Important Note About this Document

This is the Time-Stamp Policy/Practice Statement (QV-TSP/PS) of QuoVadis, a company of DigiCert, Inc. This QV-TSP/PS contains an overview of the policies, practices and procedures that QuoVadis employs for its operation as a Time-stamp Authority. This document is not intended to create contractual relationships between QuoVadis and any other person. Any person seeking to rely on Time-stamps must do so pursuant to definitive contractual documentation. This document is intended for use only in connection with QuoVadis and its business.

This document is controlled and managed under the authority of the QuoVadis Policy Management Authority. The date on which this version of the Time-stamp Policy becomes effective is indicated on this document. The most recent effective copy of this Time-stamp Policy supersedes all previous versions. No provision is made for different versions of this Time-stamp Policy to remain in effect at the same time.

- **Repository**: [https://www.quovadisglobal.com/repository](https://www.quovadisglobal.com/repository)
- **Electronic mail**: [compliance@quovadisglobal.com](mailto:compliance@quovadisglobal.com)
- **Customer complaints email**: [qvcomplaints@digicert.com](mailto:qvcomplaints@digicert.com)

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### Version Control

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**Introduction**

Regulation (EU) No 910/2014 ("eIDAS Regulation") includes requirements for Trust Service Providers (TSP) providing services to the public, including TSPs issuing Time-stamps.

Electronic signatures are used to add security by creating a tamperproof cryptographic seal around electronic data. Once a datum is signed, any change to its content will cause the electronic signature to fail, alerting the user. Electronic signatures may be used in several ways:

- Individual electronic signatures support the integrity of electronic records by declaring WHO signed WHAT (in other words, who created particular content or changes).
- Time-stamps use electronic signatures, incorporating the time from an accurate source, to confirm WHAT happened WHEN.

Individual signatures may be used independently – or together with Time-stamps – to increase the trustworthiness of electronic records and transactions.

1. **SCOPE**

The QuoVadis Time-stamping Authority (QV-TSA) uses Public Key Infrastructure and trusted time sources to provide reliable, standards-based Electronic Time-stamps. This QuoVadis Time-stamp Policy/Practice Statement (QV-TSP/PS) defines the operational and management practices of the QV-TSA such that Subscribers and Relying Parties may evaluate their confidence in the operation of the time-stamping services.

The QV-TSA aims to deliver time-stamping services in accordance with the eIDAS regulation, as well as under other applicable national laws and regulations. However, QuoVadis Time-stamps may be equally applied to any application requiring proof that a datum existed before a particular time.

Certain QuoVadis TSU provide Qualified Electronic Time-stamps under eIDAS and other national laws or regulations; see Section 4.3 (Time-stamping Authority) of this document.

2. **REFERENCES**

The following documents contain provisions which are relevant to the QV-TSP/PS:


[2] ETSI EN 319 401: Electronic Signatures and Infrastructures (ESI); General Policy Requirements for Trust Service Providers


[4] ETSI EN 319 411-2: Policy and security requirements for Trust Service Providers issuing certificates; Part 2: Requirements for trust service providers issuing EU qualified certificates


[7] ETSI EN 319.421, Electronic Signatures and Infrastructures (ESI); Policy and Security Requirements for Trust Service Providers issuing Time-Stamps

[8] ETSI EN 319.422, Electronic Signatures and Infrastructures (ESI); Time-stamping Protocol and Time-stamp Token Profiles

[9] ETSI TS 119 312: Electronic Signatures and Infrastructures (ESI); Cryptographic Suites

3. DEFINITIONS AND ABBREVIATIONS

3.1. DEFINITIONS

Coordinated Universal Time or UTC means the time scale, based on the second, as defined by the International Telecommunications Radio Committee (ITU-R) TF.460-5.

Electronic Time stamp means data in electronic form which binds other data in electronic form to a particular time establishing evidence that the latter data existed at that time.

Qualified Electronic Time stamp means an electronic time stamp issued by a Qualified TSP and whose TSU Public Key Certificate was issued by a CA operating under a ETSI EN 319 411-2 certificate policy.

Relying party means an entity (an individual or organisation) which relies on a Time-stamp Token provided by the QV-TSA.

Subscriber means an entity (an individual or organisation) which requires the services provided by a TSA and has entered into the relevant agreement with QuoVadis.

Time-stamping Authority or TSA means a trusted authority which issues Time-stamps.

Time-stamp means a data object that binds a representation of a datum to a particular time with a digital signature, thus establishing evidence.

Time-stamping Unit means a set of hardware and software which is managed as a unit and has a single private signing key active at a time.

Trust Service Provider means an entity which provides one or more electronic service that enhances trust and confidence in electronic transactions.

UTC(k) means a time scale realised by a laboratory “k” as defined in Bureau International des Poids et Mesures (BIPM) Circular T.

Additional definitions are provided in the CP/CPS.

3.2. ABBREVIATIONS

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4. GENERAL CONCEPTS

4.1. GENERAL POLICY REQUIREMENTS CONCEPTS

The present document references ETSI EN 319 401 General Policy Requirements for Trust Service Providers for generic policy requirements common to all classes of TSP services.

The structure and contents of this QV-TSP/PS 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.

The QV-TSP/PS is administered and approved by the QuoVadis Policy Management Authority (PMA), and should be read in conjunction with the relevant QuoVadis CP/CPS.

4.2. TIME-STAMPING SERVICES

Time-stamping services include the following components:

- Time-stamping provision: the technical component that issues the Time-stamps; and
- Time-stamping management: the service component that monitors and controls the time-stamping operation, including synchronisation with the reference UTC time source, according to the QV-TSP/PS.

QuoVadis adheres to the international standards in Section 2 (References) of this document to increase the trustworthiness of the time-stamping services.

4.3. TIME-STAMPING AUTHORITY

A Time-stamping Authority (TSA) is a TSP trusted by the users (i.e. Subscribers as well as Relying Parties) to issue secure Time-stamps as described in RFC 3161. The QV-TSA takes overall responsibility for the provision of time-stamping services identified in Section 4.2 (Time-stamping Services) of this document. QuoVadis operates the QV-TSA as part of its PKI.

The QV-TSA has responsibility for the operation of one or more Time-stamping Units (TSU) which create and sign Time-stamps on behalf of the TSA. Each TSU has a different key. Refer to the “QuoVadis TSAs” section of https://www.quovadisglobal.com/repository for a complete list of QuoVadis TSUs.

Following is a summary of the current QuoVadis TSUs and their issuers. Qualified TSAs do not provide Time-stamp Tokens to the public until the TSU Public Key Certificates are listed on a relevant audit and/or Trusted List.

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### 4.3.1. Conformance

QuoVadis references the policy identifier in Section 5.2 (*Identification*) of this document in all Time-stamps to indicate conformance with this policy. QuoVadis is subject to periodic independent internal and external reviews to demonstrate that the QV-TSA meets its obligations defined in Section 6.1 (*TSA Obligations*) and has implemented appropriate controls in line with Section 7 (*TSA Practices*). Refer to [https://www.quovadisglobal.com/accreditations](https://www.quovadisglobal.com/accreditations) for a list of QuoVadis’ audits and accreditations.

Where aspects of the QV-TSA are Qualified, QuoVadis confirms that the QV-TSA is audited annually by a Conformity Assessment Body, and the assessment report is submitted to the relevant national Supervisory Body. Where the Supervisory Body requires QuoVadis to remedy any failure to fulfil requirements, QuoVadis
will act accordingly and in a timely fashion. The Supervisory Body will be informed of any change in the provision of the relevant QV-TSA.

4.4. **SUBSCRIBERS AND RELYING PARTIES**

Subscribers are entities that hold a service contract with QuoVadis and have agreed to the QuoVadis Time-stamping Authority Subscriber Agreement. A Relying Party is an individual or entity relies on a Time-stamp generated a QuoVadis TSA. A Relying Party may or may not be a Subscriber. Organisations that are Subscribers are responsible for the activities of their associated users and Relying Parties and are expected to inform them about the correct use of Time-stamps and the conditions of the QV-TSP/PS.

4.5. **TIME-STAMP POLICY AND AND TSA PRACTICE STATEMENT**

This QV-TSP/PS 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.

Additional internal documents define how QuoVadis meets the technical, organisational, and procedural requirements identified in the QV-TSP/PS. These documents may be provided only under strictly controlled conditions. All QuoVadis policies and practices are under the control of the QV Policy Management Authority.

This QV-TSP/PS extends the CP/CPS which regulates the operation of the QV-PKI and associated Trust Services. The QV-TSP/PS and CP/CPS are public documents and may be downloaded at https://www.quovadisglobal.com/repository.

5. **TIME-STAMP POLICY**

5.1. **GENERAL**

This TSP defines a set of processes for the trustworthy creation of Time-stamps in accordance with ETSI EN 319 421. The Private Keys and the TSU meet the technical specifications of ETSI EN 319 422 and RFC 3161. The QV-TSA signs Time-stamps using Private Keys that are reserved specifically for that purpose. Each Time-stamp contains an identifier to the applicable policy, and Time-stamps are issued with time accurate to ±1 second or better of UTC. Time-stamps are requested by means of either the Transmission Control Protocol (TCP) or Hypertext Transfer Protocol (HTTP), as described by RFC 3161.

5.2. **IDENTIFICATION**

The object-identifier (OID) of the QuoVadis Time-stamping Policy is: 1.3.6.1.4.1.8024.0.2000.6. This OID is referenced in every QuoVadis-issued Time-stamp, and the QV-TSP/PS is available to both Subscribers and Relying Parties.

This QuoVadis Time-stamping Policy is based on the ETSI BTSP best practices Time-stamp policy defined in ETSI TS 319 421 (OID 0.4.0.2023.1.1).

5.3. **USER COMMUNITY AND APPLICABILITY**

The user community for QuoVadis Time-stamps includes only Subscribers and their Relying Parties. All Subscribers are automatically deemed to be Relying Parties. QuoVadis does not provide public Time-stamp services.

QuoVadis does not impose restrictions on applicability of its Time-stamps, with the exception of prohibited uses outlined in Section 1.4.2 (Prohibited Certificate Usage) of the CP/CPS. QuoVadis Time-stamps may be applied to any application requiring proof that a datum existed before a particular time.

6. **POLICIES AND PRACTICES**

6.1. **RISK ASSESSMENT**

QuoVadis performs annual risk assessments aligned with ETSI EN 319 401, Section 5 that identify and assess reasonably foreseeable internal and external threats to the QV-PKI, including the QV-TSA service. Based on
the risk assessment, QuoVadis develops, implements, and maintains a security plan to manage and control the 
risks identified during the risk assessment. See Section 5.4.8. (Vulnerability Assessment) of the CP/CPS.

6.2. TRUST SERVICE PRACTICE STATEMENT

QuoVadis operates the QV-TSA and assumes responsibility that the requirements of Section 7 (TSA 
Management and Operation) of this document - as well as the provisions of eIDAS, ZertES and the TAV
regulations, and the ETA - are implemented as applicable to the selected trusted Time-stamp policy.

The QV-TSP/PS is administered and approved by the QuoVadis PMA. QuoVadis is a party to the mutual 
agreements and obligations between the QV-TSA, Subscribers, and Relying Parties. The QV-TSP/PS and 
CP/CPS are integral components of these agreements.

6.2.1. Time-stamp Format

QuoVadis Time-stamps are compliant with RFC 3161 (including support for reqPolicy, nonce, and certReq). 
The cryptographic algorithms and key lengths used by the QV-TSA comply with ETSI EN 319 422 and TAV:

- Acceptable Time-stamp request hashes: SHA-256, SHA-384, SHA-512
- Signature: sha256WithRSAEncryption (minimum 3072 bit key) or sha256WithECDSA (p-256 
  key)

TSU Public Key Certificates using RSA may have a validity period no longer than three years and using ECDSA 
may have a validity period no longer than six years. The PMA conducts periodic reviews to determine if 
algorithms or key sizes used within the QuoVadis PKI are vulnerable.

6.2.2. Accuracy of the Time

The QV-TSA provides time within ±1 second or better of UTC. A time signal is provided to the TSUs from GNSS 
which is GPS traceable to UTC via USNO, as well as from three independent Stratum-1 time sources located in 
Switzerland and Germany.

The time included in a Time-stamp is the time of processing by the TSU, not the time of submission nor of 
acceptance.

6.2.3. Limitations of the Service

No stipulation.

6.2.4. Obligations of the Subscriber

Subscribers must verify that the Time-stamp has been correctly signed and check that the Private Key used to 
sign the Time-stamp has not been compromised. Subscribers must use secure cryptographic functions for 
time-stamping requests. Subscribers must inform end users (including any relevant Relying Parties) about 
the QV-TSP/PS, the CP/CPS. Subscriber obligations are also defined in the relevant QuoVadis Agreements 
(including the Master Services Agreement, Subscriber Agreement, Terms of Use, and Relying Party Agreement 
as applicable).

6.2.5. Relying Party Obligations

Before placing any reliance on a time-stamp, Relying Parties must verify that the Time-stamp has been 
correctly signed and that the Private Key used to sign the Time-stamp has not been revoked. The Relying 
Party should take into account any limitations on usage of the Time-stamp indicated by this QV-TSP/PS and 
any other reasonable precautions. During the TSU Certificate validity period, the status of the Private Key can 
be checked using the relevant Certificate Status service (which includes CRL or OCSP). QuoVadis CA and TSU 
Certificates are published at https://www.quovadisglobal.com/repository.

Note that QuoVadis operates multiple TSU, signed by different QuoVadis Issuing CAs. Specific TSU Certificates 
may be listed on Trusted Lists. See Section 4.3 (Time-stamping Authority) of this document to determine the 
relevant TSU and its status.
ETSI EN 319 421 contains some additional requirements for Qualified Electronic Time-stamps in accordance with the eIDAS Regulation. See Section 8 (Additional Requirements) of this document.

### 6.2.5.1. Long term Verification of Time-stamps

In line with Annex D of ETSI EN 319 421, verification of a Time-stamp can still be performed after the end of the validity period of the Certificate, if at the time of verification:

- the TSU Private Key has not been compromised;
- the hash algorithm, signature algorithm and signature key size are still supported by this QV-TSP/PS.

Technical developments can reduce the security value of Time-stamped data. Validity may be maintained by applying an additional Time-stamp to protect the integrity of the previous one. Alternatively the time-stamped data may be placed in secure storage.

### 6.2.6. Verification of the Time-stamp

Time-stamp verification includes the following steps:

- Verification of the Time-stamp issuer. See also Section 4.3 (Time-stamping Authority) of this document; and
- Verification of the revocation status of the Certificates in the Time-stamp.

### 6.2.7. Applicable Law

Any controversy or claim relating to the QV-TSA shall be addressed according to Section 9.13 (Dispute Resolution Procedures) and Section 9.13 (Governing Law) of the CP/CPS.

### 6.2.8. Availability

QuoVadis has implemented measures to enable 24x7 operation of the QV-TSA. Although those measures provide high service availability, QuoVadis does not guarantee an annual availability of 100%.

Use of the QV-TSA may be limited to Holders of a valid QuoVadis Certificate. QuoVadis may charge fees for the services provided by the QV-TSA.

### 6.3. TERMS AND CONDITIONS

Information regarding limitations of the service, Subscribers’ obligations, information for Relying Parties, or limitations of liability may be found in QuoVadis Agreements (including the Master Services Agreement, Subscriber Agreement, Terms of Use, and Relying Party Agreement as applicable).

### 6.4. INFORMATION SECURITY POLICY

QuoVadis has a formal Information Security Policy that documents the QuoVadis policies, standards, and guidelines relating to information security. This Information Security Policy has been approved by QuoVadis PMA and is communicated to all employees.

### 6.5. TSA OBLIGATIONS

#### 6.5.1. General

No stipulation.

#### 6.5.2. TSA Obligations towards Subscribers

QuoVadis undertakes the following obligations to QV-TSA Subscribers:

- To operate in accordance with this QV-TSP/PS and the CP/CPS;
- To ensure that TSUs maintain a minimum UTC time accuracy of ± 1 second or better;
• Undergo internal and external reviews to assure compliance with relevant legislation and QuoVadis policies and procedures; and
• To provide high availability access to QV-TSA systems except in the case of planned technical interruptions, loss of time synchronization, or Certificate verification issues.

6.6. INFORMATION FOR RELYING PARTIES

When relying upon a Time-stamp, Relying Parties have an obligation to verify that the Time-stamp has been correctly signed and that the Private Key used to sign the Time-stamp has not been compromised until the time of the verification. See also Section 6.2.5 (Relying Party Obligations) and 6.2.6 (Verification of the Time-stamp) of this document.

7. TSA MANAGEMENT AND OPERATION

7.1. INTRODUCTION

QuoVadis has implemented information security policies and operational procedures to maintain the security of the QV-TSA service.

7.2. INTERNAL ORGANISATION

The QV-TSA is operated by QuoVadis and affiliated companies. Information security and quality management of the QV-TSA is carried out within the security concept of the service. QuoVadis PKI services are provided from datacentres located in the Netherlands and Switzerland.

7.3. PERSONNEL SECURITY

To enhance the trustworthiness of its PKI operations, QuoVadis maintains appropriate personnel practices fulfilling security best practice and the requirements of relevant standards such as Section 7.2 of ETSI EN 319 401. Additional information is provided in Section 5.2 (Procedural Controls) and Section 5.3 (Personnel Controls) of the CP/CPS.

In particular:

a) QuoVadis employs personnel whom possess the expert knowledge, experience and qualifications and who have received training regarding security and data protection as appropriate for the offered services and the job function.

b) Trusted roles, on which the security of the QV-TSA is dependent, are clearly identified in the CP/CPS.

c) Security roles and responsibilities are documented in job descriptions defined from the viewpoint of separation of duties and least privilege, determining position sensitivity based on the duties and access levels, background screening and employee training and awareness.

d) Personnel shall exercise administrative and management procedures and processes that are in line with the QuoVadis Information Security Policy.

7.4. ASSET MANAGEMENT

In order to ensure that information and other assets receive appropriate security treatment, QuoVadis maintains an inventory of all assets and assigns a classification for the protection requirements to those assets consistent with the risk analysis and the requirements of relevant standards such as Section 7.3 of ETSI EN 319 401. Additional information is provided in Section 6.6 (Life Cycle Technical Controls) of the CP/CPS.

7.5. ACCESS CONTROL

Operational access to the QV-TSA system is limited to authorised individuals through practices aligned with relevant standards such as Section 7.3 of ETSI EN 319 401. Additional information is provided in Section 5.2 (Procedural Controls), Section 5.3 (Personnel Controls), and Section 6.7 (Network Security Controls) of the CP/CPS.
7.6.  CRYPTOGRAPHIC CONTROLS

7.6.1.  General
Practices of the QV-TSA for cryptographic controls are aligned with Section 7.5 of ETSI EN 319 401. Several QuoVadis Private Keys are used to deliver the QV-TSA service: a QuoVadis Issuing CA is used to issue the Time-stamp Certificates which are used within the TSUs to issue Time-stamps.

7.6.2.  TSU Key Generation
QuoVadis generates the cryptographic keys used in its QV-TSA services under M of N control by authorised personnel acting in trusted roles in a secure physical environment. The functions and duties performed by persons in trusted roles are distributed so that one person alone cannot circumvent security measures or subvert the security and trustworthiness of the PKI or TSA operations. Additional information is provided in Section 5.2.1 (Trusted Roles) and 6.1 (Key Generation and Installation) of the CP/CPS.

The keys are generated within TSU HSMs that are certified to FIPS 140-2 Level 3 or higher. Permitted algorithms and key size are described in Section 6.2.1 (Time-stamp Format) of this document.

7.6.3.  TSU Private Key Protection
QuoVadis takes specific steps to ensure that TSU Private Keys remain confidential and maintain their integrity. These include use of HSMs certified to FIPS 140-2 Level 3 or higher to hold and sign with the keys. Upon creation of new TSU Private Keys, they are backed up. Backups are copied, stored, and recovered only by personnel in trusted roles under M of N control in a physically secured environment. Any backup copies of the TSU signing Private Keys are stored in an encrypted form.

7.6.4.  TSU Public Key Certificate
QuoVadis TSU Public Keys are made available in a Public Key Certificate. Refer to the “QuoVadis TSAs” section of the Download CAs area of https://www.quovadisglobal.com/repository. The TSU do not issue Time-stamps before the corresponding Public Key Certificate is loaded into the TSU or its cryptographic device.

7.6.5.  Rekeying TSU’s Key
TSU signing Private Keys shall be replaced if the PMA determines that the algorithm or key size is vulnerable or unsuitable (see Section 7.6.1 of this document). Additional information is provided in Section 4.6 (Certificate Renewal) and Section 4.7 (Certificate Re-Key) of the CP/CPS.

7.6.6.  Life Cycle Management of the Cryptographic Module used to Sign Time-stamps
QuoVadis has in place procedures to ensure that HSMs intended for non-repudiation services are not tampered with in shipment or storage. Acceptance testing is performed to verify that cryptographic hardware is performing correctly. Installation and activation is performed only by M of N authorised personnel in trusted roles, and the devices operate in a physically secured environment. Private Keys are erased from modules when they are removed from service in accordance with the manufacturer’s instructions. Additional information is provided in Section 6.2 (Private Key Protection and Cryptographic Module Engineering Controls) of the CP/CPS.

7.6.7.  End of TSU Key Life Cycle
TSU signing Private Keys are replaced upon the expiration of their associated Public Key Certificate. The TSU rejects any attempt to issue Time-stamps once a Private Key has expired. After expiration, the Private Keys are destroyed in a manner such that the Private Keys cannot subsequently be retrieved or used.
7.7. **TIME-STAMPING**

7.7.1. Time-stamp Issuance

Time-stamps conform with the profile as defined in ETSI EN 319 422. Time-stamps are issued securely and include the correct time. The provision of a Time-stamp in response to a request is at the discretion of QuoVadis.

7.7.2. Clock Synchronisation with UTC

The QV-TSA provides time within ±1 second or better of UTC. A time signal is provided to the TSUs which is GPS time traceable to UTC via USNO, as well as from three independent Stratum-1 time sources located in Switzerland and Germany.

The QV-TSA ensures that clock synchronisation is maintained when a leap second occurs as notified by the International Earth Rotation and Reference Systems Service (IERS) or other appropriate body.

TSU clocks are protected within the HSMs and are recalibrated hourly against the reference UTC time source. TSU clocks are also able to monitor time drift outside preset boundaries and request additional recalibrations as needed. If the TSU clock drifts outside the declared accuracy, and recalibration fails, the QV-TSA does not issue Time-stamps until correct time is restored. Manual administration of the TSU clock requires M of N authorised personnel. Audit and calibration records are maintained by the QV-TSA.

7.8. **PHYSICAL AND ENVIRONMENTAL SECURITY**

The QV-TSA operates from a resilient and secure hosting facility in accordance with the relevant provisions of ETSI EN 319 421.

a) Access controls are applied to the cryptographic modules to meet the requirements of Section 7.6 (Cryptographic Controls).

b) The following additional controls have been applied to time-stamping management:

- The time-stamping management facilities are operated in an environment which physically protects the services from compromise through unauthorised access to systems or data.

- Every entry to the physically secure area is subject to independent oversight and non-authorised person shall be accompanied by an authorised person whilst in the secure area. Every entry and exit is logged.

- Physical protection is achieved through the creation of clearly defined security perimeters (i.e. physical barriers) around the time-stamping management. Any parts of the premises shared with other organisations are outside this perimeter.

- Physical and environmental security controls are implemented to protect the facility that houses system resources, the system resources themselves, and the facilities used to support their operation. The QuoVadis Information Security Policy (which includes systems concerned with time-stamping management) addresses the physical access control, fire safety factors, failure of supporting utilities (e.g., power, telecommunications), protection against theft, breaking and entering and disaster recovery.

- Controls are implemented to protect against equipment, information, media and software relating to the time-stamping services being taken off-site without authorisation.

See also Section 5.1 (Physical Controls) of the CP/CPS.

7.9. **OPERATION SECURITY**

QuoVadis has an active security management programme designed to document, implement, and maintain adequate security provisions for the QV-PKI according to best practice and the requirements of relevant standards. The QuoVadis PMA is the body responsible for setting policies and practices for the overall PKI including the QuoVadis Information Security Policy. Additional information is provided in Section 5 (Facility, Management, and Operational Controls) and Section 6 (Technical Security Controls) of the CP/CPS.
7.10. NETWORK SECURITY
QuoVadis maintain and protect all TSU systems in a secure zone which may only be accessed by personnel with trusted roles. TSU systems by are configured to remove or disable accounts, applications, services, protocols, and ports that are not used in the QV-TSA operations. Additional information is provided in Section 6 (Technical Security Controls) of the CP/CPS.

7.11. INCIDENT MANAGEMENT
QuoVadis maintains internal incident response procedures aligned with ETSI EN 319 401, Section 7.9 to guide personnel in response to security incidents, natural disasters, and similar events that may give rise to system compromise. QuoVadis reviews, tests, and updates its incident response plans and procedures on a periodic basis.

These procedures include notification to appropriate Conformance Assessment Bodies and Supervisory Authorities in the event of a disaster, security compromise, loss of time synchronisation, or business failure. Information will be provided to contracted Subscribers and Relying Parties and posted on a QuoVadis website. Additional information is provided in Section 5.7 (Compromise and Disaster Recovery) of the CP/CPS.

7.12. COLLECTION OF EVIDENCE
QuoVadis maintains records of relevant information concerning the operation of the QV-TSA for a period of 11 years. Additional information is provided in Section 5.4 (Audit Logging Procedures) of the CP/CPS. Records include:

- Events relating to the life-cycle of TSU keys and Certificates; and
- Events related to clock re-calibration and synchronisation.

Records are time-stamped to protect data integrity and moved to a protected server for storage and subsequent archiving. Records are treated as confidential in accordance with the CP/CPS but may be provided at the request of Subscribers or if required by court order or other legal requirement.

7.13. BUSINESS CONTINUITY MANAGEMENT
In the event of compromise of a TSU Private Key, QuoVadis will follow the procedures outlined in Section 5.7 (Compromise and Disaster Recovery) of the CP/CPS. This includes revoking the relevant Certificate and adding it to the QuoVadis Certificate Status service. The TSU will not issue Time-stamps if its Private Key is not valid.

The TSU will not issue Time-stamps if its clock is outside the declared accuracy from reference UTC, until steps are taken to restore calibration of time. The QV-TSA maintains audit trails to discriminate between genuine and backdated tokens.

In the event of a compromise, or suspected compromise of a Private Key, or loss of calibration when issuing time-stamps, QuoVadis will notify, as appropriate Conformance Assessment Parties and Supervisory Authorities, and make best efforts to provide Subscribers and Relying Parties with information to identify the Time-stamps which may have been affected, unless this breaches the privacy of the QV-TSA users or the security of the QV-TSA services.

7.14. TSA TERMINATION AND TERMINATION PLANS
In the case of termination of the QV-TSA, QuoVadis will follow the procedures in Section 5.8 (Certificate Authority and/or Registration Authority Termination) of the CP/CPS and also more detailed internal QuoVadis termination procedures. These include at a minimum informing relevant Supervisory Authorities and Subscribers, revoking TSU Certificates, and transferring obligations to a reliable party for maintaining event log and audit archives.
7.15. **COMPLIANCE**

The QV-TSA complies with applicable regulations and legal requirements (including eIDAS and ZertES), as well as the requirements of the QuoVadis Privacy Policy (see https://www.quovadisglobal.com/privacy-policy/).

8. **ADDITIONAL REQUIREMENTS FOR REGULATION (EU) NO 910/2014**

When a Time-stamp is claimed to be a Qualified Electronic Time-stamp as per Regulation (EU) No 910/2014, the TSU Public Key Certificate will be listed on an EU Trusted List, and/or the Time-stamp response may contain the qcStatement "esi4-qtstStatement-1" as defined in ETSI EN 319 422.

A Relying Party is expected to use a Trusted List to establish whether the TSP and the TSU are Qualified. If the Public Key of the TSU is listed in the Trusted List and the TSP it represents is a Qualified time-stamping service, then the Time-stamps issued by this TSU can be considered as Qualified.