

CERTIFIED MANAGEMENT SYSTEM
ISO 9001 | ISO 20000-1 | ISO 22301 | ISO 37001
ISO 27001 | ISO 27017 | ISO 27018 | ISO 27035
QUALIFIED TRUST SERVICES
ETSI 319 401 | ETSI 319 411-1 and 2 | ETSI 319 421 | ETSI 119 511
ELECTRONIC SIGNATURES AND SEALS - TIME STAMPS
LONG-TERM PRESERVATION

# Manual MAN eIDAS 20230426 TSA Disclosure Statement EN

Entaksi Solutions SpA

# **Table of contents**

Document information	. 1
Revisions and releases	. 1
Document approval	. 1
1. Introduction	. 3
1.1. Document maintenance	. 3
1.2. Approval and publication	. 3
2. TSP contact info	. 3
3. Electronic time stamp types and usage	. 4
4. Reliance limits	. 4
5. Obligations of subscribers	. 4
6. TSU public key certificate status checking obligations of relying parties	. 4
6.1. Qualified electronic Time-stamp	. 5
6.2. Long term verification of Time-stamps	
7. Limited warranty and disclaimer/Limitation of liability	. 5
8. Applicable agreements, CPS, CP	
9. Privacy policy	. 5
10. Refund policy	. 6
11. Applicable law, complaints and dispute resolution	. 6
12. TSP and repository licenses, trust marks, and audit	
12.1 Accessibility	6

#### **Document information**

Project	Integrated Management System			
Туре	Manual			
Document ID	MAN eIDAS 20230426 TSA Disclosure Statement EN			
Version	1.3.0			
Creation Date	26/04/2023			
Last Revision	02/12/2025			
Author	Alessia Soccio			
Status	Released			
Classification	Public			
Translation	This document is the original version. Italian translation: "MAN eIDAS 20230426 TSA Disclosure Statement".			



Paper reproductions of this document are to be considered working copies not registered by the SIG.

# **Revisions and releases**

Date	Version	Name	Role	Action	Release
26/04/2023	0.0.1	Alessia Soccio	IMSM	Draft creation.	Internal
10/05/2023	1.0.0	Alessia Soccio	IMSM	Review and release.	Public
15/12/2023	1.1.0	Alessia Soccio	IMSM	Periodic update, review of company presentation, formal review of definitions and regulatory references, minor corrections.	Public
05/12/2024	1.2.0	Alessia Soccio	IMSM	Periodic update, minor corrections.	Public
02/12/2025	1.3.0	Alessia Soccio	IMSM	Update to EU Regulation No. 1183/2024 – eIDAS 2, minor corrections.	Public

## **Document approval**



Date	Employee	Role	Signature
02/12/2025	Alessandro Geri	Sole Manager	Digitally signed

#### © 2025 Entaksi Solutions SpA

The information contained in this document is the property of Entaksi Solutions SpA, it is confidential, private, and only for the information of the intended recipient(s), and it cannot be communicated to third parties, reproduced, published or redistributed without the prior written consent of Entaksi.



#### 1. Introduction

This is the Time Stamp Authority Disclosure Statement of the Trust Service Provider (TSP) Entaksi Solutions SpA - Irish Branch (hereinafter "Entaksi"), a branch of the Italian company with VAT-ID IT01621900479 Entaksi Solutions SpA, operating in Ireland with National Trade Register number 909882.

Entaksi is a Trust Service Provider for:

- The issuance of qualified certificates for electronic signatures.
- The issuance of qualified certificates for electronic seals.
- The qualified preservation service for qualified electronic signatures.
- The qualified preservation service for qualified electronic seals.
- The creation of qualified electronic timestamps.

Entaksi is registered as a Trust Service Provider by the competent national supervisory body in Ireland (currently the Department of the Environment, Climate and Communications – DECC) and is included in the national trusted list in accordance with the eIDAS Regulation.

The Time Stamp Service is a trust service providing the creation of electronic time stamps, as defined by 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 (hereinafter "eIDAS").

This document follows the requirements of the European standard ETSI EN 319 421.

This document does not substitute or replace the Terms and Conditions of the TSA service, of which is an attachment, nor the TSA Practice Statement.

#### 1.1. Document maintenance

Entaksi has defined a review process for all the internal documents, including policies, statements and practices.

The documents are periodically reviewed under the responsibility of Entaksi management, in order to assess their compliance with national and international requirements, standards, mandatory legislation, regulations in force, particular needs imposed by the technical and technological evolution, evolution of the business context.

The review and any update take place at least once a year, or whenever one of the following circumstances occurs:

- internal organizational changes that impact on the system;
- major changes to the hardware or software architecture;
- regulatory updates;
- changes in procedures, methodologies or business context.

#### 1.2. Approval and publication

This document and all the internal policies and practices mentioned in it have been approved by Entaksi's management, published and communicated to employees and, as regards those classified as "public", published on the company website at the following link: https://www.entaksi.eu/en/documentation.html.

The website is available on 24x7 basis.

Entaksi makes available to all customers of trust services and relying parties any update of this document and other relevant documentation as soon as the update is approved and revised on the basis of what is described in the revision procedure.

Entaksi, will communicate any change that might affect the acceptance of the service by the subject, subscriber or relying parties through the communication channel established in the terms and conditions of the service.

#### 2. TSP contact info

The Trust Service Provider can be contacted at the following addresses:

Entaksi Solutions SpA - Irish Branch

Suite 4.01 - Ormond Building 31 36 Ormond Quai Upper - D07F6DC Dublin 7 - Ireland

Entaksi Solutions SpA - Italian Head Office

via la Piana 76, fraz. Pontepetri, 51028 San Marcello Piteglio (PT), Italy



#### **Entaksi Solutions SpA - Operational office**

re.working, Viale della Costituzione - Centro Direzionale Isola E2 - 80143 Napoli, Italy

Info: info@entaksi.eu

Help Desk: helpdesk@entaksi.eu

Data Protection Info: privacy@entaksi.eu
Data Protection Officer: dpo@entaksi.eu
Anti-Bribery: antibribery@entaksi.eu
Certification Authority: ca@entaksi.eu

Phone: +39 0573 171 6484

Website: https://www.entaksi.eu/en/

### 3. Electronic time stamp types and usage

The Entaksi TSA aims to provide a time stamps service in accordance with the eIDAS Regulation.

Time stamps provided by the Entaksi TSA service are compliant with RFC 3161.

The cryptographic algorithms and key lengths used by the Entaksi TSA service comply with ETSI EN 319 422.

Acceptable time stamp request hashes are: SHA-256, SHA-384, SHA-512.

Time stamps signatures algorithm can be one of the following:

- sha256WithRSAEncryption (OID 1.2.840.113549.1.1.11).
- sha384WithRSAEncryption (OID 1.2.840.113549.1.1.12).
- sha512WithRSAEncryption (OID 1.2.840.113549.1.1.13).
- ecdsa-with-SHA256 (OID 1.2.840.10045.4.3.2).
- ecdsa-with-SHA384 (OID 1.2.840.10045.4.3.3).
- ecdsa-with-SHA512 (OID 1.2.840.10045.4.3.4).

The TSA Policy and Practice Statement is identified by OID 1.3.6.1.4.1.57823.1.11. This policy is based on the ETSI BTSP best practices policy for time stamps (OID 0.4.0.2023.1.1).

#### 4. Reliance limits

Entaksi does not set reliance limits for Time-stamp services however, reliance limits may be set by applicable law in the EU country where the service is used or by customer agreement.

The TSA assures time with 1 second or better precision from a trusted UTC time source. If a trusted UTC time source cannot be acquired, the Time-stamp will not be issued.

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

## 5. Obligations of subscribers

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 revoked verifying the status of the public key certificate.

The subscriber shall use the Entaksi time stamp service in accordance with the TSA Policy and Practice Statement, technical requirements in ETSI EN 319 421 and the relevant provisions in ETSI EN 319 422.

Subscribers must use secure cryptographic functions for Time-stamping requests.

# 6. TSU public key certificate status checking obligations of relying parties

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 verifying the status of the public key certificate.



The relying party should take into account any limitation on usage of the Time-stamp indicated in the TSA Policy and Practice Statement and any other reasonable precautions.

The public key certificate status of the TSU can be verified using the Certificate Revocation List (CRL) reported in the TSU certificate CRLDistributionPoints extension (OID 2.5.29.31) or querying the Online Certificate Status Protocol responder reported in the AuthorityInformationAccess (OID 1.3.6.1.5.5.7.1.1) of the same TSU certificate.

Revocation status of the TSU certificate can be verified for 20 years after the expiration of the certificate.

#### 6.1. Qualified electronic Time-stamp

When a Time-stamp is claimed to be a Qualified Electronic Time-stamp as per eIDAS Regulation, the TSU Public Key Certificate will be verifiable using the certificates listed on an EU Trusted List.

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 can be verified using the public keys 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.

#### 6.2. Long term verification of Time-stamps

In accordance 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 the Trust Service Provider Certificate Policy.

### 7. Limited warranty and disclaimer/Limitation of liability

Warranty and liability limitations are specified in the Term and Conditions of the Qualified TSA service.

### 8. Applicable agreements, CPS, CP

Entaksi's qualified service for the creation of electronic time stamps is outlined by the following documents:

Table 1. LTP documents name and identification.

OID	Description	Permanent Link
1.3.6.1.4.1.57823.1.9	MAN eIDAS 20230426 Certificate Policy and Certification Practice Statement EN	https://r.entaksi.eu/oids/1.3.6.1.4.1.57823.1.9
1.3.6.1.4.1.57823.1.10	MAN eIDAS 20230426 PKI Disclosure Statement EN	https://r.entaksi.eu/oids/1.3.6.1.4.1.57823.1.10
1.3.6.1.4.1.57823.1.11	MAN eIDAS 20230426 TSA Policy and Practice Statement EN	https://r.entaksi.eu/oids/1.3.6.1.4.1.57823.1.11
1.3.6.1.4.1.57823.1.12	MAN eIDAS 20230426 TSA Disclosure Statement EN	https://r.entaksi.eu/oids/1.3.6.1.4.1.57823.1.12

All Entaksi's qualified trust services documents are available at the following link: https://www.entaksi.eu/en/documentation.html.

#### 9. Privacy policy

Entaksi TSA complies with applicable regulation e legal requirements (including GDPR and elDAS Regulation) as well as the requirements of the Entaksi Privacy Policy (see https://www.entaksi.eu/en/privacy.html).



The complete set of provisions relating to the processing of personal data and information security is reported on the Entaksi website (see <a href="https://www.entaksi.eu/en/ispd.html">https://www.entaksi.eu/en/ispd.html</a>).

Entaksi Management operates to guarantee that appropriate technical and organizational measures will be constantly taken against unauthorized or unlawful processing of personal data and against accidental loss or destruction of, or damage to, personal data.

## 10. Refund policy

Entaksi does not refund fees for TSA services.

## 11. Applicable law, complaints and dispute resolution

Time-stamps issued to clients located in Ireland are provided in accordance with Irish laws. Time-stamps issued outside Ireland are provided in accordance with Italian laws.

Entaksi looks for a peaceful and negotiated settlement of any disputes that may arise from its operation of the Certification Authority.

For any controversy, the exclusive competent court will be Pistoia (Italy), except for subscribers located in Ireland that can submit the controversy to the competent court of Ireland.

### 12. TSP and repository licenses, trust marks, and audit

Entaksi has several certifications, whose full and updated list of is available at https://www.entaksi.eu/en/certifications.html.

Entaksi is a Trust Service Provider for Long-term preservation of electronic signature and seals and for qualified Time-stamping services according to the eIDAS regulation.

Entaksi TSP is enlisted in the Irish List of Trust Service Providers published by the Department of the Environment, Climate and Communications of the Government of Ireland.

Entaksi TSP services are subject to conformity assessment every year by an accredited certification body, according to ETSI EN 319 401, ETSI EN 319 411-1, ETSI EN 319 411-2 and ETSI EN 319 421 as required by the eIDAS Regulation.

Audit working papers and inspection documents are classified as confidential, but the conformity certificates and their updates are published on the previously mentioned website page.

The trusted list of TSP can be checked at https://eidas.ec.europa.eu/efda/tl-browser/

#### 12.1. Accessibility

Entaksi provides its documentation, contract forms, and web-based interfaces for Trust Services management through channels designed to be accessible to persons with disabilities and users with accessibility needs, in accordance with the requirements of ETSI EN 301 549 and applicable national legislation.

Where a subscriber or relying party cannot reasonably use the standard online channels due to an accessibility need or disability, Entaksi will provide alternative accessible means (like assisted support via email or telephone) to guarantee access to identical information and services without discrimination.

Entaksi takes into account feedbacks that involve accessibility issues from users and is committed to continually improving the accessibility of its services.

