

Project	Digital Certification Services – Certification Authority and Registration or Verification Entity
Title	Privacy Policy

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Document history

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1	INTRODUCTION	4
2	OVERVIEW	4
3	ACCREDITATION OBJECTIVE	4
4	DEFINITIONS AND ABBREVIATIONS.....	4
4.1	PKI PARTICIPANTS.....	5
4.1.1	LLEIDANET PKI S.L. CERTIFICATION AUTHORITY (CA LLEIDANET PKI S.L.)...	5
4.1.2	LLEIDANET PKI S.L. REGISTRATION AUTHORITY (RA LLEIDANET PKI S.L.)	5
4.1.3	DIGITAL CERTIFICATION SERVICE PROVIDER (LLEIDANET PKI S.L.)	5
4.1.4	SUBJECT	6
4.1.5	SUBSCRIBER	6
4.1.6	APPLICANT	6
4.1.7	THIRD RELYING PARTY	6
4.1.8	ENTITY TO WHICH THE SUBJECT IS AFFILIATED	6
4.1.9	OTHER PARTICIPANTS	6
5	LLEIDANET PKI S.L. RESPONSIBILITIES	
6	SCOPE	7
7	DATA PRIVACY POLICY	7
7.1	RESPONSIBILITIES	8
7.2	COMPLIANCE.....	8

1 INTRODUCTION

Lleidanet PKI S.L. is a multinational company founded to develop, innovate and generate ICT technological solutions in the business and institutional environment. The company is passionate about providing top-notch electronic signature solutions, file and communication security, data encryption, mobility, digital certificates, and electronic procedures. Our unwavering commitment to developing and implementing these solutions is evident in the 95% of our activity dedicated to them.

As a Digital Certification Authority (CA), Lleidanet PKI S.L. offers a comprehensive suite of services encompassing digital certificate issuance, reissuance, distribution, and revocation. These essential services are delivered in collaboration with Gestión de Seguridad Electrónica, a certified Colombian company that holds the esteemed Webtrust for Certification Authorities certification.

INDENOVA S.L. also provides digital certification, registration, and verification services for its clients, either legal or natural persons.

The approach is to offer a unique offer, providing innovative solutions and services focusing on creating added value. To this end, we combine the significant know-how of our managers and professionals, their extensive experience in digital certificates and electronic signatures for eCommerce and eAdministration, and the use of advanced technology.

Our SERVICES are aimed at e-Government and e-Commerce and at "paperless office" projects, with the eSigna® Platform as a core element, which supports all our other products and solutions, conceived as independent and interconnected modules, according to the needs of the project to be implemented.

2 OVERVIEW

The purpose of this document is to delineate the distinct privacy policies governing the EC and ER within the framework of adhering to the stipulations outlined in the "Regulation (EU) No 910/2014 of the European Parliament and of the Council, dated July 23, 2014," commonly referred to as the "eIDAS Regulation." These policies are established in accordance with the directives of the European Parliament. They also align with Regulation (EU) 2016/679 provisions, commonly known as the General Data Protection Regulation (GDPR).

3 OBJECT OF THE ACCREDITATION

The scope of the accreditation encompasses the infrastructure and registration systems utilised by Lleidanet PKI S.L. providing its services, all of which are furnished by the Certification and Registration Entity, Lleidanet PKI S.L.

4 DEFINITIONS AND ABBREVIATIONS

Certification authority- CA	Organisation that provides services for issuing, revoking, re-issuing, modifying, and suspending digital certificates within the framework of the regulations established by the legislation in force.
Registration Authority- RA	This entity is responsible for completing the identity verification processes for individuals.

	digital certification services and registering certificate applicants
Certification Policy	A set of rules specifying the framework for the enforceability of services for a given user community
Holder	This is the party that requires the services provided by INDENOVA S.L.'s CA and who agrees with the terms and conditions of the services as stated in the current document.
Trusted third party	The person who receives a document, log, or electronic notification and who places trust in the validity of the transactions carried out.

4.1 PKI PARTICIPANTS

4.1.1 LLEIDANET PKI S.L. CERTIFICATION AUTHORITY (CA LLEIDANET PKI S.L.)

INDENOVA S.L., as a Certification Authority, is a private legal entity providing services of production, issuance, management, cancellation or other services related to digital certification.

4.1.2 LLEIDANET PKI S.L. REGISTRATION AUTHORITY (RA LLEIDANET PKI S.L.)

RA functions may be outsourced. INDENOVA S.L.'s RA will evaluate the compliance of its policies by carrying out internal evaluations to determine the third party's compliance.

The RA can outsource the verification and registration functions with no limits or restrictions, provided that it is clear that the final responsible party is the RA, as long as the integrity and authenticity of the transactions are ensured in the authorisation of requests for issuance, revocation, re-issuance (which is done through our PKI platform). Nevertheless, liability towards the Supervisory Body, subscribers, holders and trusting third parties lies with the entity applying for accreditation of the Registry Authority. The Registration Authority (RA) must ensure the security and protection of the RA's personal and confidential data, as well as the integrity and authenticity of transactions in the authorisation of requests for issuance, revocation, re-issuance, during the performance of the outsourcing activities.

It should be noted that inDenova provides the third party with the RA Platform to create the application and to issue the certificates, ensuring the integrity of the entire process, accessing the eSignaPKI platform with the operator's digital Certificate.

4.1.3 DIGITAL CERTIFICATION SERVICE PROVIDER (LLEIDANET PKI S.L.)

Certification Service Providers (CSPs) are external entities that offer their infrastructure or technological services to Certification Entity Lleidanet PKI S.L. as needed.

They guarantee uninterrupted service to certificate holders for digital certification services throughout the contracted period.

Lleidanet PKI S.L. delivers its digital certification services through Certification Entity Lleidanet PKI S.L.

4.1.4 SUBJECT

The subject is the natural or legal person for whom a digital certificate is issued and acts as the responsible party by placing trust in it, full acceptance and awareness of the rights and duties established and published in this CPS.

The holder's role may vary depending on the specific certificates issued by Lleidanet PKI S.L., as defined in the Certification Policy.

4.1.5 SUBSCRIBER

Subscriber is the natural person responsible for using the private key, uniquely linked to a digitally signed electronic document using their private key.

If the digital certificate holder is a natural person, they are responsible as subscribers.

If a legal entity is the holder of a digital certificate, the subscriber's responsibility shall lie with the legal representative appointed by that entity. If the Certificate is designed to be used by an automated agent, the ownership of the Certificate and the digital signatures generated based on the Certificate shall be the legal entity's property. The subscriber's liability for these purposes is attributed to the legal entity concerned.

4.1.6 APPLICANT

Applicant is the natural or legal person applying for a Certificate issued under this CPS.

For certificates for natural persons, it can be the same as the holder.

4.1.7 TRUSTED THIRD PARTY

Trusted third parties are all natural or legal persons who choose to accept and place trust in the digital certificates issued by the Certification Authority INDENOVA S.L. to a holder. The trusted third party, in turn, may or may not be a holder.

4.1.8 ENTITY THE HOLDER IS BOUND TO

Where applicable, the legal person or organisation is closely bound to the Registrant by the relationship accredited in the Certificate.

4.1.9 OTHER PARTICIPANTS

4.1.9.1 THE SECURITY COMMITTEE

The security committee is an internal body within Certification Entity Lleidanet PKI S.L., composed of the Manager, System Administrator, Chief of Operations, and Certification Cycle Auditor. It has several responsibilities, including approving the CPS as the initial document and granting authorisation for any necessary changes or modifications to the approved CPS.

before its publication. The Security Committee is responsible for integrating the PSC with the PSC of third-party certification service providers.

5 LLEIDANET PKI S.L. RESPONSIBILITIES

Lleidanet PKI S.L. formulates a Privacy Policy that digital certification service providers must adhere to. This policy is essential for safeguarding customer information's integrity, authenticity, confidentiality, and critical assets integral to digital certification services.

In the event of incidents that could potentially impact the security of services procured from Lleidanet PKI S.L., contractual obligations, financial assurances, and insurance coverage are all provided by Lleidanet PKI S.L. in accordance with its Certification Practices Statement, accessible at:

<https://www.indenova.com/acreditaciones/eidas/>

Additionally, Lleidanet PKI S.L. provides registration or verification services per the current regulatory framework to verify the identity of legal entities and natural persons applying for digital certificates.

Requests, complaints, or grievances concerning the services provided by Lleidanet PKI S.L. via the Certification Authority are received directly by Lleidanet PKI S.L. in its capacity as a Digital Service Provider, or they can be channelled through our Registration Entity. The dedicated telephone line for addressing service-related inquiries, available to certificate holders and third parties, is operational around the clock and is provided by Lleidanet PKI S.L.

6 SCOPE

This policy is mandatory for digital certification service providers contracted by Lleidanet PKI S.L.

7 DATA PRIVACY POLICY

Lleidanet PKI S.L. is committed to safeguarding the personal data of subscribers and registration service holders in compliance with Regulation (EU) 2016/679, known as the General Data Protection Regulation (GDPR).

Personal data includes information such as names, addresses, email addresses, and any data that can be linked to the identity of a natural or legal person, as found in contracts and requests from subscribers and holders. This information will be treated as confidential and used exclusively for registration purposes, except when the data subject has granted prior consent or a judicial or administrative order dictates otherwise.

A Privacy Plan will be implemented to fulfil this commitment, featuring controls to protect against unauthorised disclosure and use.

Subscribers are responsible for ensuring the accuracy and currency of the information provided to Lleidanet PKI S.L. Subscribers are also liable for any harm that may result from providing false, incomplete, or inaccurate data.

7.1 RESPONSIBILITIES

The Responsible for Information Security and Data Privacy of INDENOVA S.L. manages the implementation and ensures compliance with the current policy, along with its periodic revision, updating, dissemination, awareness and training of personnel and third parties to ensure compliance.

7.2 COMPLIANCE

INDENOVA S.L.'s RA Manager approves this document, and any non-compliance by employees, contractors and third parties mentioned in the scope of this document will be communicated to them to enforce the respective sanctions.