of the life of this CPS.

As established by the Baseline Requirements of CA/Browser Forum, in the event of a conflict between *Baseline Requirements* and a law, regulation or government order (hereinafter 'Law') of any jurisdiction in which a ANF AC operates or issues certificates, ANF AC may modify any conflicting requirement to the minimum extent necessary to make the requirement valid and legal in the jurisdiction. This applies only to operations or certificate issuances that are subject to that Law. In such event, ANF AC shall immediately (and prior to issuing a certificate under the modified requirement) include in this section 9.16.3 of the CPS a detailed reference to the Law requiring a modification of these Requirements under this section, and the specific modification to these Requirements implemented by ANF AC.

Prior to issuing a certificate under the modified requirement, ANF AC will notify the CA/Browser Forum of the relevant information newly added to its CPS by sending a message to questions@cabforum.org and receiving confirmation that it has been posted to the Public Mailing List and is indexed in the Public Mail Archives available at https://cabforum.org/pipermail/public/ (or such other email addresses and links as the Forum may designate). This will be done within a maximum period of 90 days.

Any modification to ANF AC practice enabled under this section MUST be discontinued if and when the Law no longer applies, or the Baseline Requirements are modified to make it possible to comply with both them and the Law simultaneously.

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

ANF AC may request compensation and attorneys' fees from a party for damages, losses and expenses related to the conduct of said party.

The fact that ANF AC does not enforce a provision of this CPS does not eliminate the right of ANF AC to enforce the same provisions below or the right to enforce any other provision of this CPS.

To be effective, any waiver must be in writing and signed by ANF AC.

9.16.5. Force Majeure

ANF AC is not liable for any delay or failure to perform an obligation under this CPS to the extent that the delay or failure is caused by an occurrence beyond ANF AC's reasonable control. The operation of the Internet is beyond ANF AC reasonable control.

9.17. Other provisions

No stipulation.