AUDIT REPORT – Trust Services Providers



PC nr. ACVPR 776

Period-of-time audit Date: from 2019/10/21 to 2019/10/24

Trust Service Provider (TSP) Organization:

TÜBİTAK-BİLGEM Kamu Sertifikasyon Merkezi (Governmental Certification Center, TÜBİTAK BİLGEM Kamu SM)

Registered office: PK: 74, 41470 Gebze / Kocaeli Türkiye

Sites involved in the services mentioned in the scope and to which the Certification applies:

Addresses	Site Type		TSP services supplied at site ((Refer to the services listed in the scope of certification)
TÜBİTAK BİLGEM PK: 74 41470 Gebze / Kocaeli Türkiye	Main	Primary HSM	Root CA Sub CA
Çamlıca Mahallesi, 408. Cad. No. 136, C Blok 06200 Çankaya / Ankara Türkiye	Secondary	Secondary HSM	Root CA as Disaster recovery site Sub CA as Disaster recovery site

Audit standards and regulations requirements:

Regulation (EU) 910/2014 - eIDAS

ETSI EN 319 401

ETSI EN 319 411-1

ETSI EN 319 411-2

ETSI EN 319 412-1/4

CA/Browser Forum Baseline Requirements for the Issuance and Management of Publicly-Trusted Certificates

Trusted Services (TS)	Laws, Regulations and Standards reference (last editions published at the time of the audit)	
Registration Authority Certification Authority (Digital certificates for websites - SSL)	Turkish Electronic Signature Law no. 5070 dated January 15 th , 2004 Turkish Personal Data Protection Law no. 6698 dated April, 7 th , 2016 Regulation (EU) 910/2014 – elDAS ETSI EN 319 401 ETSI EN 319 411-1 ETSI EN 319 411-2 ETSI EN 319 412-1 ETSI EN 319 412-4 CA/Browser Forum Baseline Requirements	

Audit type: Stage 2 (1st Periodic Audit)

OBJECTIVES of the Audit: Evaluate the conformity of the certified trust services to the requirements set out in the audit reference documents.

Language used for audit (if different from the language of the auditor and/or the Customer Organization): English

Accredited legal entity: KIWA CERMET ITALIA S.p.A.

Via Cadriano, 23

40057 - GRANAROLO DELL'EMILIA (BO)

Italia

KIWA CERMET Italia personnel1:

Name and Surname	Role
Valentino Privato	Audit team responsible (RGA)
Rutilio Mazza	Auditor (A)
Emin Beytullah Çamur (Kiwa Turkey)	Witness (SA)

ATTACHED DOCUMENTS to the report and consigned to the Organization:

rev. 2 2017/05/08 Page 1 of 7

¹ Indicate, in addition to the members of the Audit Group, also any observers, auditors in training, translators and other roles.

N	10D PO 31A_SF	AUDIT REPORT – Trust Services Providers			kiwa
☐ Audit plan Stage 1 MOD PO31B ☐ Detailed Activity plan MOD PO31P			☐ Management of NC - MOD PO 31C ☐ Other: List of participants, List of		
☐ Checklist EN319 411 -1 ☐ Checklist EN319 411 -2		Checklist EN 319 421			ents, copies of evidences
•	ance of the following KIWA N.V. and I		\boxtimes	No 🗆	N/A □
_	SD.001_E General Terms and Condition General Terms and Conditions Kiwa C				
The Orgai in the rep the activi	nization declares that it obey and meets the appl ort of the present audit) as well as contractual ag	ration of Trust Services providers Rev. 3 of 2018- icable local and international legislative requirements and the preements with Kiwa Cermet Italia. The Corporate Manager sign on or legal measures related to the subject of the audit, not and its Organization.	ne requi	rements for th of this report	also declares, with specific reference t
in the rep	ort of the present audit) as well as contractual ag ty of the audit: not to be aware of facts, litigation	reements with Kiwa Cermet Italia. The Corporate Manager sign or legal measures related to the subject of the audit, not	gnatory	of this report	also declares, with specific refere

The Head of the Audit Group, aware of civil liability and criminal penalties for false and mendacious declarations declares that:

- have carried out the audit in accordance with the established procedures, including time set and control methodologies;
- not to be aware of conflicts of interest with the Organization under audit in accordance with Kiwa Cermet procedures;
- have carried out a sampling of activities sufficient to determine the conclusions of this audit report.

Gebza, October 24, 2019

Organization's Representative ² (Signature and Stamp)	

Kiwa Cermet Italia Representative

RESERVED TO Kiwa Cermet Italia - Date:

Remarks:

Signature:

rev. 2 2017/05/08 Page 2 of 7

² La presente firma implica accettazione dei contenuti dell'intero rapporto di valutazione comprensivo degli allegati lasciati in copia



INITIAL AND CLOSING MEETING PARTICIPANTS

See detailed list attached to the report

NOTE:

The audit activity is conducted in accordance with sampling criteria and on the basis of the information and the documents consigned by the Organization under audit, in compliance with the rules defined in applicable international reference standards and accreditation regulations.

The absence of non-conformity does not guarantee the total absence of anomalies in the audited areas as referenced at the services/processes/activities verified.

Reference documents of the Organization:

	Document list	
Ref.	Title	
1	Organization documents list attached to the report	

Other references of the Organization:

	Distinguished Name and SHA256 fingerprint
Reference	Content
Root CA	CN = TUBITAK Kamu SM SSL Kok Sertifikasi - Surum 1 OU = Kamu Sertifikasyon Merkezi - Kamu SM O = Turkiye Bilimsel ve Teknolojik Arastirma Kurumu - TUBITAK L = Gebze - Kocaeli C = TR
	SHA-256 Fingerprint: 46EDC3689046D53A453FB3104AB80DCAEC658B2660EA1629DD7E867990648716
Sub CA	CN = TUBITAK Kamu SM SSL Sertifika Hizmet Saglayicisi - Surum 1 OU = Kamu Sertifikasyon Merkezi - Kamu SM O = Turkiye Bilimsel ve Teknolojik Arastirma Kurumu - TUBITAK L = Gebze- Kocaeli C = TR SHA-256 Fingerprint: BF32DA954571659AAF715C13EE703E3643DFCBAEEE2D82110CA68EB57CB67CE0

Documentation examined, descriptive of physical environments and infrastructure in scope:

Item	Туре	
IT Infrastructure	CMDB and Network Topology documentation and registrations	
Disaster Recovery	Procedures and instructions and registrations	
Physical and logical security	Procedures and instructions and registrations	

rev. 2 2017/05/08 Page 3 of 7



Outcome of the	he review of the previous audits findings ³ : positive negative (ref. findings:)
Use of the tru	st mark and the certificate:
Confirmation	of the Organization data declared to KIWA CERMET Italia (number of sites and employees):
⊠ Yes	No (Indicate the changes):
Consistency b	petween the sites and the purpose of the certificate and the information included in the Organization ertificate
⊠ Yes	No (Indicate the changes):
Confirmation	of the Certificate (Scope, Addresses, Sites):
∑ Yes	☐ No (indicate the changes or use specific form attached to the report)
Total number	of Category 1 (Major) Non-conformities: 0
Total number	of Category 2 (Minor) Non-conformities: 0

Number of Non-conformities still not closed from previous audits: 0

The Organization must conduct an analysis of the root causes of non-conformities and communicate to Kiwa Cermet Italia the treatment and the corrective actions defined to solve the non-conformities within 20 days after the completion of this audit.

The implementation of the corrective actions and the closure of the Non-conformities will be verified in accordance with the PSC 05SF Certification Regulations and under the conditions approved by the Audit Group Manager indicated in the NON-CONFORMITY MANAGEMENT – MOD PO 31C module.

rev. 2 2017/05/08 Page 4 of 7

 $^{^{\}rm 3}$ To be performed e.g. for verification of transfer audit from another CAB.



References to the implementation of the security risk analysis:

Internally designed and developed EBA RISK SECURITY MANAGEMENT SYSTEM based on enhanced ISO 31000 specification and ISO/IEC 27001 Annex A controls.

Period of time Audit Date Interval: from November 17, 2018 to October 24, 2019

On Site Audit Date Interval: from October 21, 2019 to October 24, 2019

Details of Audit time:

Activities	Expended time (Days)
Document review	0,5
Risk analysis verification	1
On site audit	4,5
Reporting	1

Audit methodologies adopted:

Activities	Description	
Survey methodology	All processes were submitted to audit with the methodology specified in Kiwa Cermet Italia Regulation for the certification of Trust services PSC 05_SF Rev. 3 2018-02-26	
	The audit is a full audit, and the following parts of the criteria were applied: Part 1 (NCP+, OVCP) and Part 2 (Requirements for trust service providers)	
Sampling methodology	AQL (ISO 2859-1:1999 for acceptability levels 1,00%)	
Performed tests and controls	On Samples in Registration Authority and Certification Authority: Request of new subscriptions (RA) and issues of new certificates (CA)	

rev. 2 2017/05/08 Page 5 of 7



Organizational Context and Management Commitment: (also indicate any significant changes and the degree of maturity of the services/processes being certified)

- High commitment of Management
- Very high skill of all personnel involved in scope
- Use of first class apparatus and devices
- High quality of internal developed applications both for SSL certificate testing and for general management
- Well managed system documentation with recurrent updates and revisions
- The improved eBA MS collect all the informations on the system status

Opportunities for Improvement:

- The Objective on System Management Review for OCSP service could be stated at 100%
- The incidents in the eBA Management System could be characterized by area of impact and gravity
- The data collected in eBA Management System could be analized for improvement.

Criticalities: (Report any situation that have conditioned the proper conduct of the audit, e.g. not access to staff / locations / information necessary to achieve the audit objectives)

No criticalities

Improvement of Capabilities and Conformity Preservations Guarantees:

 Management motivations, personnel skills and continuous infrastructure enhancements ensure the maintenance of conformity and improvement of service performance

Services or activities included in the scope of certification and managed in outsourcing:

- Kamu SM Site and Datacenter managed by parent Company TÜBİTAK BİLGEM, with mutual formalized agreements
- PKI CA Software ESYA developed and maintained by group Company TÜBİTAK BİLGEM UEKAE MA3 with formalized agreement

rev. 2 2017/05/08 Page 6 of 7



We declare that the the audit was performed as a full audit and in OVCP Level We declare that the Organization subjected to the audit: IS COMPLIANT with the rules of the Accreditation scheme (Accredia Circular of 2017-03-27 prot.: DC2017SSV046), to the requirements of the applicable standards of the ETSI EN 319 Series and to the REGULATION (EU) No 910/2014 of the Europear Parliament and of the Council stated July, 23 th 2014 on electronic identification and trusted services for electronic transactions, in the internal market that revoke the Directive 1999/93/EC, with particular reference to Articles 13, 15, 19, 24, 28, 29, 30 and 32 to 45 and Annexes, where relevant with the services in scope of the certification. IS NOT COMPLIANT with the rules of the Accreditation scheme (Accredia Circular of 2017-03-27 prot.: DC2017SSV046), to the requirements of the applicable standards of the ETSI EN 319 Series and to the REGULATION (EU) No 910/2014 of the Europear Parliament and of the Council stated July, 23 th 2014 on electronic identification and trusted services for electronic transactions, in the internal market that revoke the Directive 1999/93/EC, with particular reference to Articles 13, 15, 19, 24, 28, 29, 30 and 32 to 45 and Annexes, where relevant with the services in scope of the certification. (ref. non conformities in this audit referenced to in the MOD PO 31C modules attached to this report).	The Organization exposes Reserves: Yes 4 No
We declare that the Organization subjected to the audit: IS COMPLIANT with the rules of the Accreditation scheme (Accredia Circular of 2017-03-27 prot.: DC2017SSV046), to the requirements of the applicable standards of the ETSI EN 319 Series and to the REGULATION (EU) No 910/2014 of the European Parliament and of the Council stated July, 23 th 2014 on electronic identification and trusted services for electronic transactions, in the internal market that revoke the Directive 1999/93/EC, with particular reference to Articles 13, 15, 19, 24, 28, 29, 30 and 32 to 45 and Annexes, where relevant with the services in scope of the certification. IS NOT COMPLIANT with the rules of the Accreditation scheme (Accredia Circular of 2017-03-27 prot.: DC2017SSV046), to the requirements of the applicable standards of the ETSI EN 319 Series and to the REGULATION (EU) No 910/2014 of the European Parliament and of the Council stated July, 23 th 2014 on electronic identification and trusted services for electronic transactions, in the internal market that revoke the Directive 1999/93/EC, with particular reference to Articles 13, 15, 19, 24, 28, 29, 30 and 32 to 45 and Annexes, where relevant with the services in scope of the certification. (ref. non conformities in this audit referenced to in the MOD PO 31C modules attached to this report).	Satisfies the conditions for the emission of the certificate of conformity to the applicable standard:
IS COMPLIANT with the rules of the Accreditation scheme (Accredia Circular of 2017-03-27 prot.: DC2017SSV046), to the requirements of the applicable standards of the ETSI EN 319 Series and to the REGULATION (EU) No 910/2014 of the European Parliament and of the Council stated July, 23 th 2014 on electronic identification and trusted services for electronic transactions, in the internal market that revoke the Directive 1999/93/EC, with particular reference to Articles 13, 15, 19, 24, 28, 29, 30 and 32 to 45 and Annexes, where relevant with the services in scope of the certification. IS NOT COMPLIANT with the rules of the Accreditation scheme (Accredia Circular of 2017-03-27 prot.: DC2017SSV046), to the requirements of the applicable standards of the ETSI EN 319 Series and to the REGULATION (EU) No 910/2014 of the European Parliament and of the Council stated July, 23 th 2014 on electronic identification and trusted services for electronic transactions, in the internal market that revoke the Directive 1999/93/EC, with particular reference to Articles 13, 15, 19, 24, 28, 29, 30 and 32 to 45 and Annexes, where relevant with the services in scope of the certification. (ref. non conformities in this audit referenced to in the MOD PO 31C modules attached to this report). DOCUMENTS ATTACHED to this report and consigned to Kiwa Cermet Italia:	We declare that the the audit was performed as a full audit and in OVCP Level
requirements of the applicable standards of the ETSI EN 319 Series and to the REGULATION (EU) No 910/2014 of the European Parliament and of the Council stated July, 23 th 2014 on electronic identification and trusted services for electronic transactions, in the internal market that revoke the Directive 1999/93/EC, with particular reference to Articles 13, 15, 19, 24, 28, 29, 30 and 32 to 45 and Annexes, where relevant with the services in scope of the certification. IS NOT COMPLIANT with the rules of the Accreditation scheme (Accredia Circular of 2017-03-27 prot.: DC2017SSV046), to the requirements of the applicable standards of the ETSI EN 319 Series and to the REGULATION (EU) No 910/2014 of the European Parliament and of the Council stated July, 23 th 2014 on electronic identification and trusted services for electronic transactions, in the internal market that revoke the Directive 1999/93/EC, with particular reference to Articles 13, 15, 19, 24, 28, 29, 30 and 32 to 45 and Annexes, where relevant with the services in scope of the certification. (ref. non conformities in this audit referenced to in the MOD PO 31C modules attached to this report).	We declare that the Organization subjected to the audit:
requirements of the applicable standards of the ETSI EN 319 Series and to the REGULATION (EU) No 910/2014 of the European Parliament and of the Council stated July, 23 th 2014 on electronic identification and trusted services for electronic transactions, in the internal market that revoke the Directive 1999/93/EC, with particular reference to Articles 13, 15, 19, 24, 28, 29, 30 and 32 to 45 and Annexes, where relevant with the services in scope of the certification. (ref. non conformities in this audit referenced to in the MOD PO 31C modules attached to this report). DOCUMENTS ATTACHED to this report and consigned to Kiwa Cermet Italia:	requirements of the applicable standards of the ETSI EN 319 Series and to the REGULATION (EU) No 910/2014 of the Europea Parliament and of the Council stated July, 23 th 2014 on electronic identification and trusted services for electronic transactions, the internal market that revoke the Directive 1999/93/EC, with particular reference to Articles 13, 15, 19, 24, 28, 29, 30 and 32 to
	requirements of the applicable standards of the ETSI EN 319 Series and to the REGULATION (EU) No 910/2014 of the Europea Parliament and of the Council stated July, 23 th 2014 on electronic identification and trusted services for electronic transactions, the internal market that revoke the Directive 1999/93/EC, with particular reference to Articles 13, 15, 19, 24, 28, 29, 30 and 32 to 45 and Annexes, where relevant with the services in scope of the certification. (ref. non conformities in this audit referenced to
	DOCUMENTS ATTACHED to this report and consigned to Kiwa Cermet Italia:
	Audit Program MOD PO31

rev. 2 2017/05/08 Page 7 of 7

⁴ The Organisation must formalize the reserves with formal communication, stamped and signed, to the Representative of Kiwa Cermet Italia