

### AS Sertifitseerimiskeskus Certification Policy of the digital identity card in form of the Mobile-ID

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|               |         | Complemented clause 4.6.2 Submission of Application for   |  |
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| 01.01.2015 | 2.0 | Amendments aimed to bring this Certification Policy in line with the Identity Documents Act (RT I, 29.10.2014, 6) amending the terms and conditions of issuing Mobile-ID. |
|------------|-----|---|
| 01.02.2011 | 1.1 | Final version   |
| 11.01.2011 | 0.1 | Initial draft   |

Requirements for the digital certificates, identity verification, and allow for servicing of the digital identity cards in form of the Mobile-ID (hereinafter referred to as Mobile-ID) issued by The Police and Border Guard Board (hereinafter referred to as PPA).

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### 1. Introduction

#### 1.1. Overview

This document (hereafter CP) is a set of rules which specifies the fundamental operating principles and concepts of the certification service provision essential for issuance and servicing Mobile-ID certificates.

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This CP is based on the document titled "AS Sertifitseerimiskeskus – Certification Practice Statement" [1] which is registered in the National Register of Certification (NRC). This certification practice statement (hereafter the CPS) shall serve as a basis for supply of certification service. This CP supplements the principles set out in the CPS for Mobile-ID certification services.

In the case of conflict between the CP and the CPS the provisions of this CP shall prevail. In case of conflict between the Estonian original document and the English translation the Estonian original shall prevail.

This CP extends only to the digital certificates of Mobile-ID issued by AS Sertifitseerimiskeskus.

IETF (Internet Engineering Task Force) recommended document RFC 2527 [2] has been used in drafting this CP.

#### 1.2. Terminology

Refer to CPS p.10.

| Term                    | Definition  |  |
|-------------------------|---|--|
| Client Service Point    | A client service point of a mobile operator operating on the        |  |
|                         | basis of this CP and is authorized to provide Mobile-ID related     |  |
|                         | services, refer to chapter 1.5.2.1.                                 |  |
| Mobile-ID               | Digital identity card which Digital authentication certificates     |  |
|                         | and digital signature certificates are related to mobile phone      |  |
|                         | SIM card issued by the Police and Border Guard Board.               |  |
| Mobile-ID SIM card      | A SIM card for a mobile phone which in addition to regular          |  |
|                         | cellular service usage facilitates functionality of digital         |  |
|                         | signature and digital identification of persons.                    |  |
| Terms of use of the     | Document that describes the obligations and responsibilities        |  |
| certificates            | for the client while using Mobile-ID certificates. Client has to    |  |
|                         | be familiar with its contents and accept the terms and              |  |
|                         | conditions described within.  |  |
| Certificate application | An application confirmed and digitally signed by the client in      |  |
|                         | the web-based PPA environment for acquiring Mobile-ID certificates. |  |
| Security area           | Scraped area on Mobile-ID SIM cover, under which Mobile-ID          |  |
|                         | activation codes (PINs) are located.                                |  |

#### 1.3. Abbreviations

Refer to CPS p.11.

| Abbreviation | Definition   |
|--------------|--|
| MO           | Electronic communications company that provides mobile         |
|              | telephone services, and with whom contracts have been          |
|              | concluded for issuing Mobile-ID SIM cards and for servicing of |

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|     | the Mobile-ID certificates.                                    |
|-----|--|
| PPA | The Police and Border Guard Board, the issuer of the Mobile-   |
|     | ID.  |
| SK  | AS Sertifitseerimiskeskus - STO.                               |
| STO | A provider of certification services that is registered in the |
|     | Register of the Certification.                                 |

#### 1.4. Identifying the Certification Policy

This CP is identified by OID: 1.3.6.1.4.1.10015.1.3.

The OID of this CP is composed as described in table 1.

| Parameter   | OID section |
|---|-------------|
| Internet attribute  | 1.3.6.1     |
| Private business attribute                                      | 4           |
| Registered business attribute given by private business manager | 1           |
| IANA  |             |
| CC attribute in IANA register                                   | 10015       |
| Certification service attribute                                 | 1.3         |

Table 1, composition of the CP identification code.

#### 1.5. Organization and Area of Application

#### 1.5.1. Sertifitseerimiskeskus (SK)

Refer to CPS p.1.2.1.

The SK provides the certification service as a registered STO under a contract signed between PPA and SK. The PPA is responsible for the issuance of the Mobile-ID. For issuance of the Mobile-ID SIM cards there are contracts signed between SK and MO. SK has contractually delegated the responsibilities described in sections 1.5.2.1 and 1.5.2.3 to MO.

#### 1.5.2. Registration Centre

#### 1.5.2.1. Client Service Points

Refer to CPS p.1.2.2.1.

Issuance and servicing of the Mobile-ID SIM cards, servicing of the Mobile-ID certificates and change of the mobile telephone number takes place in authorized MO client service points (hereafter client service point). The list and operating hours of client service points are referred from the websites of SK http://www.sk.ee and MO's.

Additionally, client service point accepts applications from clients for revocation of Mobile-ID certificates. Before accepting an application for revocation, the client service point verifies

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the client's identity according to its internal procedures of identity verification (see also chapter 3.1).

MO ensures security with its internal procedures while providing the service.

#### 1.5.2.2. SK Client Service Point

Refer to CPS p.1.2.2.1.

SK Client Service Point accepts digitally signed applications of suspension and termination of suspension of the Mobile-ID certificates.

#### 1.5.2.3. Help Line

Help Line is a telephone service representing MO, which round the clock shall accept oral applications for suspending certificates by checking applicant's identity in advance according to the procedure of identity verification (refer to chapter 3.1).

Help Line shall provide additional information and performs operations for solving problems regarding Mobile-ID if necessary.

Information about Help Line and its contact details is presented on the website of MO. Also there shall be instructions for contacting the Help Line.

#### 1.5.3. PPA

PPA

- Accepts the applications for Mobile-ID certificates, decides the approval of the applications and forwards the approved certificate applications to the SK.
- Accepts the applications of revocation of the Mobile-ID certificates, decides the approval of the applications and forwards the approved certificate revocation applications to the SK.
- Accepts notifications from SK about the Mobile-ID certificates issued and revoked by SK;
- Decides the renewal of certificates and forwards a written request to SK.

PPA ensures security with its internal procedures while providing the service.

#### 1.5.4. User

#### 1.5.4.1. Client

Refer to CPS p.1.2.3.1.

Client is a physical person the Mobile-ID certificates are issued to as a public service if he/she has a legal right. The certificates are assigned to the Mobile-ID SIM card. Every client can have one valid Mobil-ID SIM card along with related certificates.

Client is the holder of the certificate issued under this CP.

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Client's distinguished name is compiled according to the certificate profile described in a separate document named as "Certificates on the personal identification documents of the Republic of Estonia" [7].

Client has to get acquainted and agree "The terms and conditions of using certificates of the digital identity card in the form of Mobile-ID" [3] in the PPA web-based application submission environment or at the MO for acquiring Mobile-ID certificates prior to signing the Mobile-ID certificates application or application for change of the certificates.

#### 1.5.4.2. Relying Party

Refer to CPS p.1.2.3.2.

#### 1.5.5. Area of Application of Certificates

Refer to CPS p.1.2.4.

There are two types of certificates issued under this CP:

- a) Certificates for digital signature.
- b) Certificates for digital identification of persons.

Certificates for digital signature can be used for digital signature as defined in the Digital Signatures Act [6].

This CP does not limit the use of the certificates issued in different software applications or fields of application.

#### 1.6. Contact Details

Refer to CPS p.1.3

#### SK

AS Sertifitseerimiskeskus Registry code 10747013 Pärnu mnt 141, 11314 Tallinn Phone +372 610 1880 Fax +372 610 1881 E-mail: info@sk.ee

http://www.sk.ee

#### **Help Line**

The obligations of the Help Line shall be carried out by the MO's hotline. The contact details of the Help Line are referred from the websites of SK http://www.sk.ee and MO.

#### MO

The contact details of MO are referred from the website of SK http://www.sk.ee. The change of MO's contact details must be announced immediately on MO's website and immediately inform SK about the changes.

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#### **PPA**

Pärnu mnt 139, 15060 Tallinn Help line +372 612 3000 Fax +372 612 3009 E-mail: info@politsei.ee http://www.politsei.ee

The PPA help line for solving matters regarding Mobile-ID certificate requests, processing the applications and for advisory of the service point employees is accepting calls on business days from 08:00 – 19:00, phone +372 612 3000.

#### **Client Service Points**

The list and contact details of the client service points are referred from SK's website http://www.sk.ee and on the MO's website. The change of contact details must be announced immediately on MO's website.

#### 2. General Terms

#### 2.1. Obligations

#### 2.1.1. Obligations of SK

Refer to CPS p.2.1.1.

SK shall warrant in addition that:

- The certification service is provided in accordance with the Certification Practice Statement of SK.
- The certification service is provided in accordance with this CP.

#### SK hereby additionally undertakes to:

- Accept and register the issuance of the Mobile-ID SIM cards and corresponding public keys presented by MO;
- Accept and register the requests for change of the certificates presented by the MO, decide the issuance of the certificates and forward the information on issuance of certificates to PPA;
- Accept and register the certificate requests presented by PPA and issue the corresponding certificates;
- Accept, register and process applications presented by MO for suspending, revocation of Mobile-ID certificates and the applications for change of phone number linked to the Mobile-ID SIM card;
- Accept, register and process the applications for revocation of the certificates presented by MO and forward the information on revocation of the certificates to PPA;
- Accept and register written applications for renewal of certificates submitted by PPA and renew the certificates according to applications.

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#### 2.1.2. Obligations of PPA

#### PPA is obligated to:

- Accept the digitally signed applications from clients for the issuance of the certificates assigned to the Mobile-ID SIM card;
- Accept the digitally signed applications from clients for the revocation of the certificates assigned to the Mobile-ID SIM card;
- Accept the applications from SK for the revocation of the certificates assigned to the Mobile-ID SIM card by MO;
- Accept notifications from SK about the certificates issued by SK;
- Accept notifications from SK about the certificates revoked by SK;
- Decide the renewal of certificates;
- Ensure the availability of the information about the service to the client.

While processing the abovementioned applications PPA must verify the accuracy and integrity of the applications.

While performing all procedures PPA must verify the applicant's identity and his/her powers to carry out the operation in accordance with the effective legislation.

#### PPA hereby additionally undertakes to:

- Follow the requirements described in this CP in the information system (including web based application submission environment of PPA) that is related to the certification service;
- Follow the availability and security requirements on the PPA's web based application submission system at least to the level of the requirements described in this CP
- Ensure that the employees, who are involved with information related to certification service, are not punished for intentional crime.
- Assure the availability of the information related to Mobile-ID in the public data network on address http://www.politsei.ee;
- Ensure the security with its internal security procedures while providing the service.

#### 2.1.3. Obligations of MO

#### MO undertakes to:

- Follow the availability and security requirements on the information system related to the Mobile-ID service at least to the level of the requirements described in this CP;
- Ensure the security with its internal security procedures. MO is responsible for all operations and procedures regarding the production of the Mobile-ID SIM cards, including the secure key generation on the Mobile-ID SIM card;
- Ensure that the employees, who will accept the applications regarding Mobile-ID SIM cards and certificates and/or are involved with information related to certification service, are not punished for intentional crime.
- Assure the availability of the information related to Mobile-ID in the public data network.

#### 2.1.4. Obligations of the Registration Centre

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#### 2.1.4.1. Obligations of the MO Client Service Point

Refer to CPS p.2.1.2.1.

MO client service point hereby additionally undertakes to accept requests for:

- Mobile-ID SIM card issuance and change;
- Suspension and closure of the Mobile-ID service;
- Suspension and revocation of the certificates;
- Change of phone number linked to the Mobile-ID SIM card.

#### MO client service point hereby additionally undertakes to:

- Forward the Mobile-ID SIM card request or request for Mobile-ID SIM card change to SK and hand over the Mobile-ID SIM card to the client;
- Forward the request for change of the certificates to SK;
- Forward the request for suspension and revocation of the certificates to SK;
- Preserve signed requests for Mobile-ID SIM card change and change of the certificates;
- Support the primary consultancy for handling the Mobile-ID SIM-card, applying Mobile-ID certificates in web-based environment and for using e-services that support Mobile-ID;
- Prepare and ensure the availability of information booklets about the service to the client.

While processing the abovementioned applications MO must verify:

- The accuracy and integrity of the applications;
- The identity of the applicant and his/her powers to carry out the operation in accordance with the relevant legislation and internal security procedures.

#### 2.1.4.2. Obligations of MO Help Line

Refer to CPS p.2.1.2.2.

#### 2.1.4.3. Obligations of SK Client Service Point

SK Client Service Point is obligated to:

 Accepts digitally signed applications of suspension and termination of suspension of the Mobile-ID certificates.

#### 2.1.5. Obligations of Clients

Refer to CPS p.2.1.3.

The client is obligated to:

- Present the true and correct personal data to the MO while submitting an application for the Mobile-ID SIM card or for change of the Mobile-ID SIM card;
- Present the true and correct personal data to the PPA while submitting an application for the Mobile-ID certificates;

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- Present the true and correct personal data to the MO while submitting an application for change of the certificates;
- Notify the PPA in case of change of the personal data in accordance with the effective legislation;
- Notify the MO in case of Mobile-ID becoming unusable, lost or destroyed in accordance with the effective legislation.

In case of a change in his/her personal details stored in the certificate the client must pretend to new a new Mobile-ID SIM card and Mobile-ID certificates in order to continue usage of the Mobile-ID service.

The client shall not be responsible for the acts performed during the suspension of certificates. In case the client shall terminate the suspension of certificates, the client will be solely and fully responsible for any consequences of digital identification and digital signature using the certificates during the time when the mobile service and/or certificates were suspended. If the client has a suspicion that the Mobile-ID has gone out of control of the client at the time of suspension of mobile service and/or certificate, the client is obliged to revoke the certificates.

#### 2.1.6. Obligations of Relying Party

Refer to CPS p.2.1.4.

#### 2.1.7. Obligations of Public Directory

Refer to CPS p.2.1.5.

No additional requirements are foreseen for operation of the public directory.

#### 2.2. Liability

#### 2.2.1. Liability of SK

Refer to CPS p.2.2.1.

SK is liable for all obligations described in chapter 2.1.1 of this CP within the limits of legislation of the Republic of Estonia.

#### 2.2.2. Liability of the Registration Centre

#### 2.2.2.1. Liability of the MO Client Service Point

Refer to CPS p.2.2.2.1.

MO is liable for all obligations of its authorized client service point described in chapter 2.1.4.1 of this CP.

2.2.2.2. Liability of the MO Help Line

Refer to CPS p.2.2.2.2.

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## Certification Policy of the digital identity card in form of the Mobile-ID

MO is liable for all obligations of its help line described in chapter 2.1.4.2 of this CP.

#### 2.2.2.3. Liability of SK Client Service Point

Refer to CPS p.2.2.2.2.

SK is liable for all obligations of its Client Service Point described in chapter 2.1.4.3 of this CP.

#### 2.2.3. Liability of MO

MO is liable for all obligations described in chapter 2.1.3 and elsewhere within this CP.

#### 2.2.4. Liability of PPA

PPA is liable for all obligations described in chapter 2.1.2 and elsewhere within this CP.

#### 2.2.5. Limits of Liability

Refer to CPS p.2.2.3.

#### 2.3. Settling disputes

Refer to CPS p.2.3.

#### 2.4. Publication of Information and Directory Service

#### 2.4.1. Publication of information by SK

Refer to CPS p.2.4.1

Valid certification revocation list is accessible on the website http://www.sk.ee/crls

#### 2.4.2. Publication Frequency

Refer to CPS p.2.4.1

The certificate revocation lists are updated and published regularly and not less than in every 12 hours.

#### 2.4.3. Access Rules

Refer to CPS p.2.4.3

#### 2.4.4. Directory Service

Refer to CPS p.2.4.4

The certificates issued in accordance of this CP are published in the public directory that is available at ldap://ldap.sk.ee.

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The certificates that are suspended or revoked shall be deleted from the public directory. In case of termination of suspension of certificates, certificates shall be re-published in the public directory.

The expired certificates shall be deleted from the public directory on the next day following the expiration.

#### 2.5. Audit

Refer to CPS p.2.5.

#### 2.6. Confidentiality

Refer to CPS p.2.6.

#### 3. Client identification

#### 3.1. Identification of Client

PPA shall verify the client's identity in accordance with relevant legislation and its internal procedures of identity verification.

MO shall verify the client's identity in accordance with relevant legislation and its internal procedures of identity verification.

SK shall verify the client's identity in accordance with relevant legislation and its internal procedures of identity verification.

## 3.2. Procedure of Certifying Correspondence of Applicant's Private Key to Public Key

The certificates are issued only to the public keys generated for client by MO.

#### 3.3. Distinguished Name

Refer to CPS p.3.3.

Client's distinguished name is compiled according to the certificate profile described in a separate document named as "Certificates on the personal identification documents of the Republic of Estonia" [7].

SK ensures the uniqueness of the combination of the client's distinguished name per Client.

# 4. Provision of Certification Service. Procedure and Terms of Certification Process

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This chapter describes the processing and terms of the certificate application.

#### 4.1. Submission of Applications for Certificates

Refer to CPS p.4.1.

The application for certificates can only be submitted in the web based application submission environment of PPA.

The Client confirms the accuracy of the data in the application for Mobile-ID certificates in web-based PPA environment and signs digitally the application for Mobile-ID certificates. A signed application for Mobile-ID certificates serves as a basis for the preparation of an application for the certificates. The verification of identity takes place electronically prior to the submission of the application.

The application for change of the Mobile-ID certificates is considered an application, where the Client subscribes for the new Mobile-ID SIM card and new certificates for the valid Mobile-ID and the validity end date of those certificates is the same with the validity end date of the initial certificates.

An application for the change of the Mobile-ID certificates can be submitted via the MO.

The Client can request for the change of the certificates at the MO if:

 the Mobile-ID certificates are in valid state and remaining validity period is more than 30 days.

The Client can submit an application for the premature re-issuance of the Mobile-ID to PPA, if:

- the Mobile-ID is still in valid state for more than 365 days and the Client applies for the certificates which validity end date is longer compared to validity end date of the certificates issued for the valid Mobile-ID;
- the Client has breached obligations stated by the legislation and the terms and conditions of Mobile-ID certificate usage [3] which has resulted in revocation of the certificates.

An application for the premature re-issuance of the Mobile-ID is treated as common application for the certificates and it can be submitted via web based application submission environment of PPA.

The contents and procedure of submission of the applications for certificate and for change of the certificates must meet the requirements of the Digital Signatures Act [6].

Client gets acquainted and agrees with the terms and conditions of Mobile-ID certificate usage [3] along with the submission of the applications for certificate and change of the certificates.

Additional information is available on the web page of the PPA http://www.politsei.ee

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#### 4.2. Processing of Applications for Certificates

The processing terms and conditions are stated by the effective legislation. Upon processing the applications for certificates the correctness and completeness of the information supplied by the client is verified.

In case of application for change of the certificates, after the Client has digitally signed the application for change of the certificates at the MO, the MO electronically verifies the applicant's identity and validates the Client's digital signature. Thereafter, the MO forwards the application for change of the certificates to SK.

The MO is obliged to preserve the applications for change of the certificates.

#### 4.2.1. Decision Making

Refer to CPS p.4.2.1.

The acceptance or rejection of an application for certificates shall be decided by PPA. The decision is based on the results of identity verification, correctness of the information supplied and on the client's right to have Mobile-ID certificates according to the legislation of the Republic of Estonia.

In case of positive decision, the PPA forwards the requests for certificates that facilitates digital signature and that facilitates digital identification to the SK.

During the decision making, there is an automated application verification mechanism in progress. The client shall be notified via the web based application submission environment of the PPA.

The acceptance or rejection of an application for change of the certificates shall be decided by SK. In case of positive decision, SK issues new certificates for the Mobile-ID.

#### 4.2.2. Certificate Issuance

The private keys of key pair are generated onto the Mobile-ID SIM card and the public keys forwarded to the MO by the producer of the Mobile-ID SIM card. The MO issues the Mobile-ID SIM card to the client and forwards the application of issued Mobile-ID SIM card to SK. The client submits an application for certificates in the web based application submission environment of the PPA. The certificates corresponding to the application are issued by SK upon automated authenticity and integrity verification of application data forwarded by PPA.

The certificates issued by SK shall be in active state.

In case of application for change of the certificates, the MO issues new Mobile-ID SIM card to the Client. Thereafter the MO forwards the application for the issued Mobile-ID SIM card to SK. Via the MO, the Client submits digitally signed application for change of the certificates. The MO electronically verifies the applicant's identity and validates the Client's digital signature. The MO forwards the application for change of the certificates to SK. After receiving a respective application from the MO, SK decides the acceptance or rejection of an

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application for change of the certificates. In case of positive decision, SK issues new certificates for the Mobile-ID and notifies PPA about the issuance of the new certificates.

#### 4.2.3. Certificate Check-up and Verification

Refer to CPS p.4.2.4.

#### 4.2.4. Certificate Renewal

Renewal of certificates will take place only based on a written request submitted by PPA. In case of certificate renewal the old certificate shall be revoked and new certificate shall be issued to the old key.

The certificates that are expired or revoked under other circumstances will be replaced with issuance of a new Mobile-ID.

## 4.3. Applications for Suspension and Revocation of Certificates

Refer to CPS p.4.3.

#### 4.4. Suspension of Certificates

Refer to CPS p.4.4.

To avoid misuse of the Mobile-ID certificates the Mobile-ID service will be closed. At SK client service point certificates will be suspended.

Suspension of certificates is possible:

- At client service points of MO;
- By telephoning the MO help line;
- At SK client service point.

The identity of the applicant shall be verified according to the identity verification procedure (refer to chapter 3.1) while calling the MO helpline, in client service point of MO and at SK client service point. The personal data details shall be compared to the data recorded into the subscription contract of Mobile-ID.

The document's data used within identity verification process shall not be recorded while accepting the application for suspension of certificates in the client service point of MO or in the MO help line.

#### 4.5. Termination of Suspension

Refer to CPS p.4.5.

The suspension of certificates can be terminated in a client service point of SK.

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The applicant's identity is verified in accordance with relevant legislation and SK's internal procedures of identity verification.

The application for termination of suspension must contain:

- The owner's and the applicant's (in case the owner and applicant are different persons) forename and surname;
- The owner's and the applicant's (in case the owner and applicant are different persons) personal id-code;
- The basis for termination of suspension.

#### 4.6. The Certificate Revocation

#### 4.6.1. The Powers of Revoking a Certificate

Refer to CPS p.4.6.1.

PPA or the MO is authorized to submit the application for revocation of the Mobile-ID certificate to SK.

#### 4.6.2. Submission of Application for Revocation

Refer to CPS p.4.6.2.

Revocation of certificates is possible in the web based application submission environment of the PPA or at the MO client service point by Client. The identity of the applicant shall be verified electronically in accordance with the authentication certificate related to the identity document and the identity of the applicant at the MO client service point shall be verified based on the identity document.

The application for revoking a certificate must contain:

- Holder's forename and surname;
- The personal id-code of the certificate holder;
- The basis for revocation of certificates.

Client has the possibility to terminate the Mobile-ID contract or exchange the Mobile-ID SIM card in MO client service point. In the course of respective activities, MO client service point shall suspend the certificates and submit the application for revocation of certificates to PPA.

PPA is additionally authorized to submit the application for revocation of the Mobile-ID certificates according to the Identity Documents Act [8] or related to the written application for renewal of the certificates.

#### 4.6.3. Procedure of Revocation

Refer to CPS p.4.6.3.

#### 4.6.4. Effect of Revocation

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Refer to CPS p.4.6.4.

#### 4.7. Procedures Ensuring Tracking

Refer to CPS p.4.7.

#### 4.8. Action in an Emergency

Refer to CPS p.4.8.

## 4.9. Termination of Certification Service Provider Operations

Refer to CPS p.4.9.

### 5. Physical and Organizational Security Measures

#### 5.1. Security Management

Refer to CPS p.5.1.

#### 5.2. Physical Security Measures

5.2.1. SK Physical Entrance Control

Refer to CPS p.5.2.1.

#### 5.2.2. Other Requirements. Storage of Mobile-ID SIM cards

The Mobile-ID SIM cards shall be stored in the client service point of MO according to the internal procedures.

#### 5.3. Requirements for Work Procedures

Refer to CPS p.5.3.

#### 5.4. Personnel Security Measures

Refer to CPS p.5.4.

### 6. Technical Security Measures

#### 6.1. Key Management

6.1.1. Certification Keys of SK

Refer to CPS p.6.1.1.

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#### 6.1.2. Client Keys

Refer to CPS p.6.1.2.

#### 6.1.2.1. Creating the Client Keys

The algorithms, key lengths and other parameters used to generate the keys are described in "Certificates on the personal identification documents of the Republic of Estonia" [7]. The Mobile-ID SIM card manufacturer is required to submit the confirmation that the keys are generated according to best practice and are unique along with the SIM cards and corresponding public keys.

The client keys are protected with PIN codes or activation codes known only to the client.

## 6.1.2.2. Protection of Client's Private Key and Activation Codes during Personalization Period

The confidentiality and non-usage of the generated private keys and activation codes until the hand over of the Mobile-ID SIM card used for storing keys and activation codes of the keys to the client is warranted by MO and by the manufacturer of the Mobile-ID SIM card.

The activation codes shall be printed in one copy straight to the security area of the Mobile-ID SIM card which is handed over to the client unopened. The client has the obligation to refuse to adopt a Mobile-ID SIM card with the breached security area.

#### 6.1.2.3. Activation of Client's Private Key

Subsequent to insertion of three false activation codes (PIN codes) the Mobile-ID functionality of the SIM card shall be blocked. The PUK code of the Mobile-ID SIM card handed over to the client can be used to unblock the Mobile-ID functionality.

The functions of authentication and signing shall be blocked independently. Subsequent to insertion of three false PUK-codes, the Mobile-ID functionality shall be blocked permanently.

If the PUK codes are lost or the PUK code is blocked, the client has to refer to the client service point for a substitute Mobile-ID SIM card and to the web based application submission environment of the PPA for applying for the new certificates.

#### 6.1.2.4. Backup and Deposition of Client's Keys

There shall be neither backup nor depositions of the private keys of the client under any circumstance.

#### 6.2. Logical Security

Refer to CPS p.6.2.

## 6.3. Description of Technical Means used for Certification

Refer to CPS p.6.3.

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## 6.4. Storage and Protection of Information Created in Course of Certification

Refer to CPS p.6.4.

#### 7. Technical Profiles of Certificates and Revocation Lists

The technical profiles of certificates and revocation lists are described in a separate document named as "Certificates on the personal identification documents of the Republic of Estonia" [7].

### 8. Management of Certification Policy

Refer to CPS p.8.

This CP and referred documents [1], [7] are published on the website of SK and document [3] is published on the web pages of SK, PPA and MO.

Any substantive changes shall be in the coordination with PPA and MO.

#### 9. Referred and Related Documents

#### Referred documents:

- [1] Certification Practice Statement of AS Sertifitseerimiskeskus (CPS), published: https://sk.ee/en/repository/CPS/;
- [2] RFC 2527 Request For Comments 2527, Internet X.509 Public Key Infrastructure, Certificate Policy and Certification Practices Framework, https://www.ietf.org/rfc/rfc2527.txt;
- [3] Terms and Conditions of Use of the Certificates issued to a digital identity card in form of Mobile-ID, AS Sertifitseerimiskeskus, published: https://sk.ee/en/repository/conditions-for-use-of-certificates/;
- [4] RFC 5280 –Internet X.509 Public Key Infrastructure Certificate and CRL Profile, http://www.ietf.org/rfc/rfc5280.txt;
- [5] RFC 3739 Internet X.509 Public Key Infrastructure: Qualified Certificates Profile, http://www.ietf.org/rfc/rfc3739.txt;
- [6] Digital Signatures Act of the Republic of Estonia, published: https://www.riigiteataja.ee/akt/114032014012&leiaKehtiv;
- [7] Certificates on the personal identification documents of the Republic of Estonia, published: https://sk.ee/en/repository/profiles/;
- [8] The Identity Documents Act, published: https://www.riigiteataja.ee/akt/123032015016&leiaKehtiv;

#### Related legislation:

- Personal Data Protection Act, published: https://www.riigiteataja.ee/akt/112072014051&leiaKehtiv.

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