



TSA Disclosure Statement

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1. Introduction

This document represents the Trans Sped Temporary Marking Authority Transparency Statement, hereafter referred to as the TSA Transparency Statement. This document does not replace or supersede the Code of Practices and Procedures and the Timestamp Policy. It is an informational document that provides information on TSA services. This document is not intended to create contractual relations between Trans Sped and any other person, the document is intended for use only in connection with Trans Sped and its business. The use of this version of the TSA Transparency Statement has been approved by the Management Committee of Policies and Procedures and may be amended and modified from time to time, in accordance with policies and regulations, by the Management Committee of Policies and Procedures of Trans Sped.

2. Qualified Trust Service Provider Data

Name	TRANS SPED S.A.
Address	28 Despot Voda Street, District 2, 020656, Bucharest, Romania
Website	www.transsped.ro
Telephone	+40 (021) 210.87.00 +40 (021) 210.87.02
Email	office@transsped.ro
Request for revocation of certificate	support@transsped.ro support.cloudsignatures@transsped.ro

3. Type and timestamp tokens Usage Procedures

Trans Sped offers the time-stamping service as part of its trust services, in accordance with Law no. 451/2004 and the eIDAS regulation. The purpose of timestamps is to determine exactly when an electronic document was created or signed. Timestamps enable the implementation of advanced signature schemes needed in the context of large-scale development of electronic services.

To provide the time stamping service, Trans Sped has implemented a Time Stamping Authority - Trans Sped TSA. Trans Sped TSA issues time stamps in accordance with the requirements of the eIDAS Regulation, Law no. 451/2004 regarding the time stamp, MCSI Order no. 492/2009 regarding the technical and methodological norms for the application of Law no. 451/2004 regarding the time stamp and specifications of the standard EN 319 421 v1.1.1 (2016-03) ETSI 319 421 V1.1.1 (2016 0 -3), ETSI 319 422 V1.1.1 (2016 0 -3).

The identifier of the Trans Sped TSA policy is the following:

OID = 1.3.6.1.4.1.39965.1.2.1

The base ETSI policy identifier followed is as follows: **0.4.0.2023.1.1**

itu-t(0) identified-organization(4) etsi(0) time-stamp-policy(02023) policy-identifiers(1) baseline-ts-policy (1)

The Trans Sped TSA policy identifier is included in each timestamp issued.

The timestamp provided by Trans Sped TSA is in accordance with RFC 3161. The service provides timestamps with RSA algorithm and a key length of 2048 which supports SHA 256 hash algorithm.

4. Reliability Limits

In the context where the subscriber has a contractual relationship for the provision of timestamps with Trans Sped TSA, the timestamp service provided by Trans Sped TSA may be used for the purpose of any lawful transaction, without limitation, as long as no other specific conditions are specified at the level of contract. Trans Sped has no financial responsibility for the improper use of timestamps.

5. Subscribers Obligations

Subscribers must use the time-stamping service of Trans Sped TSA in accordance with the specifications in chapter 4 (Requirements for a time-stamping client) of the EN 319 422 v1.1.1 (2016-03) Electronic Signatures and Infrastructures (ESI) standard; Time-stamping protocol and time-stamp token profiles.

Subscribers must verify that the timestamps have been signed correctly and that the TSU private key used to sign the timestamps has not been revoked.

For more information, please consult the Terms and Conditions available at www.transsped.ro.

6. Obligations of Third Parties

Third parties that trust timestamps issued by Trans Sped TSA must verify that the timestamps have been signed correctly and that the TSU private key used to sign the timestamps has not been revoked.

When verifying a timestamp after the TSU certificate has expired, third parties must ensure that the hash function, cryptographic algorithms and key lengths used can still be considered secure.

For more information, please consult the Terms and Conditions available at www.transsped.ro.

7. Limited Warranty and Disclaimer/Limitation of Liability

Within the limits established by Romanian legislation, under no circumstances (except for fraud or misconduct) will Trans Sped be responsible for:

- Any financial loss.
- Any loss of data.
- Any adverse consequence directly or indirectly caused by the use, provision, licensing, performance or non-performance of certificates or electronic signatures.
- Any other negative consequences.

Trans Sped has no financial responsibility for the improper use of timestamps.

8. Retention of Events Logs

Trans Sped maintains an operative electronic register of issued time stamps, permanently available for online consultation. The structure and operating conditions of the electronic register are those established by MCSI Order no. 492/2009 regarding the technical and methodological norms for the application of Law no. 451/2004 regarding the time stamp.

9. Applicable agreements and practice statement

All documents related to the time stamp authority are publicly available at the URL <https://www.transsped.ro/repository/>.

10. Privacy Policy

The applicable privacy policy is public and can be downloaded by accessing <https://www.transsped.ro/certificari>.

Trans Sped processes Customer data according to legal regulations and in compliance with Regulation (EU) no. 679/2016 on the processing of personal data.

11. Refund Policy

The termination of the service contract does not affect the fees paid by the *User*. Trans Sped does not issue refunds of fees that have already been paid, unless the service contract expires due to the default of Trans Sped or if Trans Sped explicitly allows this - for example, in case of several packages.

12. Applicable Law, Litigation and Dispute Resolution

Trans Sped aims to amicably resolve and through negotiations disputes arising from its activity. Resolution follows the principle of a step-by-step approach.

Trans Sped and the *Client* agree that in case of any litigation issue or complaint arising due to any reason, they shall attempt to resolve the dispute amicably by negotiation, before referring the dispute to legal channels. The initiating party will be required to notify any affected party immediately and fully inform them of all implications of the case.

Questions, objections, and complaints regarding activity of or use by Trans Sped of *Qualified Digital Certificates* shall be addressed in writing.

Trans Sped shall notify requesting parties, at the address specified by them, of receiving a request and the time required to investigate such, within 30 business days calculated as of receiving a request.

If a Client believes that the response is inadequate or that the dispute that has arisen cannot be resolved on its basis without involving Trans Sped, the applicant may initiate mediation with Trans Sped and the *Trusted Parties*. All participants in such a mediation shall receive written notice of the mediation date 10 business days prior to it and filing. The reply of Trans Sped and any documents containing other requested information shall be provided to them in writing.

If no result of the mediation is obtained within 30 business days as of submitting the application, the applicant may initiate legal action regarding the situation. The *parties relying on the certificate* shall be subject to the jurisdiction of the Bucharest Tribunal.

Trans Sped shall operate under the applicable Romanian legislation. Romanian law is observed by Trans Sped in its contracts, regulations and policies and they shall be conceived in compliance with the Romanian law.

13. Trust Service Provider and the Authorization, Trust Marks and Audit Depository of Trans Sped

Trans Sped has the quality of a qualified reliable service provider, based in Romania. The provision of qualified trust services by Trans Sped is subject to compliance assessments and audits required by applicable European and national legislation. The Trans Sped Repository is available at <https://www.transsped.ro/repository/>

The List of Trusted Trust Service Providers with Qualified Status from Romania

<https://esignature.ec.europa.eu/efda/tl-browser/#/screen/tl/RO>
<https://www.adr.gov.ro/wp-content/uploads/2022/02/TrustedList-versiunea-pdf.pdf>

Safe-biopharma/Direct Trust trust list

<https://directtrust.org/about-membership/member-list>

14. Accreditations and certifications

Trans Sped holds several accreditations and certifications in the provision of trust services. These include:

✚ eIDAS accreditation

According to the provisions of the "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" (shortly eIDAS Regulation), trust service providers must be audited every two years by a European accredited audit firm, thus verifying the compliance of the services provided with the requirements of eIDAS and ETSI technical standards. Trans Sped is the first provider in Romania to have successfully carried out such an audit, the qualified certificates and qualified time stamps issued are recognised in all EU countries.

✚ Cross-certification U.S. Federal Bridge

Trans Sped is recognized as a certified issuer of qualified digital certificates for electronic signatures, Trans Sped certificates are an integral part of the applications offered by Science Applications International Corporation - SAIC (www.saic.com).

✚ ISO 9001

By obtaining ISO 9001 certification Trans Sped certifies the development, implementation, and improvement of quality management systems. The standard has been implemented since 2004 and is identified by the confidence clients have in the supplied products.

The ISO 9001 certification proves that Trans Sped assumes the following objectives:

- ❖ The prices of products and services always reflect the quality offered to its clients.
- ❖ It constantly improves the quality of the offered services and products.
- ❖ It regularly checks and improves the processes used.
- ❖ It has the necessary technology to assure clients of the quality of the provided services.

✚ ISO 27001

The ISO 27001 "Information Security Management Systems" certification was a priority for Trans Sped and was obtained in 2008 in order to guarantee maximum security for the protection of client data and to comply with the relevant regulations. The policy of Trans Sped contains the necessary information to identify how to apply the "Information Security Management System", thus rendering confidence to clients and keeping up with the latest technologies in the field.

ISO 14001

Since 2011 Trans Sped has become a "Green" organization that reduces its environmental impact. The certification for the ISO 14001 Standard - "Environmental Management System" ensures that:

- It regularly improves its environmental performance.
- It complies with international environmental requirements.

ISO 22301

Trans Sped it is certified that has implemented a business Continuity Management System for the following scope: digital transformation, fintech, digitization and process automation, as well as trusted services such as: digital certificates of qualified electronic signatures, advanced and simple, qualified time stamps, qualified electronic seals and certified electronic archiving solutions and long-term preservation solutions.

OHSAS 18001

The "Occupational Health and Safety Management" standard is a supplementation to ISO 9001 "Quality Management" and ISO 14001 "Environmental Management System". The certification was obtained in 2011 and focuses on continuous improvement by integrating the company's processes into the Plan, Do, Check, Act loop.

- It improves internal procedures to ensure minimal environmental impact.
- It collaborates with companies and institutions that are ISO 14001 certified.
- The management is involved in finding new solutions to reduce the environmental impact.
- The employees comply with procedures that help lower environmental impact.

Remote person identification services by video means

TRANS SPED is the first company in Romania to receive a positive approval from the Romanian Digitalization Agency for the provision of remote identification services by video means, according to the eIDAS Regulation, ETSI Standards and the 2021 ADR Standard on the regulation, recognition, approval, or acceptance of the remote person identification procedure using video means.

By the remote person identification services by video means, Trans Sped can identify Users by resorting to the automatic or human-operated video method, both for the issuance of qualified digital certificates and as a third-party identifier.