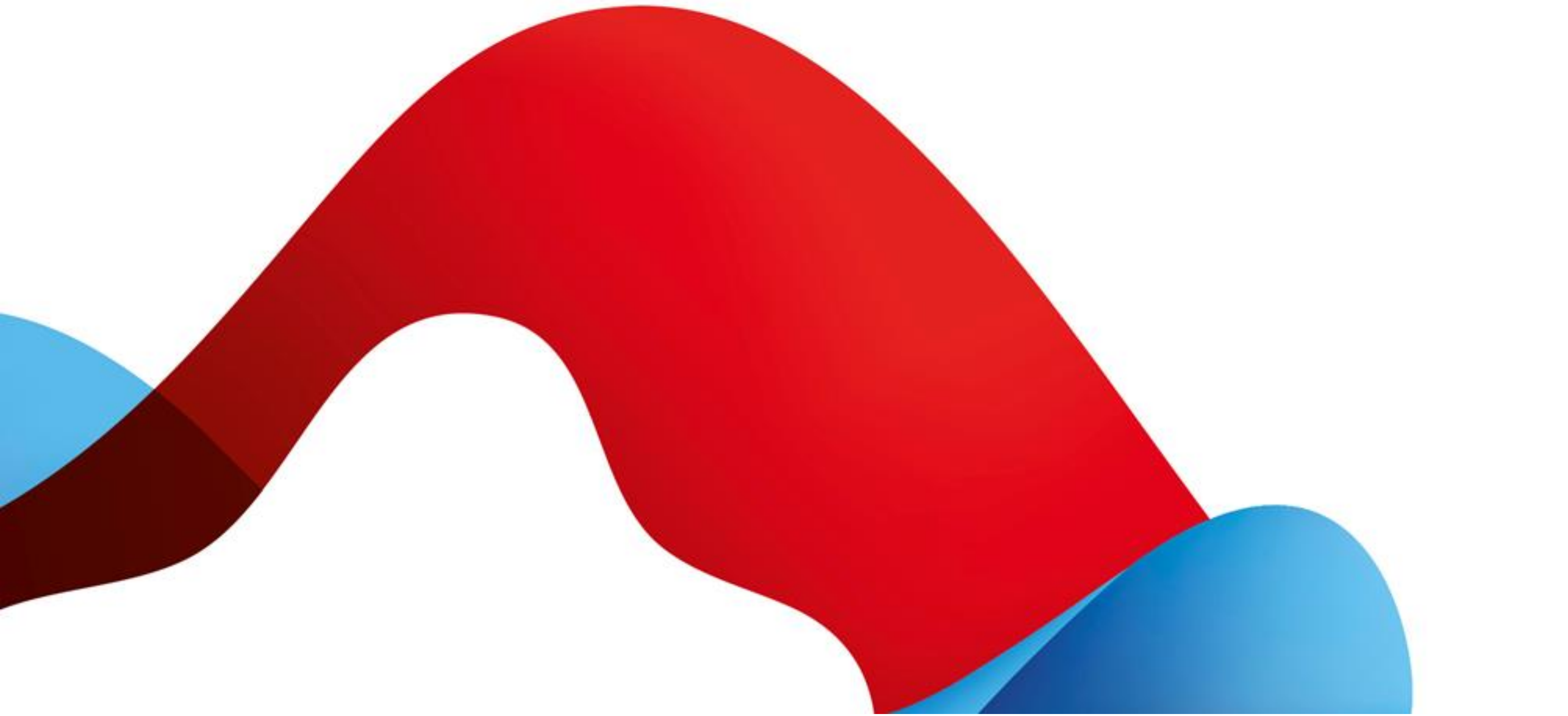
Service description

All-in Signing service for EU seals (static signatures)



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1 Service overview

The All-in Signing (AIS) service is a server-based remote signature service of Swisscom IT Services Finance S.E., Vienna, Austria, hereinafter “Swisscom ITSF”. The All-in Signing (AIS) service is delivered in the data centres of Swisscom (Switzerland) Ltd in Switzerland, and Swisscom (Switzerland) Ltd distributes the AIS service in its own name or grants the right to third parties to distribute the AIS service in their own name.

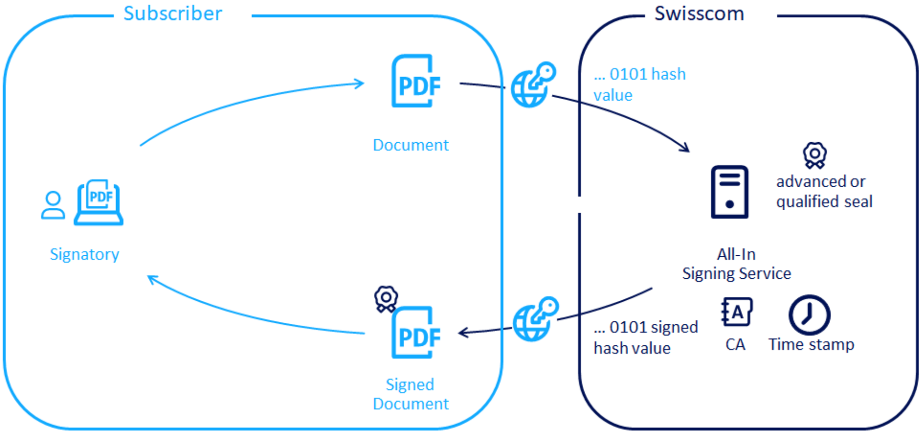
Swisscom ITSF is a qualified trust services provider for the issuing of electronic seals in the EU in accordance with the eIDAS Regulation and Austria’s Signature and Trust Services Act (Signatur- und Vertrauensdienstegesetz or “SVG”). A compliance assessment authority regularly checks whether the requirements under European and Austrian law and/or technical norms for recognised providers of certification services for electronic signatures are met. The supervisory authority has given Swisscom ITSF the qualification status of qualified trust services provider for issuing qualified certificates for electronic signatures and electronic seals. Swisscom ITSF is on the trusted lists in accordance with Art. 22 of the eIDAS (electronic identification, authentication and trust services) Regulation and is authorised to use the EU trust seal.

In general, Swisscom ITSF offers, depending on the type of contract, advanced and qualified electronic signatures for individuals, as well as advanced and qualified electronic seals for organisations. This service description outlines the service for advanced and qualified electronic seals for legal entities in accordance with EU legislation (the eIDAS Regulation).

Organisations that create seals (hereinafter “seal creators”, see the detailed definition in section 2) can use AIS to attach an electronic seal to digital files, thereby ensuring the integrity and the authenticity of a file. From a technical point of view, the electronic seal is based on the exact same procedure as the electronic signature. The Swisscom ITSF trust service creates and manages the seal certificate for the seal creator, on a fiduciary basis and in conjunction with Swisscom (Switzerland) Ltd, and makes it available for the AIS service through an encrypted channel. Thus, apart from a subscriber application, the seal creator does not need any other operational resources, such as tokens or a signature card, for this service.

In the seal creation process, the subscriber application produces a document such that only the hash (check sum of fixed length without any indication of the content) is sent to the AIS service. The files that are effectively readable and the information they contain do not leave the subscriber’s system environment and cannot, therefore, be viewed by Swisscom. The signed hash is reintegrated into the document by the subscriber application, thereby creating a signed document. All the document hash values that are sent over the secure interface that is authenticated by the seal creator are signed by Swisscom ITSF. Batch operations are thus also possible. In this case, the authorised establishment of the connection is recognised as a release for the seal. The subscriber can also operate the subscriber application for a seal creator as a third party. In this case, Swisscom needs authorisation from the seal creator to create a seal via the subscriber application of the subscriber.

Before commencing the service, every seal creator submits a certificate application, which is verified by Swisscom ITSF or by a third party under the responsibility of Swisscom.

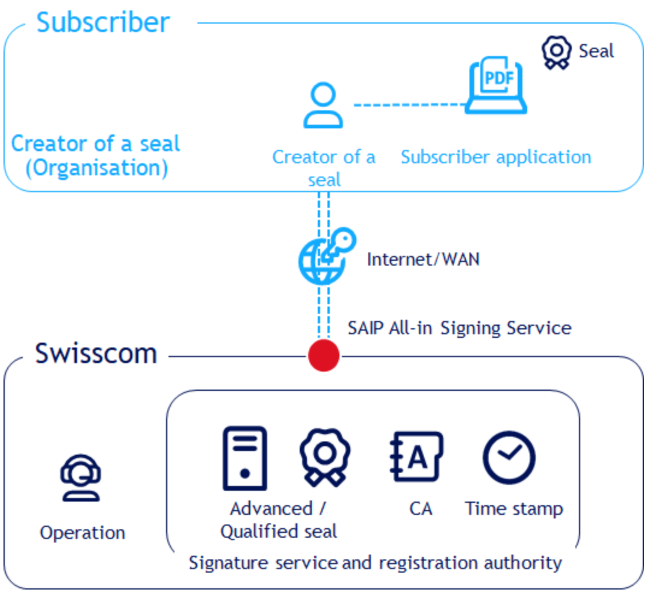


2 Definitions

2.1 Service Access Interface Point (SAIP)

The Service Access Interface Point (SAIP) is the contractually agreed, geographical and/or logical point at which a service is delivered to the service user. It is also the point at which a service is monitored and the service level reported.

The following schematic representation illustrates the services and service components of the All-in Signing service:


Subscriber
Seal
PDF
Creator of a seal (Organisation)
Creator of a seal
Subscriber application
Internet/WAN
SAIP All-in Signing Service
Swisscom
Operation
Advanced / Qualified seal
CA
Time stamp
Signature service and registration authority

🟦 = Customer ⬛ = Swisscom service

2.2 Service-specific definitions

Term	Description
Access certificate	Certificate that authenticates the access of the subscriber application to AIS and enables encrypted communication with the AIS service. It is a publicly trusted SSL/TLS certificate or an SSL/TLS certificate that is signed by the subscriber and also includes the public key. The specification is included in the configuration and acceptance declaration. If the subscriber and seal creator are identical, an authorised representative of the subscriber transmits the access certificate to Swisscom electronically (for example, by e-mail). If the subscriber and seal creator are not identical, in addition to transmitting the access certificate to Swisscom, it is necessary to have the written consent of the seal creator allowing Swisscom to use the access certificate to create electronic seals in the name of the seal creator with the subscriber application of the subscriber. In the case of a qualified certificate, the seal creator always retains access to the private key of the access certificate and transfers this personally to Swisscom.
AIS	All-In Signing.
AIS service	All-in Signing service. The signature service provides an interface linked to a subscriber application to activate the seal creation.
CMS	Cryptographic message syntax – a syntax defined in RFC5652 for the digital signature and cryptographic messages.
CP/CPS	Certification guidelines (CP/CPS) for issuing certificates of the “Diamond” (qualified) and “Sapphire” (advanced) classes.

Term	Description
	Certification guidelines, certification practice and documentation of certification authorities defining the rules and standard practices for issuing certificates.
Distinguished name	Standard form for describing a certificate subject. The subject of a certificate unambiguously designates the identification of the signatory.
Document	For the sake of clarity, the term “document” is used synonymously with the term “data”. Both documents and data can be signed.
eIDAS Regulation	Regulation no. 910/2014 of the European Parliament and Council of 23 July 2014 on electronic identification and trust services for electronic transactions in the internal market and for repealing Directive 1999/93/EC; also regulates electronic signatures in particular.
Electronic seal	From a technical point of view, the electronic seal is based on the exact same procedure as the electronic signature. An electronic seal is data in electronic form attached to other data in electronic form or logically linked to such data in order to ensure the origin and integrity of the data. This service description outlines the advanced and qualified electronic seal that is defined by the eIDAS Regulation.
Electronic signature	The electronic signature is a technical procedure for verifying the authenticity of a document, an electronic message or other electronic data and the identity of the signatory.
ETSI Standard 319 411	The European Telecommunications Standards Institute (ETSI) publishes standards for various areas of information and communication technology. The 319 411 standard is one of the standards that covers digital signatures, defining the requirement for different levels of trustworthiness of signatures.
FIPS 140-2	Federal Information Processing Standards are publicly announced standards developed by the United States federal government.
Hash	Unique representation of a large amount of data on a small amount of data, almost like a document’s fingerprint. No inferences can be made from the hash that would reveal the contents of the document in any way.
HSM	Hardware security module. This is a peripheral device for the efficient and secure execution of cryptographic functions and applications, in particular for the protection of key information used cryptographically.
OASIS DSS	Interface standard for digital signatures for web services and other services of the OASIS Group (non-profit organisation for open standards in IT).
PKCS#1	Cryptographic standard of the RSA Laboratories.
RA	Registration authority.
Registration authority (RA)	Authority responsible for the identification of future seal creators. May be provided by the subscriber, Swisscom or third parties, provided a contractual relationship with Swisscom exists.
REST	Representational state transfer. A programming paradigm for distributed systems, particularly web services.
Seal creator	Legal entity as defined in the eIDAS Regulation in whose name a digital certificate has been issued by Swisscom, on the basis of which the legal entity creates an advanced or qualified seal. Future seal creators must first apply to Swisscom for a digital certificate. Until the application has been approved by Swisscom, seal creators are applicants (who may not create seals if the application is rejected).
Secure signature creation module (HSM)	Qualified and certified hardware for creating signature keys and signature certificates.
Signature	See “Electronic signature”.

Term	Description
Signature certificate or seal certificate	Certificate that is issued to the signer or the seal creator. It is managed by Swisscom on a fiduciary basis and is used for signature or seal creation.
SOAP	Simple Object Access Protocol – an interface programming paradigm for web services that represents an alternative to REST.
SSL/TLS	Secure Socket Layer/Transport Layer Security. Encryption protocols for secure data transmission on the Internet based on SSL/TLS (access) certificates.
Static signature	Term frequently used in technical documents for the “organisation signature” or “seal” in accordance with this service description.
Subscriber	Swisscom provides the services covered by this service description to the subscriber. The subscriber is either a direct customer of Swisscom with an All-in Signing service contract (including the configuration and acceptance declaration) or has a commercial contract with a partner of Swisscom with a configuration and acceptance declaration with respect to Swisscom. Unless the subscriber is identical to the seal creator, the subscriber requires authorisation by which the seal creator sends or transfers the access certificate to Swisscom electronically or accepts the access certificate authorised by the subscriber for Swisscom.
Subscriber application	The subscriber provides one or more seal creators with access to an application with which they can create advanced or qualified electronic seals in accordance with Swisscom’s terms and conditions of use, and the subscriber ensures the transmission of seal data to the remote signature service of Swisscom as well as the authentication. The subscriber application receives the signed data and prepares the document for the seal creator. The subscriber application is not part of this service description. It is provided outside of the All-In Signing service, for example, by partners of Swisscom.
Terms and conditions of use	The terms and conditions of use govern the use of the seal certificates and certification service in the relationship between Swisscom IT Finance Service S.E. and the seal creator on a subscriber application. They can be viewed at https://www.swisscom.ch/en/business/enterprise/offer/security/digital_certificate_service.html.

3 Variants and options

Standard variant	Electronic seal
Advanced electronic seal	●
Qualified electronic seal	●
Electronic time stamp	●
Data storage in Switzerland	●
Operation in accordance with certification guidelines (CP/CPS)	●

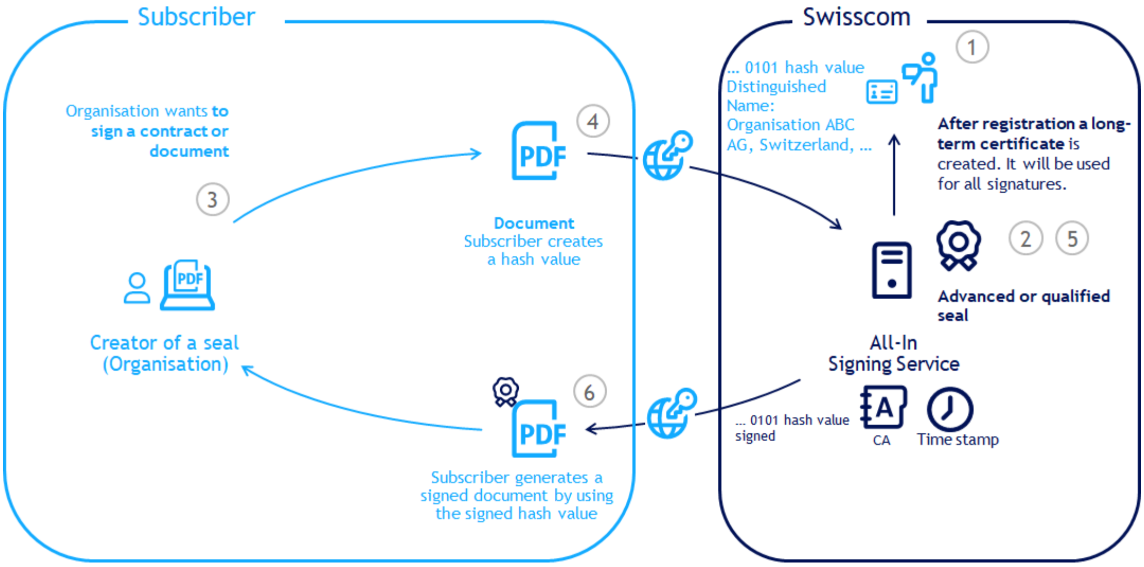
● = Standard (included in the price)

3.1 Definition of the services

Service	Definition
Advanced electronic seal	Advanced electronic seal in accordance with Art. 3 (26) of the eIDAS Regulation and ETSI standard 319 411 “NCP+”.
Qualified electronic seal	Qualified electronic seal in accordance with Art. 3 (27) of the eIDAS Regulation. This can be issued solely in the name of a legal entity in accordance with the eIDAS Regulation.
Electronic time stamp	Electronic time stamp in accordance with Art. 3 (33) of the eIDAS Regulation that does not meet the requirements of a qualified electronic time stamp under Art. 3 (34) of the eIDAS Regulation.

Service	Definition
Data storage in Switzerland	Personal data associated with the certificates is stored exclusively in Switzerland in compliance with the applicable provisions of the EU GDPR (General Data Protection Regulation) and Swiss data protection law.
Operation in accordance with certification guidelines (CP/CPS)	The operations of a trust services provider are governed by the certification guidelines of Swisscom ITSF (CP/CPS) for the issuing of signature certificates. The latest version can be viewed here: https://www.swisscom.ch/en/business/enterprise/offer/security/digital_certificate_service.html. Advanced electronic seals are based on "Sapphire" class certificates and qualified electronic seals are based on "Diamond" class certificates.

3.2 Seal creation procedure for all options


Subscriber
Organisation wants to sign a contract or document
3
Creator of a seal (Organisation)
4
PDF
Document
Subscriber creates a hash value
6
PDF
Subscriber generates a signed document by using the signed hash value
Swisscom
1
... 0101 hash value
Distinguished Name:
Organisation ABC AG, Switzerland, ...
After registration a long-term certificate is created. It will be used for all signatures.
2
5
Advanced or qualified seal
All-In Signing Service
... 0101 hash value signed
A
CA
Time stamp

- The registration authority (1) authenticates the seal creator beforehand on the basis of register entries and accepts an application of an authorised representative of the seal creator. In the case of qualified seals, this authorised representative must appear in person before a representative appointed by Swisscom. The application and other documents submitted are checked and archived.
- After the application has been approved, the key material is created and stored for the seal creator on the AIS platform (2). A corresponding long-term certificate (usually three years) is issued for this key pair in accordance with the certification guidelines of Swisscom and with the subject of the seal certificate in the seal certificate application (distinguished name of the seal creator).
- The subscriber authorised by the seal creator or the seal creator itself issues an SSL/TLS access certificate. The subscriber saves this on its server. In addition, the subscriber sends a copy of the access certificate to Swisscom, which saves it on the AIS platform. This ensures the connection between the subscriber application and the AIS service.
- In the case of a qualified seal, the private key of the access certificate must be created and managed on a cryptographic module or HSM with a minimum standard of FIPS 140-2 that has been agreed with Swisscom or its partner (such as Yubikey FIPS Series authentication devices). The private key is to be created in the presence of a representative appointed by Swisscom.
- All signature applications are also authenticated with this access certificate; other individual authentication no longer applies.

- The seal creator selects the document (3) or set of documents to be signed. The subscriber application creates a hash in accordance with Swisscom provisions (4) and sends it to the AIS service. Information relevant to the seal certificate subject (distinguished name) is also sent by the subscriber application.
- If the distinguished name of the seal creator is recorded by the registration authority and authorised for the creation of seals, a hash signature (5) is generated in accordance with CMS or the PKCS#1 standard to ensure the integrity of the hash.
- The seal with additional validation information in the signature certificate (such as signature certification chain for a trustworthy root certificate and qualified time stamp) is returned. The subscriber application ensures the seal of the document by embedding of the signed hash in the document. (6)
- The security of the subscriber application is ensured through regular self-audits of the subscriber in accordance with the configuration and acceptance declaration and, if needed, through an audit by Swisscom.

3.3 Process for authenticating a seal creator

Before the service commences, Swisscom conducts an audit of the seal creator in accordance with the provisions of CP/CPS (see above). For this purpose, the seal creator must be named in the seal certificate application and a representative who is an authorised signatory of the seal creator must sign the application for a seal certificate. In the case of signature regulations calling for two authorised signatories, another representative of the seal creator must also sign. By signing the seal certificate application, the seal creator authorises Swisscom to issue the certificate. The signatures must take place in the presence of an authorised representative of Swisscom either as a qualified electronic signature or by hand.

3.4 Revocation (declaration of invalidity) of a seal certificate

Seal certificates and/or access certificates must be declared invalid by the seal creator if there are visible signs that they have been misused or compromised. Swisscom will then issue a new seal certificate, if necessary on the basis of a new access certificate.

A notice of revocation must be issued by the representative of the seal creator named in the certificate application whose means of authentication (mobile number) has been stored at Swisscom. A revocation request is verified by means of the stored mobile number and release. Other procedures for revocation are possible in accordance with the provisions of CP/CPS.

4 Service description and responsibilities

Non-recurring services

Activities (S = Swisscom/Su = Subscriber)	S	Su
Provision of service		
1. Provision of the AIS infrastructure.	✓	
2. Provision of the SAIP interface based on the OASIS DSS protocol via SOAP or REST. The interface can be found at http://documents.swisscom.com/product/1000255-Digital_Signing_Service/Documents/Reference_Guide/Reference_Guide-All-in-Signing-Service-en.pdf.	✓	
3. Sending of the signed configuration and acceptance declaration with activation-relevant information and the required contact persons.		✓
4. Implementation of the requirements of the configuration and acceptance declaration.		✓
5. Provision of an application for a seal certificate signed by the seal creator with all the necessary documents for authenticating the seal creator and approving the conditions of use of the service. Signature in the application for the seal certificate by an authorised representative of the seal creator. Identification obtained by means of a representative of the seal creator appearing in person or a qualified electronic signature.		✓
6. Assurance that an access certificate is sent to Swisscom by the seal creator or its authorised representative with confirmation of power of attorney in the signed acceptance and configuration declaration.		✓

Activities (S = Swisscom/Su = Subscriber)	S	Su
7. Creation and management of the private key for the access certificate in a Swisscom approved storage solution or HSM with minimum FIPS 140-2 certification by the seal creator or authorised partner, insofar as qualified electronic seals are created. If no process approved by Swisscom exists, the private key is generated on the authorized storage solution or HSM in the presence of an authorised representative of Swisscom and the customer's representatives named and authorised in the seal application form. In this case, the creation and transmission of the access certificate are recorded in a jointly signed protocol.		✓
8. Activation of the communication for the access certificate sent.	✓	
9. If required, configuration of the firewall, on the server side at the subscriber’s premises.		✓
10. Designation of a person responsible, including constant deputation, for all matters concerning technology and security of the subscriber application and contact partners for audit matters in the configuration and acceptance declaration.		✓
11. Review of application documents.	✓	
12. Connection of the subscriber and sending of subscriber-specific access data.	✓	
13. Integration of the AIS service into subscriber-specific application(s) and/or subscriber-side connection of the interface to AIS, e.g. through the use of a subscriber application of a partner.		✓
14. Verification of access to the AIS service and the information on the seal certificate. Immediate report of any errors to Swisscom before being used for seal creation.		✓
15. Fault rectification through update or re-installation.	✓	
16. Operation of a revocation office for declarations of invalidity of a seal certificate if the seal certificate has been compromised or for other reasons.	✓	
17. Revoking and the enabling of revocations by the seal creator if there are signs that the seal or access certificate has been compromised through a revocation process published by Swisscom.		✓
18. Notification of the relinquishment of business activities, a bankruptcy notice against the subscriber, the opening of bankruptcy proceedings or a debt restructuring moratorium.		✓

Termination of the service or termination of the seal creation for a seal creator		
1. Deletion of the seal and access certificates in the AIS infrastructure.	✓	
2. Deletion of the associated key from the HSM.	✓	

Recurring services

Activities (S = Swisscom/Su = Subscriber)	S	Su
Standard services		
1. Operation of the AIS infrastructure, renewal of the seal certificate before its validity expires.	✓	
2. Lifecycle management of the AIS service infrastructure.	✓	
3. Lifecycle management of the subscriber’s infrastructure: updating to the current status of technology and security (security patches, updates etc.).		✓
4. Appropriate technical and organisational measures to protect the data sent from the subscriber application (e.g. including deactivation of connections not required, access regulations, etc.). Disclosure of the security system of the subscriber application and communication to Swisscom, if requested by Swisscom or its certification authority.		✓
5. Amendment of the definition of the security requirements.	✓	

Activities (S = Swisscom/Su = Subscriber)	S	Su
6. Lifecycle management of the access certificate: timely exchange before expiration of validity by the seal creator itself by e-mail to 1st-level support of Swisscom, specifying the claimed identity and the PRO number named in the contract.		✓
7. Assurance of the confidentiality of the data exchange between Swisscom and the subscriber (for example, avoidance of “inspection” modules).		✓
8. Selection of an approved storage solution or HSM in the case of a qualified seal that allows for the blocking of access to the subscriber application after no more than five failed authentication attempts with the service. A new access certificate must then be created in accordance with the authorised process or in a joint ceremony with Swisscom.		✓
9. Creation of seal certificates.	✓	
10. Definition of the seal certificate content and procedure for seal creation.	✓	
11. Sending of the seal creator’s data (distinguished name) in accordance with the provisions of the certificate application of the seal creator and the configuration and acceptance statement.		✓
12. Creation of seals.	✓	
13. Creation of seals in connection with an electronic time stamp.	✓	
14. Fulfilment of the cooperation obligations and requirements by the security officer.		✓
15. Customer notification in the event of faults and maintenance.	✓	
16. Provision of support services (service desk, incident management, etc.).	✓	
17. Reporting of changes to subscriber-specific information (contact persons, access certificate, termination of seal creators, etc.).		✓
18. Updating of subscriber-specific information (contact persons, access certificate, etc.).	✓	
19. Reporting of service faults.	✓	
20. Reporting of security incidents on the system of the subscriber application that concerns the AIS service.		✓
21. Reporting of any security incident on the system of the signature service that impacts the subscriber or seal creator.	✓	
22. Decision-making and responsibility for the legal implications of the seal type selected (see section 7.3).		✓
23. Further development, adjustment of the interface to current regulatory and security requirements. Information on adjustment of the interface three months before release, unless immediate action is called for by law or for security reasons. Maximum of two adjustments per year.	✓	
24. Adjustment of the interface in line with Swisscom’s new requirements within three months.		✓

5 Service levels and reporting

5.1 Service levels

The following service levels generally relate to the agreed support times. Definitions of terms (operation time, support time, availability, security and continuity) and the description of the measurement method and reporting are set out in the other contract elements (e.g. “SLA definitions”).

The following service levels are provided. If more than one service level is available per variant, the service level is indicated in the service contract.

All-in Signing service for EU seals (static signatures)

B

Service level & targets			Electronic seal
Operation Time			
Operation Time	Mo-Su	00:00-24:00	
Provider Maintenance Window	PMW-DC	PMW Data Center Swisscom	●
	PMW-S: with advance notice for security and system-critical updates	Daily 19:00-07:00, only for announced maintenance	●
Support Time			
Support Time [1]	Mo-So	00:00-24:00	●
Fault acceptance	Mo-So	00:00-24:00	●
Availability			
Service Availability			
▪ Signature service	99.8%		●
▪ Directory services according to CP/CPS section 2.2	99.9%		●
Security			
	Advanced (ITSLA)		●
	Customised (ITSLC)		○
Continuity			
ICT service continuity (ICTSC)	RTO 120 hrs | RPO 24 hrs		●
	RTO 48 hrs | RPO 24 hrs		○

● = Standard (included in the price) ○ = For an additional charge — = Not available

5.1.1 Support and Operation

During the support time, Swisscom ensures the operation of the AIS service in accordance with SLA clause 5.1 up to SAIP. Faults can be reported and accepted during this time (1st Level Support). If the AIS service has been purchased through a Swisscom partner, it must be contacted in the event of malfunctions. The partner will forward the fault to Swisscom if he cannot remedy it. Customer specific issues and service setups are handled by the 2nd Level Support Monday to Friday during from 8h00 to 17h00. The holiday regulations of the basic document "SLA definitions" must be considered.

5.2 Service level reporting

As part of the service, the subscriber receives the following standard service level report. Further reports can be provided, subject to charge, as part of the advanced reporting service after assessing the feasibility of the Customer's requirements.

[1] If the AIS service was supplied by a Swisscom partner, the latter should generally be contacted in the event of faults. If the partner is not able to rectify the fault, the partner will pass it on to Swisscom.

Service level report		Electronic seal	Reporting period
Availability	Service availability ▪ Signature service	● (On request)	Monthly
	▪ Directory services	● (On request)	Monthly
Continuity	ICT Service Continuity RTO|RPO	● (On request)	Monthly

● = Standard (included in the price) ○ = For an additional charge — = Not available

6 Billing and quantity report

6.1 Billing

Services are billed retroactively for the previous month. The billing details are governed by the service contract.

6.2 Quantity report

Quantity reports are governed by the service agreement.

7 Special provisions

7.1 Subscriber application

The subscriber application is not part of this service description. The subscriber application is provided by the subscriber, by a Swisscom partner or by Swisscom.

7.2 Operation of the subscriber application when the subscriber and seal creator are not identical

The representative of the seal creator authorised in the certificate application must transfer the access certificate to Swisscom or, in the case of advanced seals, approve the transfer of the access certificate to Swisscom by the subscriber in writing. This authorises the subscriber to operate the subscriber application for the seal creator with respect to Swisscom. If there is a change in the authorised representative, Swisscom is to be notified in writing or by e-mail by a representative of the seal creator or by the previous representative.

In this way, all documents that are transmitted via the Swisscom interface will have an electronic seal. Swisscom cannot verify that the access of the operator of the subscriber application with authority to access the key material for seal creation was authorised or that it was error-free.

7.3 Potential uses for the advanced or qualified seal

The use of the advanced or qualified electronic seal generally serves to guarantee the proof of origin and the integrity of the content of a file. The electronic seal is not to be confused with the legal concept of the electronic signature. Moreover, the legal effects of the higher-quality qualified electronic seal are not the same as those of the advanced electronic seal. It is up to the subscriber and the subscriber's seal creator to clarify in advance the legal effects of the chosen type of electronic seal (with or without a time stamp). Swisscom accepts no responsibility in this regard.

Qualified electronic seal (Swisscom “Diamond” class certificate): the qualified electronic seal created using AIS satisfies the criteria defined in the CP/CPS and the definition under Art. 3 (27) of the eIDAS Regulation with legal effect in accordance with Art. 35 of the eIDAS Regulation.

Qualified electronic seal (Swisscom “Sapphire” class certificate): the advanced electronic seal created using AIS satisfies the criteria defined in the CP/CPS and the definition under Art. 3 (26) of the eIDAS Regulation with legal effect in accordance with Art. 35 of the eIDAS Regulation.

Simple electronic time stamp: the simple electronic time stamp created using AIS satisfies the criteria defined in the CP/CPS and the definition under Art. 3 (33) of the eIDAS Regulation with legal effect in accordance with Art. 41 of the eIDAS Regulation. It is not a qualified electronic time stamp in the sense of Art. 3 (34) of the eIDAS Regulation.

The advanced electronic seal and the qualified electronic seal do not have the same legal effects as a handwritten signature or a qualified electronic signature. Depending on the situation, some documents therefore require a handwritten signature, a qualified electronic signature or a qualified electronic seal, under certain circumstances with an electronic time stamp, in order for the intended legal validity to enter into effect.

The validity of electronic seals created via AIS in accordance with the certification guidelines (CP/CPS) for the issuing of certificates issued by the issuing CAs “Diamond” (qualified) and “Sapphire” (advanced) may differ under the application of foreign law and may be more or less extensive as compared to EU law.

The exchange of encrypted data and the issuing of certificates in/with certain countries are also subject to legal restrictions.

7.4 Data processing by third parties in Switzerland or abroad, emergency access

Swisscom ITSF engages Swisscom (Switzerland) Ltd., whose headquarters are in Switzerland, for the provision of trust services. Swisscom (Switzerland) Ltd operates the IT systems used for the provision of trust services, and these systems are located in Switzerland. The digital certificates are thus issued on servers in Switzerland. This involves contract data processing that is handled by Swisscom (Switzerland) Ltd in Switzerland on behalf of Swisscom ITSF. Swisscom ITSF has concluded the required data privacy agreements for this purpose with Swisscom (Switzerland) Ltd. Data processing by third parties on behalf of Swisscom and/or from abroad is always carried out in accordance with the applicable provisions of EU data protection law. Such processing may be carried out, for example, by employees resident abroad (cross-border commuters) or on business trips as well as by the maintenance divisions of foreign manufacturers. Within the framework of this service, such processing may specifically occur in the following constellations:

- In support cases from the EU, the 3rd-level support of the application manufacturer has VPN access to application data at Swisscom that does not include any personal data other than the data published by the seal creator in the certificate. This access is monitored by Swisscom. Identification data cannot be viewed by the application manufacturer.
- Supervisory authorities and compliance assessment authorities which have to confirm the conformity of the signature application may come into contact with personal and identification data as part of audits under the supervision of Swisscom conducted in order to assess the compliant implementation of identity authentication and the issuing of signatures. These compliance assessments take place in Switzerland.
- RA agents who carry out identification with the RA app on behalf of Swisscom are proposed to Swisscom by the Customer. They are subject to data protection obligations. Identification in this case can also be done by foreign nationals, abroad or by cross-border commuters residing abroad.
- Data from the identification process that are processed with the RA app can, depending on the situation, also be collected by RA agents abroad.

If, during the provision of this service, Swisscom is confronted with faults that it is unable to resolve itself, it may grant manufacturers or service partners from the EU temporary, supervised VPN access to the systems of Swisscom for the purpose of analysing and rectifying the faults in question. The seal creation data published by the seal creator in the certificate and the master data of the seal creator (e.g. organisation name, designation of the SSL certificate published by the Customer) may also be visible to these third parties in some cases. Access is monitored in real time by a Swisscom technician to ensure that there is no unsupervised access to data and that the connection can be severed immediately in the event of any misuse. This process is consistent with the best-practice approaches used in the banking and insurance sectors.