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# TunStamp Authority Timestamp Policy / Timestamp Practice Statement

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#### 1 Introduction

The Tunisian national agency for digital certification ("TunTrust") was founded in accordance with Law no. 2000-83 of 9 August 2000 governing electronic exchanges and commerce. TunTrust is a government-owned Timestamp Authority (TSA) operated in compliance with the international standards.

This document entitled TimeStamp Policy / TimeStamp Practice Statement of the TunStamp Authority (to be referred to as "TP/TPS" hereafter) has been prepared for the purpose of explaining the technical and legal requirements met by the Tunisian TimeStamp Authority (to be referred to as "TunStamp").

The present document specifies policy and security requirements relating to the operation and management practices of the TunStamp Authority issuing time-stamps. Such time-stamps can be used in support of digital signatures or for any application requiring to prove that a datum existed before a particular time.

This TP/TPS is applicable to all persons, including, without limitation, all requesters, subscribers, relying parties, registration authorities and any other persons, that have a relationship with TunTrust with respect to timestamps issued by the TunStamp Authority.

This TP/TPS also provides statements of the rights and obligations of TunStamp Authority, authorized registration authorities, requesters, subscribers, relying parties, resellers, comarketers and any other person, or organization that use or rely on timestamps issued by the TunStamp Authority.

The present document can be used by independent bodies as the basis for confirming that TunStamp can be trusted for issuing time-stamps according to international standards.

The structure and contents of this TP/TPS are laid out in accordance with ETSI EN 319 421" Electronic Signatures and Infrastructures (ESI); Policy and Security Requirements for Trust Service Providers issuing Time-Stamps". In the event of any inconsistency between this TP/TPS document and the ETSI EN 319 421, the requirements set out in the ETSI EN 319 421 document take precedence over this one.

## 2 Scope

TunTrust uses its public key infrastructure and trusted time sources to provide reliable, standards-based time-stamps. This Time-stamp Policy/Practice Statement defines the operational and management practices of the TunStamp authority such that Subscribers and Relying Parties may evaluate their confidence in the operation of the time-stamping services. TunTrust aims to deliver time-stamping services used in support of qualified electronic signatures, as well as under applicable Tunisian law and regulations. However, TunTrust time-stamps may be equally applied to any application requiring proof that a datum existed before a particular time.



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## 3 References

This TP/TPS describes the practices used to comply with the current versions of the following policies, guidelines, and requirements:

- 1. ETSI EN 319 421: Electronic Signatures and Infrastructures (ESI); Policy and Security Requirements for Trust Service Providers issuing Time-Stamps
- 2. ETSI EN 319 422: Electronic Signatures and Infrastructures (ESI); Time-stamping protocol and time-stamp token profiles
- 3. ETSI EN 319 401 : Electronic Signatures and Infrastructures (ESI); General Policy Requirements for Trust Service Providers
- 4. ETSITS 101 861: Electronic Signatures and Infrastructures (ESI); Time stamping profile
- 5. RFC 3628: Policy Requirements for Time-Stamping Authorities
- 6. RFC 3161, Internet X.509 Public Key Infrastructure Time-stamp Protocol (TSP)

## 4 Definitions and Abbreviations

#### 4.1 Definitions

**Coordinated Universal Time (UTC)**: time scale based on the second as defined in Recommendation ITU-R TF.460-6

Relying party: natural or legal person that relies upon an electronic identification or a trust service

**Subscriber**: legal or natural person bound by agreement with a trust service provider to any subscriber obligations

**Time-stamp**: data in electronic form which binds other electronic data to a particular time establishing evidence that these data existed at that time

**Time-stamp policy**: named set of rules that indicates the applicability of a time-stamp to a particular community and/or class of application with common security requirements

Trust service: electronic service which enhances trust and confidence in electronic transactions

Time-stamp token: data object defined in IETF RFC 3161, representing a time-stamp

**Trust service policy**: set of rules that indicates the applicability of a trust service to a particular community and/or class of application with common security requirements

**Trust service practice statement**: statement of the practices that a TSP employs in providing a trust service

Trust service provider: entity which provides one or more trust services

Time-Stamping Authority (TSA): TSP which issues time-stamps using one or more time-stamping units

**Time-Stamping Unit (TSU)**: set of hardware and software which is managed as a unit and has a single time-stamp signing key active at a time



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**TSA Disclosure statement**: set of statements about the policies and practices of a TSA that particularly require emphasis or disclosure to subscribers and relying parties, for example to meet regulatory requirements

TSA practice statement: statement of the practices that a TSA employs in issuing time-stamp

**TSA system**: composition of IT products and components organized to support the provision of time-stamping services

#### 4.2 Abbreviations

<b>BIPM</b>	Bureau International des Poids et Mesures
BTSP	Best practices Time-Stamp Policy
CA	Certification Authority
<b>GMT</b>	Greenwich Mean Time
IT	Information Technology
TAI	International Atomic Time
TP	TimeStamp Policy
TPS	TimeStamp Practice Statement
<b>TSA</b>	Time-Stamping Authority
TSP	Trust Service Providers
<b>TST</b>	TimeStamp Token
TSU	Time-Stamping Unit
UTC	Coordinated Universal Time

## 5 General Concepts

#### 5.1 TimeStamp Authority

TunTrust is the Tunisian timestamp provider responsible of provisioning time-stamps services to the public. It has the responsibility for the operation of the one or more time-stamp units that are creating and signing on behalf of the TunStamp Authority.

This authority is trusted by Subscribers and Relying Parties for the issued time-stamp Tokens.

Although providing time-stamp services could be outsourced, TunTrust has the ultimate responsibility of ensuring that the requirements of the time-stamp policy herein are met.

## 5.2 Time-Stamping Services & Usage

The provision of time-stamping services is broken down in the present document into the following component services for the purposes of classifying requirements:

- **Time-stamping provision**: This service component generates time-stamps compliant with the RFC 3161.
- **Time-stamping management**: This service component monitors and controls the operation of the time-stamping services to ensure that the service provided is as



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specified by the TSA. This service component has responsibility for the installation and de-installation of the time-stamping provision service.

#### 5.3 TimeStamp Authority Obligations

#### TunStamp Authority is:

- compliant with this TP/TPS,
- providing trustworthy time-stamps,
- providing UTC time accuracy of  $\pm 1$  second,
- delivering time-stamping services based on minimum 99,9% availability,
- performing internal and external audits to assure compliance to this TP/TPS,
- ensuring that all requirements and procedures detailed in this TSP are implemented,
- authenticating requests for time countermarks using electronic certificates.

#### 5.4 Subscribers

Subscribers are either Legal Entities or natural persons that have agreed to the TunStamp Subscriber Agreement.

- When the subscriber is an individual, he / she will be held directly responsible if his / her obligations are not correctly fulfilled.
- When the subscriber is an organization, some of the obligations that apply to that organization will have to apply as well to the end-users. In any case the organization will be held responsible if the obligations from the end-users are not correctly fulfilled and therefore the organization is expected to suitably inform its end-users.

#### 5.5 Relying parties

Relying parties are individuals or organizations that use timestamps of the TunStamp Authority to verify the timestamp. Relying parties are allowed to use such timestamps only in accordance with the terms and conditions set forth in this TP/TPS. It is in their sole responsibility to verify legal validity and applicable policies.

The terms and conditions set for relying parties include an obligation on the relying party that, when relying on a time-stamp token, the relying party shall:

- a) verify that the time-stamp token has been correctly signed and that the private key used to sign the timestamp has not been compromised until the time of the verification;
- b) take into account any limitations on the usage of the time-stamp indicated by the timestamp policy;
- c) take into account any other precautions prescribed in agreements or elsewhere.

After expiry of the time-stamp certificate, the relying party should:

- verify that the TSU private key is not revoked, and
- verify that the cryptographic hash function and the signing algorithm used in the timestamp token are still considered secure.



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# 5.6 Time-Stamp Policy and TSA Practice Statement 5.6.1. Purpose

The TunTrust Time-Stamp Policy ("what is adhered to") and the TunTrust Timestamp Practice Statement ("how it is adhered to") have been merged into one document, the TunStamp-TP/TPS. This document specifies a time-stamp policy and practice statement to meet general requirements for trusted time-stamping services as defined by the standards in section 2 (References) of this document.

#### 5.6.2. Level of Specificity

This TunStamp TP/TPS extends the CP/CPS of the Tunisian National PKI which regulates the operation of the Tunisian National PKI and associated non-repudiation services. Both of the documents are public documents and may be downloaded at http://www.tuntrust.tn/repository.

#### 5.6.3. Approach

The TunStamp TP/TPS establishes the general rules concerning the operation of the Tunstamp TSA. Additional internal documents define how TunTrust meets the technical, organizational, and procedural requirements identified in the TunStamp TP/TPS. These documents may be provided only under strictly controlled conditions.

## 6 Time-Stamp Policies

#### 6.1 Overview

This TunStamp TP/TPS is a set of rules that indicates the applicability of a TST to a particular community or class of application with common security requirements, which include:

- The TSU, private keys, and profiles of public key certificates are in compliance with technical specifications of the RFC 3161 and RFC 3628.
- The TunStamp TSA holds private keys used in signing time-stamps.
- TSTs are issued with the accuracy of  $\pm$  1 second, as indicated in Section 5.3 (Timestamp Authority Obligations).
- Means used in requesting for time-stamps include the Transfer Control Protocol (TCP) and Hypertext Transfer Protocol (HTTP).

#### 6.2 Document Name and Identification

The object identifier (OID) for the TunStamp TP/TPS is: 2.16.788.1.2.6.1.11

Through the conclusion of this object identified in the issued tokens for electronic timestamp, TunTrust confirms compliance with this policy.



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The object identifier described above is in compliance with ETSI BRSP (Best Practices Policy for Time-Stamps) OID=0.4.0.2023.1.1, in accordance with the standard ETSI EN 319 421.

#### 6.3 User Community and Applicability

The TunStamp TSA's User Community is composed of subscribers and relying parties. Accordingly, subscribers are also regarded as relying parties.

This TunStamp TP/TPS is aimed to meeting the requirements of time-stamping qualified digital signatures for long term validity, but is generally applicable to any requirement for an equivalent quality.

This policy does not define restrictions on the applicability of the time-stamps issued.

#### 6.4 Conformance

To show conformance with this document, the TunStamp TSA uses the identifier for the time-stamp policy established in Section 6.2 (Document Name and Identification) of this document in its issued TSTs.

The TunStamp TSA is subject to periodic independent internal and external audits. The TunStamp TSA guarantees conformance of its implemented controls and ensures that it meets its obligations specified in Section 5.3 (TimeStamp Authority Obligations) of this document.

## 7 Policies and practices

#### 7.1 Risk Assessment

TunTrust carries out a risk assessment to evaluate business risks and determine the necessary security requirements and operational procedures. This risk analysis performed with the full support and collaboration of all component services providers and is regularly reviewed and revised if necessary. This risk analysis is available as an internal document.

TunTrust performs annual risk assessments that:

- 1. Identifies foreseeable internal and external threats that could result in unauthorized access, disclosure, misuse, alteration, or destruction of any Certificate Data or Certificate Management Process;
- 2. Assesses the likelihood and potential damage of these threats, taking into consideration the sensitivity of the Certificate Data and Certificate Management Processes; and
- 3. Assesses the sufficiency of the policies, procedures, information systems, technology, and other arrangements that TunTrust has in place to counter such threats.

TunTrust management approve the risk assessment and accept the residual risk identified.



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#### 7.2 Trust Service Practice Statement

Additionally to be compliant to ETSI EN 319 421, the following measures have been applied in order to guarantee the quality, performance and operation of the time-stamping service :

#### 7.2.1. Time-stamp format

The issued time-stamp token by TunStamp are compliant to RFC 3161 time-stamps. The service issues RSA2048 encrypted time-stamps that accept the following hash algorithm:

#### SHA256

#### 7.2.2. Accuracy of the time

The time signal is provided via Google NTP servers. The time-stamping service uses this time signal as a time source. With that setup the time-stamping service reaches an accuracy of the time of  $\pm$ 1 or better with respect to UTC.

#### 7.2.3. Limitations of the service

Every TSU certificate is issued at least once a year with a validity period of 03 years each.

Thereby, the TunStamp digital signature on the Time-Stamp Token (TST) has a validity period of two years. So, the expected validity period of every TST is two years.

The timestamp service can only be provided to authorized TunStamp subscribers holding a valid electronic certificate in order to authenticate to the TunStamp server.

#### 7.3 Terms and conditions

Within the published document "Terms and conditions for timestamp subscribers" information about e.g. limitation of the service, subscribers obligations, information for relying parties or limitations of liability can be found. Additionally the following information apply:

#### 7.3.1 Trust service policy being applied

The present document represents the applied trust service policy, see chapter 6 for further information.

#### 7.3.2 Period of time during which TSP event logs are retained.

TunTrust retains any audit logs generated for at least seven years. TunTrust makes these audit logs available to its Qualified Auditor upon request.

TunTrust retains all documentation relating to timestamp requests and the verification thereof, and all timestamps and revocation thereof, for at least 20 years after any timestamp based on that documentation ceases to be valid.



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## 7.4 Information Security Policy

TunTrust Board of Directors is responsible for defining the information security policy and ensuring publication and communication of the policy to all personnel who are impacted by the policy.

This information security policy is implemented with the full support and collaboration of all component services providers and is regularly reviewed and revised if necessary. Appropriate systems, infrastructures and measures for quality and information security management are implemented and maintained at all times. Any changes that would impact on the level of security provided must be approved by TunTrust through its TunTrust Board of Directors. The TunTrust information security policy as well as documentation on security controls and operating procedures is available as separate and internal documents.

#### 7.5 TimeStamp policy and TSA practice statement

As specified in ETSI EN 319 401, a Time-Stamp Policy is a form of Trust Service Policy. However, TSA Practice Statement is a form of Trust Service Practice Statement. Both are applicable to trust service providers issuing time-stamps. TunTrust makes the choice to combine them in a unique policy specifying the general requirements for trusted time-stamping services and how those last are met.

The policy herein states that TunTrust:

- Provides a trustworthy service for all Subscribers and Relying Parties,
- Is issuing TimeStamp Tokens in compliance with the RFC 3161,
- Ensures that the private keys of the TimeStamp Services are protected at all time,
- Is compliant with Tunisian law and regulations,
- Ensures that audits are performed by an independent body,

## 8 TunStamp Management and Operation

#### 8.1 Introduction

TunTrust has implemented a corporate information security framework (a set of policies, processes, organizational culture, technical and operational practices, etc.) in order to meet its strategic objectives related to IT security.

## 8.2 Internal organization

TunTrust, which is a legal entity according to Tunisian national law, ensures that:

- Trust service practices under which TunStamp operates are non-discriminatory.
- Trust services are accessible to all applicants whose activities fall within its declared field of operation and that agree to abide by their obligations as specified in sections 5.4 & 5.5 of the present policy.



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- TunTrust has a documented agreement and contractual relationship in place where the provisioning of services involves subcontracting, outsourcing or other third party arrangements.
- TunTrust has implemented an information security management system to maintain the security of the trust service provided.
- TunTrust employs sufficient number of personnel having the necessary education, training, technical knowledge and experience relating to the type, range and volume of work necessary to provide time-stamping services. In order to satisfy this adequacy, periodic improvement of the required skills and competencies in addition to providing interims are applied.

## 8.3 Personnel Security Controls

All persons filling time-stamping operations are selected on the basis of skills, loyalty, trustworthiness, and integrity. Persons should at the minimum have no criminal record.

The requirements governing the qualifications, selection and oversight of individuals who operate, manage, oversee, and audit the CA are set forth in the CPS.

Appropriate disciplinary sanctions are applied to personnel violating TSP policies or procedures.

Both permanent and temporary employees have their job descriptions taking into account segregation of duties and least privilege.

Trusted roles in TunTrust are formally assigned by the senior management. TunTrust has ensured the definition of critical roles such as :

#### • Registration and Customer Services Responsible (Operator)

Employees responsible for routine certification services such as customer services, document control, processes relating to certificate registration, generation and revocation. These employees are trusted roles.

#### • PKI Administrator

The PKI Administrator is a trusted role. He is responsible for the installation and configuration of the different components of the PKI (CA, RA, TMS, ...).

#### • System Administrator

The System Administrator is a trusted role. He is responsible for the installation and configuration of the system hardware, including servers and different components of the PKI. The System Administrator is also responsible for keeping systems updated with software patches and other maintenance needed for system stability and recoverability.

#### • Physical and Logical Security Officer



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The Physical Security Officer is a trusted role. He is responsible for the installation and configuration of the physical security platforms (access control, video surveillance, IDS, ...) and the logical security platforms (firewalls, WAF, routers, network configuration).

#### • Customer Support Personnel (Operator)

Customer support and vetting personnel serve in a trusted role. They are responsible for interacting with Applicants and Subscribers, managing the certificate request queue and completing the certificate approval checklist as identity vetting items are successfully completed.

#### • Auditor

The Auditor is a trusted role. He is authorized to view archives and audit logs of the trustworthy system.

#### Key Manager

- The Key Manager is a trusted role. He is responsible of conducting the key ceremonies

#### 8.4 Asset management

TunTrust has ensured an appropriate level of protection of its assets including information assets.

TunTrust has maintained an inventory of all information assets and has assigned a classification consistent with the risk assessment.

All media are handled securely in accordance with requirements of the information classification scheme.

Media containing sensitive data is securely disposed of when no longer required.

#### 8.5 Access control

TunTrust time-stamping system access is restricted to authorized individuals.

#### In particular:

- a) Multiple Firewalls technologies are implemented to protect TunTrust internal network and to prevent all protocols and accesses not required for its operations.
- b) User account management and timely modification or removal of access are deployed.
- c) Computer security controls are activated for the separation of trusted roles, including the separation of security administration and operation functions.



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- d) TunTrust personnel is identified and authenticated before using critical applications related to the service. TunTrust personnel is accountable for their activities.
- f) All sensitive data is protected against disclosure through re-used storage objects being accessible to unauthorized users.

## 8.6 Private Key Life-cycle Management

TunTrust key pair generation creates a verifiable audit trail that the security requirements procedures were followed. Only TSA authorized personnel are allowed to create new keypairs. Private keys and TSA certificates are not used after end of its life cycle. A private key is destroyed after its end-of-life.

#### 8.6.1 TSU Key generation

For the generation of the TSU's signing keys, TunTrust performs the following controls:

- 1. generates the keys in a physically secured environment as described in this TP/TPS;
- 2. generates the TSU keys using personnel in trusted roles under the principles of multiple person control and split knowledge;
- 3. generates the TSU keys within cryptographic modules meeting the applicable technical and business requirements as disclosed in this TP/TPS;
- 4. logs its TSU key generation activities; and
- 5. maintains effective controls to provide reasonable assurance that the Private Key was generated and protected in conformance with the procedures described in this TP/TPS and (if applicable) its Key Generation Script.

#### 8.6.2 TSU private key protection

TunStamp private keys are protected within a hardware security module (HSM) meeting Level 3 of the Federal Information Processing Standard 140 (FIPS 140).

Copying, storing or recovering operations carried out on the TSU's backed up signing keys are undertaken in a physically secured environment by personnel in trusted roles under dual control. The personnel authorized to carry out those actions is limited to those required to do so under TunStamp's practices.

#### 8.6.3 TSU public key certificate

TunTrust ensures the integrity and authenticity of its signature keys when made available to relying parties.

The electronic certificates are published on the TunTrust website: www.tuntrust.tn

The minimum length of key used for electronic signing/marking of issued timestamps is 2048 bits.

TunTrust CAs certificate profiles description is available as in the naming and profile document (published in repository http://www.tuntrust.tn/repository).



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#### 8.6.4 Rekeying TSU's key

In standard situations (expiry of the term of a certificate of the relevant TSU), the replacement of data for the verification of electronic signatures/marks in issued timestamps shall be sufficiently in advance prior to the expiry of the term of the certificate performed in the form of issuance of a new certificate of the relevant TSU.

In the event of non-standard situations (for example in the event of a development of cryptanalytic methods that may endanger the security of the process of creation of electronic signatures/marks, i.e. a change in encryption algorithms, key length, etc.), the replacement shall be performed at the adequate time.

Both in the event of standard and non-standard situations, the replacement of data for the verification of electronic signatures/marks in a certificate of the relevant TSU shall be notified to the general public in advance (if possible) and in an appropriate manner.

#### Certificate Revocation and Suspension 8.6.5

TunTrust does not provide the service of certificate suspension.

TunTrust will revoke the TSA Certificate if one or more of the following occurs:

- a) TunTrust obtains evidence that the TSA's Private Key corresponding to the Public Key in the Certificate suffered a Key Compromise;
- b) TunTrust obtains evidence that the Certificate was misused;
- c) TunTrust is made aware that the Certificate was not issued in accordance with or that the TSA has not complied with the applicable TP/TPS;
- d) TunTrust determines that any of the information appearing in the TSU Certificate is inaccurate or misleading;
- e) TunTrust or the TSA ceases operations for any reason;
- f) TunTrust or TSA's right to issue timestamps under these Requirements expires or is revoked or terminated;
- g) Revocation is required by TunTrust TP/TPS; or
- h) The technical content or format of the TSU Certificate presents an unacceptable risk to Application Software Suppliers or Relying Parties.

#### 8.6.6 Life cycle management of signing cryptographic hardware

TunTrust ensures that:

- The time-stamp signing cryptographic hardware won't be tampered with during shipment or when and while stored. In the process of receipt of the HSM, the correctness and integrity of the seals of the manufacturer's shipping container are inspected. The TSU is stored in a safe place with a controlled access, and the basic installation including tests, synchronization and inspection follow. Each of the above activities shall be recorded in writing.
- The installation, initialization, inspection and synchronization of the TSU is performed by persons in trusted roles and in the presence of witnesses. In the event of having the TSU hardware repaired or in the event of termination of the provision of certification services or in the event of termination of the activities of TunTrust, the data for the creation of electronic signatures/marks of generated timestamps shall be destroyed as recommended by the



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manufacturer. Specific procedures of the TSU administration are described in the relevant internal documents of TunTrust.

- Activation and duplication of TunStamp's signing keys in cryptographic hardware is done only by personnel in trusted roles using dual control in a physically secured environment.
- TunStamp private signing keys stored on TSU cryptographic module will be erased upon device retirement in a way that it is practically impossible to recover them.

#### 8.6.7 End of TSU key life cycle

TunTrust defines an expiration date for TSU's keys which is not to be longer than the end of validity of the associate public key certificate. However in order to be able to verify during a sufficient lapse of time the validity of the time-stamps, the validity of the TunStamp's signing key will be reduced.

The expiration date for TunStamp's keys is to be defined when the TSU cryptographic module is initialized or by setting a private key usage period within the TSU's public key certificate.

TunTrust ensures that its private signing keys will not be used beyond the end of their life cycle:

- Operational or technical procedures will be in place to ensure that a new key is put in place when TunStamp's key expires.
- TunStamp private signing keys including any copies will be destroyed such that the private keys cannot be retrieved.

The life cycle of a certificate ends in the following cases:

- Expiration of the timestamp certificate or
- Revocation of the timestamp certificate.

#### 8.7 Time-stamping

- TunStamp employs time-stamping on all security related transactions using trusted time source.
- TunStamp uses a key generated exclusively for time-stamp shall signing.
- The time-stamp generation system of TunStamp automatically reject any attempt to issue time-stamps if the signing private key has expired.

#### 8.8 Clock Synchronization

The TunStamp clock is synchronized with UTC Time within the declared accuracy with the following particular requirements:

- The calibration of the TSU clocks is maintained such that the clocks do not drift outside the declared accuracy.
- The declared accuracy shall be of 1 second.



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- TunTrust has protected its TSU clocks against threats which could take it outside its calibration.
- TunTrust ensures that time-stamp issuance will be stopped in case of drifts or jumps out of synchronization with UTC.
- The clock synchronization shall be maintained when a leap second occurs. The change to take account of the leap second shall occur during the last minute of the day when the leap second is scheduled to occur.

## 8.9 Physical Security Controls

All TunTrust equipments, including cryptographic modules, are running with a redundant installation. Backups are stored at an off-site location in order to grant disaster recovery and business continuity. They are protected from unauthorized access at all times.

Physical security controls have been applied to all TunStamp Authority and any remote workstations used to administer the trust system, except where specifically noted.

The time-stamping service itself is located in a physical secured environment that minimizes the risk of natural disasters.

The private keys of the TSU are securely stored in a FIPS 140-2 Level 3 HSM.

The big lines related to TunTrust physical security controls are given below:

#### Physical access

TunTrust protects its equipment from unauthorized access and implements physical controls to reduce the risk of equipment tampering. The secure parts of TunTrust TSA hosting facilities are protected using physical access controls with biometric scanners or card access systems making them accessible only to appropriately authorized individuals.

The buildings housing TunTrust's TSA systems have security personnel on duty full time (24 hours per day, 365 days per year). The exterior and internal passageways of the buildings are under constant video surveillance. TunTrust securely stores all removable media and paper containing sensitive plain-text information related to its CA operations in secure containers in accordance with its Data Classification Procedure.

#### Media storage

- All media containing production software and data, audit, archive, or backup information are stored within TunTrust facilities with appropriate physical and logical access controls designed to limit access to authorized personnel and protect such media from accidental damage such as water, fire, and electromagnetic.



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#### Off-site Backup

TunTrust performs routine backups of critical system data, and other sensitive information. The backed up data are stored in a physically secured offsite locations.

#### 8.10 Operation security

TunTrust uses trustworthy systems and products that are protected against modification. In order to ensure the technical security and reliability of the processes supported by them, the following steps were taken:

a) An analysis of security requirements is carried out at the design and requirements specification stage of any systems.

Capacity requirements and scalability testing are planned to ensure the future required capacities of the timestamp service,

- b) Change control procedures are applied for releases, modifications and emergency software fixes of any operational software.
- c) The integrity of TunTrust systems and information are protected against viruses, malicious and unauthorized software through the use of antivirus systems and integrity check systems.
- d) Media used within time-stamping systems is securely handled to protect it from damage, theft, unauthorized access and obsolescence.
- f) TunTrust has implemented several procedures for all trusted and administrative roles that impact on the provision of services.
- g) TunTrust security officers perform periodic monitoring for new security patches and vulnerabilities that should be applied within a reasonable time after being tested.

#### 8.11 Network security controls

TunTrust's CA system is connected to one internal network and is protected by firewalls, a Demilitarized Zone (DMZ) and Network Address Translation for all internal IP addresses. TunTrust 's customer support and vetting workstations are also protected by firewall(s) and only use internal IP addresses.

Firewalls and boundary control devices are configured to allow access only by the addresses, ports, protocols and commands required for the trustworthy provision of PKI services by such systems. It is TunTrust's security policy to block all ports and protocols and open only necessary ports to enable CA functions. All CA equipment is configured with a minimum number of services and all unused network ports and services are disabled. All firewall configurations and changes thereto are documented, authorized and implemented in accordance with change management procedures.



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TunTrust's network configuration is available for review on-site by its auditors and consultants under an appropriate non-disclosure agreement.

#### 8.12 Incident Management

TunTrust has an Incident Response Procedure and a Disaster Recovery Plan. TunTrust documents a business continuity procedure and disaster recovery plan designed to notify and reasonably protect Application Software Suppliers, Subscribers, and Relying Parties in the event of a disaster, security compromise, or business failure.

TunTrust does not disclose business continuity plans to Subscribers, Relying Parties, or to Application Software Suppliers, but will provide business continuity procedure and the risk treatment plan to the TunTrust auditors upon request.

TunTrust annually tests, reviews, and updates these procedures. The business continuity procedure includes:

- 1. The conditions for activating the plan,
- 2. Emergency procedures,
- 3. Fallback procedures,
- 4. Resumption procedures,
- 5. A maintenance schedule for the plan;
- 6. Awareness and education requirements;
- 7. The responsibilities of the individuals;
- 8. Recovery time objective (RTO);
- 9. Regular testing of contingency plans.
- 10. TunTrust's plan to maintain or restore the CA's business operations in a timely manner following interruption to or failure of critical business processes
- 11. A requirement to store critical cryptographic materials (i.e., secure cryptographic device and activation materials) at an alternate location;
- 12. What constitutes an acceptable system outage and recovery time
- 13. How frequently backup copies of essential business information and software are taken;
- 14. The distance of recovery facilities to the CA's main site; and
- 15. Procedures for securing its facility to the extent possible during the period of time following a disaster and prior to restoring a secure environment either at the original or a remote site.

#### 8.13 Collection of evidence

In the event of detecting a potential hacking attempt or other form of compromise, TunTrust refer to its incident management procedure and disaster recovery plan, and eventually performs an investigation in order to determine the nature and the degree of damage:

#### TSU kev management

- a) Records concerning all events relating to the life-cycle of TSU keys will be logged.
- b) Records concerning all events relating to the life-cycle of TSU certificates will be logged.



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#### **Clock Synchronization**

- c) Records concerning all events relating to synchronization of a TSU's clock to UTC will be logged. This include information concerning normal re-calibration or synchronization of clocks used in time-stamping.
- d) Records concerning all events relating to detection of loss of synchronization will be logged.

The confidentiality and integrity of current and archived records concerning operation of services shall be maintained. They will be completely and confidentially archived in accordance with disclosed business practices.

Those records will be made available if required for the purposes of providing evidence of the correct operation of the services for the purpose of legal proceedings.

Those events will be securely saved in a way that they cannot be easily deleted or destroyed for a period of 20 years.

#### 8.14 Business Continuity Management

TunTrust operates two backup sites, whose purpose is to ensure continuity of operations in the event of failure of the primary facility or site and mitigate the effects of any kind of natural or man-made disaster. The Disaster Recovery Plan is regularly tested, verified and updated to be operational in the event of a disaster. The TunTrust operation is designed to restore full service within six (6) hours of main site system failure.

#### 8.15 TSA termination

In case of termination of TSA operations for any reason whatsoever, TunTrust will provide timely notice and transfer of responsibilities to succeeding entities, maintenance of records, and remedies. Before terminating its own TSA activities, TunTrust will where possible take the following steps:

- Continued maintenance of information required to verify the correctness of trust services, for a reasonable period, will be provided.
- Notice period without seeking Subscriber's consent.
- Make reasonable arrangements to preserve its records according to the applicable TP/TPS.
- Reserve its right to provide succession arrangements for the re-issuance of certificates by a successor TSA that has all relevant permissions to do so and complies with all necessary rules, while its operation is at least as secure as TunTrust is.

The requirements of this article may be varied by contract, to the extent that such modifications affect only the contracting part.



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#### 8.16 Compliance

TunTrust operates at all times in compliance to the following:

- A. the applicable laws;
- B. the requirements of this TP/TPS; and
- C. the requirements of the then-current ETSI EN 319 401 and ETSI EN 319 421 (latest relevant version).

## 9 Other Business and Legal Matters

#### 9.1 Dispute resolution provisions

In case of litigation or dispute, any party must notify TunTrust by registered letter with acknowledgment of receipt. TunTrust undertakes to process these notifications and to provide a response within thirty (30) days.

The requests are addressed directly or through a lawyer to the TunTrust 's General Manager, by registered letter with acknowledgment of receipt.

The request must contain the following information:

- The name, the legal form, the registered office of the applicant and, where applicable, the registration number in the trade register,
- The name and registered office of the defendant;
- A detailed statement of the subject matter of the dispute and requests.
- The application must be accompanied by all documents, correspondence and preliminary evidence.
- The office of the agency is responsible for registering the request according to its number and date, in the business register.
- The dispute can be settled amicably.
- In case of failure of the conciliation attempt, the courts of Ariana are competent.

## 9.2 Governing law

The laws and regulations in force in Tunisia are applied.

## 9.3 Compliance with applicable law

This TP/TPS is subject to the laws and regulations applicable in Tunisia.