

## Conformity Assessment Declaration

Conformity assessment of a trust service in accordance with the eIDAS EU Regulation<sup>1</sup>

Next audit before 09 September 2023

Next full audit before 08 April 2025

Hereby determines in accordance with Article 20 para. 1 of the eIDAS EU Regulation<sup>1</sup> the conformity of the trust service provider

**CORPME**

***“COLEGIO DE REGISTRADORES DE LA PROPIEDAD, MERCANTILES Y DE BIENES MUEBLES DE ESPAÑA”***

The conformity has been assessed<sup>2</sup> for the following services provided by the trust service provider in accordance with eIDAS EU Regulation<sup>1</sup>:

- **Creation of Qualified Certificates for Electronic Signatures**
- **Creation of Qualified Electronic Time Stamps**

This conformity assessment has been registered under LSTI N°1635-249\_V2

Dublin, 19<sup>th</sup> June 2023



Armelle TROTIN  
Head of the Certification Body

<sup>1</sup> 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 and repealing Directive 1999/93/EC

<sup>2</sup> LSTI SAS has been accredited pursuant to the accreditation certificate of French Accreditation Body COFRAC with registration number 5-0546 in accordance with EN ISO/IEC 17065:2013 as a certification body for products, processes, and services in accordance with the Annex of the accreditation certificate and in accordance with the eIDAS EU Regulation art. 3 (18) and the ETSI EN 319 403. Detailed scope at <http://cofrac.fr/en/easysearch/index.php>.

## Conformity Assessment Body

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**LSTI SAS**

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France

**LSTI Worldwide Limited**

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## National Accreditation Body

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**COFRAC**

52 Rue Jacques Hillairet  
75012 Paris  
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Phone: +33 144688220

Link to LSTI's accreditation: <https://tools.cofrac.fr/annexes/sect5/5-0546.pdf>

## Certification documentation

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The certification documentation includes :

1. the present Conformity Assessment Declaration;
2. the certificates of conformity for the qualified services defined in the eIDAS EU Regulation Art. 3 No. 16;
3. the assessment reports n° n°1635-249\_V1 which contain detailed statements and description of the physical, logical and functional architecture of the TSP, list of the products and details regarding the electronic certificates.

# Description of the trust services:

## 1 Trust service provider and Trust Services

**CORPME<sup>3</sup>**

CORPME - Colegio de Registradores de la Propiedad, Mercantiles y de Bienes Muebles de España

Diego de León 21 - 28006 Madrid – Spain

Registered with the Trade Companies under number Q-2863012-G

Mr. Luis Lahoz - Chief Information Officer

Colegio de Registradores

[luis.lahoz@corpme.es](mailto:luis.lahoz@corpme.es)

CORPME is a trust service provider according to the eIDAS EU Regulation Art. 3 No. 19. In order to achieve or to maintain the status of a "Qualified Trust Service Provider" in accordance with the eIDAS EU Regulation Art. 3 No. 20, the TSP has to ensure that a conformity assessment is carried out.

CORPME provides the following services, which have been defined in the eIDAS EU Regulation Art. 3 No. 16, the conformity of which has been assessed with the present declaration:

- **Creation of Qualified Certificates for Electronic Signatures**
- **Creation of Qualified Electronic Time Stamps**

in accordance with the eIDAS EU Regulation Art. 3 No. 16.

## 2 Audit organization

**The audit team was:**

Mr. Philippe BOUCHET – Lead Auditor

Mr. Patrick LEGAND – Auditor

Auditors declare to have no conflicts of interest while auditing CORPME.

**Renewal / full audit**

Audit of the correct implementation of the TSP operations during the onsite inspection at the TSP location.

This audit has been carried out April 10, 2023 to April 14, 2023 by Mr Philippe BOUCHET – Lead Auditor and Mr Patrick LEGAND - Auditor, has been accompanied on the part of the TSP by Mr Luis LAHOZ Chief Information Officer - CORPME.

**Audited Site(s) address(es) and function(s):**

Name of the audited site	Name of the unity or division	Process or function	Address
<b>Site 1</b> - Colegio de Registradores de la Propiedad, Mercantiles y de Bienes Muebles de España (CORPME)	Registradores de España- RA Data Center(s)	Main CA/RA	Diego de León 21 28006 Madrid Spain
<b>Site 2</b> - Colegio de Registradores de la Propiedad, Mercantiles y de Bienes Muebles de España (CORPME)	Backup Data Center(s) Archiving data recording Archiving of audit data	Backup CA	Alcala 540 28027 Madrid Spain

<sup>3</sup> Hereinafter referred to as: TSP or trust service provider

**Total audit time in days:** 14 days in total (10 days on site)

**Explanation of the context of the audit:**

The context/objectives of the audit are:

- To determine the client's compliance with the criteria of the audit;
- To evaluate the ability of the client organization to meet legal, regulatory and contractual requirements;
- To evaluate the effectiveness of the client organization to permanently meet its specified goals;
- If applicable, identify the parts of the client organization that could be improved.

**Evolution since the previous audit:**

There are no CA changes since the last audit regarding the CA that issue Qualified Certificates:

- Root CA 1.3.6.14.1.17276
- Internal CA 1.3.6.14.1.17276.0.1
- External CA 1.3.6.14.1.17276.0.2

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### 3 TSP public documentation

The following public documents of the TSP have been the subject-matter of the audit:

*REG-PKI-DPC01v.3.0.2\_Certification\_Practice\_Statement 12/03/2021*

*REG-PKI-DPC02v.3.0.2\_CORPME\_Internal\_Certification\_Policies 12/03/2021*

*REG-PKI-DPC03v.3.0.1\_CORPME\_External\_Certification\_Policies 12/03/2021*

*REG-PKI-DPC04v.1.3.1 CORPME Time Stamping Practices and Policies.pdf*

*20200506 Renovación ARL Producción CA Raíz Offline.pdf*

*22 - PR\_CT\_Procedimiento de Seguridad de los Recursos Humanos\_210312.pdf*

*CORPME - DS\_Time Stamping Authority\_210312.pdf*

*CORPME - Use License\_Administrative Position\_210312.pdf*

*CORPME - Use License\_Entity without Legal Personality Representative\_210312.pdf*

*CORPME - Use License\_Internal Personnel\_210312.pdf*

*CORPME - Use License\_Legal Person Representative for Electronic Invoicing\_210312.pdf*

*CORPME - Use License\_Legal Person Representative\_210312.pdf*

*CORPME - Use License\_Local Administration\_210312.pdf*

*CORPME - Use License\_Personal\_210312.pdf*

*CORPME - Use License\_Professional\_210312.pdf*

*CORPME - Use License\_Registrar\_210312.pdf*

*CORPME-DD\_Autoridad de Sellado de Tiempo\_210312.pdf*

*CORPME-DS\_Time Stamping Authority\_210312.pdf*

*DI\_CT\_Ceremonia de renovación de certificado de TSA\_190506.pdf*

*DI\_CT\_Ceremonia de sustitución de HSM\_190614.pdf*

*DI\_CT\_Informe de Análisis y Gestión de Riesgos\_201113.pdf*

*DI\_CT\_Manual de renovación remota de certificados.pdf*

*Informe Auditoría Interna 202011.pdf*

*Informe Auditoría Interna 202012.pdf*  
*Informe Auditoría Interna 202101.pdf*  
*Informe Auditoría Interna 202102.pdf*  
*Informe Auditoría Interna\_202010.pdf*  
*Informe Auditoría Interna\_Septiembre 2020.pdf*  
*K1\_PKI\_PLATFORM - Plataforma PKI.pdf*  
*PO\_CD\_Política Seguridad y Privacidad\_210204.pdf*  
*PR\_CT\_Procedimiento de Seguridad de los Recursos Humanos\_210312.pdf*  
*PR\_CT\_Adquisición, desarrollo y mantenimiento\_210312.pdf*  
*PR\_CT\_Caducidad de las claves de las CA's y la TSA\_210312.pdf*  
*PR\_CT\_Ciclo de vida del hardware criptográfico\_210312.pdf*  
*PR\_CT\_Control de acceso de los Trusted Roles\_210312.pdf*  
*PR\_CT\_Gestión de los identificadores de objetos\_210312.pdf*  
*PR\_CT\_Metodología de Análisis y Gestión de Riesgos\_210312.pdf*  
*PR\_CT\_Plan de Terminación\_210312.pdf*  
*PR\_CT\_Procedimiento de Backup de la CA Raíz\_210312.pdf*  
*PR\_CT\_Procedimiento de Gestión de Usuarios y Control de Acceso\_210312.pdf*  
*PR\_CT\_Procedimiento de Seguridad de las Operaciones\_210312.pdf*  
*PR\_CT\_Procedimiento de Sustitución de HSM\_190601.pdf*  
*PR\_CT\_Renovación de las claves de la VA\_210312.pdf*  
*PR\_CT\_Renovación de las claves de las TSUs\_210312.pdf*  
*PR\_CT\_Revocación de certificados\_210312.pdf*  
*Plan de acción pentest\_210326.pdf*

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## 4 Fulfillment of the requirements of the eIDAS EU Regulation

This conformity assessment declaration only reflects the fulfillment of the requirements laid down in the eIDAS EU Regulation. It must be considered as an additional part to the detailed audit reports which indicate the fulfillment of the requirements laid down in the ETSI European Norms.

The fulfillment of the requirements laid down in the **eIDAS EU Regulation and in the ETSI European Norms** has been verified by auditing the corresponding documents of the TSP and by auditing the correct implementation during the onsite inspection at the TSP location.

Relevant standards used are:

**EN 319 403 V2.2.2:** *Electronic Signatures and infrastructures (ESI) - Trust Service Providers conformity assessment - Requirements for conformity assessment bodies assessing Trust Service Providers*

**EN 319 401 V2.3.1:** *Electronic Signatures and Infrastructures (ESI) – General Policy requirements for trust service providers*

**EN 319 411-1 V1.3.1:** *Electronic signatures and infrastructures (ESI) - Policy and security requirements applicable to trust service providers issuing certificates - Part 1: General requirements*

**EN 319 411-2 V2.4.1:** *Electronic Signatures and Infrastructures (ESI); Policy and security requirements for Trust Service Providers issuing certificates; Part 2: Requirements for trust service providers issuing EU qualified certificates*

**EN 319 421 V1.1.1:** *Electronic Signatures and Infrastructures (ESI) - Security and policy requirements for trust service providers issuing time- stamps*

**And**

**Certification scheme:** LSTI-Q055-V6.7: Certification rules for Trust Service providers

Article	eIDAS		EN 319 401 EN 319 411-1 & 411-2 EN 319 421					National Compliance	
	Compliant	Not compliant	Compliant	Minor NC	Major NC	Not assessed	Not applicable		deviations
<b>General requirements for qualified TSP</b>									
Art 5.1		X		X				2	No national requirements
Art. 13.1	X		X						No national requirements
Art. 13.2	X		X						No national requirements
Art. 13.3	X		X						No national requirements
Art. 15	X		X						No national requirements
Art. 19.1		X		X				1,7	No national requirements
Art. 19.2	X		X						No national requirements
Art. 20	X		X						No national requirements
Art. 24.1		X							No national requirements
Art. 24.2 a	X		X						No national requirements
Art. 24.2 b		X							No national requirements
Art. 24.2 c	X		X						No national requirements
Art. 24.2 d		X		X				4	No national requirements
Art. 24.2 e		X		X				1,7	No national requirements
Art. 24.2 f		X		X				1,7	No national requirements
Art. 24.2 g		X		X				1,6,7	No national requirements
Art. 24.2 h	X		X						No national requirements
Art. 24.2 i	X		X						No national requirements
Art. 24.2 j	X		X						No national requirements
Art. 24.2 k	X		X						No national requirements
Art. 24.3	X		X						No national requirements
Art. 24.4		X		X				5	No national requirements
<b>Qualified certificate for electronic signature (+)</b>									
Art. 28.1 annex I	X		X						No national requirements
Art. 28.3	X		X						No national requirements
Art. 28.4	X		X						No national requirements

Article	eIDAS		EN 319 401 EN 319 411-1 & 411-2 EN 319 421						National Compliance
	Compliant	Not compliant	Compliant	Minor NC	Major NC	Not assessed	Not applicable	deviations	
Art. 28.5	X		X						No national requirements
<b>Qualified electronic time stamps</b>									
Art 42.1 a	X		X						No national requirements
Art 42.1 b	X		X						No national requirements
Art 42.1 c	X		X						No national requirements



Deviation number	Standards	Standard chapter	eIDAS articles
<i>Deviation 1</i>	ETSI EN 319411-1	OVR -6.5.2-02	<i>Article 24.2 (f) Article 24.2 (g) Article 19.1 Article 24.2 (e)</i>
<i>Deviation 2</i>	ETSI EN 319411-2 ETSI EN 319421	OVR-5.1-02 OVR-6.3.5-07 8.1	<i>Article 5.1</i>
<i>Deviation 3</i>	ETSI EN 319411-2	OVR-6.3.5-12	<i>Article 22(5)</i>
<i>Deviation 4</i>	ETSI EN 319411-2	OVR-6.9.4-03	<i>Article 24.2 (d)</i>
<i>Deviation 5</i>	ETSI EN 319411-2	CSS-6.3.10-12	<i>Article 24.4</i>
<i>Deviation 6</i>	ETSI EN 319 401	OVR-5.4.1-02 REQ-7.12-07 OVR-7.1-02	<i>Article 24.2 (g)</i>
<i>Deviation 7</i>	ETSI EN 319 401	REQ-7.6-02	<i>Article 24.2 (f) Article 24.2 (g) Article 19.1 Article 24.2 (e)</i>
<i>Deviation 8</i>	CORPME TIME STAMPING PRACTICES AND POLICIES	§ 3.3	
<i>Deviation 9</i>	ETSI EN 319 421	7.6.7 b)	

The correspondence between eIDAS regulation articles and the relevant ETSI EN Standards is detailed in the LSTI Annexe 1 - DT\_W\_209\_V10.0

## 5 Art 29 - Certification of qualified electronic signature creation devices

### 5.1 Art.30

1. *Conformity of qualified electronic signature creation devices with the requirements laid down in Annex II shall be certified by appropriate public or private bodies designated by Member States. EN 28.8.2014 Official Journal of the European Union L 257/101*

2. *Member States shall notify to the Commission the names and addresses of the public or private body referred to in paragraph 1. The Commission shall make that information available to Member States.*

3. *The certification referred to in paragraph 1 shall be based on one of the following:*

*(a) a security evaluation process carried out in accordance with one of the standards for the security assessment of information technology products included in the list established in accordance with the second subparagraph; or*

*(b) a process other than the process referred to in point (a), provided that it uses comparable security levels and provided that the public or private body referred to in paragraph 1 notifies that process to the Commission. That process may be used only in the absence of standards referred to in point (a) or when a security evaluation process referred to in point (a) is ongoing.*

### 5.2 Art.31

*Publication of a list of certified qualified electronic signature creation devices*

1. *Member States shall notify to the Commission without undue delay and no later than one month after the certification is concluded, information on qualified electronic signature creation devices that have been certified by the bodies referred to in Article 30(1). They shall also notify to the Commission, without undue delay and no later than one month after the certification is cancelled, information on electronic signature creation devices that are no longer certified.*

2. *On the basis of the information received, the Commission shall establish, publish and maintain a list of certified qualified electronic signature creation devices.*

**Information on the TSP that uses a QSignCD and/or QSealCD published in the European list eIDAS art. 31. (Precise the publication date of the Trusted List and proof in annexe)**

The SSCD is published in the European list eIDAS art. 31 as a QSignCD and QSealCD

Name in the list: « Carte IAS Classic en version 4.4.2 avec serveur MOC 1.1 sur plateforme Multiapp v4.0.1 »

[https://www.ssi.gouv.fr/uploads/20190211\\_568.pdf](https://www.ssi.gouv.fr/uploads/20190211_568.pdf)

## 7 Requirements fulfilled as laid down in the ETSI European Norms

The fulfillment of the requirements for the trust service laid down in ETSI EN 319 401 and ETSI EN 319 411-1/-2 and EN 319 421 has been verified within the framework of the audits °1635-249. The results are listed in detail in the following separate reports:

- 1635-249\_Rapport\_Corpme\_S

## 6 Other third parties involved

N/A - There are no third parties involved.

## 7 Next evaluation

*Next audit to review the correct implementation of the corrective actions for the minors pending deviation before the 09 September 2023.*

*Next full assessment of re-certification is to be carried out before 08 April 2025.*

## 8 Final summary

### a) Technical application environment

A trust service provider may entrust third parties with the fulfilment of parts of its processes. The overall responsibility for the fulfilment of the requirements laid down in eIDAS EU Regulation and the ETSI European Norms will remain by CORPME. A third party contracted by the CORPME may provide its service as a module with a conformity assessment carried out by a conformity assessment body.

CORPME provides a trust service for the creation of qualified certificates for electronic signatures with the functions identification, registration, key generation, certificate issuance, and a certificate status service with revocation service.

The trust services are provided by employees, who are trained and authorised for their duties, within a physically, organisationally and technically secure environment.

### b) Commissioning

This conformity assessment has to be renewed after security-related changes or due to the validity of the product/module confirmations referred to.

The operation procedures of the trust service provider were demonstrated to the conformity assessment body within the framework of the conformity assessment in accordance with Article 20 para. 1. The correct implementation of the requirements laid down in the eIDAS EU Regulation was determined. Pursuant to Article 21 para. 2, the trust service provider may only begin with the provision of the qualified trust service after the qualified status has been set out by the S.B. in the trusted list.

### c) Operation of the trust service

The following conditions have to be observed during the operation

- In case of any security-related changes and in case of any suspicion of manipulation, which cannot be clarified or remedied by mechanisms provided for such cases or by any additional measures of the trust service provider provided for such cases, a recognised conformity assessment body has to be involved according to ETSI EN 319 403, chapter 7.10.
- Any exchange or change of the trust service and in the organisation of the processes or the security elements has to be reported to a recognised conformity assessment body in accordance with ETSI EN 319 403, chapter 7.10 and requires a review and an extension of the conformity assessment, if appropriate.
- Any security-related change has to be reported without delay to the national S.B., as the competent authority, in accordance with the eIDAS EU Regulation Art. 24 para. 2a).

## 9 Conformity Assessment Declaration modifications records

Version	Issuing Date	Changes
Version 1	19 June 2023	Initial Declaration – Renewal

## End of the Conformity Assessment Declaration