

Audit attestation for Ivnosys Soluciones, S.L.

To whom it may concern,

This audit attestation purpose is to confirm that Trust Conformity Assessment Body has successfully audited the qualified electronic certificates for electronic signatures issuance service provided by Ivnosys Soluciones, S.L.

This present audit attestation dated 2020-03-24 and reference number TCAB39ZABCWDXCRYOP8C, consists of 7 pages.

Kindly find here below the details accordingly.

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Data of the Conformity Assessment Body (CAB)

Table 1. Data of the Conformity Assessment Body.

Name	Trust Conformity Assessment Body S.A.
VAT Number (VIES)	ES-B87459335
Registry	Company registered in the Mercantile Registry of Madrid, volume 34302, page 24, section 8, page M-617071
Address	Diego de León, 47 28006 Madrid (Spain)
Main web page	http://tcab.eu/
Representative	Ainhoa Inza
Telephone	+34 91 388 07 89
Email	ainza@tcab.eu
Accreditation scheme	TCAB is accredited for the certification of trust services according to SO/IEC 17065 and ETSI EN 319 403.
Accreditation certificate	166/C-PR333
Accreditation date	20/07/2018
Certificate URL	https://www.enac.es/documents/7020/8b50f045-8ed2-4d1f-a6a2-31f6970e6316
Certificate URL (Technical Annex)	https://enac.es/documents/7020/6aa99e14-7f23-443c-92c5-1bb61512dc2c

Data of the Accreditation Body

Table 2. Data of the Accreditation Body.

Name	ENAC Entidad Nacional de Acreditación
VAT Number	G-78373214
Address	C/ Serrano 240, 3ª 28016 Madrid, España
Main web page	http://www.enac.es
Telephone	+34 91 769 85 04
Email	operaciones@enac.es

Data of the Electronic Trust Services Provider

Table 3. Data of the Trust Services Provider.

Name	IVNOSYS SOLUCIONES S.L.U.
VAT number:	B98333362
Registry	Company registered in the Mercantile Registry of Valencia, volume 9306, Book: 6588 page 60, section 8, page V143049.
Address	C/ Acceso Ademuz 12 – 1º –Of. 1., 46980 Paterna (Valencia)
Main web page	https://www.ivnosys.com/
Representatives	Victor Alberto Tortosa Tortosa – Operations Manager
Telephone	+34 96 003 12 03
Email	info@ivnosys.com

Assessment Data

The trust service was assessed in accordance with eIDAS Regulation (Regulation (UE) 910/2014), ETSI EN 319 401, ETSI EN 319 411 and ETSI EN 319 412 relevant requirements. The fulfilment of these requirements has been verified by evaluating the corresponding documents of the TSP and by an on-site audit at the TSP location.

Table 4. Assessment Data.

Audit time and location	Documentary review was performed from 2020-01-08 to 2020-01-13.
	On-site assessment took place on 2020-01-15 in Paterna (Valencia, Spain).
Audit length	5 days
Standard/s	eIDAS (Regulation UE 910/2014) ETSI EN 319 401, v2.2.1 ETSI EN 319 411-1, v1.2.2 ETSI EN 319 411-2, v2.2.2 ETSI EN 319 412-1 v 1.1.1 ETSI EN 319 412-2 v 2.1.1 ETSI EN 319 412-3 v 1.1.1 ETSI EN 319 412-5 v 2.2.1
Kind of audit	Certification
Audited area – Scope	<i>Servicio de expedición de certificados electrónicos cualificados de firma electrónica.</i> Qualified electronic certificates for electronic signatures issuance service.
Period of time audited	2019-01-18 to 2020-01-15

During the period assessed, the certificates issued were not SSL oriented. Reviewed 20% of the certificates issued, with no nonconformities detected.

Certification Authority (CA)

The audited CA is identified as follows:

Table 5. Identification of the audited CA.

Distinguished Name (DN)	CN = IvSign CA O = IVNOSYS SOLUCIONES S.L. 2.5.4.97 = VATES-B98333362 OU = see current address at https://psec.ivnosys.com/address L = PATERNA C = ES
Applied policy	2.23.140.1.2.2 Compliant with Baseline Requirements – Entity identity asserted
SHA-256 fingerprint	92193F427DFD45D1F7EE0C0A3B1A974EA7AF7679183990E28762C13A263DB978
URL	http://ca.ivsign.net/certs/IVSIGNCA.crt

The audited CA is a subordinate CA belonging to the following Root CA trust hierarchy:

Table 6. Root CA for the assessed CA's trust hierarchy.

Distinguished Name (DN)	CN = CHAMBERS OF COMMERCE ROOT - 2016 O = AC CAMERFIRMA S.A. 2.5.4.97 = VATES-A82743287 SERIALNUMBER = A82743287 OU = CHAMBERS OF COMMERCE ROOT - 2016 OU = see current address at www.camerfirma.com/address L = MADRID S = MADRID C = ES
Applied policy	Any policy
SHA-256 fingerprint	04F1BEC36951BC1454A904CE32890C5DA3CDE1356B7900F6E62DFA2041EBAD51
URL	https://www.camerfirma.com/certs/chambersofcommerceroot-2016.crt

Trust Service Assessed

The assessment has been performed of the following trust service:

Qualified electronic certificates for electronic signatures issuance service (*Servicio de expedición de certificados electrónicos cualificados de firma electrónica*, as stated in the accreditation certificate).

Specifically, the qualified electronic certificates issuance included in this assessment scope are issued in accordance with the policy detailed below as defined in ETSI EN 319 411-1 are:

Table 7. Applied policies of the audited trust services.

Qualified certificate type	OIDs		Additional information
	I	IVNOSYS SOLUCIONES	
	E	ETSI EN 319 411-2	
Corporate - Natural persons related to an organization (<i>Corporativo</i>)	I	1.3.6.1.4.1.47304.4.16.1.2.2	Software
	E	0.4.0.194112.1.0	
	I	1.3.6.1.4.1.47304.4.16.1.2.3	Managed on behalf (QSCD)
	E	0.4.0.194112.1.2	
Representative with powers of attorney for general representation <ul style="list-style-type: none"> • Legal person • Entity without legal personality 	I	1.3.6.1.4.1.47304.4.16.1.3.1.2	Software
	E	0.4.0.194112.1.0	
	I	1.3.6.1.4.1.47304.4.16.1.3.1.3	Managed on behalf (QSCD)
	E	0.4.0.194112.1.2	
Representative for procedures with the public sector <ul style="list-style-type: none"> • Legal person • Entity without legal personality 	I	1.3.6.1.4.1.47304.4.16.1.3.2.2	Software
	E	0.4.0.194112.1.0	
	I	1.3.6.1.4.1.47304.4.16.1.3.2.3	Managed on behalf (QSCD)
	E	0.4.0.194112.1.2	
Representative for attorney <ul style="list-style-type: none"> • Legal person • Entity without legal personality 	I	1.3.6.1.4.1.47304.4.16.1.3.3.2	Software
	E	0.4.0.194112.1.0	
	I	1.3.6.1.4.1.47304.4.16.1.3.3.3	Managed on behalf (QSCD)
	E	0.4.0.194112.1.2	

All these certificates are qualified certificates where the electronic signature creation data (private key) related to the electronic signature validation data (certificate) is issued on software or secured in a QSCD (Qualified Signature Creation Device). When the certificate is issued on software, it contains the QC statement for policy QCP-n as required by ETSI EN 319 412-5. When it is otherwise issued within the QSCD, these contain the QC statement for policy QCP-n-qscd as required by ETSI EN 319 412-5.

Audited service areas

We have been engaged to report on Ivnosys Soluciones' operations at Paterna (Spain) for its Qualified electronic certificates for electronic signatures issuance service. For this purpose, Ivnosys Soluciones has:

- disclosed its business, key lifecycle management, certificate lifecycle management, and CA environment control practices in its:
 - CPS. CERTIFICATION PRACTICE STATEMENT FOR THE IVSIGN CA CERTIFICATION AUTHORITY, version 0.5 of date 2019-09-24.
 - MPS. Declaración De Prácticas de Gestión del Servicio de Firma Electrónica a Distancia Ivsign de Ivnosys Soluciones S.L., version 0.2 of date 2019-01-08 (in English, Remote Signature Service Practice Statement).
 - CERTIFICATION PRACTICES STATEMENT DIGITAL CERTIFICATES AC CAMERFIRMA SA. EIDAS-2015-2016, version 1.2.11 of January 2020.
 - PDS. IVSIGN CA PKI Disclosure Statement, version 1 of date 2019-01-23.
- maintained effective controls to provide reasonable assurance that:
 - Ivnosys Soluciones' Certification Practice Statement is consistent with its Certificate Policies
 - Ivnosys Soluciones provides its services in accordance with its Certificate Policies and Certification Practice Statement
- maintained effective controls to provide reasonable assurance that:
 - the integrity of keys and certificates it manages is established and protected throughout their lifecycles;
 - the integrity of subscriber keys and certificates it manages is established and protected throughout their lifecycles;
 - signature activation data when "on-behalf" scenarios is only known to the subscriber;
 - subscriber information is properly authenticated (for the registration activities performed by Ivnosys Soluciones); and
- maintained effective controls to provide reasonable assurance that:
 - logical and physical access to CA systems and data is restricted to authorized individuals;
 - the continuity of key and certificate management operations is maintained; and
 - CA systems development, maintenance, and operations are properly authorized and performed to maintain CA systems integrity in accordance with ETSI and UNE standards related to the service in scope.

Ivnosys Soluciones makes use of external Registration Authorities for specific subscriber registration activities as disclosed in the business practices. Our procedures did not extend to the controls exercised by these external Registration Authorities.

Certification authority's responsibilities

Ivnosys Soluciones is responsible for the provision of the described services in accordance with Regulation (EU) 2014/910 and the technical standards established for the services provided.

Auditor's responsibilities

Trust Conformity Assessment Body responsibility is to express an opinion on the trust service provided within the Regulation (EU) 2014/910 based on the assessment performed. Assessment was performed in accordance with ISO/IEC 17065:2012 and ETSI EN 319 403 v2.2.2, using for assessment standards specific for the trust services assessed. Trust Service Provider certification scheme requires that planification and assessment are performed to obtain reasonable assurance about whether, in all material respects, the trust service provider operations are secure and comply with Regulation (EU) 2014/910, including:

- obtaining an understanding of Ivnosys Soluciones' key and certificate lifecycle management business practices and its controls over key and certificate integrity, over the authenticity and confidentiality of subscriber and relying party information, over the continuity of key and certificate lifecycle management operations and over development, maintenance and operation of systems integrity;
- testing and evaluating the operating effectiveness of the controls; and
- performing such other procedures as considered necessary in the circumstances.

We believe that our audit provides a reasonable basis for our opinion.

Relative effectiveness of controls

The relative effectiveness and significance of specific controls at Ivnosys Soluciones and their effect on the assessments of control risk for subscribers and relying parties are dependent on their interaction with the controls and other factors present in the sites of subscribers and the relying parties. We have performed no procedures to evaluate the effectiveness of controls at individual subscriber and relying parties' locations.

Inherent limitations

Because of the nature and inherent limitations of controls, Ivnosys Soluciones' ability to meet the aforementioned criteria may be affected. For example, controls may not prevent, or detect and correct, error, fraud, unauthorized access to systems and information, or failure to comply with internal and external policies or requirements. Also, the projection of any conclusions based on our findings to future periods is subject to the risk that changes may alter the validity of such conclusions.

Basis for qualified opinion

During our procedures, we identified some controls that were not fully implemented, specifically:

Data processing and protection (Art. 5):

- Documentary consistency between templates and final contract agreements should be improved, specifically regarding GDPR provisions.

Accessibility for disabled people (Art. 15):

- Website needs to improve on accessibility for people with visual limitations.

Requirements for the qualified Trust Services Providers of qualified trust services (Art. 24.2, sections a) through j), ETSI EN 319 401, ETSI EN 319 411-1, ETSI EN 319 411-2):

- eIDAS and security training for personnel directly involved in qualified trust services should be increased.
- Consistency between CPS and internal documentation should be reviewed regarding the end of life assets.
- Past event records should be automatically and more regularly analyzed to improve performance and incident detection.
- Despite the public certificate of the CA being available online in the policy section, web address for the public keys of the CA specified in section 2.2 of the CPS is not available and should be corrected.

Auditor's opinion

In our opinion, except for the matters described in the preceding paragraphs, Ivnosys Soluciones service, issuing qualified electronic certificates for electronic signatures, as referred to above, is fairly stated, in all material respects, in accordance with Regulation (UE) No 2014/910 and related technical standards.

This report does not include any professional opinion regarding the quality of Ivnosys Soluciones' services, beyond those covered by the Regulation (EU) 2014/910 and technical standards supporting the assessment, nor the suitability of any of Ivnosys Soluciones' services for any customer's intended purposes.

A. Inza, Auditor

TCAB, Trust Conformity Assessment Body, S.L.

March 24th, 2020