

CORPME TRUST SERVICE PROVIDER

TIME STAMPING SERVICE TSA DISCLOSURE STATEMENT

This document constitutes an extract of the rights and obligations contained in Time Stamping Practices and Policies of the Colegio de Registradores de la Propiedad y Mercantiles de España, CORPME, The Public Corporation of Land and Business Registers of Spain (hereinafter CORPME) and applies to the **Time Stamping Service**. This Disclosure Statement summarize Time Stamping Practices and Policies published.

The legal effects of the service, as well as the related rights and obligations, will be interpreted in all cases according to the current legislation, Time Stamping Practices and Policies in the version allocated in the following URL: <http://pki.registradores.org/normativa/index.htm>.

Before making use of the service, it is recommended to read this Disclosure Statement, in order to assess the trust offered by it. Ignorance of this Disclosure Statement may not be claimed to exempt from the responsibilities or to require them elsewhere.

1. Trust service provider contact Information

Colegio de Registradores de la Propiedad y Mercantiles de España.

Prestador del Servicio de Certificación del CORPME.

Príncipe de Vergara, 70

28006-MADRID

Teléfono: 902181442 / 912701699

Email: psc@registradores.org

Web: <http://pki.registradores.org/normativa/index.htm>

2. Time Stamping Service description

The Time Stamping is an online mechanism that allows to demonstrate that a data series have existed and have not been altered from a specific time.

The CORPME is a Time Stamping Authority (TSA or Time Stamping Authority) that acts as a trusted third party testifying existence of such electronic data at a specific date and time.

Currently, the TSA is composed of a single Time Stamping Unit (TSU) that issues the time stamps under the policy with OID 1.3.6.1.4.1.17276.0.3.3.1 described in the Practices and Policies of Time Stamping, in accordance with BTSP time stamping policy described in ETSI EN 319 421.

The TSA guarantees that the time and date included in the stamps remain within the margins of precision of the temporary reference provided by the Time Section of the Royal Institute and Observatory of the Navy in San Fernando, which in any case may exceed a maximum deviation of one second. Therefore, the CORPME TSA provides one-second accuracy.

CORPME offers Time Stamping service as follows:

- **Time Stamping Service:** Client performs a Time Stamping request according to RFC 3161 to a CORPME URL, obtaining in response a digital evidence signed by CORPME TSA.

3. Limits of use

The CORPME's TSA allows the generation of time stamps on any type of document or object, with or without electronic signature of any kind. The TSA guarantees that the time and date included in the stamps remain within the precision margins of the temporal reference provided by the Time Section of the Royal Institute and Observatory of the Navy in San Fernando, which in no case may exceed a deviation maximum of one second. Therefore, the CORPME TSA provides one-second precision.

The supported HASH algorithms are: SHA-224, SHA-256, SHA-384, SHA-512. Due to technological limitations of the tool used for TSA management and administration, requests with the SHA1 algorithm may be accepted.

The Time Stamping services are not free, so it will be necessary to contract the service previously with the CORPME. Time Stamping Services may be sell under the temporary limitation agreed upon and / or number of time stamping requests. In any case, the TSA's billing conditions are reviewed, guaranteeing that no additional charges are applied to those established in the contracts.

To be able to access the time stamping services, the Client must contract previously with the CORPME.

The CORPME will perform access control to the service based on IP addresses, therefore, the Client must inform on which IP addresses requests will be made.

The client must adapt their systems to the TSP protocol in order to make time-stamping requests. The time-stamping service offered by CORPME does not provide any software or customer integration libraries. To adapt systems, there are public libraries that implement TSP protocol in various programming languages:

- **BouncyCastle** (<http://www.bouncycastle.org>): Set of cryptographic libraries that implement the TSP protocol in Java and C #
- **OpenTSA** (<http://www.opentsa.org>): OpenSSL cryptographic library extension implements TSP protocol in C language.
- **Digistamp** (<http://digistamp.com/toolkitDoc/MSToolKit.htm>): Toolkit based on the Microsoft CryptoAPI cryptographic library those implements the TSP protocol in Visual Basic.
- **IAIK**: Includes cryptographic libraries in Java that implement the TSP protocol. These libraries are free for non-commercial purposes only.
- **Adobe Reader**: The Adobe Reader 8 application allows the validation of time stamps included in PDF documents.

Any signed documents related to rights and obligations for the participants in the CORPME TSP, as well as the associated audit records, shall be stored for a minimum period of fifteen (15) years.

The CORPME will use different systems to generate time stamps, providing high availability to the service. In addition, the certificate status information service, in its two variants (CRLs and OCSPs), is available 24 hours every day of the year, both for third parties who trust and for certificates holders or other parts require them. In the event of service unavailability, an objective recovery time of 8 hours is contemplated.

4. Obligations of the client

The client shall be bound to comply with the provisions of the regulations and in addition to:

- Respect the contractual documents signed with TSA.
- Verify time stamp the digital signature correctness and validity of the TSA certificate at the time of signing it.
- Verify that hash contained in the time stamp matches the one that was sent.
- Storage and conservation of time stamps delivered by the TSA. It is the Client's responsibility to store the time stamps, if he/she anticipates they will be necessary in the future.

5. Obligations of the third parties

It shall be the obligation of the users to comply with the provisions of current regulations and:

- Verify time stamp signature correctness and TSA certificate validity at the time of signing it.
- Verify and take into account any limitations in the use of the time stamp indicated by the time stamp policy
- Verify and take into account any other precautions or limitations included in the time stamping agreements and in the time stamping practices and policy.

6. Limitations of liability

The CORPME will not be responsible in any case in any of these circumstances:

- State of War, natural disasters, malfunction of electrical services, telematics and / or telephone networks or computer equipment used by the client or third parties, or any other case of force majeure.
- For improper or fraudulent use of time stamps.
- For the improper use of the information contained in the Certificate or in the CRL.
- For the content of stamped messages or documents.
- In relation to actions or omissions of the client.
- Information veracity lack in information provided to issue the stamp.
- Negligence in the preservation of access data to the Time Stamping Service, in the assurance of the confidentiality and in the protection of all access or disclosures.
- Excessive use of the time stamp, as provided in current regulations and in these TSA Practices and Policies.
- In relation to actions or omissions of the user, third party who relies on the certificate.
- Failure to check the suspension or loss of validity of the TSA electronic certificate published in consultation service regarding the validity of the certificates or lack of verification of the electronic signature.

7. Applicable agreements and Time Stamping Practices and Policies

Time Stamping Practices and Policies, published at <http://pki.registradores.org/normativa/index.htm>, include the public information of the Terms and Conditions and characteristics of the certification services provided by the CORPME as TSP, containing the obligations and procedures in relation to the issuance of **Time Stamping Service**.

The activities that the CORPME may subcontract to carry out its activity as TSP are carried out contractually according to the CPS. In these cases, the access to the information owned by the CORPME follows the protocol defined in the Security Policy, in terms of the identification of risks, establishment of security controls to protect access formalizing confidentiality agreements and, if applicable, processing of personal data in compliance with current regulations.

8. Privacy Policy

In accordance with the General Data Protection Regulation (EU REGULATION 2016/679), the user and owner of the data is informed that the person responsible for the processing of their personal data is the COLLEGE OF PROPERTY AND COMMERCIAL REGISTRATORS. OF SPAIN (hereinafter, "CORPME"), with CIF: Q-2863012-G and College Headquarters at Calle Príncipe de Vergara 72, 28006 in Madrid.

The processing of your personal data will be carried out by CORPME for the following purposes based on the type of document signed by the user:

- For use licenses: purpose of processing the submitted application and the corresponding billing.
- For revocations: the purpose of the processing is to manage the request for revocation of the Certificate.
- For delegation of functions: the purpose of the processing is the management of requests and issuance of digital certificates in compliance with the purposes included in the declaration of certification practices of the College of Registrars as a provider of certification services.
- Declaration of Responsible Roles of Trust: the purpose of the processing is the management and processing of your Declaration of Responsible Status.
- The registrar's declaration – registration employees: purpose of managing the Registrar's Declaration and the issuance of their Certificate.

The legitimizing basis that enables the processing of your data is the execution of the service or contract requested by the interested party or compliance with the agreement signed, if applicable.

Likewise, the user is informed that their data will be transferred only for the fulfillment of legally established obligations or if necessary for the execution of the contract or agreement signed, if applicable.

The personal data requested in the form are essential for the management of the request made by the user, the execution of the signed agreement and/or provision of the electronic signature service, in such a way that the refusal to provide them will mean the impossibility of its realization. The data owner guarantees that the personal data is real and truthful.

The communication of your personal data by CORPME is not foreseen, without prejudice to those communications that may be made to comply with the obligations and responsibilities imposed by mandatory laws or regulations, or when required to do so by mandate. of competent authority in accordance with Law or as a necessary requirement for the signing of the requested contract.

We inform you of the existence of the right to request from the data controller access to personal data relating to the interested party, and its rectification or deletion, or the limitation of its processing, or to oppose the processing, as well as the right to portability. of the data. Likewise, the user may complain to the Spanish Data Protection Agency (AEPD) www.aepd.es.

You can obtain more information about the processing of personal data carried out by CORPME in the data protection policies available on the website: www.registradores.org

The maximum data retention period will be 15 years. In any case, CORPME may retain the data of the owners for a longer period of time in those cases in which it is necessary due to the existence of responsibilities derived from the provision of the service.

Interested parties may contact the CORPME Data Protection Delegate via email dpo@corpme.es.

9. Return Policy

The time stamp services will be reimbursed under the conditions established in each type of contract.

10. Applicable Law, claims and dispute resolution

The operations of the CORPME TSP, as well as Time Stamping Practices and Policies, will be subject to the applicable regulations, specially:

- EU Regulation 910/2014, of the European Parliament and of the Council, of 23 July 2014 on electronic identification and trust services for electronic transactions in the internal market and repealing Directive 1999/93/EC .
- Law 6/2020, of November 11, regulating certain aspects of electronic trust services.
- Law 39/2015, of October 1, on the Common Administrative Procedure of Public Administrations
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- Regulation (EU) 2016/679 of the European Parliament and of the Council, of April 27, 2016, relating to the protection of natural persons with regard to the processing of personal data and the free circulation of these data and by which repeals Directive 95/46/EC (General Data Protection Regulation) and applicable Spanish data protection regulations, as well as instructions, resolutions and reports from the supervisory authority.
- Regulation (EU) 2024/1183: Regulation (EU) 2024/1183 of the European Parliament and of the Council of 11 April 2024 amending Regulation (EU) No 910/2014 with regard to the establishment of the European framework digital identity
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 - Regulation (EU) No 910/2014 of the European Parliament and of the Council of 23 July 2014 on electronic identification and trust services for electronic transactions in the internal market.
 - Ley 6/2020, de 11 de noviembre, reguladora de determinados aspectos de los servicios electrónicos de confianza.
 - Ley 39/2015, de 1 de octubre, del Procedimiento Administrativo Común de las Administraciones Públicas.

All claims between users and the CORPME shall be communicated by the disputing party to the CORPME, in order to attempt to resolve it.

For the resolution of any dispute regarding the provision of certification services, the parties are submitted to the Spanish courts and tribunals, regardless of where the certificates were issued.

11. Licensing and repository, trusted brands and audit

The CORPME, as TSP, maintains several accreditations and certifications for its trust services, especially remarkable for the Time Stamping Service:

- ETSI EN 319 421 “Policy and Security Requirements for Trust Service Providers issuing Time-Stamps” y ETSI EN 319 422 “Time-stamping protocol and time-stamp token profiles”.

The inclusion of qualified certificates issued by CORPME in the list of trust service providers (TSL) in Spain can be verified through the following link: <https://eidas.ec.europa.eu/efda/tl-browser/#/screen/tl/ES/12> and <https://sedediatid.digital.gob.es/Prestadores/Paginas/Inicio.aspx> .

Likewise, CORPME is registered as a qualified provider with the Ministry for Digital Transformation and Civil Service <https://sedeaplicaciones.minetur.gob.es/Prestadores/Inicio.aspx> and keeps published the certification of trust services issued by the Certification Authority at the following URL: <http://pki.registradores.org/normativa/index.htm>.

In accordance with the provisions of Regulation (EU) No. 910/2014 and Regulation (EU) 2024/1183, CORPME will carry out biennial audits in accordance with said Regulation.

March 2025