



**Q-CERT LTD (dba "QMSCERT")**  
CONFORMITY ASSESSMENT BODY

Thessaloniki, May 17, 2019

**Audit Attestation**

for

**ADACOM S.A.**

To whom it may concern,

QMSCERT is accredited by the official Italian Accreditation System (ACCREDIA) as conforming to ISO/IEC 17065 and ETSI EN 319 403 for the certification of Trust Service Providers against the Regulation (EU) 910/2014 – eIDAS and the supporting ETSI European Norms (Accreditation Certificate: [PRD No.272B](#)).

QMSCERT has been asked by ADACOM S.A. (dba "ADACOM") to audit its Certification Authority services against a specific set of applicable requirements. On that basis, after examination of ADACOM's documentation and practices, QMSCERT hereby attests that:

*We have successfully audited the ADACOM Certification Authority services without any critical findings.*

This Audit Attestation document is registered under the unique reference number 170519-4-R1-AA. It is valid only in conjunction with the Conformity Assessment Report (CAR) which contains details of the audit and the target certificates. CAR document is appended as Annexes A and B and consists of four (4) pages in total (reference number: 170519-4-R1-CAR).

On behalf of QMSCERT

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## Trust Service Provider

ADACOM S.A. ("ADACOM")

Seat:

- 25 Kreontos Str, Athens 104 42, Greece

Operative units:

- 25 Kreontos Str, Athens 104 42, Greece
- 190 Syggrou Ave, Athens 176 71, Greece

## Background

ADACOM is a certified eIDAS Qualified Trust Service Provider (QTSP) listed at the National Trusted Services List (TSL) of Greece and thus at the EU Trusted List for the following Qualified Trust Services:

- Issuance of EU Qualified Certificates for Electronic Signatures for Natural Persons, Natural Persons Associated to Legal persons
- Issuance of EU Qualified Certificates for Electronic Seals

ADACOM also offers Class 1 (LCP) and Class 2 (NCP) certificates for client authentication and email protection in accordance with the specific requirements of the Symantec Trust Network Certificate Policies.

ADACOM wishes to be re-certified for the above qualified and non-qualified services pursuant to the respective Articles 28 and 38 of Regulation (EU) No. 910/2014 and according to CA/Browser Forum Requirements. For this purpose, ADACOM requested from QMSCERT Certification Body to perform an independent audit and issue an Audit Attestation. This Conformity Assessment Report is part of this Audit Attestation.

## Assessment Context

Q-CERT Ltd (distinctive title of "QMSCERT"), as the body carrying out the audit, is accredited by the official Italian Accreditation System (ACCREDIA) as conforming to ISO/IEC 17065 and ETSI EN 319 403 for the certification of Trust Service Providers against the Regulation (EU) 910/2014 – eIDAS and the supporting ETSI European Norms (Accreditation Certificate: [PRD No.272B](#)).

Q-CERT Ltd is also accredited by the official Hellenic Accreditation System (ESYD) as conforming to ISO/IEC 17065 for product certification in other business sectors (Accreditation Certificate: [No.654-3](#)).

Both ESYD and ACCREDIA are full members and signatories to the multilateral agreement (MLA) of both International Accreditation Forum (IAF) and the European Cooperation for Accreditation (EA).

QMSCERT is committed to providing and maintaining certification services that are discrete, non-discriminatory, ethical, professional, and focused to legal and other implied or expressed requirements for the benefit of all interested and relevant parties.

## Specifications Context

The audit was conducted in accordance with:

- 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

for the following trust services defined in the above Regulation:

- creation of qualified certificates for electronic signatures (QCP-n-qscd)

- creation of qualified certificates for electronic seals (QCP-l-qscd)
- creation of certificates for client authentication (LCP, NCP)
- creation of certificates for S/MIME (LCP, NCP)

Audit included all applicable requirements of the relevant ETSI standards and in particular:

Name	Scope
ETSI EN 319 401 V2.2.1 (2018-04)	General Policy Requirements for Trust Service Providers
ETSI EN 319 411-1 V1.2.2 (2018-04)	Policy and security requirements for Trust Service Providers issuing certificates; Part 1: General requirements
ETSI EN 319 411-2 V2.2.2 (2018-04)	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 V1.1.1 (2016-02)	Certificate Profiles; Part 1: Overview and common data structures
ETSI TS 119 412 V1.2.1 (2018-05)	Certificate Profiles; Part 1: Overview and common data structures
ETSI EN 319 412-2 V2.1.1 (2016-02)	Certificate Profiles; Part 2: Certificate profile for certificates issued to natural persons
ETSI EN 319 412-3 V1.1.1 (2016-02)	Certificate Profiles; Part 3: Certificate profile for certificates issued to legal persons
ETSI EN 319 412-5 V2.2.1 (2017-11)	Certificate Profiles; Part 5: QCStatements
ETSI TS 119 495 V1.2.1 (2018-11)	Sector Specific Requirements; Qualified Certificate Profiles and TSP Policy Requirements under the payment services Directive (EU) 2015/2366

and, where applicable, has included all related CA/Browser Forum Requirements and in particular:

- Baseline Requirements Certificate Policy for the Issuance and Management of Publicly-Trusted Certificates, Version 1.6.2 effective on December 10, 2018
- Network and Certificate System Security Requirements, version 1.2, effective on September 15, 2018

## Audit Procedure

Audit Team has been selected based on proficiency and competency in order to prepare and carry out the audit, report its results and submit its recommendation for Technical Review and Certification Decision, according to the established internal procedures of the Certification Body.

A full annual audit was conducted on-site and included:

- Review of previous certification documents, which verified that there were no pending corrective actions since previous audit and that the Certification Body can transfer the existing certification.
- Review of documentation updates since previous audit, which verified the conformance of documented statements, policies and procedures against the Specifications Context.
- Management system implementation review, which verified that all audited policies and procedures (documented or not) were properly implemented into the actual operations of the organization in conformance with the Specifications Context

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**Conformity Assessment Report - Main Body: Annex A to Audit Attestation: 170519-4-R1-AA**

**Organization Name: ADACOM S.A.**

**Reference Number: 170519-4-R1-CAR, Issue No: 0, Issue Date: May 17<sup>th</sup>, 2019**

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- Product verification, which verified that all audited products (certificates, timestamps) were conformant to the product requirements set in the Specifications Context.

Audit took place on sampling basis, under the inherent limitations of the system controls themselves and only in the scope and purpose of the Specifications Context. Its purpose was to verify the conformance of the CA's trust services against the applicable requirements.

An audit report was documented by the audit team, and its recommendation was submitted for technical review and certification decision, according to the Certification Body's standard procedures and regulations (TSP Audit Regulation in particular, which has been drafted according to the Accreditation Body's TSP Regulation). The conditions to conduct the audit were fully met prior and during the audit.

## Audit Target

The following public documents of the TSP have been the subject matter of the audit:

- Symantec Trust Network (STN) Certificate Policy, version 2.8.24 dated 08/09/2017
- ADACOM S.A. Certification Practice Statement for EU Qualified certificates for electronic signatures and electronic seals, version 4.1 dated 25/02/2019
- ADACOM Terms and Conditions for Use of Qualified Trust Services, version 3.2 dated 25.02.2019
- PKI Disclosure Statement, version 1.2 dated 25/02/2019

Examination Period includes records from **May 22, 2018 to May 7, 2019**.

## Audit Results

### Overview

The audit team successfully audited the Trust Services of ADACOM and submitted its audit report **without critical findings**. Improvement remarks have also been submitted by the Certification Body for review by the TSP, in order to assist its continuous efforts for improvement, in line with the PDCA model.

The Audit Attestation and its Annexes (A, B) have been issued by the Certification Body in order to officially confirm this assessment.

### Incident Reports

No incident reports examined in the audit period.

### Next Audit

In accordance with the Certification Regulation, and due to the applicability of CA/Browser Forum Baseline Requirements, a full audit shall take place before **May 17, 2020**.

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**Conformity Assessment Report - Root and Sub-CAs List: Annex B to Audit Attestation: 170519-4-R1-AA**

**Organization Name: ADACOM S.A.**

**Reference Number: 170519-4-R1-CAR, Issue No: 0, Issue Date: May 17<sup>th</sup>, 2019**

## LIST OF ROOT CAs<sup>1</sup>

	Subject Distinguished Name	Certificate SHA-256 Fingerprint	Notes on Technical Constraints
1	CN=Symantec Class 2 Public Primary Certification Authority - G6,OU=Symantec Trust Network,O=Symantec Corporation,C=US	CB:62:7D:18:B5:8A:D5:6D:DE:33:1A:30:45:6B:C6:5C:60:1A:4E:9B:18:DE:DC:EA:08:E7:DA:AA:07:81:5F:F0	
2	CN=VeriSign Class 1 Public Primary Certification Authority - G3,OU=(c) 1999 VeriSign\, Inc. - For authorized use only,OU=VeriSign Trust Network,O=VeriSign\, Inc.,C=US	CB:B5:AF:18:5E:94:2A:24:02:F9:EA:CB:C0:ED:5B:B8:76:EE:A3:C1:22:36:23:D0:04:47:E4:F3:BA:55:4B:65	
3	CN=VeriSign Class 2 Public Primary Certification Authority - G3,OU=(c) 1999 VeriSign\, Inc. - For authorized use only,OU=VeriSign Trust Network,O=VeriSign\, Inc.,C=US	92:A9:D9:83:3F:E1:94:4D:B3:66:E8:BF:AE:7A:95:B6:48:0C:2D:6C:6C:2A:1B:E6:5D:42:36:B6:08:FC:A1:BB	

## LIST OF AUDITED CERTIFICATES – SUBORDINATE CAs

	Subject Distinguished Name	Certificate SHA-256 Fingerprint	Technically Constrained <sup>2</sup>
2	CN=ADACOM CA for EU Qualified e-Seals,2.5.4.97=VATEL-099554476,OU=Adacom Trust Services,OU=Class 2 Managed PKI Individual Subscriber CA,OU=Symantec Trust Network,O=ADACOM S.A.,C=EL <b>REPORTED AS INACTIVE SINCE 2018-09-21</b>	4A:0A:95:BB:67:38:02:D6:99:03:87:07:92:59:72:E4:BD:C2:15:D2:95:2C:6B:4D:62:FF:70:93:6C:5B:49:FB	FALSE
1	CN=ADACOM CA for EU Qualified e-Signatures,2.5.4.97=VATEL-099554476,OU=Adacom Trust Services,OU=Class 2 Managed PKI Individual Subscriber CA,OU=Symantec Trust Network,O=ADACOM S.A.,C=EL <b>REPORTED AS INACTIVE SINCE 2018-09-24</b>	21:4F:05:BA:C5:8E:05:C6:BD:63:64:02:CA:26:4E:80:17:2A:F6:EC:F0:7E:E4:1C:6C:CC:62:BA:64:F7:ED:F3	FALSE
4	CN=ADACOM CA for EU Qualified e-Seals,2.5.4.97=VATEL-099554476,OU=Adacom Trust Services,OU=Class 2 Managed PKI Individual Subscriber CA,OU=Symantec Trust Network,O=ADACOM S.A.,C=EL	DC:E5:AB:8F:DD:D1:A3:CD:89:0E:79:01:3A:3C:01:CB:22:BA:FC:12:FE:1D:C1:6F:9F:42:3A:36:DA:E7:47:C7	TRUE Client Authentication Secure Email
3	CN=ADACOM CA for EU Qualified e-Signatures,2.5.4.97=VATEL-099554476,OU=Adacom Trust Services,OU=Class 2 Managed PKI Individual Subscriber CA,OU=Symantec Trust Network,O=ADACOM S.A.,C=EL	02:74:66:AD:7F:90:63:E0:0B:E7:61:26:AB:87:00:35:C2:0E:1F:CB:89:B3:24:77:66:C8:41:BD:52:72:32:6F	TRUE Client Authentication Secure Email
5	CN=ADACOM Class 1 Consumer Individual Subscriber CA - G2,OU=Symantec Trust Network,O=ADACOM S.A.,C=GR	F5:F6:09:DC:0D:1C:44:2D:5F:A6:6D:60:17:53:02:70:70:5A:33:69:34:3B:DB:3B:9F:1A:BE:33:20:23:16:51	TRUE Client Authentication Secure Email
6	CN=ADACOM Class 2 Consumer Individual Subscriber CA - G2,OU=Symantec Trust Network,O=ADACOM S.A.,C=GR	E6:F2:44:28:DB:F9:66:FC:54:99:CF:11:C4:DF:A8:C0:F2:3D:BF:39:30:C5:A3:DB:4E:F2:AB:C3:D2:9A:E3:02	TRUE Client Authentication Secure Email

<sup>1</sup> Outside the scope of the audit; trust anchors of Symantec Trust Network

<sup>2</sup> When TRUE, the subCA has additional technical restrictions to limit the scope of Certificate issuance (as per BR §7.1.5)