



Qualified Registered Electronic Mail Service Policy and Practice

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1. Introduction

Secumail B.V. (hereafter SecuMailer) is a qualified trust service provider exercising activity in accordance with the requirements of 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. As such the company is registered in the trust list of the European trust service providers (<https://webgate.ec.europa.eu/tl-browser/#/tl/NL>), as well as in the register of Dutch trust service providers maintained by the Rijksinspectie Digitale Infrastructuur (<https://www.rdi.nl/onderwerpen/elektronische-vertrouwensdiensten/documenten/publicaties/2018/januari/01/digitale-statuslijst-van-vertrouwensdiensten>).

SecuMailer provides to its users highly reliable and secure qualified registered electronic mail service in accordance with Art. 44 of Regulation (EU) No. 910/2014.

1.1. Overview

This document describes the general rules and regulations applied by SecuMailer in the provision of the Qualified Registered Electronic Mail Service (QREMS). This document applies to a trust service provided by SecuMailer in line with Art. 44 of Regulation (EU) No. 910/2014 and in line with the applicable legislation in The Netherlands.

The Registered Electronic Mail Service (REMS) provides secure and reliable delivery of electronic mails between the parties and offers evidence for the delivery process. The evidence can be considered statements by a trusted party, more specifically – SecuMailer, that a certain event related to the delivery process (sending, delivery, message denial, etc.) happens at a specific moment. The evidence can be transmitted immediately (together with the message or separately) or it can be stored in SecuMailer storage for later access. SecuMailer creates evidence in the form of digitally signed data.

Regulation (EU) No. 910/2014 provides the legal framework for facilitation of cross-border cooperation in the European Union (EU) for recognition of the existing national law systems related to the Registered Electronic Mail Service. The REMS standards framework aims to cover the general and globally recognised requirements for registered electronic mail provided in a secure and reliable manner, irrespective of the applicable legislation.

This document defines the common requirements towards the activity of SecuMailer in its capacity as a Qualified Registered Electronic Mail Service Provider (QREMSP). This policy sets out the provisions that apply to company staff (competences, responsibilities, authorisation and obligations based on the role of each employee).

QREMS is a specific type of Electronic Registered Delivery Service (ERDS) that is based on the formats, protocols and mechanisms used in normal email messages. SecuMailer, as a provider of this service, meets a certain number of additional requirements set out in this document. The QREMS standards framework aims to cover the general and globally recognised requirements for secure and reliable registered electronic mail.

SecuMailer performs secure initial identification of the recipient and the sender and protection against loss, theft, corruption or unauthorised change of the data transmitted, thus ensuring the integrity of the user content.

It is important for SecuMailer users to familiarise themselves with the objectives and the role of this Policy and Practice so that this service can be put into practice. The relationships between SecuMailer and the users shall be settled through a Contract.

This document is in line with the standard ETSI EN 319 531 Electronic Signatures and Infrastructures (ESI) Policy and Security Requirements for Registered Electronic Mail Service Providers.

This policy is a public document. It can be changed at any time by SecuMailer and each new revision shall be approved by the Board of Directors and communicated to all relevant stakeholders through the company website (<https://secumailer.nl>).

1.2. Legislative references

This policy and practice is in line with the following legal documents, standards and recommendations:

- 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;
- ETSI EN 319 401 Electronic Signatures and Infrastructures (ESI); General Policy Requirements for Trust Service Providers;
- ETSI EN 319 411-1 Electronic Signatures and Infrastructures (ESI); Policy and security requirements for Trust Service Providers issuing certificates; Part 1: General Requirements;
- ETSI EN 319 411-2 Policy and security requirements for Trust Service Providers issuing certificates. Requirements for trust service providers issuing EU qualified certificates;
- ETSI EN 319 421 Electronic Signatures and Infrastructures (ESI); Policy and Security Requirements for Trust Service Providers issuing Electronic Time-Stamps;
- ETSI EN 319 522-1 Electronic Signatures and Infrastructures (ESI); Electronic Registered Delivery Services Part 1 Framework and Architecture;
- ETSI EN 319 522-2 Electronic Signatures and Infrastructures (ESI); Electronic Registered Delivery Services Part 2 Semantic Contents;
- ETSI EN 319 522-3 Electronic Signatures and Infrastructures (ESI); Electronic Registered Delivery Services Part 3: Formats;
- ETSI EN 319 522-4-1 Electronic Signatures and Infrastructures (ESI); Electronic Registered Delivery Services Part 4-1 Message delivery bindings;
- ETSI EN 319 522-4-2 Electronic Signatures and Infrastructures (ESI); Electronic Registered Delivery Services Part 4-2 Evidence and identification bindings;
- ETSI EN 319 522-4-3 Electronic Signatures and Infrastructures (ESI); Electronic Registered Delivery Services Part 4-3 Capability and requirements bindings;
- EN 319 532 Part 1 Registered Electronic Mail (REM) Services. Framework and Architecture;
- EN 319 532 Part 2 Registered Electronic Mail (REM) Services. Semantic Contents;
- EN 319 532 Part 3 Registered Electronic Mail (REM) Services. Formats;
- EN 319 532 Part 4 Registered Electronic Mail (REM) Services. Interoperability profiles;
- ETSI EN 319 521 Electronic Signatures and Infrastructures (ESI); Policy and security requirements for Electronic Registered Delivery Service Providers;
- ETSI EN 319 531 Electronic Signatures and Infrastructures (ESI) Policy and security requirements for Registered Electronic Mail Service Providers

1.3. Document name and identifier

The full name of this document is “SecuMailer Qualified Registered Electronic Mail Service Policy and Practice”. The identifier for the document is:

Policy name	Object Identifier (OID)
Qualified Registered Electronic Mail Service Policy and Practice	1.3.6.1.4.1.60954.1.1

SecuMailer ensures that it does not alter the object identifier of this document as well as the object identifiers of policies, practices and other referral documents, in any circumstances. SecuMailer follows an internal OID management procedure.

1.4. Certificate usage

SecuMailer does not issue any certificates or private keys itself. It relies on cryptographic materials provided by 3rd party QTSPs as alluded to in this document.

1.5. Participants in the infrastructure

a. Users

Any natural or legal person who has a contract with SecuMailer for a Qualified Registered Electronic Mail Service is a QREMS user. Users can use the QREMS (electronic delivery/handover) as senders and/or recipients. Where practically feasible, the products used in the QREMS delivery are also accessible to people with disabilities.

b. Relying parties

Relying parties (third parties) are natural or legal persons who rely on the evidence provided by the provider in relation to the QREMS. They themselves are not QREMS users.

c. Other participants

SecuMailer reserves the right to enter into contracts with external parties for the provision of certain certification services, where necessary.

1.6. Application of Registered Electronic Mail

Registered Electronic Mail (REM) is a specific type of registered electronic mail that is based on the formats, protocols and mechanisms used in normal e-mail messages. Regulation (EU) No. 910/2014 defines a Qualified Registered Electronic Mail Service (QREMS), which is a specific type of ERDS and where the service and its provider shall meet a certain number of additional requirements.

The Qualified Registered Electronic Mail Service (QREMS) allows sending and/or receiving of a consignment that contains user content (e.g. electronic documents) related to it or to its transport metadata and REMS evidence for this process. This service is a useful tool for rapid and reliable delivery of information. SecuMailer ensures the security and safety of the communication with authentication of the time when the user content has been sent by the sender and authentication of the time of receipt of the user content by the recipient, as well as evidence for the communication that guarantees the authenticity of the exchanged deliveries. The evidence can be transmitted immediately (together with the user content or separately) or it can be stored in SecuMailer storage for later access.

The service is designed for legal entities, for administrations, healthcare organisations and organisations providing public services. The service is not intended for private / personal / individual use.

1.7. Management of Policy and Practice

a. Management Policy Organisation

SecuMailer is responsible for managing this Policy and Practice. The document is maintained as part of the ISO/IEC 27001 ISMS management structure to ensure that the document is reviewed and updated as part of the ongoing ISMS planning cycle.

Any version of the Policy and Practice is in force until the approval and publication of a new version. Each new version is developed by SecuMailer employees and, after approval by the SecuMailer Board of Directors, is published on the SecuMailer website: <https://www.secumailer.nl/eidas>.

Users are required to comply only with the valid version of the Policy and Practice at the time of using the services of SecuMailer.

b. Contact person

The contact person in relation to the management of the “Qualified Registered Electronic Mail Service Policy of SecuMailer shall be the Chief Operations Officer of SecuMailer. Further information can be requested at the following address:

SecuMailer

Zilverparkkade 72

8232 WK Lelystad

Contact telephone: +31320337381

Website: <https://secumailer.nl>

Email address: info@secumailer.com

c. Approval procedure

The SecuMailer Management Board is responsible for the trust service. All versions of this document are subject to final confirmation by the SecuMailer Management Board. In case of substantial changes, a new document version is clearly distinguishable from previous ones. The amended document along with the enforcement date, which cannot be earlier than 14 days after publication, is published electronically on the SecuMailer website repository as well as communicated internally.

1.8. Definitions and abbreviations

a. Definitions

Electronic Registered Delivery Service (ERDS) – an electronic service that allows electronic data transmission between a sender and a recipient and presents evidence related to the processing of the data transmitted, including evidence for sending and receiving the data, which also protects the data transmitted from the risk of loss, theft, damages or any unauthorised changes;

ERDS evidence – data generated by the registered electronic mail service the purpose of which is to prove that a given event has happened during a specific period of time;

ERDS handover metadata – data related to the user content generated by the registered electronic mail and handed over to the recipient’s agent/ERD;

ERDS notification/return receipt – an ERD message that contains evidence for ERDS and some metadata;

Delivery – an action where the sender’s user content has successfully crossed the border with the user agent/application of the recipient;

Interface – in this case this term shall mean user interface, which constitutes a shared border between two separate computer components that exchange information which is used for access to resources.

NTA 7516 – Dutch national standard for transport of medical and confidential data via email

Qualified Registered Electronic Mail Services Provider (QREMSP) – a qualified provider of qualified trust services that provides a registered electronic mail service in accordance with Regulation (EU) No. 910/2014;

Qualified Registered Electronic Mail Service (QREMS) – registered electronic mail service that meets the requirements set out in Art. 44 of Regulation (EU) No. 910/2014;

Recipient – an individual or a legal entity to whom user content is addressed;

REMS consignment – data structure that contains the user content, REMS metadata and/or REMS evidence;

REM handover metadata – data related to the user content generated by REMS and handed over to the user agent;

Registered Electronic Mail Service (REMS) – a service that allows electronic data transmission between entities, provides evidence related to the processing of the data transmitted, including evidence for the data sending and receiving, which also protects the data transmitted against the risk of loss, theft, corruption or unauthorised changes;

REMS evidence – data generated as part of the registered electronic mail service, which have the purpose to prove that a certain event has taken place at a certain moment;

Sender – an individual or a legal entity that provides user content;

Store and Forward (S&F) – REMS operation style (REM Store and Forward) of SecuMailer, where the user content that has been created and sent by the sender is transmitted to the recipient without an express requirement for confirmation by the recipient; After the sender sends the content, the recipient is not required to perform any other action, except for identification and authentication. For this purpose, the user content shall be stored at the recipient’s system.

User content – original data created by the sender that should be delivered to the recipient. It can consist of one or more files. The body of the e-mail message and all files attached, if any, constitute user content.

UA/User Agent – user agent/application. This is a system comprising of software and/or hardware components used by the sender/recipient to participate in the data exchange with the registered electronic mail service providers;

b. Abbreviations

DANE – DNS-based Authentication of Named Entities

DNSSEC – Domain Name System Security Extensions

ERDS – Electronic Registered Delivery Service;

IMAP – Internet Mail Application Protocol, protocol for accessing a mailbox

MDA – Mail Delivery Agent (mailbox service using protocols like IMAP/POP3)

MTA – Mail Transfer Agent (mail servers like Exchange, Microsoft 365, Gmail)

MUA – Mail User Agent (mail clients like Outlook, Apple Mail, Gmail)

POP3 – Post Office Protocol, protocol for accessing a mailbox

QTSP – Qualified Trust Service Provider;

QERDS – Qualified Electronic Registered Delivery Service;

QREMS – Qualified Registered Electronic Mail Service;

QERDSP – Qualified Electronic Registered Delivery Service Provider;

QREMSP – Qualified Registered Electronic Mail Service Provider;

REM – Registered Electronic Mail;

REMS – Registered Electronic Mail Service;

S&F – Store and Forward;

SMTP – Simple Mail Transfer Protocol – an internet standard for transfer of electronic mail;

UA (user agent) – user agent/application;

TLS – Transport Layer Security – a cryptographic protocol that ensures the security of internet communication.

2. Responsibility for publication and storage

2.1. Repositories

SecuMailer publishes communication related to the company activity and all significant documents that might be of interest for the users and the relying parties at its website.

Users and relying parties shall be informed about the Policy, Practice and General Terms of the Registered Electronic Mail Service before signing a contract. The documentation, including Policy and Practice, agreements, models, audit reports, etc. is published on the SecuMailer website immediately on each update. The operational certificates of the certifying authority are published immediately upon each issue of new certificates.

SecuMailer offers services related to access to the information stored in the repository (the public register), providing HTTPS based access to it. The information published in the SecuMailer repository is permanently accessible (24/7/365), except in the cases of events beyond SecuMailer's control.

SecuMailer publishes to its publicly available repository, available at <https://secumailer.nl/eidas>, the following documents:

- QREMS Policy and Practice (this document)
- Audit results

SecuMailer has a User Portal for Subscribers, it is available 24/7 with 99% annual availability. In the User Portal the Subscriber can find the following information:

- Service Level Agreement
- Termination Plan
- QREMS Terms and Conditions

2.2. Publication of certificate information

SecuMailer does not create any certificates or private keys itself. It relies on cryptographic materials provided by 3rd party QTSPs as alluded to in this document. Therefore there is no publication of certificate information.

2.3. Time or frequency of publication

Documentation listed under Repositories above are reviewed, updated and published with a minimum delay when:

- Any significant change is made or at least once per year;
- Any legal, regulatory or otherwise mandatory requirement calls for an update.

Upcoming changes will be made public minimum 14 days in advance. Subscribers and Relying parties will be notified via the SecuMailer public repository and further according to the SecuMailer choice of appropriate channel.

3. Service delivery process

3.1. Requirements toward the qualified registered electronic mail service

QREMS allows transfer of user content between a sender and a recipient who are users of SecuMailer. This service provides evidence for the integrity and time of data transmission, including evidence for their sending and receipt. The service protects the data against loss, theft, breach of their integrity or unauthorised change and meets the requirements of QERDS in accordance with Regulation (EU) No. 910/2014.

The QREMS service provided by SecuMailer complies with the following requirements:

- SecuMailer guarantees the sender's identity
- SecuMailer guarantees the recipient's identity before the delivery of data (the consignment/user content)
- Sending and receipt of the user content is backed by evidence signed with a qualified electronic seal of SecuMailer in a way that precludes any possibility for any unnoticed change in the user content (utilising the CaDES-T standard)
- The date and time of sending and receiving are noted with a qualified electronic time stamp
- The availability, integrity and confidentiality of user content is guaranteed from the time of sending it until its receipt
- The integrity of the user content is protected during the exchange between the sender and the recipient or among the distributed system components of the service
- QREMS uses the qualified services of the QTSP SK ID Solutions for issue and management of qualified eSeal certificates (X.509) and QTSP DiSig for qualified time stamps
- The entire information on the provision of QREMS is stored for the duration of the contract with the customer

3.2. Technology layers

The SecuMailer QREMS is constructed of several technology layers. In order to ensure integrity of the service one first has to ensure the security of the service. This achieved by building the QREMS on top of two additional layers:

- GDPR security layer
- NTA 7516 security layer.

Visually this layering is represented as follows:



a. GDPR layer

The GDPR layer takes care of the confidentiality and integrity of the transport layer. SecuMailer guarantees that a secure connection of sufficient quality is realised between the sender and SecuMailer and from SecuMailer to the recipient. If no such connection can be achieved then SecuMailer will deliver the message via a secure web portal with mandatory usage of 2FA for the recipient.

b. NTA 7516 layer

On top of the GDPR layer you will find the NTA 7516 layer. NTA 7516 is a Dutch standard for the exchange of medical and highly confidential data via email. It provides a structure for technical requirements and process agreements to use email as the carrier for confidential data. See paragraph 4.3 for more information on NTA 7516. The NTA 7516 layer takes care of 2FA requirements for both sender and recipient. eIDAS level 'Substantial' or 'High' is required for 2FA. NTA 7516 also adds additional requirements for transport security such as DANE/DNSSEC, SPF, DKIM and DMARC. NTA 7516 requires an advanced digital signature for protecting the payload of the message.

c. QREMS layer

On top of the NTA 7516 layer SecuMailer has created its QREMS solution. QREMS adds the following capabilities:

- A CaDES-T digital signature will be applied to the message, based on a Qualified eSeal digital certificate combined with a Qualified Timestamp
- Full evidence capture of the QREMS process from submission to delivery
- Evidence is signed with a Qualified Timestamp before being stored
- Submission and Delivery notifications for the Sender

The combination of the GDPR, NTA 7516 and QREMS layers constitute a complete QREMS solution that addresses all requirements from 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.

3.3. Description of technology

SecuMailer is integrated with the senders mail system and accepts email as determined by the sender. QREMS emails are provided with a special header on the senders side to distinguish them from general GDPR or NTA 7516 messages. Senders have authenticated themselves with their mail server with two-factor authentication as determined by their NTA 7516 policy.

The connection between the senders mail server and the SecuMailer platform is a HTTPS VPN using mandatory TLS, certificate DN + hostname verification and SMTP authentication (based on SASL).

Upon receipt of the QREMS message by the SecuMailer platform it will recognize the special QREMS header and do the following:

- Select the QREMS transport (which is built on top of the NTA 7516 transport)
- Retrieve the senders authentication mechanism from the database
- Initiate an out-of-band authentication of the recipient
- After successful authentication of the recipient the system will proceed with the QREMS message by adding a CaDES-T digital signature which includes a Qualified Timestamp

- The message will be sent to the recipient utilizing the NTA 7516 transport (using client certificate authentication, DANE/DNSSEC, Mandatory TLS, DKIM, SPF)
- Upon receipt or non-delivery of the QREMS message an evidence notification will be sent to the sender
- All aspects of the QREMS message handling are stored in the SecuMailer database for possible later evidence handling

After the consignment enters the recipient's R-REMS system, the consignment is considered handed over. At the moment of this event, the necessary evidence with integrated data about the type of event, including date, time, control/hash sum of the user content, which are electronically signed by the QREMS signing service and signed with a qualified time stamp. If no delivery to R-REMS is possible, the system also automatically generates the necessary evidence for this event.

3.4. Logical model of the process of delivery of QREMS

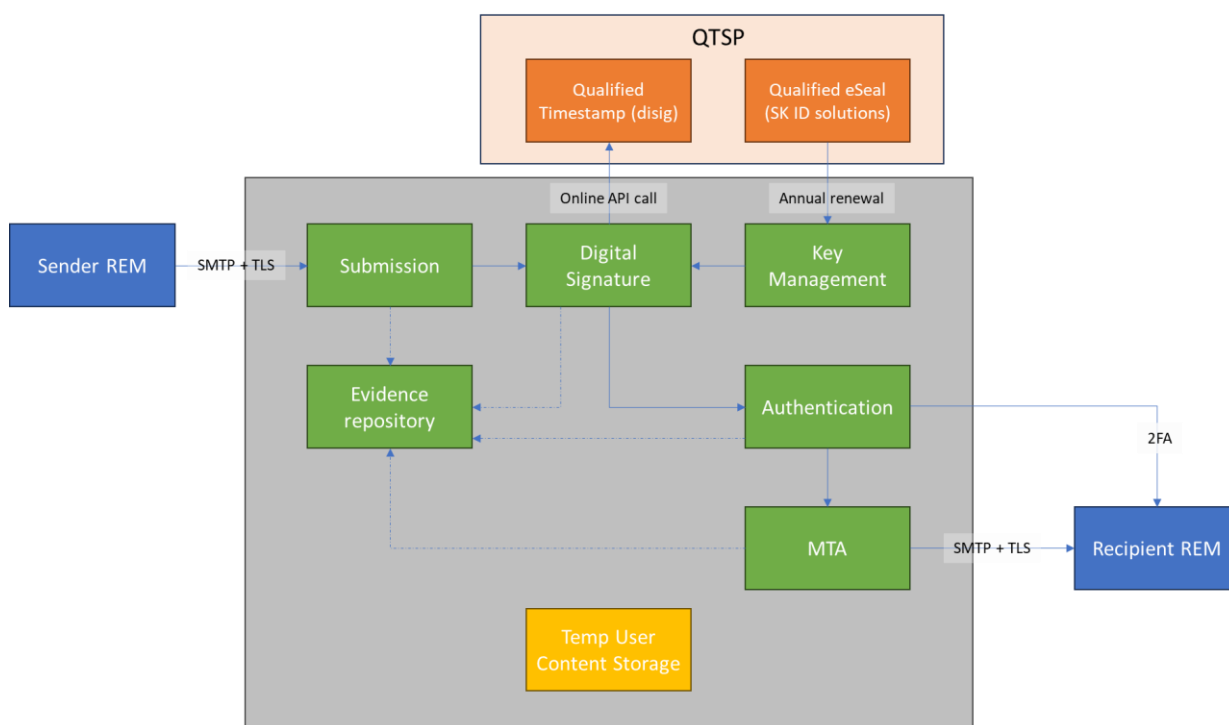
QREMS provides data about events that happen during the transmission of user contents (messages, documents and other objects) between the parties, e.g. evidence that the data have been sent by the sender or that they have been delivered to the recipient. This evidence can be used in order to proof to third parties or during court proceedings that the exchange of user content was conducted between the specific parties at a specific moment in time, which is confirmed by a qualified time stamp. All service users (senders and recipients) have a unique identifier that is logged in the REM messages and the evidence for ERDS. For REMS, the users' unique identifier is an e-mail address, as required by clause 5 of ETSI EN 319 532-3.

The evidence for QREMS is signed with an qualified electronic seal provided by SK ID Solutions. The evidence contains information about a specific event related to the process of data transmission between the sender and the recipient, such as successful/unsuccessful sending or successful/unsuccessful receiving of the user content, as well as the specific moment when that event occurred. The evidence for QREMS can be downloaded from the sender's/recipient's system. SecuMailer stores all evidence for the duration of the customer contract for later access by stakeholders.

QREMS takes place through a "user agent" – an application directly interacting with the user. The user agents/programmes (UA) via which the sender and the recipient communicate with the system for registered electronic mail service are SMTP and IMAP clients that support TLS encryption.

In these cases, the client software uses standard e-mail protocols (SMTP/IMAP) for access to QREMS. The sender and the recipient have a unique identifier used to identify them in REM deliveries and evidence for REMS. For QREMS, the users' unique identifier is an e-mail address, as required by clause 5 of ETSI EN 319 532-3. For the purpose of submission of user content, certain metadata are transmitted by the sender to QREMS, e.g. the e-mail address of one or more recipients, the delivery options, etc. These metadata are transmitted with the electronic mail consignment. The additional specification of the content and the format of the metadata is in line with ETSI EN 319 532-2 and ETSI EN 319 532-3.

The logic model illustrated on the figure presents the functionality of QREMS in individual components called "roles". The general QERDS model also applies to QREMS. The ERDS elements are described in the QERDS Policy (subsection 4.2.1 of ETSI EN 319 522-1).



In addition to the general ERDS components, REMS also provides a component for temporary storage of REMS user content – REMS storage of user contents. This is required because authentication takes place before delivery, hence the REMS user content must be stored temporarily before actual delivery can take place. As soon as authentication and delivery have taken place then the temporary REMS user content will be removed from the REMS storage of user content.

3.5. Operational process of provision of service

SecuMailer customers access QREMS using application programs / Uis. SecuMailer interfaces with the mail server and has no direct connection with the Mail User Agents (MUAs) of the customer. The customer must guarantee that the MUAs in use comply with the requirements as stated in the NTA 7516 standard. The use of the service requires initial identification of the sender and recipient. The data about the sender and recipient collected by SecuMailer are personal data, contact details, identity document data, etc.

QREMS provides users with the opportunity to send and receive user content in MIME format. QREMS provides users with the opportunity to send user content through SMTP and to receive user content through IMAP.

The requirements of Regulation (EU) No. 910/2014 are applied for QERDSP and for QERDS for the user content, which is protected through a qualified electronic seal or signature issued by SecuMailer in a way that precludes any possibility for changes in the data without establishing this change. The date and time of sending, delivery and receiving of the user content are signed with a qualified electronic time stamp. The evidence for sending and the evidence for receipt is linked to the user content with a qualified electronic time stamp. The evidence includes a unique identifier, which is the e-mail of the individual or of the legal entity.

SecuMailer applies the Send and Forget (S&F) principle in the provision of QREMS. In this process, the user content provided by the sender is transmitted to the recipient without requesting their express consent. SecuMailer's system allows the user content to be available to the recipient for a

- The REMS sends a notification to the recipient with a request for authentication. The Recipient authenticates itself based on data that is stored in the REMS user directory. After successful authentication the message is released and sent to the recipient via the Recipient REM (R-REM).
- The delivery (or non-delivery) handover event is captured by the REMS and is stored as evidence in the REMS evidence repository.
- The handover evidence is sent to the Sender.

All evidence generated is stored by QREMS for later access upon request.

3.6. REM interfaces

By definition, REMS is a specific type of ERDS, which allows to apply the ERD interfaces to REM. Considering the fact that the transport mechanisms in ERDS may vary, whereas in REM they are generally based on IMAP and SMTP standards, REM interfaces have a more specific structure.

a. User content submission interface – Sender REM

The S-REM interface is used by REM-UA/Application of the sender for forwarding the original user content to the recipient(s). S-REM uses SMTP and TLS protocols, which provide a secure channel for the data sent. This interface requires initial identification and authentication of the sender.

b. User content retrieval interface – Recipient REM

This interface is used by the REM-UA/Application for retrieving user content and the relevant metadata and evidence. This interface requires initial identification and authentication of the recipient. SecuMailer has ensured preventive measures in order to guarantee the data confidentiality and integrity. SecuMailer ensures the confidentiality, integrity and authenticity of the data sent through TLS. R-REM uses IMAP and TLS protocols.

c. Evidence retrieval interface – REM ERI

This interface is used by the REM-UA/Application for retrieving evidence. This interface requires initial identification and authentication. SecuMailer has ensured preventive measures in order to guarantee the data confidentiality and integrity. SecuMailer ensures the confidentiality, integrity and authenticity of the data sent through TLS. REM ERI uses IMAP and TLS protocols.

3.7. Sender/recipient identification

a. Sender identification

Sender identification takes place on the S-REMS system and is determined by the requirements of the NTA 7516 process as part of the QREMS onboarding. Customers must support 2FA authentication on the users workplace that are involved with the QREM service. The used 2FA method is captured in the SecuMailer database and is provided as part of the evidence gathering and creation.

b. Recipient identification

Recipient identification takes place on the REMS system and is facilitated by the R-REMS system. A recipient will receive a notification for QREMS authentication via the R-REMS system. The notification will initiate the authentication process on the REMS system which will use 2FA of class “Substantial” or “High”.

3.8. Creation of evidence

QREMS provides evidence of the sending and the receipt of user content. SecuMailer collects and stores data on:

- All events related to the initial verification of the identity of the sender and its identification.
- All events related to the initial verification of the identity of the recipient and its identification.
- At the initial verification of identity, the identification data of a natural person, identification data of a legal person and all other data that are necessary for its correct determination are verified.
- Data intended for initial identification of the sender/recipient.
- Authentication level of the sender/recipient.
- Evidence that the sender has been properly authenticated prior accepting the consignment.
- Data on the operation of QREMS confirming the authentication of the sender and the recipient, as well as the communication between them.
- Evidence that the user content has been received by the recipient.
- Evidence that the user content has not been changed during the transmission.

3.9. Evidence related to the sender (S-REMS)

REM fulfils additional requirements in the creation of evidence for REMS for each type of event. Sending is an action where the original user content coming from an external source passes through message submission interface of REMS. The procedure includes sender authentication. In REM, the initial message is the user content that shall be sent to the recipient, which is received through the system and which is REMSP responsibility. REM message submission is accessed through SMTP (Simple Mail Transfer Protocol), which is used for ensuring submission of the user content to REMS. The sender may use a user agent or a mail transfer agent. After the submission, REMS may process the submitted original user content in order to approve its acceptance; e.g. it may check it for malware, may check whether the titles of the user content are in line with the requirements for such types of messages, etc.

REMS processes the following events:

Event type under ETSI EN 319 522-1	Relevant interface	Issuer of REMS	Implementation
SubmissionAcceptance	REM submission	S-REMS	REMS accepts the original user content and the REMSP undertakes the responsibility to deliver it to all designated recipients by observing the rules for delivery given by the sender.
SubmissionRejection	REM submission	S-REMS	REMS rejects the presented user content. REMS informs the sender about the reason for rejection

3.10. Evidence related to the recipient (R-REMS)

The submission of user content is a process where the sender's user content (the consignment) is transferred to the recipient's system which is R-REMS. The process includes successful initial identification and authentication of the recipient and use of QREMS through R-REMS. In this process, the relevant metadata and/or identification data for REMS are transferred together with the sender's content.

The delivery of the user content takes place at the recipient's system, which is R-REMS. REMS issues evidence for the successful or unsuccessful transfer:

Event type under ETSI EN 319 522-1	Relevant interface	REMS Issuer	Implementation
ContentHandover	REM delivery	R-REMS	The user content has been successfully delivered to the recipient in their system, which is R-REMS
ContentHandoverFailure	REM delivery	R-REMS	The user content has not been successfully delivered to the recipient in their system, which is R-REMS within a certain period of time or for other reasons.

3.11. Evidence related to the delivery

The delivery is an operation of R-REMS, which makes the user content available for the recipient and accessible to him after their authentication. The delivery is considered implemented internally by REMS, not through external interfaces. R-REMS issues evidence for successful or unsuccessful consignment for each user content to REMS. The delivery may take place by storing the user content in the recipient's system, which is an R-REMS and to which the recipient has access following authentication.

The evidence storage period is for the duration of the contract. No user content is stored on the SecuMailer platform.

R-REMS issues evidence for successful or unsuccessful delivery of the user content to the recipient:

Event type under ETSI EN319 522-1	Relevant interface	Issuer	Implementation
ContentConsignment	none	R-REMS	R-REMS delivers the user content to the recipient.
ContentConsignmentFailure	none	R-REMS	R-REMS could not deliver the user Content to the recipient within a certain period of time.

In line with the terminology used in ETSI EN 319 531 SecuMailer's Policy specifies the consignment and handover time of user content based on the specific implementation of the QREM service:

- By the recipient's use of a MUA:
 - Consignment: Upon receipt in the mailbox of R-REMS.
 - Handover: The time of retrieval of the consignment in the e-mail client of the sender (addressee).
- By the recipient's use of web interface for access to electronic mail:
 - Consignment: Upon receipt in the mailbox of R-REMS.
 - Handover: At the time of visualisation as a new email in the recipient's browser through the web interface.

Protection of the data transferred against any risk of loss, theft, corruption or unauthorised changes

Data communication is securely protected by an encrypted channel, thus eliminating the risk of loss, theft, damage or unauthorized modifications of data. The evidence is reliably stored to prevent against any subsequent loss and theft in a protected environment under the control of SecuMailer for the duration of the contract.

3.12. Termination of service subscription

Termination of the service is available on week days from 08:00-17:00 CET.

3.13. Time synchronization

The time in the systems associated with the termination of a service contract for the provision of electronic registered email service is synchronized to UTC at least every 24 hours.

3.14. Service Limitations

Limitations that apply to the usage of the QREM Service are listed in the SecuMailer Service Level Agreement.

4. Identification and certification of identity

4.1. Initial verification of customer identity

All new Customers who want to use the SecuMailer Registered Electronic Mail Service need to be identified before implementation can take place.

SecuMailer only engages with legal entities as its customers, it does not engage with private individuals. Legal entities are represented by natural persons. SecuMailer captures information for both legal entities and its legal representatives.

SecuMailer identifies legal entities via the Chamber of Commerce registration and captures the following data:

- Name of the legal person (company)
- Chamber of Commerce registration number
- Business address
- Business phone number
- VAT registration number
- Means of authentication for its users

Legal entities are always represented via legal representatives. SecuMailer identifies legal representatives by calling the business phone number as listed on their website and asking for the business contact person that initiated the contact with SecuMailer.

Dutch law does not require any special documents or power of attorney for a natural person to act as a legal representative if the abovementioned procedure is followed.

SecuMailer will contact the legal representative, as established with the abovementioned procedure, and initiate a video call. In this video call the legal representative will show a valid photo identification document (one of the following: passport, national ID card, driver's license). The SecuMailer representative will check the following:

- The photo identification document is one of the following documents: passport, national ID card or driver's license
- The photo identification document is valid
- The photo on the photo identification document matches with the legal representative's facial features

SecuMailer will capture the following data:

- Family name (or names)
- Personal name (or names)
- Job title
- Contact information
- A redacted copy of the photo identification document (BSN¹ removed)

Without this validation SecuMailer will not connect the customer to its Registered Electronic Mail Service.

¹ BSN is the Dutch national identification number

4.2. Authentication

Senders are authenticated using the various means allowed by the NTA 7516 standard. The means of electronic identification meet the requirements referred to in Article 8 of Regulation (EU) No. 910/2014 with respect to the "significant" or "high" security levels. The senders authentication mechanism is described in the NTA 7516 declaration and a reference is stored in the SecuMailer database to be used in the creation of evidence.

Recipients are authenticated using two factor authentication (2FA) based on eIDAS level Substantial or High. Currently supported mechanisms are TOTP (RfC 6238) via SMS. Future supported mechanisms are DigiD² (Dutch national eID) and Itsme³.

4.3. NTA 7516

NTA 7516 is a Dutch standard for the exchange of medical and highly confidential data via email. It provides a structure for technical requirements and process agreements to use email as the carrier for confidential data.

The standard distinguishes between two classes of recipients:

- Professional recipients: Healthcare professionals and healthcare organisations
- Consumer recipients: Patients, caretakers and other natural persons outside of a healthcare organisation with a valid interest in the information

Professional recipients must make use of a NTA 7516 solution offered by a certified vendor in order to receive secure email as a professional recipient. This is established by means of a special DNS resource record in the DNS of the NTA 7516 professional sender / recipient that contains the name (and gateway) of the vendor.

Recipients without the NTA 7516 resource record are by definition classified as consumers.

The distinction is relevant for the application of certain technical standards and the means of authentication.

Professional recipients must comply with the following technical standards: TLS, DANE + DNSSEC, DKIM, SPF and DMARC.

Professional recipients must also be onboarded with a special procedure that establishes the identity of the organisation, its representatives and the technical measures they have carried out to comply with the NTA 7516 standard. This includes mandatory 2FA authentication on the workstation of the employee using the NTA 7516 solution of a vendor. These informational elements are captured in a customer agreement. Only after signing the agreement will the customer be allowed to provide the NTA 7516 resource record to its DNS.

Consumer recipients must use a mail server that supports TLS, DKIM, SPF and DMARC. Most modern mail providers are able to comply with these requirements. Because there is no insight into the execution or availability of 2FA on the recipient side it means that the NTA 7516 sender will have to provide 2FA authentication to the recipient.

After the authentication of the recipient (either professional or consumer) the actual message is delivered to the recipient. In the case of SecuMailer this is via regular email protocols (SMTP / IMAP /

² <https://www.digid.nl/>

³ <https://www.itsme-id.com/>

POP3). This closely mimics the requirements of Registered Electronic Mail service with the exception of the qualified digital signature and qualified timestamp.

4.4. QREMS additions on top of NTA 7516

SecuMailer has built its Registered Electronic Mail Service on the foundation of the NTA 7516 standard and has added to its service:

- CaDES-T digital signature using qualified eSeal certificate and qualified timestamp
- QREMS evidence storage
- QREMS evidence notifications to the sender
- Qualified timestamp for QREMS evidence

4.5. Names

The name requirements in the issued certificates are as specified in Recommendation ITUT X.509 or IETF RFC 5280 and ETSI EN 319 412. The names may be in accordance with the Domain Name Service (DNS) described in RFC 2247. This way allows subscribers to use two types of names: DN and DNS at the same time.

SecuMailer will use a qualified eSeal certificate issued to the entity “SecuMailer”. SecuMailer will sign email with this certificate on behalf of the user.

5. Control of physical and organizational security

5.1. Physical security controls

The measures taken with regard to the physical protection of SecuMailer are an element of the information security system developed and implemented in SecuMailer which complies with the requirements of the ISO/IEC 27001 standard. The SecuMailer ISO/IEC 27001 ISMS describes all controls in document “B10 Control of physical access”.

SecuMailer hosts its physical infrastructure with Amazon Web Services (AWS). SecuMailer uses the eu-west-1 region (Dublin/Ireland) and the eu-central-1 region (Frankfurt/Germany).

AWS supports 143 security standards and compliance certifications including ISO/IEC 27001:2013, 27017:2015, 27018:2019, 27701:2019, 22301:2019, 9001:2015, and CSA STAR CCM v4.0, GDPR and ISAE 3402.

The measures related to the physical protection of information data, technology systems, premises and their related support systems are aimed at preventing:

- Unauthorised access, damage and interference with working conditions.
- Loss, damage or compromise of resources.
- Compromise or theft of information or information processing tools.
- The SecuMailer infrastructure is physically and logically distinct and is not used for any other activities performed by SecuMailer.

a. Premises and premise construction

SecuMailer premises are purely used for office work and do not contain any sensitive data or equipment.

b. Physical access

Physical access to AWS data centres complies with the most stringent controls. A complete overview can be accessed at this location: <https://aws.amazon.com/compliance/data-center/controls/>

The overview covers the aspects site location and construction, physical access, power and air conditioning, water exposure, fire prevention and protection, media storage, waste disposal and off-site backup.

AWS is ISO 27001 and CSA STAR certified: <https://aws.amazon.com/compliance/iso-certified/>

AWS is SOC 1, 2 and 3 certified: <https://aws.amazon.com/compliance/services-in-scope/SOC/>

c. Access control

The goal of access control is to minimize the security risk of unauthorized access to physical and logical systems. Access to SecuMailer systems is limited to authorized personnel. The SecuMailer ISO/IEC 27001 ISMS describes all controls in document “B11 User access management”.

5.2. Incident management

Any person who witnesses or suspects a security incident is required to inform the management. Reporting security incidents may be performed in any way (personally, by telephone or email) that enables the relevant management persons to be notified as soon as

possible. The management is required to investigate the reported incident and to adopt or propose appropriate measures to prevent its recurrence. Every security incident is recorded in a protocol. The SecuMailer ISO/IEC 27001 ISMS describes all controls in document “B05 Incident management”.

5.3. Human resource security

SecuMailer ensures that its employees perform administrative and management procedures and procedures that are consistent with information security management, thereby ensuring the reliability and security of its operations.

SecuMailer recruits staff and, where applicable, hires subcontractors who have the necessary experience, reliability and qualifications and who have undergone training in security and protection of personal data.

SecuMailer applies appropriate disciplinary sanctions to employees who violate company policies or procedures.

The SecuMailer ISO/IEC 27001 ISMS describes all controls in document “B09 Human resource security”.

5.4. Audit procedure

The audits performed in SecuMailer concern the processing of information data and the management of key procedures. SecuMailer annually performs at least one internal audit. The provider has successfully undergone an audit from TÜV Nord, Tayllorcox and Brand Compliance and is certified under the following standards: ISO/IEC 27001, NEN 7510, eIDAS QREMS and NTA 7516.

The SecuMailer ISO/IEC 27001 ISMS describes all controls in document “B07 Internal audit”.

5.5. Archiving

Information about significant events is periodically archived in an electronic form. SecuMailer archives all data and files related to: registration information, the system security, all requests submitted by customers, all customer information and all correspondence between SecuMailer and its customers. All documents and data used in the identity verification process are subject to archiving.

The information under Art. Article 24 (2) (h) of Regulation (EU) No 910/2014 (all relevant information in relation to data issued and received by SecuMailer, in particular with a view to providing evidence in court proceedings and insurance of continuity in the provision of the service) is stored for the duration of the contract.

a. Storage of data media

The SecuMailer ISO/IEC 27001 ISMS describes all controls in document “B13 Asset management”.

b. Waste disposal

Procedures for safe destruction of media have been put in place to minimize the risk of leakage of confidential information to unauthorized persons. The procedures for safe destruction of media containing confidential information are consistent with the sensitivity of such information.

The SecuMailer ISO/IEC 27001 ISMS describes all controls in document “B13 Asset management”.

c. Asset management

SecuMailer ensures an adequate level of protection for its assets, including information assets. The provider maintains a list of all information assets and performs a risk assessment.

The SecuMailer ISO/IEC 27001 ISMS describes all controls in document “B13 Asset management”.

d. Records of events and keeping logs

The SecuMailer ISO/IEC 27001 ISMS describes all controls in document “B14 IT management”.

5.6. Business Continuity Plan

SecuMailer has developed, documented, implemented and currently maintains control plans, procedures and mechanisms in line with the International Standard ISO 22301 to ensure the necessary level of business continuity and information security during adverse events.

SecuMailer ensures:

- An adequate management structure in order to prepare, mitigate and respond to a disastrous event using staff having the necessary authority, experience and competence.
- The development and approval of response and recovery plans and procedures, describing in detail how the company will manage a disastrous event and maintain the continuity of information security.
- Information security control mechanisms within the procedures and supporting systems and tools for business continuity and recovery after a disaster.
- Compensating mechanisms for control of the information security control mechanisms that cannot be maintained during an adverse event.

A business continuity plan is provided that involves duplication of critical systems. Backup is stored in geographically remote locations. The specific conditions are in line with the applicable standards, recommendations and regulations specified in the area of information security. SecuMailer reviews at regular intervals of time the mechanisms created for control of the information security continuity so as to ensure their effectiveness and efficiency during adverse events.

SecuMailer regularly creates backups of important information and software and ensures that all basic information and software can be recovered after a disaster or in case of loss of the archive.

Recovery mechanisms are reviewed regularly to ensure that they meet the requirements of the Business Continuity Plan.

The SecuMailer ISO/IEC 27001 ISMS describes all controls in document “B18 Continuity information security”.

6. Technical Security Controls

6.1. Key pair generation and installation

SecuMailer does not issue any certificates or private keys itself. It relies on cryptographic materials provided by 3rd party QTSPs as alluded to in this document.

6.2. Private Key Protection and Cryptographic Module Engineering Controls

SecuMailer has developed security controls for the management of all cryptographic keys and cryptographic devices during their entire lifecycle.

SecuMailer uses a Qualified eSeal certificate issued by SK ID Solutions, registered as a Qualified Trust Service Provider and included with the European Trust List.

The private key of the Qualified eSeal is stored in AWS KMS, a certified FIPS 140-2 level 3 Hardware Security Module⁴ and it does not exit the environment unprotected. This key is archived, stored and recovered only by employees on trusted positions. The number of employees authorised to perform this function is minimum and corresponds to the QREMS practice.

SecuMailer uses a remote Qualified Electronic Time Stamp service provided by DiSig A.S., registered as a Qualified Trust Service Provider and included with the European Trust List. As such no key storage requirement exists for the Qualified Electronic Time Stamp.

QREMSP uses modern protocols and algorithms for encryption of the data transmitted.

The SecuMailer ISO/IEC 27001 ISMS describes all controls in document “B14 IT management”.

6.3. Computer security

SecuMailer uses Amazon Web Service cloud infrastructure as its hosting platform. AWS is responsible for ensuring the confidentiality, integrity and availability of its cloud infrastructure (Shared Responsibility Model⁵).

The architecture of SecuMailer uses serverless computing which results in computer systems that are only active for milli seconds after which they are discarded. There is no permanent compute infrastructure to attack and / or abuse.

Workstations of SecuMailer employees are protected with standard measures for anti-virus and malware. Documents are stored in Microsoft 365 cloud, there is no local storage on workstations.

The SecuMailer ISO/IEC 27001 ISMS describes controls for computer security of employees in document “Communication sheet rules information security”.

6.4. Information system vulnerability assessment

SecuMailer classifies and maintains registers of all assets in accordance with ISO/IEC 27001.

According to the SecuMailer Security Policy, an analysis of the vulnerability assessment is performed for all internal procedures, applications and information systems. Analysis requirements may also be determined by an external institution authorized to audit SecuMailer.

⁴ <https://aws.amazon.com/kms/features/>

⁵ <https://aws.amazon.com/compliance/shared-responsibility-model/>

The analysis of the activities and the supervision of the performance of all procedures are automatically by the security systems of all information and communication devices of SecuMailer. The vulnerability assessment is based on analysis of logs, security events, and other important data.

SecuMailer uses intruder.io for continuous vulnerability management and AWS Security Hub for continuous security baseline monitoring.

The SecuMailer ISO/IEC 27001 ISMS describes all controls in document “B16 Technical audits”.

6.5. Network security

SecuMailer infrastructure utilizes modern technical means of information exchange and protection to ensure the network security of systems against external interventions and threats. The SecuMailer network at AWS is fully compartmentalised into various zones separated with access controls, firewalls and zone routing. Inbound traffic is only possible via clearly defined and controlled ingress points

The SecuMailer ISO/IEC 27001 ISMS describes all controls in document “B15 Network management”.

6.6. Timestamp

SecuMailer uses the Qualified Electronic Time Stamp service from DiSig a.s.

The SecuMailer ISO/IEC 27001 ISMS describes all controls in document “B20 QREMS”.

7. Compliance audit and other assessment

The audits carried out at SecuMailer concerns the processing of information data. SecuMailer annually performs at least one internal audit. SecuMailer is annually audited by TÜV Nord as part of its ISO/IEC 27001 and NEN 7510 certification and by TayllorCox for eIDAS QREMS certification.

7.1. Actions taken as a result of an audit

Reports of internal and external audits are transmitted to SecuMailer. On the basis of the assessments made in the report, SecuMailer's Management Team sets out measures and deadlines for remedying the identified gaps and inconsistencies. SecuMailer staff undertake specific actions for their removal within the specified deadlines.

8. Other business and legal issues

8.1. Financial responsibility

SecuMailer shall be financially liable to QREMS customers who rely on its business. The financial liability shall only be applicable if the damage is due to the fault of SecuMailer or the parties with which it has concluded an agreement. If SecuMailer confirms and accepts that damage has occurred, it undertakes to compensate the damages. The maximum payment limit shall not exceed the amount of damage and shall not exceed the monthly fee for the month the issue occurred.

8.2. Personal data privacy

SecuMailer is registered as a personal data processor under the terms of the Personal Data Protection Act. As a personal data processor SecuMailer strictly respects the requirements for the confidentiality and non-disclosure of personal data of natural and legal persons that have come to its knowledge in the performance of its activities as a Qualified Trust Service Provider.

The company uses in its activities:

- Only such information about the activities and the business of its customers and partners that is required to provide QREMS.
- Confidential information such as commercial, financial and technical documents (software, data, surveys, prices, contracts and other documents).

SecuMailer informs its employees of their obligations by means of the document “Communication sheet rules information security” which is part of the SecuMailer ISO 27001 ISMS.

8.3. Intellectual property rights

There are various data integrated in the QREMS operated by SecuMailer, which are subject to intellectual property rights and other proprietary or non-proprietary rights.

8.4. Obligations, responsibilities and warranties

a. Obligations, responsibilities and warranties of SecuMailer

SecuMailer warrants that it performs its activities by:

- Complying with the terms and conditions of this document, the requirements of Regulation (EU) No. 910/2014 and the national legislation.
- Its provided QREMS service not infringing the copyrights and licensed rights of any third party.
- Using technical equipment and technologies that ensure system reliability and technical and cryptographic security in the performance of the processes, including a secure and protected mechanism/device for generating keys in its infrastructure.
- Providing QREMS after verifying the information provided by means permitted by law.
- Securely storing and maintaining information related to the QREMS provided and the systems operational performance.
- Complying with the established operational procedures and the technical and physical control regulations, in accordance with the terms and conditions of this Policy.
- Providing conditions for the accurate determination of the time of sending and receiving data.
- Performing procedures of identification and authentication of natural and legal persons or of authorized representatives of legal persons;

- Taking immediate measures in the event of technical security issues.
- Informing customers about their obligations and due care in the use of the QREMS certification service provided by SecuMailer.
- Using and storing the collected personal and other information only for the purposes of its activities in accordance with the national legislation.
- Maintaining disposable funds, which enable it to carry out its activities.
- Concluding an insurance for the period of its activities.
- Maintaining trusted staff having the necessary expertise, experience and qualifications to perform the activities.
- Maintaining a Public Register in which it publishes electronic documents related to its activities.
- Providing permanent access to the Public Register by electronic means (24/7/365).
- Ensuring protection against the introduction of changes to the maintained Public Register from unregulated or unauthorized access or due to a random event.
- Performing periodic internal audits of the SecuMailer platform.
- Performing external audits by independent auditors and publishing the audit results on its website.
- Using in its activities certified software and hardware as well as secure and reliable technology systems.
- Providing maximum access to its services (365/24/7), except for the following cases:
 - Scheduled and pre-announced technical repairs to the infrastructure.
 - Unscheduled technical repairs to the infrastructure as a result of unforeseen failures.
 - Maintenance due to infrastructure failures beyond the provider's jurisdiction.
 - Inaccessibility of the service as a result of force majeure or extraordinary events.
- Declaring the maintenance or upgrading of its infrastructure at least three (3) days prior to the commencement of the repair.

SecuMailer is liable to its customers for any damages caused by gross negligence or intent:

- Resulting from failure to comply with the requirements of Regulation (EU) No. 910/2014 in the performance of its QREMS provision activities
- Resulting from failure to comply with its obligations to provide QREMS
- Resulting from faults in establishing the original identity of customers.

b. Obligations of senders and recipients

Natural and legal persons shall have the following obligations:

- To become acquainted with and comply with the terms and conditions of the Agreement, the General Terms and Conditions, Policies and Practices when using QREMS, as well as the requirements in the other documents published in the Public Register of SecuMailer.
- To use the qualified electronic registered delivery for legitimate purposes only and in accordance with its Policy and Practice.
- To agree with the terms and conditions set out in the Agreement between them and SecuMailer.

c. Release from liability

SecuMailer IS NOT liable for damages arising from:

- The use of QREMS beyond the limits of its listed intended uses and restrictions of its operation.
- Illegal actions by customers.
- Accidental events having the nature of force majeure, including malicious actions of third parties (hacker attacks, depriving of the device for the use of the electronic registered delivery, of the identification method, etc.).

8.5. Limitation of liability

For the Qualified service of Registered Electronic Mail, SecuMailer sets a liability limit of EUR 5.000.

8.6. Activity insurance

SecuMailer concludes a compulsory insurance for its activities as a Qualified Trust Service Provider.

8.7. Time and termination of Policy and Practice

This document becomes effective as soon as it is approved by the Board of Directors of SecuMailer and published in the SecuMailer Public Register. Appendices to this Policy and Practice take effect after their publication.

The provisions in this document are valid until the next version of this document is published on the SecuMailer website.

Upon termination of the operation of SecuMailer, the topicality of the Policy and Practice, as well as the provisions contained in this document, are terminated.

The Provider keeps all previous versions / editions of this document duly and securely.

8.8. Policy and Practice amendments

Changes in this document may result from observed errors, updates and suggestions from affected parties. In the event of an invalid Policy and Practice clause, the validity of the entire document is retained and the contract with the customer is not violated. The invalid clause is replaced by a legal norm.

SecuMailer may make editorial changes to this document that do not affect the content of the rights and obligations contained therein. In the event of changes to Policy and Practice, the Object Identifier of the document (OID) is retained and does not change. Changes that lead to a new version of the document are published on the SecuMailer website.

8.9. Dispute settlement

Any disputes or complaints concerning the use of QREMS provided by SecuMailer shall be settled through mediation on the basis of written information. Complaints shall be dealt with by the legal adviser of SecuMailer. Any complainant will receive a reply within 2 (two) business days after the submission thereof. In the event that no resolution is found for a dispute within 30 (thirty) days of the commencement of the settlement procedure, the parties may refer the dispute to the Dutch courts.

8.10. Applicable law

For all matters not covered by this document the provisions of the Dutch legislation shall apply.

8.11. Compliance with applicable law

SecuMailer warrants that the service operates legally and reliably. It is offered in accordance with the applicable legal requirements. Any issues not settled by this document shall be governed by the provisions of the Dutch legislation. In the event that national legislation changes, the legal rules shall apply until the harmonization of this Policy.

SecuMailer warrants that personal data are processed in accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council on the Protection of Natural Persons with regard to the processing of personal data and on the free movement of such data.

Wherever possible, the QREM service and the end-user products used in the provision of the service are accessible to disabled people.

8.12. General provisions

The obligations and responsibilities of consumers and SecuMailer are governed by contractual agreements. Relationships with trustworthy parties are governed by general law. Contracts for the provision of QREMS should be concluded in written or electronic form, subject to the provisions of Regulation (EU) No 910/2014, Regulation (EC) 2016/679 and the applicable legislation in the Kingdom of The Netherlands.