

# e-tuğra

## CERTIFICATE POLICY (For SSL and CSC)



**E-Tuğra EBG Bilişim Teknolojileri ve Hizmetleri A.Ş.**  
**(E-Tugra EBG Information Technologies and Services Corp.)**

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Ceyhun Atıf Kansu Cad. 130/58  
Balgat / ANKARA  
TURKEY

Phone: 90.850.532.23.14

Phone: 90.850.532.23.12

Fax: 90.312.473.56.91

[www.e-tugra.com.tr](http://www.e-tugra.com.tr)

E-Tuğra EBG Bilişim Teknolojileri ve Hizmetleri A.Ş. (E-Tugra EBG Information Technologies and Services Corp.) Certificate Policy (CP)

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## DOCUMENT HISTORY

Version	Release Dates	Status & Description
V4.0	20/06/2016	New format adaptation
V4.1	26/08/2016	Administrative update/ clarifications Yearly
V4.2	29/09/2017	Administrative update/ clarifications Yearly
V4.3	26/01/2018	ETSI 319-411x Adaptation BR Requirements Changes Administrative update/ clarifications Yearly
V4.4	29/08/2018	Administrative update/ clarifications Yearly BR Requirements Changes Roots Info were added
V4.5	21/10/2019	Certificate Chains Added. Reseller Section was added Certificate Hierarchy was added CAB Forum documents versions are updated Region restriction for Certificate Application were updated CRL and OCSP update routines updated.
V4.6	30/03/2020	New Roots added Administrative update/ clarifications Yearly Upgrades with Mozilla Policy Review
V4.7	12/03/2021	Enhancement on Revocation Process Revocation Contact Person Subordinates Usages BR Requirements Checks
V4.8	05/07/2021	Updates to section 4.9.12 to reflect Mozilla 2.7.1 updates for private key compromise. Revision on Authentication of Domain Names Revision on Life Cycle Technical Controls Fixing wording mistakes
V4.9	20/08/2021	Update on compliance documents versions
V5.0	25/10/2021	Update on Certificate Policies
v5.1	10/01/2022	Updates and improvements for Root Inclusion on Bugzilla 1628720 Major changes: * Revocation procedures revised, * Remove misunderstanding on certificate profiles & policy identifiers, * Corrections on Name Forms, Certificates extensions, Uniqueness of Names and Certificate Profiles. * Web addresses and contacts, * Verifications resources for organizations QIIS, QGIS etc. * Handling IDN domain names, * Required skills and qualification of Contractors, * Improvement on Private Key Compromise Procedures, * EV Verification improvements according to EVG
V6.0	14/02/2022	Removing QEC statements. The scope of this document and related CPS is restricted for only SSL and CSC.
V6.1	09/03/2022	Improvements for Root Inclusion on Bugzilla 1628720 resulting updates in the following sections:

		<ul style="list-style-type: none"><li>• 3.2.2 &gt; text revised for EVG 11.6</li><li>• 7.2.2 &gt; CRL issuer encoding</li></ul> Reference added for section 9.16.3 in the event of conflicting law
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## 1. INTRODUCTION

EBG Bilişim Teknolojileri ve Hizmetleri AŞ (EBG Information Technologies and Services Corp. To be referred to as “e-tuğra hereafter) is a joint stock company (AŞ), which is incorporated and presently continues operations in compliance with the Turkish Commercial Code. It has powers of providing services related to electronic signatures, electronic certificates (QEC, SSL, CSC) and time stamps in its capacity as a Trusted Service Provider (to be referred “TSP” hereafter).

This document entitled Certificate Policy (to be referred to as “CP” hereafter) has been prepared for the purpose of explaining and making public the technical and legal requirements met by e-tuğra in its capacity as an “TSP”, its operations, its technical and organizational structure and obligations of the parties assuming certain roles in connection with services provided by “TSP”.

This document covers only SSL/TLS and Code Signing certificates and all other certificate types are out of scope.

This document identifies the policies in the operations such as certificate applications, certificate issuance and management of certificates, certificate renewal and certificate revocation to be conducted in compliance with administrative, technical and legal requirements; it also sets the implementing responsibilities of e-tuğra as an TSP, of the certificate owner and of the third parties.

This document has been prepared in order to show the operations of e-tuğra as a Trusted Service Provider in compliance with:

- The documents published at <http://www.cabforum.org> by “CA/Browser Forum” which are called “Guidelines for Issuance and Management of Extended Validation Certificates”, “Guidelines for the Issuance and Management of Extended Validation Code Signing Certificates” and “Baseline Requirements for the Issuance and Management of Publicly-Trusted Certificates” for the services such as Standard (DV) SSL (Secure Socket Layer), Premium (OV) SSL, EV (Extended Validation) SSL Certificates and Code Signing Certificate.
- For Code Signing Certificates Minimum Requirements for the Issuance and Management of Publicly-Trusted Code Signing Certificates, published at <https://aka.ms/csbr> (the “Code Signing Minimum Requirements”) for Code Signing Certificates are applied.
- For SSL and Code Signing Certificates, ETSI EN 319 411-1 and related ETSI EN 319 401 are applicable. The policies Normalized Certificate Policy, Domain Validated Certificate Policy, Organization Validated Certificate Policy, Extended Validated Certificate Policy and Extended Validated Certificate Guideless in ETSI EN 319 411-1 are applied.

All the above documents will hereinafter be referred to as regulation.

If there is a conflict between one of these documents above and this CP, the Requirements of CAB Forum and ETSI take precedence over this document. See section 9.16.3 for further details.

### 1.1. Overview

“e-tuğra” publicly discloses and brings to the attention of the parties the features of the electronic certificates and the considerations governing their use, certification processes, rights and obligations of the parties taking part in the certification process and the technical and operational activities that it carries out in its capacity as “CSP” under the document of Certificate Policy “CP”. In addition, “e-

tuğra” outlines how the aspects covered by “CP” are implemented in the document called “Certification Practice Statement” (to be referred as “CPS” hereafter) and it brings this document to the attention of the public and the concerned parties. Policies in this document cover e-tuğra’s customer services, registration units, certificate issuance procedures which in turn all of e-tuğra’s electronic certificate services for SSL/TLS and CSC Certificates.

## 1.2. Document Name and Identification

This “CP” document is called “e-tuğra Certificate Policy” and it is prepared in order to explain the certification practice statement. The version number and the validity date take place on the cover page of the document.

E-tuğra's "CP" document, by the use of the corporate object identifier "2.16.792.3.0.4" taken from Turkish Standards Institution, covers all of the following certificate policies.

This document is disclosed to the public at the website <http://www.e-tugra.com.tr>.

### “e-tuğra” Standard (DV) SSL Certificate Policy,

It covers Domain Validated SSL certificates for servers based on CAB Forum “Baseline Requirements for the Issuance and Management of Publicly-Trusted Certificates”.

**Object Identifier:** 2.16.792.3.0.4.1.1.2

- \* Corresponds to policy with OID: 0.4.0.2042.1.6 ETSI 319 411-1 DVCP
- \* Corresponds to policy with OID: 2.23.140.1.2.1 CAB Forum BR Guide

### “e-tuğra” Premium (OV) SSL Certificate Policy,

It covers Organizational Validated SSL certificates for servers based on CAB Forum “Baseline Requirements for the Issuance and Management of Publicly-Trusted Certificates”.

**Object Identifier:** 2.16.792.3.0.4.1.1.3

- \* Corresponds to policy with OID: 0.4.0.2042.1.7 ETSI 319 411-1 OVCP
- \* Corresponds to policy with OID: 2.23.140.1.2.2 CAB Forum BR Guide

### “e-tuğra” EV SSL Certificate Policy,

It covers Extended Validated (EV) SSL certificates for servers based on CAB Forum “Guidelines for Issuance and Management of Extended Validation Certificates”.

**Object Identifier:** 2.16.792.3.0.4.1.1.4

- \* Corresponds to policy with OID: 0.4.0.2042.1.4 ETSI 319 411-1 EVCP
- \* Corresponds to policy with OID: 2.23.140.1.1 CAB Forum EV Guide

### “e-tuğra” Code Signing Certificate Policy,

It covers the Organization Validated Code Signing Certificates.

**Object Identifier:** 2.16.792.3.0.4.1.1.13

- \* Corresponds to policy with OID: 0.4.0.2042.1.7 ETSI 319 411-1 OCVS
- \* Corresponds to policy with OID: 2.23.140.1.4.1 CAB Forum CS Guide

### “e-tuğra” EV Code Signing Certificate Policy,

It covers the Extended Validated (EV) Code Signing certificates for code signing operations.

**Object Identifier:** 2.16.792.3.0.4.1.1.14

- \* Corresponds to policy with OID: 0.4.0.2042.1.4 ETSI 319 411-1 EVCS and EVCG

\* Corresponds to policy with OID: 2.23.140.1.3 CAB Forum EVCS Guide

### 1.3. Participants

The subjects defined as Participants under “e-tuğra CP” are the parties which take part in e-tuğra’s operations as “TSP” and hold the rights and obligations with regard to such operations.

The participants under “e-tuğra CP” are e-tuğra as Trusted Service Provider (TSP), registration authorities, individual or corporate certificate owners and third parties.

#### 1.3.1. Trusted Service Provider (“e-tuğra”)

e-tuğra is an “TSP” for which rights and obligations are established in line with the Electronic Signature Law No 5070 and the related legal provisions and this “CP” document. e-tuğra is responsible for carrying out the operations such as receiving, issuing, distributing, publishing of certificates and the revocation, renewal of the certificates and the services related to all Private Key Infrastructure like OCSP and CRL. All these operations are conducted by the “Trust Center” which takes place at e-tuğra’s center.

End user certificates are issued by e-tuğra as “TSP” and are signed by e-tuğra intermediate CAs.

All intermediate CAs are issued by e-tuğra as “TSP” according to their key usage areas and are signed by e-tuğra root CA.

#### 1.3.2. Registration Authorities

Registration Authorities (to be referred to as “RA” hereafter) are the residential structures which perform services related to the application, renewal or revocation of certificate requests and which are under direct control and inspection of e-tuğra and the staff affiliated to e-tuğra, employed whether directly or on contract or outsourced in these residential structures or individual people and/or corporate entities which conclude Registration Unit Contracts by e-tuğra.

On the basis of documents established by e-tuğra, RAs are responsible for checking the identification of Certificate Holders applying for certificate and the validity of the information to be incorporated in certificates. In addition, RAs can also assume responsibilities for receiving applications for operations to be carried out between “Certificate Holders” and e-tuğra throughout the certificate life cycle and for performing necessary operations for and on behalf of e-tuğra.

Certificate applications to be made via RAs can be realized by direct visit of the applicant to the RA’s office and necessary information and documents delivered to the office by the applicant or posted by mail according to e-tuğra application process procedures. In either way certificate requests are forwarded to e-tuğra’s Trust Center and the certificates are issued.

“e-tuğra” does not delegate domain validation for SSL certificates to RAs

The address and communication information of all RAs are disclosed to the public via the website of “e-tuğra”.

#### 1.3.3. Certificate Owners

Certificate owners are those people or organizations whose identity or title is verified in order for the certificates to be issued for them.

Verification of identity and /or title depends on the type of certificate to be applied according to the regulations and standards.

The liability of the certificate owner and consequences due to the use of a certificate are determined by the relevant legislation and the certificate owner's commitment or agreement.

#### **1.3.4. Resellers**

Resellers are only responsible for marketing and sales of e-tuğra certificates with a given rights and region restriction. All certificate applications done via resellers are validated and processed by e-tuğra or Registration Authorities of e-tuğra. For other trademark sub CA's created for issuing standard and Premium (OV) SSL other than e-tuğra, the owners of trademarks have only sales and marketing rights for these trademarks. All validation of applications and issuing of certificates for all Sub-CA are only done by e-tuğra.

#### **1.3.5. Third Parties**

Third parties are those who receive documents signed by private keys based on the certificates issued by e-tuğra and those who rely on the relevant certificates.

#### **1.3.6. Other Parties**

In the context of all certification services such as certificate issuing, publication of repository and the preservation of the security of the certificate information are provided by e-tuğra.

Other parties are the individuals or corporate institutions which cooperate with e-tuğra and provide service.

E-tuğra signs contracts with other parties in order to guarantee that the service given by them are reliable and proper, business processes are conducted according to the procedures and instructions required by this "CP" and "CPS" prepared by e-tuğra and that any private or confidential information about certificate owners are not disclosed

### **1.4. Certificate Usage**

#### **1.4.1. Use of Authorized Certificates**

"e-tuğra" root and intermediate certificates can only be used to sign certificates in accordance with the purpose of use and to verify data and certificates.

All SSL certificates are used by certificate owners on servers only for the domain names in the certificate and for SSL operations.

SSL Certificates;

- Standard (DV) SSL: It verifies a Domain Name and the identity of the web services on this Domain Name and it guarantees that the communication is encrypted.
- Premium (OV) SSL: It verifies a Domain Name and the identity of the associated institution, and it also guarantees that the communication with web services on this domain name to be encrypted.
- EV SSL: It verifies a Domain Name and the identity of the associated institution, and it also guarantees that the communication with web services on this domain to be encrypted. e-tuğra makes sure that the relation between the EV SSL Certificate Domain Name and the institution to be in line with the "Guidelines for Issuance and Management of Extended Validation Certificates" published by "CA/Browser Forum" and it develops the certificate.

Code Signing Certificate (CSC) is used for signing software codes by the real person and/or institution which holds the intellectual property rights of certificate owners.

The usage rights of all certificates belong only to certificate owners.

### 1.4.2. Prohibited Usage of Certificates

It is prohibited to use root and intermediate certificates issued by e-tuğra for purposes other than determined conditions in the regulations.

The right of usage of all other e-tuğra certificates belongs to certificate owners and the use of certificates beyond the control of the certificate owner is not allowed.

e-tuğra certificates cannot be used outside the limits and scope declared in this “CPS” document.

### 1.4.3. Certificate Hierarchy

The Root CA's and the Sub-CAs that have been issued by the mentioned Root-CA's below are subject to polices in this document.

#### 1.4.3.1 Certification Authorities and Subordinates

<b>Identification of the Root-CA:</b>	E-Tugra certification Authority			
<b>Distinguished Name</b>	CN=E-Tugra Certification Authority, OU=E-Tugra Sertifikasyon Merkezi, O=E-Tuğra EBG Bilişim Teknolojileri ve Hizmetleri A.Ş., L=Ankara, C=TR			
<b>SHA-256 fingerprint</b>	B0:BF:D5:2B:B0:D7:D9:BD:92:BF:5D:4D:C1:3D:A2:55:C0:2C:54:2F:37:83:65:EA:89:39:11:F5:5E:55:F2:3C			
<b>Certificate Serial number</b>	6A683E9C519BCB53			
<b>Iden. of the Sub-CA</b>	<b>Distinguished Name</b>	<b>SHA-256 fingerprint</b>	<b>Serial number</b>	<b>Usage Purpose on End Entities</b>
E-Tugra Domain Validated CA	CN=E-Tugra Domain Validated CA,OU=E-Tuğra Sertifikasyon Merkezi,O=E-Tuğra EBG Bilişim Teknolojileri ve Hizmetleri A.Ş.,L=Ankara,C=TR	CB:6F:CE:E4:1C:55:E2:47:74:DF:02:BE:35:DE:6D:41:8E:94:EF:58:11:F7:DB:13:73:AF:88:09:CF:70:7F:2A	3AEFB1B7F A55ADCO	TLS Web Server Authentication, TLS Web Client Authentication
E-Tugra Extended Validated CA	CN=E-Tugra Extended Validated CA,OU=E-Tuğra Sertifikasyon Merkezi,O=E-Tuğra EBG Bilişim Teknolojileri ve Hizmetleri A.Ş.,L=Ankara,C=TR	CE:7A:DC:19:77:57:A5:2E:69:A2:01:4C:CE:03:D9:80:63:25:02:76:47:42:C2:92:3D:73:80:56:8E:21:00:A6	7815C206C 403B277	TLS Web Server Authentication, TLS Web Client Authentication, Code Signing
E-Tugra Organization Validated CA	CN=E-Tugra Organization Validated CA,OU=E-Tuğra Sertifikasyon Merkezi,O=E-Tuğra EBG Bilişim Teknolojileri ve Hizmetleri A.Ş.,L=Ankara,C=TR	11:47:53:E8:8D:00:0E:75:99:61:5A:99:07:E2:6B:73:B6:D8:51:31:7F:F2:B2:7A:CA:9D:B8:FC:50:56:92:A7	60D6C120 84607AF0	TLS Web Server Authentication, TLS Web Client Authentication, Code Signing

TrustSafe Domain Validated CA	CN=TrustSafe Domain Validated CA,OU=SSL Department,O=Isimtescil Bilisim Anonim Sirketi,L=Istanbul,C=TR	50:AA:20:D9:BE:BB:6D:22:4E:4F:A7:72:CE:B9:01:CA:7B:84:DE:54:5A:0F:4E:F9:4D:BC:E1:AC:41:F7:D0:0D	5A1BDFDC B9826A12	TLS Web Server Authentication, TLS Web Client Authentication
TrustSafe Organization Validated CA	CN=TrustSafe Organization Validated CAOU=SSL Department,O=Isimtescil Bilisim Anonim Sirketi,L=Istanbul,C=TR	C2:B8:70:C3:85:C8:C8:25:0F:2D:50:9A:11:76:4A:3C:13:8D:2A:02:56:6F:36:1C:09:96:AB:CC:8A:00:B3:6A	2CB328C9 D86A55C3	TLS Web Server Authentication, TLS Web Client Authentication

<b>Identification of the Root-CA:</b>	E-Tugra Global Root CA RSA v3			
<b>Distinguished Name</b>	CN = E-Tugra Global Root CA RSA v3 OU = E-Tugra Trust Center O = E-Tugra EBG A.S. L = Ankara C = TR			
<b>SHA-256 fingerprint</b>	EF:66:B0:B1:0A:3C:DB:9F:2E:36:48:C7:6B:D2:AF:18:EA:D2:BF:E6:F1:17:65:5E:28:C4:06:0D:A1:A3:F4:C2			
<b>Certificate Serial number</b>	0D:4D:C5:CD:16:22:95:96:08:7E:B8:0B:7F:15:06:34:FB:79:10:34			
<b>Iden. of the Sub-CA</b>	<b>Distinguished Name</b>	<b>SHA-256 fingerprint</b>	<b>Serial number</b>	<b>Usage Purpose on End Entities</b>
E-Tugra Extended Validated CA RSA v3	CN = E-Tugra Extended Validated CA RSA v3,OU = E-Tugra Trust Center,O = E-Tugra EBG A.S.,L = Ankara,C = TR	5F:4F:81:D8:85:65:3A:50:3A:9E:4D:23:56:19:49:BE:ED:9A:5B:72:34:98:5E:EC:23:00:20:BE:3D:79:1A:81	31:38:FF:98:B1:AC:CC:72:BD:FB:C6:5D:2B:D8:CB:C8:3F:35:FE:CF	Client Authentication, Server Authentication
E-Tugra Organization Validated CA RSA v3	CN = E-Tugra Organization Validated CA RSA v3,OU = E-Tugra Trust Center,O = E-Tugra EBG A.S.,L = Ankara,C = TR	D4:C4:CA:F9:A1:B2:E2:0A:AF:77:E9:39:51:EF:B6:97:3A:3B:AC:9D:26:1D:67:46:AA:C4:A4:9E:07:85:AA:DD	55:E1:B4:43:9D:B2:A1:B7:12:13:48:D6:35:AA:77:12:B6:DF:42:B4	Client Authentication, Server Authentication
E-Tugra Domain Validated CA RSA v3	CN = E-Tugra Domain Validated CA RSA v3,OU = E-Tugra Trust Center,O = E-Tugra EBG A.S.,L = Ankara,C = TR	9D:C9:46:CD:46:62:BE:72:B3:59:70:50:EE:3A:31:7D:83:7A:CC:7C:0F:CE:51:54:D4:68:85:E0:FE:F4:89:39	49:28:FE:65:65:97:40:8D:4D:7A:24:2C:2E:91:BB:E7:FD:CB:0B:D7	Client Authentication, Server Authentication

<b>Identification of the Root-CA:</b>	E-Tugra Global Root CA ECC v3
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<b>Distinguished Name</b>	CN = E-Tugra Global Root CA ECC v3 OU = E-Tugra Trust Center O = E-Tugra EBG A.S. L = Ankara C = TR			
<b>SHA-256 fingerprint</b>	87:3F:46:85:FA:7F:56:36:25:25:2E:6D:36:BC:D7:F1:6F:C2:49:51:F2:64:E4:7E:1B:95:4F:49:08:CD:CA:13			
<b>Certificate Serial number</b>	26:46:19:77:31:E1:4F:6F:28:36:DE:39:51:86:E6:D4:97:88:22:C1			
<b>Iden. of the Sub-CA</b>	<b>Distinguished Name</b>	<b>SHA-256 fingerprint</b>	<b>Serial number</b>	<b>Usage Purpose on End Entities</b>
E-Tugra Extended Validated CA ECC v3	CN = E-Tugra Extended Validated CA ECC v3,OU = E-Tugra Trust Center,O = E-Tugra EBG A.S.,L = Ankara,C = TR	80:D5:4E:E5:4C:A5:64:8C:0E:A1:4F:A5:DF:95:35:CA:53:61:55:CE:90:02:67:CB:E9:AC:B3:9E:18:2E:DC:59	7B:F1:81:E3:25:1F:AB:B7:4C:B8:52:A9:53:62:81:78:DD:7D:D1:94	Client Authentication, Server Authentication
E-Tugra Organization Validated CA ECC v3	CN = E-Tugra Organization Validated CA ECC v3,OU = E-Tugra Trust Center,O = E-Tugra EBG A.S.,L = Ankara,C = TR	87:EC:80:B7:06:20:53:FE:5A:CD:4A:BE:84:B0:1E:BF:34:04:A6:4C:6B:27:C E:AB:53:1E:A7:50:90:AA:43:F1	15:53:3C:F8:96:7C:68:15:1E:89:AA:38:86:BF:4B:92:7E:3E:16:7E	Client Authentication, Server Authentication
E-Tugra Domain Validated CA ECC v3	CN = E-Tugra Domain Validated CA ECC v3 OU = E-Tugra Trust Center O = E-Tugra EBG A.S. L = Ankara C = TR	51:10:1F:AA:96:31:29:31:9A:4A:07:75:3F:B3:BA:D3:90:1C:BA:CF:6F:19:03:9F:A0:E0:56:35:AF:AD:58:FC	4F:EE:B0:CC:9B:2B:77:DB:54:20:CD:4D:64:75:09:E3:B3:B3:2A:DE	- Client Authentication, Server Authentication

## 1.5. Policy Administration

e-tuğra, as the authority that establishes the certificate policy is responsible for the management of this “CP” document.

### 1.5.1. Organization Administering the Document

The security forum formed by e-tuğra staff which is specifically authorized by e-tuğra is responsible for publication, revision, renewal and all related operations of “CP” documents. All rights and responsibilities associated with this document belong to e-tuğra.

### 1.5.2. Contact

Contact information for e-tuğra “CP” follows;

E-Tuğra EBG Bilişim Teknolojileri ve Hizmetleri A.Ş. (E-Tuğra EBG Information Technologies and Services Corp.).

**Address:** Ceyhun Atıf Kansu Cad. Gözde Plaza No:130/58-59 Balgat Ankara

**Phone:** 0-312-473 56 90

**Fax:** 0-312-473 56 91

**Call Center:** 0-850-532 23 14

**Technical Support:** 0-850-532 23 12

E-Mail: [info@e-tugra.com.tr](mailto:info@e-tugra.com.tr) , [destek@e-tugra.com.tr](mailto:destek@e-tugra.com.tr)

Web: <http://www.e-tugra.com.tr> – <http://www.e-tugra.com>

### Revocation Reporting Contact Information

Address: Ceyhun Atif Kansu Cad. Gözde Plaza No:130/58-59 Balgat Ankara

Technical Support: 0-850-532 23 12

E-Mail: [revoke@e-tugra.com.tr](mailto:revoke@e-tugra.com.tr) , [iptal@e-tugra.com.tr](mailto:iptal@e-tugra.com.tr)

Web: <http://www.e-tugra.com.tr> – [https://helpdesk.e-tugra.com.tr/submit\\_ticket](https://helpdesk.e-tugra.com.tr/submit_ticket)

### 1.5.3. Person Determining CP Suitability for the Policy

The compatibility and applicability of this CP document to e-tuğra ECSP certificate processes is audited by authorized e-tuğra management board.

### 1.5.4. “CP” approval procedures

“e-tuğra” authorities conduct audit operations on a regular basis for "CP" document and for “e-tuğra” "TSP" polices. In accordance with the audit outcomes and/or in case of modification on “TSP” operational processes, modification or renewal is done on “CP”. "CP" changes or new versions are submitted to the competent “e-tuğra” security forum and the senior management of security.

## 1.6. Definitions and Acronyms

### 1.6.1. Abbreviations

Abbreviation	Explanation/Definition
"CP"	Certificate Policies
"CPS"	Certification Practice Statement
"CRL"	Certificate Revocation List
"CSR"	Certificate Signing Request
"CSC"	Code Signing Certificate
"CWA"	CEN (Comité Européen de Normalisation) Workshop Agreement
"DN"	Distinguished Name
"DNS"	Domain Name System
"DVCP"	Domain Validation Certificate Policy
"EAL"	Evaluation Assurance Level
"TSP"	Trusted Service Provider
"ETSI TS"	ETSI Technical Specifications
"ETSI"	European Telecommunication Standardization Institute
"e-tuğra"	E-Tuğra EBG Bilişim Teknolojileri ve Hizmetleri A.Ş.
"EV"	Extended Validation
"EVG"	Extended Validation Guidelines
"EVCP"	Extended Validation Certificate Policy
"EVCG"	Extended Validation Certificate Policy Guideless
"DRC"	Disaster Recovery Center
"IDN"	Internationalized Domain Name
"DBA"	Doing Business As
"IETF RFC"	Internet Engineering Task Force Request for Comments
"IETF"	Internet Engineering Task Force

"ISO/IEC"	International Organization for Standardization / International Electrotechnical Committee
"NCP"	Normalized Certificate Policy
"RA"	Registered Authority
"QEC"	Qualified Electronic Certificate
"OCSP"	Online Certificate Status Protocol
"OID"	Object Identifier.
"OVCP"	"Organization Validation Certificate Policy"
"PKI"	Public-Key Infrastructure
"QGIS"	Qualified Government Information Source
"QIIS"	Qualified Independent Information Source
"QTIS"	Qualified Government Tax Information Source
"SSL"	Secure Sockets Layer
"TCKN"	Republic of Turkey the Number of Citizenship
"TSE"	Turkish Standards Institution

### 1.6.2. Definitions

Concept	Explanation/Definition
"Application Methods"	Methods comprising of technical and administrative processes by which an application is made by Applicants to "TSP", necessary documents are drawn up, certificate charges are paid, documents are retained, and certificates are issued and forwarded to certificate owners and aspects such as the procedures over the communication of requests for Revocation, renewal and suspension of certificates. These methods are available at <a href="http://www.e-tugra.com.tr">www.e-tugra.com.tr</a> .
"Archive"	All information, documents and electronic data that TSP has to keep
"Authority" - "Agency" - "Institution"	Information Technologies and Telecommunications Authority
"Certificate Holder" - "Certificate Owner" - "Certificate User"	Natural person or legal entity for which a certificate is issued by TSP. "Certificate Holder", "Certificate Owner" and "Certificate User" used in this document have synonymous meaning.
"Certificate policy"	Rules as a whole which designate the acceptability of certificates in view of implementations which are a certain gathering of security requirements and/or a group of general requirements are called "Certificate policy". "Certificate policy" is a document made public by Trusted service providers, which aim at meeting the objectives outlined above. Certificate users have to comply with CP published by "TSP". CP including any changes thereto which may be introduced from time to time is available on "TSP" web site.
"Certificate Practice Statement "	It is a public statement made by "TSP", which is periodically updated, whereby the requirements which have to be met by each party defined as part of TSP, particularly Certificate Users, in order to achieve designated operations and whereby implementations and procedures are elaborated. CPS including any changes that may be made thereto periodically is available on "TSP" web site.
"Certificate Revocation List"	An electronic file that has been generated, signed and published by the TSP to disclose the revoked certificates to the public.

<b>"Certificate Signing Request" ("CSR")</b>	A certificate request generated by the applicant that is signed by his own private key.
<b>"Code Signing Certificate" ("CSC")</b>	The certificate that verifies the owner of the source code of software that can be executed on a computer.
<b>"Distinguished Name Field" ("DN")</b>	Field that consists of either the subscriber's or the issuer's name on the certificate. It may comprise different subfields like CN, O, OU, T, L and SERIALNUMBER, each of which may exist with the relaxant data depending on the type of certificate.
<b>"Electronic Data"</b>	Records generated, transported or stored in electronic, optical or similar means.
<b>"Electronic Signature Law"</b>	Law no. 5070 of the Republic of Turkey published in the official journal on 15 January 2004.
<b>"Electronic Signature"</b>	Electronic data affixed to other electronic data or having logical association with electronic data and used to authenticate the identification.
<b>"EV SSL"</b>	The SSL certificate issued and maintained in accordance with the "Extended Validity Certificate Policy" defined in ETSI EN 319 411-1 standard and "Guidelines for Issuance and Management of Extended Validation Certificates" published by "CA/Browser Forum".
<b>"Financial Liability Insurance"</b>	Insurance that the TSP should carry to cover the damages that would arise from its failure to perform its obligations under the Law.
<b>"Hashing Algorithm"</b>	An algorithm which is used to produce a fixed length summary of the electronic data to be signed.
<b>"Identification Info"</b>	Certificate User Name of the Person of the TCKN for citizenships of Turkey, passport number, place of birth, date of birth and nationality for others.
<b>"Intermediate Certificate" ("Sub-root Certificate")</b>	Certificate that has been created for the issuing end user certificates, "Trust Center" pursuant to the PKI hierarchy of the TSP, carries the signature of the TSP's root certificate and is used to sign the end user certificates.
<b>"Key"</b>	Any of the public or private keys.
<b>"Law"</b>	Electronic Signature Law of the Republic of Turkey published in the official journal on 15 January 2004.
<b>"On-line Certificate Status Protocol" ("OCSP"):</b>	Standard protocol that has been created to disclose the validity status of certificates to the public and allows receipt of certificate status information by on-line methods instantly and without interruption.
<b>"Premium (OV) SSL"</b>	The SSL certificate issued and maintained in accordance with OVCP in ETSI EN 319 411-1 standard and "Baseline Requirements for the Issuance and Management of Publicly-Trusted Certificates" published by "CA/Browser Forum" and verifies domain names and organization validity.
<b>"Public Key Infrastructure" ("PKI")</b>	The architecture, techniques, practices and procedures that collectively support the implementation and operation of a certificate-based public key cryptographic system and based on cryptographic key pairs having mathematical connection.
<b>"Private Key"</b>	Data such as passwords, cryptographic private keys etc. which are unique, owned and used by the subject to generate an electronic signature; named as signature creation data in the Law.

<b>"Public Key"</b>	Cryptographic key disclosed to the third parties in a public key encryption scheme; named as signature verification data in the Law.
<b>"Qualified Electronic Certificate" ("QEC")</b>	Qualified Electronic Certificate, which is defined by Electronic Signatures Law of Republic of Turkey, applicable for Electronic Signatures in terms of technical considerations.
<b>"Registration Authority"</b>	A unit which is included in the TSP structure, receives certificate applications of certificate subscribers, and renewal applications, directs requests to the issuing "Trust Center", has subunits that handle customer relations under the TSP activities.
<b>"Regulation"</b>	Covers all of <ul style="list-style-type: none"> <li>● Regulation on the Procedures and Principles Applicable for Implementation of the Electronic Signatures Law of Republic of Turkey.</li> <li>● The documents published at <a href="http://www.cabforum.org">http://www.cabforum.org</a> by "CA/Browser Forum" which are called "Guidelines for Issuance and Management of Extended Validation Certificates", Guidelines for the Issuance and Management of Extended Validation Code Signing Certificates" and "Baseline Requirements for the Issuance and Management of Publicly-Trusted Certificates".</li> <li>● Minimum Requirements for the Issuance and Management of Publicly-Trusted Code Signing Certificates, published at <a href="https://aka.ms/csbr">https://aka.ms/csbr</a> (the "Code Signing Minimum Requirements") for Code Signing Certificates are applied.</li> <li>● ETSI EN 319 411-1 and related ETSI EN 319.</li> </ul>
<b>"Revocation Status Log"</b>	A log which includes revocation data for unexpired certificates and allows determining the exact revocation time and is accessible for third persons fast and securely.
<b>"Root Certificate"</b>	A certificate which associates the TSP's institutional identity information with the TSP's public key data, has been generated by the issuing "Trust Center", carries its signature, published by the TSP to verify all certificates issued by the TSP.
<b>"Secure Electronic Signature"</b>	is an electronic signature; <ol style="list-style-type: none"> <li>a) which is exclusively owned by its holder,</li> <li>b) which is developed only by the secure electronic Signature Creation Tool solely available to the signature owner,</li> <li>c) which provides establishment of the identity of the signature owner on the basis of qualified electronic certificate,</li> <li>d) Which provides determination if any changes have later been made to the signed electronic data.</li> </ol>
<b>"Secure Sockets Layer" ("SSL")</b>	A security protocol developed with the purpose of providing data security in internet communications, verifying the server source that serves the data and optionally verifying the client that receives the data.
<b>"Signature Creation Tool"</b>	Software or hardware tool that uses the signature creation data to create an electronic signature.
<b>"Signature Creation Data"</b>	see "Private Key".

<b>"Signature Verification Data"</b>	see "Public Key".
<b>"Signature Verification Tool"</b>	Software or hardware tool that uses the signature verification data to verify an electronic signature.
<b>"Standard (DV) SSL"</b>	The SSL certificate issued and maintained in accordance with DVCP in ETSI EN 319 411-1 standard and "Baseline Requirements for the Issuance and Management of Publicly-Trusted Certificates" published by "CA/Browser Forum" and verifies domain names.
<b>"Subject"</b>	A person or a server name to appear in the CN field of a certificate.
<b>"Time Stamp Policies"</b>	A document which contains general rules regarding the time stamping and services.
<b>"Time Stamp"</b>	An electronic record verified by the TSP to determine the time when an electronic data has been generated and altered.
<b>"Trust Center"</b>	A unit in TSP structure; operates registration of certificates from demands of registry authorities; processes application approvals and issues certificates; operates certificate revocation process; creates, manages and publishes certificate records and records of the certificate revocation status.
<b>"Trusted Service Provider"</b>	A public agency or institution or natural or legal persons in private law authorized to provide electronic certification, time-stamping and electronic signature services.

## 2. PUBLICATION AND REPOSITORY RESPONSIBILITIES

According to the Trusted Service Provider provision, e-tuğra is under obligation of preparing and maintaining necessary documents and records concerning the certification process. Some of these documents and records are published to the public in order to conduct certificate services effectively and to ensure the safety and the continuity of certificate usage.

### 2.1. Repositories

e-tuğra publishes issued Root and Intermediate CA Certificates, “CRLs”, “CPS” and “CP” documents, agreements to be used in TSP operations, informative documents, relevant audio and visual publications in its Repository. The repository is available for access on the basis of 24 hours every day by certificate owners, third parties and any other interested people. The repository services are available 24/7.

e-tuğra does not employ or use a third party, neither a person nor an enterprise, to publish the relevant documents and records.

### 2.2. Publication of Certification Information

All the relevant information about the conduct of certification operations is kept public. The institutional procedures about internal operations of the “TSP” and confidential commercial information are outside this content. The basic information published in repository of e-tuğra is below:

- E-tuğra Root and Intermediate CA Certificates
- E-tuğra Time Stamp and “OCSP” Certificates
- Certificates issued by e-tuğra and those having the written consent of the certificate owner to be published
- E-tuğra’s updated “CRL” files
- E-tuğra’s “CP” and “CPS” documents
- E-tuğra’s Certificate Application Forms, Certificate Agreements
- Corporate Application Agreements
- Documents related to certificate applications
- Informative documents and relevant audio and visual publications

The access to this information referred to in this section is publicly disclosed at e-tuğra’s website <http://www.e-tugra.com.tr>.

The CP and CPS include all the material required by RFC 3647, and are structured in accordance with RFC 3647. CRLs are published in online repositories. The CRLs contain entries for all revoked unexpired Certificates with a validity period that depends on Certificate type and/or position of the Certificate within the Certificate chain.

“e-tuğra” conforms to

- the current version of “Baseline Requirements for the Issuance and Management of Publicly-Trusted Certificates, v.1.8.1” which is published by CA/Browser Forum at <http://www.cabforum.org> for all SSL certificates,
- the current version of “Guidelines for the Issuance and Management of Extended Validation Certificates v.1.7.8” which is published by CA/Browser Forum at <http://www.cabforum.org> for EV SSL certificates (EVG),
- the CA/Browser Forum Guidelines for the Issuance and Management of Extended Validation Code Signing Certificates (the “EV Code Signing Guidelines”), published at [www.cabforum.org](http://www.cabforum.org),

- the Minimum Requirements for the Issuance and Management of Publicly-Trusted Code Signing Certificates, published at <https://aka.ms/csbr> (the “Code Signing Minimum Requirements”),
- CA/Browser Forum Network and Certificate System Security Requirements, and
- other root store policies/programs where “e-tuğra” Root Certificates are embedded

In case of any inconsistency between the Requirements and this CPS, the Requirements take precedence over this document.

### **2.3. Time or Frequency of Publication**

- Any updates in “CP” and “CPS”, new versions of the documents are published in the repository along with their old versions.
- E-tuğra Root and Intermediate CA Certificates and certificates to be published by consent of the certificate owner are published on the day of their arrangement.
- Certificate Status Information’s are published according to sections 4.9.7 and 4.9.10.
- “CRLs” for all SSL and CSC are published at least once every 24 hours in order to be valid for 1 (one) week at the most.

### **2.4 Access Controls on Repositories**

The Repository is available to the access of all concerned parties in a manner to provide service 24 hours every day. Authorized e-tuğra staff conducts regular controls to ensure the authenticity and the validity of the published information in the repository and it takes all security measures.



### 3. IDENTIFICATION AND AUTHENTICATION

“e-tuğra” authenticates the identification of new certificate applicants, renewal requests, or electronic address information of webs, e-mail and similar servers for which certificates will be issued and all related contents included on certificates according to legal and technical requirements based on all necessary documents and official sources.

#### 3.1. Naming

##### 3.1.1. Types of Names

Only the types of names supported by X.500 format are used in certificates.

##### 3.1.2. Requirement for Names to be Meaningful

Names in the issued certificates are meaningful and free from ambiguity.

##### 3.1.3. Anonymity of Certificate Owners, Use of Nicknames, Concealment of the Names of Certificate Owners

e-tuğra does not use anonymous names or nicknames in issued certificates.

According to the Laws and standards, it is not possible to conceal the certificate owner’s name in Premium (OV) SSL, EV SSL and CSCs. For IDNs, e-tuğra includes the Punycode value of the IDN in the Subject name.

##### 3.1.4. Rules for Interpretation of Different Types of Names

Names on issued certificates are interpreted and prepared according to the X.500 distinguished name form.

##### 3.1.5. Uniqueness of Names

e-tuğra ensures that issued certificates allow unique identification of certificate owners with information contained in distinguished name field. For legislative reasons, distinguished name field may vary according to the type of the certificate.

- In Standard, Premium and EV SSL certificates
  - “CN” contains a server name registered in DNS under the name of the subscriber. In Premium wildcard certificates, CN field contains “\*.<DNS name>”. Wildcards are not issued for EV SSL certificates. CN field can’t contain the reserved IP addresses and internal server names. It must be one of the entries in SAN.
  - “L” contains the city of incorporation which is indicated in the Turkish Trade Register.
  - “C” contains a country code of incorporation that is listed in ISO 3166-1 standard.
  - “SAN” contains the “DNS” which is indicated in the “CN” field. Provided that domain name ownership or the authority to control the domain name for server certificates is verified for each domain name, more than one domain name can be written in this field. The constraints which are specified in “CN” are also valid for SAN field.
- In Standard (DV) SSL Certificates, distinguishing the certificate owner uniquely is achieved by the field name to which certificate is issued. For these certificates only domain name verification is

executed and no kind of organizational verification is executed. Because of the verification level of Standard (DV) SSL certificates, only domain name is included in the certificate content and no kind of information regarding the legal entity is included in the certificate content.

- In Premium and EV SSL Certificates, e-tuğra uses a unique name field for legal entities resident in Turkey according to the rules below. In DN field for incorporations:
  - “O” section contains:
    - For Incorporations: The complete name of incorporation as in Turkish Trade Register.
    - For Government Agencies or Public Institutions: Official title in the foundation of the institution which takes place in Organizational Law and related legislations.
    - For Associations, Foundations, Chambers and Unions: Official title in official records.
    - For Business Entities: Official title in up-to-date tax assessment documents.
  - “SERIAL NUMBER” section contains (For Only EV SSL):
    - For Incorporations Companies: contains the unique trade registration number of the center of the incorporation registered in Turkish Trade Register.
    - For Government Agencies or Public Institutions: The unique tax number of certificate owner government institutions.
    - For Associations, Foundations, Chambers and Unions: The unique tax number of certificate owner government institutions.
    - For Business Entities: If applicable (TCKN) Turkish Republic identity number or the unique trade-register number in Turkish Trade Register.

Note: If the registration number is not available, e-tuğra rejects the request.

- “OU ” contains the organizational unit or a trademark which is registered in Turkish Standards Institution. Otherwise, it's not used.
- “GivenName” and “FirstName” if present, natural person Subject’s name (For Premium and EV SSL)
- For Uniqueness of Name in Premium (OV) SSL and EV SSL certificates for commercial entities who are not resident in Turkey the same conditions necessary for Turkish residents are required, according to the local regulation, equivalent official vouchers are demanded.

### **3.1.6. Recognition, Authentication and Role of Trademarks**

“e-tuğra” verifies any DBA included in a Certificate using a third party or government source, attestation letter, or reliable form of identification in accordance with section 3.2.2 of the Baseline Requirements.

“e-tuğra” will require a Tradename Registry Letter for national SSL applications which do not include a country code in the domain name. Also, for international applications an equivalent document of Trademark Registry Letter is required.

Certificate owners are responsible for their trademarks to appear and to be used correctly in a certificate application. It is prohibited for certificate owners to use trademarks which violate intellectual property rights of others. If e-tuğra determines any violation regarding the use of trademark names at any certificate application, it holds the right to deny an application or suspend or revoke a certificate.

### 3.2. Initial Identity Validation

A process is exercised which ensures that the data sources for the validation of certificate content are checked and released in accordance with section 3.2.2.7 of Baseline Requirements.

A procedure is established which ensures that the applicant is contacted via verified communication method defined in 11.5 EVG and can confirm that they are aware of the request and agree to it.

#### 3.2.1. Method to Prove Possession of Private Key

For SSL and CSC certificates, certificate applicants prove their possession of Private Key by submitting PKCS#10 or equivalent file to e-tuğra. In cases where the Private Key is created in the name of the certificate owner, this condition is not valid.

#### 3.2.2. Authentication of Organization Identity and Domain Control

In cases where a certificate contains the name of an organization (legal entity), the following methods of verification apply according to the type of the certificate. This process of verifying a legal entity is conducted according to e-tuğra procedures which are dependent on the predetermined conditions.

##### For All SSL's

For all SSL certificates, “e-tuğra” validates the Applicant’s right to use or control the domain names that will be listed in the Certificate using one or more of the procedures listed in section 3.2.2.4 of the Baseline Requirements. The methods are described in Section 3.2.7 “Authentication of Domain Names”

##### For Standard (DV) SSL

There is no verification of legal identity in Standard (DV) SSL applications.

##### For Premium (OV) SSL and CSC

The name and the title of the legal entity are verified on the basis of official documents of the country of residence of the applicant according to e-tuğra procedures. The e-mail address submitted by the authorized person who conducts the application process on behalf of the certificate owner should be verified by the authorized person.

Validation of the Applicant’s right to use or control the domain names is performed as in standard SSL.

“e-tuğra” verifies the identity and address of the Applicant using the procedures found in section 3.2.2.1 or section 3.2.3 of the Baseline Requirements. Only applications from entities based on or located in Turkey are accepted for Premium (OV) SSL and CSC.

##### For EV SSL and EV CSC

Information concerning organization identity related to the issuance of EV SSL/TLS Server Certificates is validated in accordance with the EV Guidelines

In verification of EV SSL applications at least the following conditions must be met:

- “e-tuğra” maintains the blacklist/banned list and checks whether a certificate applicant is enrolled there if yes, the application is rejected.
- The name or the title, legal existence and physical existence of the legal entity which will take place in the certificate are verified according to the official documents of the country of residence of the applicant. In addition to this verification, a circular of signature or another valid official document in applicable legislation is required in order to show that the certificate applicant is authorized to represent the legal entity and to sign.

- The operational continuity of the certificate applicant is confirmed by a current official document presented by a public institution or by a legally authorized person to settle the official document, and validated from QIIS and QTIS.
- The address of the central office of the legal entity of the certificate applicant is verified according to the legal documents of the country of residence along with QGIS and QIIS entries. Moreover, telephone numbers, submitted by the certificate applicant in application forms are cross-checked by legal records. The applicant is called from the verified telephone number in order to confirm the application.
- The e-mail address submitted by the authorized person who conducts the application process on behalf of the certificate applicant should be verified. This verification is achieved by sending a verification email message to the authorized person.
- The domain name which will take place in the certificate must belong to the legal entity or the right and authority to use the domain name must be given to the legal entity by the domain name's registered owner.
- All of the conditions to be met in the verification of the identity of the legal entity in EV SSL certificate applications and the verification process are conducted according to the "Guidelines for Issuance and Management of Extended Validation Certificates" published by "CA/Browser Forum".
- Validation of the Applicant's right to use or control the domain names is performed as in Standard (DV) SSL.
- Any DBA and/or Assumed names will be included in a Certificate must be proofed and verified using a trusted third party or government source.
- Only applications from entities based on or located in Turkey are accepted for EV SSL and EV CSC.
- Legal existence and physical existence of an entity for OV and EV SSL and Code Signing Certificates: Private Organization are verified by a registration form that was taken in the last 6 months from the Chamber of Commerce. Governmental organizations are validated using the KAYSIS system. For other types of organization, a legal letter taken from a related ministry that was produced in the last 6 month is used.
- Verification of Name, Title, and Authority of Contract Signer and Certificate Approver is done with a Notarized Signature Circulars or a Government based documents or Use of a correspondingly secure login method that identified the signer prior to signing.

E-Tugra established a procedure that covers all above issues and all other verification requirements of EVG 11. It also ensures that the operational existence of the applicant (legal entity) is reliably verified in accordance with EVG 11.6.

The list of QIIS/QTIS/QGIS and Registry Agencies is published on E-Tugra repository.

These are regularly reviewed and updated according to EVG 11.11.5. All data sources are approved by the "e-tugra security board".

### **Others**

For all certificate types if Country is used in Subject; it is verified by using the address of the organization who requested the certificate. If organization name is not used in certificate (a) information provided by the Domain Name Registrar (b) the ccTLD of the requested Domain Name; or (b) the IP Address range assignment by country for either (i) the web site's IP address, as indicated by the DNS record for the web site or (ii) the Applicant's IP address.

### **3.2.3. Authentication of Individual Identity**

The identity of the people applying for a certificate is verified by an official and photographed document such as national identity card, passport, driving license which are all given by legal arrangements. The original official document on which the identity is based during the first application should be presented to e-tuğra or Authorized Registration Units where a photocopy of the official document is taken and it is verified.

When receiving the applications for CSC or EV CSC/SSL with the principal individuals (Business entity) are authenticated/validated face to face at the first application.

For second and subsequent applications, in cases where it passes more than 6 (six) months after the validity period of the last certificate or there is a change of name or information in the “DN” field, face to face authentication is required again.

In other cases where identification is not necessary, identification can be made via telephone, fax or e-mail according to e-tuğra procedures and instructions.

In cases where a professional title needs to be contained in the certificate, there is a need to submit the official documentation according to the applicable legislation.

### **3.2.4. Non-verified Subscriber Information**

Non-verified subscriber information is not used on SSL and KIS certificates.

### **3.2.5. Verification / Proof of Authority**

In cases where the name of a legal entity is to be contained in the certificate, the applicant must submit an official document showing the authority of the applicant to act on behalf of the legal entity.

For Premium (OV) SSL and CSC, there is a need for an official document to support that the applicant has the authority to act on behalf of the legal entity. The request is verified using a Reliable Method of Communication, in accordance with section 3.2.5 of the Baseline Requirements.

For EV SSL and EV CSC, procedures prepared according to the “Guidelines for Issuance and Management of Extended Validation Certificates” published by “CA/Browser Forum” are applied. The request is verified in accordance with section 11.8.3 of the EV Guidelines.

In the case of organizations, proof of their existence and the right of an authorized signatory to represent the organization is verified and confirmed according to section 3.2.2.

In addition to above applicant info, legal entity info etc. are verified from QIIS, QGIS and QTIS entries.

### **3.2.6. Interoperability Criteria**

“e-tuğra” does not make certification transactions for easing interoperability with another Trusted service provider.

### **3.2.7. Authentication of Domain Names**

“e-tuğra” validates the Applicant’s right to use or control the domain names that will be listed in the Certificate using one or more of the procedures listed in section 3.2.2.4 of the Baseline Requirements.

- Email to the Domain Contact by sending a Random Value through email to the Domain Contact and receiving confirmation by their use of the Random Value, performed in accordance with BR Section 3.2.2.4.2;
- Constructed Email to Domain Contact establishing the Applicant's control over the FQDN by sending an e-mail created by using 'admin', 'administrator', 'webmaster', 'hostmaster' or 'postmaster' as the local part followed by the ("@" sign, followed by an Authorization Domain name, including a Random Value in the e-mail, and receiving a response using the Random Value, performed in accordance with BR Section 3.2.2.4.4;
- DNS Change by confirming the presence of a Random Value or Request Token in a DNS CNAME, TXT, or CAA record for either an Authorization Domain Name or an Authorization Domain Name prefixed with a label that begins with an underscore character, performed in accordance BR Section 3.2.2.4.7;
- An Agreed-Upon Change to the Website by the Applicant placing an agreed-upon Request Token or Request Value in the contents of a file (Request Token, Random Value does not appear in the request used to retrieve the file and receipt of a successful HTTP status code response from the request) performed in accordance with BR Section 3.2.2.4.18;
- The other methods are not used in section 3.2.2.4 of the Baseline Requirements.

All of the above methods of validation, may be used for Wildcard Certificate Domain Name ("\*.<DNS name>".) validation along with current best practice of consulting a public suffix list.

No certificates are issued for IP Addresses and Internal Names. All names must be authenticated with methods above.

### **3.3. Identification and Authentication for Re-key Requests**

#### **3.3.1. Identification and Authentication for Routine Re-key**

It's possible to renew or rekey the certificate before the expiration of DV, OV, EV SSL and CSC certificates. Already verified data/information beyond 13 months can't be re-used in both renew and rekey.

If a change in terms and conditions of e-tugra services has occurred in the period between the initial identity verification and the time of re-key request of the applicant, such change is published on the website of e-tugra and the applicant is properly informed.

#### **3.3.2. Identification and Authentication for Re-keying After Revocation of Certificate**

No re-keying is performed after revocation of certificates and the request for re-keying is treated as a new application and all procedures related to certificate application are conducted.

### **3.4. Identification and Authentication for Revocation Request**

Revocation requests for Standard (DV) SSL may be achieved only by the completion of approval operations sent to e-mail addresses taking place in application of certificate. Otherwise, authorization of the revocation request is completed by one of the methods of validation of ownership of the domain defined in section 3.2.2.

For Premium (OV) SSL, EV SSL, "CSC" and EV CSC

- Revocation requests are received in writing signed only by the authorized person to act on behalf of the legal entity. The certificate owner or the authorized persons to represent the

institution can revoke certificates on e-tuğra's web page by verifying the information given at the application.

- If the applicant is the same real person who made the first certificate application, registered subscriber information is used for identification.
- If the applicant is not the real person making the first application, there is a need for an official document to support that the applicant has the authority to act on behalf of the legal entity.

## 4. CERTIFICATE LIFE-CYCLE OPERATIONAL REQUIREMENTS

“e-tuğra” issues certificates and manages the certificate life-cycle in accordance with the policies set forth in this “CP” document.

### 4.1. Certificate Application

#### 4.1.1. Who Can Submit a Certificate Application?

Any legal entity including public institutions and government agencies may apply for Standard (DV) SSL, Premium (OV) SSL, EV SSL, CSC and EV CSC.

"e-tuğra" maintains a Black List in the internal database for previously revoked Certificates and previously rejected certificate requests due to suspected phishing or other fraudulent usage or concerns.

#### 4.1.2. “Certificate” Application, Enrollment Process and Responsibilities

Certificate Application is formed by two steps such as enrollment and key generation. Enrollment is the verification of certificate application based on documents and the registration in a complete and correct manner. Key generation is the issuance of public and private keys by certificate applicant or by e-tuğra. In case of a key generation by the applicant, the public key should be sent to e-tuğra electronically according to procedures and standards.

##### **SSL Application:**

The applications of Standard (DV) SSL, Premium (OV) SSL and EV SSL are all done via e-tuğra’s web site. The generation of public and private key is done by the applicant. During the application, the applicant uploads the CSR necessary for the certificate generation to the system. After the completion of the application, a private code is sent to the e-mail address of manager or technical department which takes place in DNS records in order to verify the Domain Name.

Documents published on e-tuğra’s web site are delivered or sent to one of e-tuğra’s RAs together with the documents showing the authority of the application officials authorized by the application owner. Application owners should agree to a Subscriber Agreement or other applicable terms and conditions during the application process. The application process is ended by inspection and verification of documents according to e-tuğra procedures.

##### **CSC Application:**

The application for “CSC” is done via e-tuğra’s website. The generation of public and private key is done by the applicant. During the application, the applicant installs the CSR necessary for the certificate generation to the system. After the completion of the application, a private code is sent to the e-mail address provided at the time of application approval.

Documents published on e-tuğra’s website are delivered or sent to one of e-tuğra’s RAs. Application owners should agree to a Subscriber Agreement or other applicable terms and conditions during the application process. The application process is ended by inspection and verification of documents according to e-tuğra procedures.



## 4.2. Certificate Application Processing

### 4.2.1. Performing Identification and Authentication Functions

Applications for certificates of Standard (DV) SSL, Premium (OV) SSL, EV SSL CSC and EV CSC are conducted according to policies and relevant e-tuğra procedures explained in section 3.2.

Re-use of validation information is limited to 398 days for Premium (OV) SSL, EV SSL CSC and EV CSC.

“e-tuğra” maintains a database and procedure for identification and additional requirements verification activity for High-Risk Certificate Requests.

### 4.2.2. Approval and Rejection of Certificate Applications

e-tuğra is free to approve or reject the applications made. A certificate application is approved if the following conditions are met:

- One of the application methods which take place in section 4.1.2 should be completed.
- According to the policies explained in section 3.2 and relevant e-tuğra procedures, required forms and documentation should be fully completed.
- Payment of the certificate should be made.

Even if the conditions above are met, occurrence of any of the following conditions leads to the rejection of the application:

- The applicant is not responding satisfactorily or in time to the questions raised for verifying the submitted information and documents.
- In thirty (30) days after the registration of an application of Standard (DV) SSL, Premium (OV) SSL, EV SSL and “CSC”, CSR file is not delivered to e-tuğra.
- For a Standard (DV) SSL, Premium (OV) SSL, EV SSL and “CSC” application, there is a strong belief that issuing such certificates may endanger the reputation of e-tuğra.

For a Standard (DV) SSL, Premium (OV) SSL, EV SSL application containing a new gTLD under consideration by ICANN until the gTLD has been approved.

When the application is for Standard (DV) SSL, Premium (OV) SSL, EV SSL, e-tuğra shall examine the authorized CA register, CAA, according to RFC 6844, and if the CAAs are present but do not allow e-tuğra to issue the certificates because it is not registered, e-tuğra will not issue the certificate but will allow applicants to make another request after e-tuğra has resolved the incident.

The Certification Authority CAA identifying domains for CAs within “e-tuğra” operational control are “e-tugra.com”, “etugra.com”, “e-tugra.com.tr”, “etugra.com.tr”.

e-tuğra does not have to show a valid reason when an application is rejected.

### 4.2.3. Time to Process Certificate Applications

The applications are processed and issued in 1 (one) day for Standard (DV) SSL, in between 3 (three) and 6 (six) days for Premium (OV) SSL and “CSC”, in between 5 (five) and 12 (twelve) days for EV SSL and EV CSC.

Times given in this section about the application processes are applicable only if certificate applications are accurate and flawless according to the policies and e-tuğra procedures in section 3.2.

### **4.3. Certificate Issuance**

#### **4.3.1. Action of “TSP” During Certificate Issuance**

After the approval of the application following the completion of the application processes defined in section 4.2.2, accepted certificates are issued in e-tuğra’s Trust Center.

After the application processes are completed and the applications are accepted, the certificates are issued by passing a two-tier approval process by “e-tuğra’s Secure Staff” within the Trust Center.

#### **4.3.2. Notification to Certificate Owner about the Issuance of Certificate**

After the certificate is issued, the certificate owner is informed by e-mail or SMS message about the issuance of the certificate.

### **4.4. Certificate Acceptance**

#### **4.4.1. Operations Deemed Acceptance of Certificate**

The act of receiving the certificate issued by e-tuğra is deemed as the acceptance of the certificate. For all kinds of certificates, certificate owners are under obligation to review and verify the accuracy of the data in the certificate before installing or using it and to notify e-tuğra and request revocation of the certificate if it includes data that is inaccurate or inconsistent with the information given during the application. If the so-called inconsistency of data is caused by e-tuğra, then the issuance of the new certificate is done by the forms filled out by the applicant.

#### **4.4.2. Publication of Certificates by “TSP”**

“e-tuğra” publishes all CA Certificates in its repository or according to the requirements in section 1.1. “e-tuğra” publishes end-entity Certificates by delivering them to the Subscriber.

#### **4.4.3. Notification of Certificate Issuance to Other Concerned Parties**

Not applicable.

### **4.5. Key Pair and Certificate Usage**

#### **4.5.1. Subscriber Private Key and Certificate Usage**

Certificate Owners are under obligation to use their certificates and their private key in accordance with the obligations cited in relevant Law, Regulation, other regulatory actions, the “CP” and “CPS” documents and the related certificate user agreements. Moreover, if there are limitations regarding the use and the physical content of the certificates, then the certificate should be used within these limitations.

Certificate owner is under obligation to ensure confidentiality and the security of the private key and of the activation data and to prevent any unauthorized use thereof. Certificate owners must immediately inform e-tuğra in case of any suspicion over the confidentiality or security loss, theft or security compromise of the private key, of the signature creation device or of the activation data.

#### 4.5.2. Relying Party Public Key and Certificate Usage

Third parties who will conduct business and transactions relying on the certificates of “e-tuğra” must first check the certificate. Certificate owners are under obligation to use their certificates in accordance with the obligations cited in relevant Law, Regulation, other regulatory actions, the “CP” and “CPS” documents.

If there is any doubt about certificate validity control to be done under secure and appropriate conditions, then third parties take necessary precautions. Before relying on a certificate, third parties should check:

- Whether the certificate is used in accordance with its usage purpose;
- The certificate is not installed on systems such as nuclear facilities, air traffic control, aircraft navigation or weapons control systems where an operational failure may lead to injury, death, or environmental damage;
- Whether the certificate conforms key usage field value,
- Whether the certificate is issued by e-tuğra;
- Whether the certificate, the root and intermediate certificates on which the certificate is based on are valid. (For this issue “e-tuğra” provides uninterrupted CRL and OCSP services).

During these operations third parties are under obligation to use secure software and hardware defined by the legislation and standards.

In cases where the checking and verifying procedures fail, third parties should not rely on these certificates.

“e-tuğra” cannot be held responsible for third parties not fulfilling the conditions about the use of public key and certificate.

#### 4.6. Certificate Renewal

Not Applicable.

##### 4.6.1. Circumstances for Certificate Renewal

Not Applicable.

##### 4.6.2. Who May Request Renewal?

Not Applicable.

##### 4.6.3. Processing Certificate Renewal Requests

Not Applicable.

##### 4.6.4. Notification of Renewed Certificate Issuance to Subscriber

Not Applicable.

##### 4.6.5. Operations Deemed Acceptance of Renewal

Not Applicable.

**4.6.6. Publication of Renewed Certificate by “TSP”**

Not Applicable..

**4.6.7. Notification of Certificate Issuance to Other Participants**

Not Applicable.

**4.7. Certificate Re-key**

Not Applicable.

**4.7.1. Circumstances Requiring Re-keying of Certificates**

Not Applicable.

**4.7.2. Who May Request Certificate Re-keying?**

Not Applicable.

**4.7.3. Processing Certificate Re-keying Requests**

Not Applicable.

**4.7.4. Notification of New Certificate Issuance to Certificate Owner**

Not Applicable.

**4.7.5. Operations Deemed Acceptance of Re-keying of Certificate**

Not Applicable..

**4.7.6. " Publication of the Re-keyed Certificate by “TSP”**

Not Applicable.

**4.7.7. Notification of Certificate Issuance by “TSP” to Other Concerned Parties**

Not Applicable.

**4.8. Certificate Modification****4.8.1. Circumstances Requiring Certificate Modification**

Modifications to the content of a certificate can be made only when the certificate is revoked or there is a change in the content of the certificate by the issuance of a new certificate. Such a modification requires a new certificate application process to be initiated.

**4.8.2. Who May Request Certificate Modification?**

Policies of section 4.1.1 apply.

#### **4.8.3. Process of Certificate Modification Requests**

Policies of section 3.2 apply.

#### **4.8.4. Notification of New Certificate Issuance to Certificate Owner**

Policies of section 4.3.2 apply.

#### **4.8.5. Operations Deemed Acceptance of Modified Certificate**

Policies of section 4.4.1 apply.

#### **4.8.6. Publication of the Modified Certificate by “TSP”**

Policies of section 4.4.2 apply.

#### **4.8.7. Notification of Certificate Issuance by “TSP” to Other Entities**

Not applicable.

### **4.9. Certificate Revocation and Suspension**

#### **4.9.1. Circumstances Requiring Certificate Revocation**

e-tuğra will revoke a certificate within 24 hours after acknowledge and one or more of the following occurs:

- Request by the certificate owner or by the person authorized to represent in writing which can be made via e-tuğra’s official website, call center over phone, by sending e-mail and signing by secure electronic signature or in a written way;
- e-tuğra obtains reasonable evidence that the Subscriber's Private Key corresponding to the Public Key in the Certificate suffered a Key Compromise;
- e-tuğra is made aware of a demonstrated or proven method that can easily compute the Subscriber’s Private Key based on the Public Key in the Certificate (such as a Debian weak key, see <https://wiki.debian.org/SSLkeys>);
- The certificate owner/authorized person/subscriber notifies e-tuğra that the original Certificate request was not authorized and does not retroactively grant authorization;
- e-tuğra obtains evidence that the validation of domain authorization or control for any FQDN or IP address in the Certificate should not be relied upon.

e-tuğra may revoke a certificate within 24 hours and will revoke certificate within 5 days after acknowledge and one or more of the following occurs:

- The certificate no longer complies with requirements defined in section 6.1.5 and 6.1.6 of CA/B baseline requirements or any section of the Mozilla root store policy;
- It is discovered that the certificate is being used to enable criminal activities such as phishing attacks, fraud or the distribution of malware or mis-used;
- It is evident that the certificate has been used in contradiction to the provisions of the “CP” and “CPS” guide documents and Letter of Commitment and Certificate User Agreement;

- e-tuğra confirms any evidences or circumstances showing that use of a FQDN, IP address or email in the certificate is no longer legally permitted (e.g. a court or arbitrator has revoked a Domain Name Registrant's right to use the Domain Name, a relevant licensing or services agreement between the Domain Name Registrant and the Applicant has terminated, or the Domain Name Registrant has failed to renew the Domain Name);
- It is understood that a Wildcard Certificate has been used to authenticate a fraudulently misleading subordinate Fully-Qualified Domain Name;
- There is a change of the information in the content of the certificate or about the certificate owner;
- As a result of "e-tuğra"s sole discretion, during the administration of certificate, detecting non-compliance on the principles of "CPS" guidebooks and on the policies of related "CP". Also, the certificate is not issued in CA/B requirements or related browser policy;
- e-tuğra identifies that the information in certificate is false / incorrect or inaccurate; e-tuğra may be of the opinion that this circumstance took place relying on plausible evidence; moreover, the same circumstance may take place by the notification of the certificate owner or the person authorized to represent;
- The right of e-tuğra to issue certificates under CA/B forum requirements has expired or revoked or terminated, unless e-tuğra has made arrangements to continue maintaining the CRL/OCSP repository;
- Revocation is required by e-tuğra CP and/or CPS;
- e-tuğra confirms a demonstrated or proven method that exposes the certificate owner Private Key to compromise or if there is clear evidence that the specific method used to generate the Private Key was flawed OR Any of the algorithms, or associated parameters or key length, used when creating certificates are compromised or become insufficient for its remaining intended usage;
- The private key has been lost, stolen, disclosed or there is a revelation of a risk of access or use by a third party;
- The certificate owner has lost his/her control over the private key due to the revelation of the activation code or a similar reason;
- The software or hardware in which the private key is located has been lost, broken or become insecure.

e-tuğra will revoke a Subordinate CA Certificate within seven (7) days after acknowledge and one or more of the following occurs:

- e-tuğra obtains request revocation from Subordinate CA in writing;
- The Subordinate CA notifies e-tuğra that the original Certificate request was not authorized and does not retroactively grant authorization;
- e-tuğra obtains evidence that the Subordinate CA's private key corresponding to the public key in the certificate suffered a key compromise or doesn't comply with requirements defined in section 6.1.5 & 6.1.6 of the CA/B forum requirements & any section of the Mozilla Root Store policy;
- e-tuğra obtains evidence that the certificate was misused,
- e-tuğra is made aware that the certificate was not issued in accordance with the BR or the applicable Certificate Policy or Certification Practice Statement documents,

- e-tuğra determines that any of the information appearing in the certificate is inaccurate or misleading,
- e-tuğra or Subordinate CA ceases operations for any reason and has not made arrangements for another CA to provide revocation support for the certificate,
- e-tuğra or Subordinate CA's right to issue certificates under these Requirements expires or is revoked or terminated, unless the Issuing CA has made arrangements to continue maintaining the CRL/OCSP Repository,
- Revocation is required by e-tuğra's Certificate Policy and/or Certification Practice Statement,
- The technical content or format of the server certificate presents an unacceptable risk to Application Software Suppliers or Relying parties.

#### 4.9.2. Who Can Request Revocation?

Certificate revocation requests can be done by the following people:

- Domain name owner or application owner for Standard (DV) SSL,
- The authorized person to represent the certificate owner legal entity for Premium (OV) SSL, EV SSL and EV CSC,
- Public institutions and court authorities which have such authorization,
- E-tuğra staff in necessary circumstances.

Third Parties who are identifying to be a problem with a certificate such as related to fraud, misuse, or compromise.

#### 4.9.3. Procedures for Revocation Request

"e-tuğra" gives certificate revocation service continuously on a 24/7 basis via e-tuğra's support website or email or call center.

For all types of SSL ve CSC certificates, revocation request by certificate owner is taken by call center, "e-tuğra" support web sites, email or with declarative statements. Third Parties may request a revocation via email, or "e-tuğra" support website providing the reason for revocation.

Public revocation contact information is given section 1.5.2.

Revocation requests for Standard (DV) SSL may be achieved by the completion of approval operations sent to email addresses taking place in application of certificate. If this method is not applicable, it can be confirmed with the e-mail addresses in the DNS records of the domain name or FTP or CNAME options. For Premium (OV) SSL, EV SSL, "CSC" and EV CSC,

- Revocation requests are received in writing signed only by the authorized person to act on behalf of the legal entity. After the verification of the written revocation request, the revocation is completed. After this operation, the revocation status is notified to the authorized person.
- If the applicant is the same real person who made the first certificate application, the revocation process is completed by using the confirmation code sent to him via his mobile phone or e-mail registered in the "e-tuğra".
- If the applicant is not the real person making the first application, "e-tuğra" requests and verifies the authorization documents of the applicant for the organization inside the certificate subject.

If the application is received by email, "e-tuğra" support website or call center, a written request signed by the authorized person is received. Third Parties may report a problem in a certificate like related to

fraud, misuse, or compromise via the e-mail, support website or Call Center published for the purpose of revocation.

In cases where there is a security problem on the side of e-tuğra, or a notice is received regarding the existing certificates, or a mistake is found in the certificate issuance process, then e-tuğra may initiate certificate revocation. For this kind of certificate revocations, the outcome is notified to related certificate users by email. In necessary cases, new certificate issuance operations are started after the revocation without asking for a fee.

A revoked certificate cannot become reusable.

In cases where root and intermediate certificates are revoked, the status is notified in electronic media to all related parties immediately in the shortest possible time. End user certificates that have the signature of the revoked root and intermediate certificates are also revoked and users are notified by email.

#### **4.9.4. Certificate Revocation Request Grace Period**

In cases where technical and commercial opportunities are available, the certificate revocation request is processed within the shortest period of time by e-tuğra. After the approval of the certificate revocation request, such certificate is included in the first “CRL” to be published and this period cannot be longer than 24 hours.

Revocation lists are published at <http://crl.e-tugra.com>, <http://crl1.e-tugra.com> addresses for each certificate authority.

#### **4.9.5. Processing Time for Certificate Revocation Request**

“e-tuğra” concludes within the shortest period of time all certification requests sent via web 7 days and 24 hours as long as the request is adequate and the technical and commercial opportunities allow.

For SSL and CSC, revocation requests received via written statement or email or phone or via online section of “e-tuğra” web are taken into process immediately. “e-tuğra” investigates the facts and circumstances involved with the request and will provide a preliminary report on its findings to both the Subscriber and the entity who filed the Certificate problem report.

After the revocation request is approved the certificate takes place in the first “CRL” to be published.

#### **4.9.6. Checking Liability of Third Parties about Revocation**

Third parties are under obligation to check the present validity status of a certificate prior to proceeding with any business or transaction based on a secure electronic signature. Third parties must check certificate validity status by means of “CRL” and “OCSP”. For the purpose of meeting their control obligations specified by “CP”, “CPS” and the Regulations.

#### **4.9.7. Frequency of Publication of Certificate Revocation List (CRL)**

“CRLs” for Standard (DV) SSL, Premium (OV) SSL, EV SSL and “CSCs” are published at least once every 24 hours in order to be valid for 1 (one) week at the most; “CRLs” for intermediate certificates are published when one of immediate certificate is revoked, otherwise once every 6 months in order to be valid for 6 months. E-tuğra provides “CRL” service 24 hours 7 days.

Only exception to the validity period of CRL is the expiry date of root or sub-root certificates. Expiry date of a root or a sub-root certificate is written to the NextUpdate field of the CRL if the next update of the CRL exceeds the validity period of a root or a sub-root certificate.



#### 4.9.8. Timing for Publication of “CRLs”

CRLs are published immediately after they are issued, within 10 minutes at the most at the addresses <http://crl.e-tugra.com> and <http://crl1.e-tugra.com>.

#### 4.9.9. Accessibility to Online Revocation Control

“e-tuğra” provides uninterrupted “OCSP” service ensuring real time certificate revocation status control. “OCSP” service is based on the installation of appropriate software by users to access e-tuğra’s “OCSP” provider, transmission of status control requests and provider sending replies to requests online. Certificate owners and third parties can use the secure electronic signature verification device to make use of “OCSP” service.

Within the scope of “e-tuğra” OCSP service, the responses sent to the client systems are signed using the OCSP responder certificates that are generated for the purpose of signing OCSP responses. Any response for a certificate issued by “e-tuğra” is signed using an OCSP responder certificate that is issued by the root or sub root certificate that issued the queried certificate.

“e-tuğra” operates and maintains its CRL and OCSP capability with resources sufficient to provide a response time of less than ten seconds under normal operating conditions.

#### 4.9.10. Online Revocation Checking Requirements

It is recommended that when inquiring about the status of certificates, third parties should prefer “OCSP”.

Any change on a subscriber and all other type certificate status are published to the OCSP servers automatically.

“e-tuğra” supports an OCSP capability using the GET method for all Certificates. The servers will not respond with a "good" status for a certificate that has not been issued.

#### 4.9.11. Other Forms of Revocation Advertisements Available

“e-tuğra” does not use any other method than “OCSP” and “CRL” for publishing revocation status.

#### 4.9.12. Special Requirements Regarding Key Compromise

For All SSL and CSC Certificates, If “e-tuğra” discovers or suspects that a Private Key has been compromised, it will make commercially reasonable efforts to notify the Trusting Parties. “e-tuğra” will use “key compromise” in a CRL upon discovery of such reason or as required by an applicable CP.

Reports to “e-tuğra” for Key Comprise include:

- The private key itself.
- A valid email address so that confirmation of your problem report and associated certificate revocations will be sent.

“e-tuğra” provides specific instructions and support for Key compromise on the following website: [https://helpdesk.e-tugra.com.tr/submit\\_ticket](https://helpdesk.e-tugra.com.tr/submit_ticket) and other resources as indicated in section 1.5.2 of this CP. Once you submit the ticket on this URL, one can select the right purpose i.e. Certificate Revocation and write more details about the key compromise in the Message section. For other methods pointed in section 1.5.2, more details about the key compromise can be provided.

“e-tuğra” may revoke root and intermediate certificates in case there is a suspicion about the confidentiality and security compromise of the private keys. If root and intermediate certificates are

revoked, all certificates which are issued by these certificates are also revoked. The status of revocation of root and intermediate certificates and of all other certificates issued by them is notified to certificate owners and third parties.

For all certificate revocation operations originating from “e-tuğra”, new certificate issuance operations are started immediately by “e-tuğra”.

In case there is a security problem regarding end user certificates, then such certificates are revoked and certificate owners are informed.

#### **4.9.13. Conditions for Certificate Suspension**

Suspension operations are not applied for SSL and KIS certificates. Suspension operations are not applied for root and intermediate certificates.

#### **4.9.14. Who Can Apply for Suspension?**

Suspension operations are not applied for SSL and KIS certificates. Suspension operations are not applied for root and intermediate certificates.

#### **4.9.15. Process of Certificate Suspension Requests**

Suspension operations are not applied for SSL and KIS certificates. Suspension operations are not applied for root and intermediate certificates.

#### **4.9.16. Limits on Suspension Period**

Suspension operations are not applied for SSL and KIS certificates. Suspension operations are not applied for root and intermediate certificates.

### **4.10. Certificate Status Services**

Certificate status service is given by 2 (two) different methods: Certificate Revocation List (CRL) and Online Certificate Status Protocol (OCSP). Revocation status information includes information on the status of certificates at least until the certificate expires.

#### **4.10.1. Operational Features**

Certificate status checks can be done by “CRLs” and “OCSP”. E-tuğra provides CRL and OCSP services 24 hours 7 days in an uninterrupted way from the following web addresses:

- <http://crl.e-tugra.com>,
- <http://crl1-etugra.com>
- <http://ocsp.e-tugra.com>,
- <http://ocspvs.e-tugra.com>,
- <http://ocspvn.e-tugra.com>

#### **4.10.2. Service Accessibility/Availability**

“e-tuğra” provides “CRL” and “OCSP” services without interruption 24/7. These services are not unavailable for no longer than 1 hour.

In order to prevent “OCSP” services from being interrupted, certificate services offered at e-tuğra’s center are always sustained by a Disaster Rescue Center that has sufficient level of infrastructure for availability, accessibility and start over purposes. In cases where a situation beyond the control of e-tuğra arises that leads to interruption of services, then e-tuğra’s Disaster Rescue Center takes over the management of certification services.

#### **4.10.3. Optional Features**

Not applicable.

#### **4.11. End of Subscription**

Certificate ownership ends upon the expiry of the validity of a certificate or the revocation of a certificate.

#### **4.12. Key Escrow and Recovery**

E-tuğra does not back up or does not store private keys of certificate owners, neither it regenerates, nor it provides data recovery services.

##### **4.12.1. Key Escrow and Recovery Policy and Practices**

Not applicable.

##### **4.12.2. Session Key Encapsulation and Recovery Policy and Practices**

Not applicable.

## 5. FACILITY, MANAGEMENT, AND OPERATIONAL CONTROLS

This section describes the core physical and operational controls and procedures that “e-tuğra” carry out as an “TSP” when delivering certificate services. “e-tuğra” performs its operations regarding network security according to Communication and Operation Management Procedure, meeting the requirements of ETSI EN 319 411-1, Baseline Requirements Network and Certificate System Security documents.

### 5.1. Physical Controls

#### 5.1.1. Site Location and Construction

“e-tuğra” carries out all core “TSP” operations, including certificate life cycle management and key management, within a physically protected “Trust Center” that has various security areas designed to stop, prevent and detect covert or open attacks.

#### 5.1.2. Physical Access

Access to “e-tuğra”s “Trust Center” requires getting past a security system that is protected by multiple security levels. There are two types of security levels: access to the external site and access to the “Trust Center”.

#### 5.1.3. Power and Air Conditions

Uninterrupted power supplies and generators are installed to ensure the uninterrupted operation of the hardware used at the “Trust Center” and for “e-tuğra”s core “TSP” operations. In addition, heating/ventilation/air conditioning systems are also in place to monitor the ambient temperature and relative humidity.

#### 5.1.4. Anti-flood Protection

“e-tuğra”s “Trust Center” is built on the top of the building for protection against flooding and is equipped with appropriate insulation systems. Areas and sections where critical hardware and equipment are located are separated from the plumbing and sewerage systems.

#### 5.1.5. Fire Prevention and Protection

“e-tuğra” has taken all necessary measures to prevent and extinguish fires as well as flames or smoke that can lead to damage. The “Trust Center” is reinforced with additional fire prevention and extinguishing systems.

#### 5.1.6. Data Media Storage Environments

Software and data used in operations as well as all media containing audit, archive or back-up data are stored in the “Trust Center” or in secure environments, accessible by authorized persons only, that are designed to protect the media against any accidents and damage (e.g. water, fire and electromagnetic interferences) and have proper physical access controls in place.

#### 5.1.7. Waste Control

All documents used throughout the certificate life cycle management and in other “e-tuğra” “TSP”

operations and have become ineffective and/or unnecessary are destroyed according to the applicable procedures. Any secure electronic signature creation devices and other relevant cryptographic hardware are physically destroyed or reset according to the manufacturer's instructions. All the other wastes are taken out of the building according to normal waste disposal procedures.

### 5.1.8. Off-site Back-up

To ensure the business continuity of certification management services, "e-tuğra" maintains back-ups of electronic records on-site at the "Trust Center" and off-site, according to the "Business Continuity Plan" and "Disaster Recovery Plan", as a measure against any potential technical breakdowns and/or disasters.

## 5.2. Procedural Controls

### 5.2.1. Trusted Roles

Management controls for certificate life cycle and electronic certificate services, key management controls, and "e-tuğra" management systems and repository controls are conducted by "trusted staff" that have access and control authorization. "Trusted Staff" members are selected among individuals who have adequate knowledge and experience in "PKI" technology, data security and risk management. The following "e-tuğra" "trusted staff" definitions shall apply:

- **Senior Managers:** are responsible for the technical and administrative implementation of "e-tuğra" certificate services.
- **Security Manager:** is "trusted staff" assigned with the duty, power and responsibility to identify, implement, and approve all policies and principles related to the information security management system.
- **Trust Center Manager:** is "trusted staff" responsible for the entire technical management of the security applications.
- **Certificate Operators:** are "trusted staff" assigned and authorized to perform operational processes such as application document controls, certificate registration, certificate issuance, revocation and suspension.
- **Registration Authority (RA) Operators:** are "trusted staff" assigned and authorized to perform operational processes such as application document controls, certificate registration, and revocation and suspension requests.
- **System Administrator (Network and System Administrator):** are "trusted staff" assigned and authorized to install, configure and maintain "e-tuğra"s "TSP" secure systems to deliver certificate services and management. In addition, they are assigned and authorized to use "e-tuğra"s "TSP" secure systems on a daily basis and perform system back-up and recovery.
- **System Auditors:** are "trusted staff" that are assigned and authorized to access "e-tuğra"s "TSP" secure system audit records and archives and ensure their continuity.

"Trusted staff" are selected and assigned among individuals that meet the criteria in Section 5.3 by a manager fully authorized in terms of security.

### **5.2.2. Number of Staff Needed for each Role**

All “e-tuğra”'s critical operational procedures are performed by at least two “trusted staff” in accordance with the relevant instructions. Critical operational procedures are high-security applications that require the use of cryptographic devices.

All issuance, renewal and revocation operations relating to “e-tuğra”'s "TSP" root and intermediate certificates require at least two manager-level “trusted staff” that are duly qualified and authorized.

### **5.2.3. Identification and Authentication for Each Role**

Individuals assigned as “trusted staff” are entered into the security system with their identification and biological data and designated rights. An authority checks and identification is performed before each critical operation. After the authentication is successfully completed, the operation is allowed and logged after completion.

### **5.2.4. Roles Requiring Separation of Duties**

Certificate life cycle management operations, “TSP” key management operations and relevant controls are performed by at least two trusted staff who have different responsibilities. The principle of separating responsibilities prevents a single person from performing the whole or major part of an operation. Each operation is logged to include the date, role and name of the staff performing the operation.

## **5.3. Personnel Controls**

### **5.3.1. Qualification, Experience and Clearance Requirements**

“e-tuğra”'s recruitment policy is built on its “TSP” requirements. The recruitment policy has two sections: the recruitment of general staff and “trusted staff”. “e-tuğra”'s general staff consists of employees assigned to marketing, organizational and administrative roles, without any involvement in the “Trust Center” operations. All recruitments and assignments require a security clearance.

Individuals demonstrating the required qualifications, education and confidentiality are recruited as general “e-tuğra” staff by senior managers.

### **5.3.2. Professional Background Checks**

A series of security and background checks are performed before “e-tuğra” general staff and trusted staff are recruited. These include the primary source verification of references, previous employment, education, qualifications, and criminal record as well as an assessment of technical and administrative suitability.

### **5.3.3. Training Requirements**

Prior to assignment, “e-tuğra” staff receive legal and technical training in “TSP” services, certificate life cycle management services, professional responsibilities, core public key infrastructure framework, Registration Authority and “Trust Center” operations, “e-tuğra” security procedures, and certificate policies. “e-tuğra”'s training are periodically revised and updated as needed.

Registration officers are trained and evaluated enough for the EV certificates validation criteria defined in EVG 14.1.2.

#### **5.3.4. Training Frequency and Conditions**

In addition to the initial training, “e-tuğra” staff receive updated training at regular intervals. The frequency and content of the training are subject to change in line with the organization’s performance analyses. Training may be delivered in the case of any change or update in “e-tuğra”s operations, software and hardware or as needed.

#### **5.3.5. Job Rotation Frequency and Sequence**

“e-tuğra”s management may subject its staff to rotation, as deemed necessary and appropriate, on the basis of their knowledge, skills and experience.

#### **5.3.6 Sanctions for Unauthorised Actions**

“e-tuğra” shall take disciplinary action and exercise the penal clauses laid down in the non-disclosure agreement in the event that the security and operational policies are breached. If “e-tuğra” or its customers incur any damage due to such breach “e-tuğra” may seek indemnification from the individual responsible for the breach.

Legal action shall be taken in the event that unauthorized actions or procedural breaches are included in the crimes defined in the Electronic Signature Law, the Turkish Penal Code (Law) or other relevant laws.

#### **5.3.7. Independent Contractor Requirements**

“e-tuğra” may enter into agreements with independent contractors to perform its “TSP” operations. Such service agreements shall be compatible with “e-tuğra”s security and operational procedures.

Contractor personnel employed for “e-tuğra” operations are subject to the same process, procedures, assessment, security control, skills and training as permanent CA personnel.

#### **5.3.8. Documents Provided to Staff**

“e-tuğra” provides all staff with “CPS” and “CP” documents, procedures related to certificate services, security procedures and instructions as well as specific software and hardware manuals related to their respective roles.

Delegated Third Party’s personnel involved in the issuance of a Certificate must meet the training and skills requirements of Section 5.3.3 and the document retention and event logging requirements of Section 5.4.1.

### **5.4. Audit Logging Procedures**

#### **5.4.1 Types of Logged Events**

All certificate services carried out within the certificate life cycle are logged. The following records relating to “e-tuğra”s “TSP” operations and organizational functions are stored electronically and/or as hard copy and include the description, success/failure status and date of the event as well as information about the individuals related to the event:

- “TSP” key (data) creation, back-up, storage, recovery, archiving and disposal.
- Cryptographic device lifecycle management events
- Certificate application, acceptance/rejection, validation, issuance, renewal, re-keying and revocation.

- Cryptographic device lifecycle management events
- Certificate and “CRL” creation and publication. and OCSP entries
- Successful or unauthorized access attempts to the PKI and other systems.
- System failures, hardware failures and other abnormalities
- All actions performed on systems.
- Staff entries to the “Trust Center” and exits from there.
- Firewall and router activities.
- Visitors’ entries to the “TSP” main facility and exits from there.

#### **5.4.2. Log Processing Frequency**

Audit logs are kept on a continuous basis and reviewed periodically. The audit records are backed up and archived at regular intervals.

#### **5.4.3. Retention Period of Audit Logs**

Once processed, audit logs are maintained and are accessible through the system according to the data processing storage capacity for at least 7 years. All data and documents that must be maintained according to applicable legislation are archived as described in Section 5.5.2.

#### **5.4.4. Protection of Audit Logs**

In order to protect audit logs, physical and logical access controls are used to prevent unauthorized viewing, modification, deletion or any other access to electronic and hard copy audit logs.

#### **5.4.5. Audit Log Back-up Procedures**

Audit logs are periodically backed up on-site at the “Trust Center” and off-site according to the applicable archive procedures.

#### **5.4.6. Audit Data Collection System**

At the time of application, the “TSP” management application automatically generates and saves audit data for electronic actions at the network and operating system level. Audit data pertaining to manual actions are recorded manually by “e-tugra” staff.

#### **5.4.7. Notification to Parties Causing an Event**

When the audit data collection system records a significant event, there is no need to warn the individual, organization or incumbent causing the event. However, depending on the essence and significance of the event the system notifies the senior manager(s) to whom the relevant individual reports.

#### **5.4.8. Security Vulnerability Assessments**

Routine audit log reviews enable the identification of security vulnerabilities in the system and procedures. Appropriate action is taken in case of any vulnerability.

Log monitoring tools alert the appropriate personnel of any events, such as repeated failed actions, requests for privileged information, attempted access of system files, and unauthenticated responses.



“e-tuğra” performs annual risk assessments that identify and assess reasonably foreseeable internal and external threats that could result in unauthorized access, disclosure, misuse, alteration, or destruction of any certificate data or certificate issuance process as discussed on section 8. “

## **5.5. Records Archival**

### **5.5.1. Types of Records Archived**

The following documents and data are backed up and archived according to “e-tuğra”s archive procedures:

- All applications for certificate processes, application agreements, and other relevant agreements and documents.
- Actions and data relating to the issuance, revocation, suspension and renewal of certificates (including the date of the actions and authorized persons carrying out such actions).
- Agreements and major correspondences with customers and business partners.
- All audit logs provided in Section 5.4.
- All certificates and “CRLs”.
- “TSP” root and intermediate certificates after their expiry.
- Requests and verification of requests for revocation, suspension, and removal of suspension as well as the relevant contact information.
- All “CPS” and “CP” documentation published by “e-tuğra” (all published versions).
- All procedures, instructions and forms used by “e-tuğra”.

### **5.5.2. Archive Retention Period**

Records pertaining to all SLL and CSC laid down in Section 5.5.1 must be kept for a period of not less than 10 years.

### **5.5.3. Protection of Archives**

Electronically archived data is protected against any unauthorized viewing, modification, deletion or other access by using physical and logical access controls.

Data entered manually on hard copy documents is protected in physically protected areas accessible only by authorized staff.

### **5.5.4. Archive Back-up Procedures**

As deemed appropriate, “e-tuğra” may keep the back-ups of documents and data on-site at the “Trust Center” and/or off-site, provided that the security level is the same as that of the originals.

Hard copy archives are not backed up.

### **5.5.5. Time-stamping Requirements for Records**

CRLs, other database revocation inputs and any other data and documents deemed necessary by “e-tuğra” contain a time-stamp. Used time data is synchronized with UTC. All records are time-stamped as deemed necessary.

### **5.5.6. Archive Collection System**

The archives are compiled electronically using the “e-tuğra” management systems or manually by authorized persons.

### **5.5.7. Archive Data Access and Verification Procedures**

“CPS” and “CP” documents as well as sample end user agreements are published in the related section of the website (repository). Only “trusted staff” and Information and Communications Technologies Authority officials have access to classified documents. Certificate applications and data pertaining to subscribers and other data can only be accessed by duly authorized corporate applicants, provided that such data is relevant to their entity, “trusted staff”, registration officers, and Information and Communications Technologies Authority officials.

Documents available in the archive shall be kept in a readable format throughout their retention period.

## **5.6. Key Changeover**

Pursuant to the relevant legislation, “e-tuğra” “TSP” root and intermediate certificates shall be valid for not more than 10 years. As deemed necessary for security purposes the validity of the root and intermediate certificates may be extended before their expiration. For continuity of TSP services, new “TSP” root and intermediate key pairs and certificates are created at least 4 years before existing root and intermediate certificates expiration date. The previous keys are stored in a usable manner until the end of the validity. New certificates created after the “TSP” root and intermediate certificate changeover are signed with new intermediate certificates. However, for the purposes of verifying previous certificates, access is made available to previous “TSP” root and intermediate certificates.

## **5.7. Compromise and Disaster Recovery**

### **5.7.1. Incident and Hazard Handling Procedures**

Where incidents that affect security of “TSP” operations occur, all necessary measures are taken in accordance with the “Business Continuity Plan”, “Disaster Recovery Plan”, and other data security management system procedures to resume the safe operation of the system, notify the affected parties and implement all other measures as soon as possible.

Subscribers and third parties can complete the Troubleshooting and Problem Form available on “e-tuğra”’s website to solve any security problems they may encounter while using the certificates. “e-tuğra” assesses all reports made through the website and takes action as needed and provides feedback as soon as possible.

### **5.7.2. Hardware, Software and/or Data Corruption**

Where the hardware, software and necessary data in the “Trust Center” is corrupted the back-up hardware and software is initially put into operation. Where data is lost the back-ups are put into operation and/or re-created according to the “Business Continuity Plan” and “Disaster Recovery Plan”. If the certificate management processes are irreversibly damaged due to unrescuable data the certificates affected from the breakdown are immediately revoked, then new certificates are issued and the relevant parties are notified.

### **5.7.3. Entity Private Key Compromise Procedures**

Where the security of private key in “e-tuğra” “TSP” root and intermediate certificates is compromised, all relevant certificates are immediately revoked and all relevant parties are notified via the website and email according to the “Business Continuity Plan” and “Disaster Recovery Plan”. If appropriate, “e-tuğra” contacts government agencies, law enforcement, application software suppliers and other interested parties with predefined channels and activate any other appropriate additional security measures;

New private key for “e-tuğra” “TSP” root certificates is then generated accordingly. Pursuant to applicable procedures, revoked certificates are replaced with new certificates.

### **5.7.4. Post-Disaster Business Continuity**

In line with the “Business Continuity Plan” and “Disaster Recovery Plan” “e-tuğra” identifies the actions to be taken in the event of incidents that may prevent its operation.

### **5.8. CA or RA termination**

Where “e-tuğra” is obliged to terminate its operations, it shall notify the Information and Communications Technologies Authority of such termination and make a public announcement at least three months in advance pursuant to the applicable “Law” and its Regulations.

If the handover is not completed within the designated deadlines “e-tuğra” shall revoke all relevant certificates and notify all relevant parties through a public release and direct emails to subscribers and corporate applicants. In such a case, “e-tuğra” shall destroy its own private key and back-ups after all certificates are revoked and “CRL” logs are generated.

Standard (DV) SSL, Premium (OV) SSL, EV SSL, CSC and EV CSC subscribers shall be deemed duly notified of the termination through the public release and e-mailing. In this context, the clauses pertaining to “e-tuğra”’s obligations and the issuance of status information for certificates that are still valid shall be regulated in the handover process.

All provisions in this article apply solely to active parties.

## 6. TECHNICAL SECURITY CONTROLS

### 6.1. Key Pair Generation and Installation

#### 6.1.1. Key Pair Generation

The process of generating key pair for e-tuğra's root and intermediate certificates is carried out by at least two pre-chosen and trained "trusted staff" and relevant officials by the use of secure systems that ensure the necessary security and cryptography for the generated keys, and in accordance with the procedures in a technically and administratively secured environment as described in section 5.2.2. Cryptography modules that are used to generate key pairs for e-tuğra's root certificate meet the conditions of FIPS 140-2 Level 3. Digital signing and key pairs of e-tuğra's root and intermediate certificates are generated in accordance with the algorithms and standards stated in ETSI EN 319 411-1, Baseline Requirements, EV Guidelines documents; the activities done during the key generation process are recorded and signed together with the date. These records are kept for audit and monitoring. An external auditor witness is required in generation of any CA keys to be used as publicly trusted root Certificates. The key pair is generated at a secure electronic signature creation device of "TSP" and cannot be taken out except for the aim of backup. In order to keep data of key pair in safe condition, all necessary physical and technical safety measures are taken.

The key pair data of e-tuğra's root certificate are generated within the borders of the Republic of Turkey and they cannot be taken out of these borders in any condition. The validity period of key pair data of e-tuğra cannot exceed 10 years.

"e-tuğra" hardware security modules are kept and run under physical and electronic protection against all types of interference. Backup of data on modules are taken and stored in a safe according to the procedures. The keys on a module that physically need to be replaced, are terminated as stated in section 6.2.10 and the backups that will be used in new modules are stored in a different secure environment.

Server administrators who apply for server certificates and technical administrators who apply for "CSC" are responsible for conducting the key generation securely.

#### 6.1.2. Private Key Delivery to Certificate Owner

Certificate application owners who will apply for Standard (DV) SSL, Premium (OV) SSL, EV SSL, CSC and EV CSC are responsible for a secure key generation during application. "e-tuğra" does not generate Private Keys for publicly trusted SSL certificates.

#### 6.1.3. Public Key Delivery to "TSP"

In cases where key pairs are generated by the certificate application owner, certificate request has to be signed by the private key. In order to provide the security of the requested information and to prevent third parties accessing the requested information, the request should be sent to e-tuğra via secure electronic communications.

#### 6.1.4. "TSP" Public Key Delivery to Users

"TSP" certificates of e-tuğra (root and intermediate certificates) are published at <http://www.e-tugra.com.tr/crt>.

### 6.1.5. Key Sizes

“e-tuğra” selects from the following Key Sizes/Hashes for Root Certificates, Issuing CA Certificates and end entity Certificates as well as CRL/OCSP Certificate status responders. These choices align with the SSL Baseline Requirements, EV Guidelines.

Certificates must meet the following requirements for algorithm type and key size

#### Root CA Certificates

Digest algorithm	SHA-256, SHA-384 or SHA- 512
Minimum RSA modulus size (bits)	4096
ECC curve	NIST P-256, P-384, or P-521

#### Subordinate Certificates

Digest algorithm	SHA-256, SHA-384 or SHA512
Minimum RSA modulus size (bits)	2048
ECC curve	NIST P-256, P-384, or P-521

#### Subscriber Certificates

Digest algorithm	SHA-256, SHA-384 or SHA512
Minimum RSA modulus size (bits)	2048
ECC curve	NIST P-256, P-384, or P-521

The information about the digest algorithm used in certificates issued by e-tuğra is given in section 7.1.3.

### 6.1.6. Parameters for Key Generation and Quality Checking

Key pairs belonging to e-tuğra’s root certificates are generated by “trusted staff” at e-tuğra’s Trust Center or at authorized RAs where physical and technical security conditions are fulfilled. Parameters, algorithms and devices used during the generation process are in accordance with the requirements in the Regulations.

Where key generation takes place on the applicant side for Standard (DV) SSL, Premium (OV) SSL, EV SSL, CSC and EV CSC, the applicant is responsible for generating the private key in appropriate tools and quality. “e-tuğra” checks and verifies the validity of the CSR file sent by the applicant according to key length and other parameters.

### 6.1.7. Key Usage Purposes

End user certificates issued by e-tuğra are only used for verification of signature, identification and authentication.

Keys of subordinate certificates of e-tuğra are used for signing user certificates, “CRLs”, “OCSP” certificates and time stamp certificates. Usage purposes of keys are indicated in key usage fields of certificates.

Keys of OCSP server certificates of “e-tuğra” shall be used for signing OCSP responses.

CA Certificates are not used to sign Certificates except in the following cases:

- Self-signed Certificates to represent the Root CA itself;

- Certificates for Subordinate CAs and Cross Certificates;
- Certificates for infrastructure purposes (e.g., administrative role certificates, internal CA operational device certificates; and
- Certificates for OCSP Response verification

## 6.2. Private Key Protection and Cryptographic Module Engineering Controls

### 6.2.1. Cryptographic Module Standards and Controls

“e-tuğra” uses secure electronic signature creation devices conforming to the standards for CRL signing operations.

“e-tuğra” uses secure cryptographic hardware modules, i.e., HSMs certified at FIPS 140-1 Level 3 to protect signature generation, storage for private key and public key for root and intermediate certificates.

During the whole lifetime of cryptographic hardware modules, the devices are kept under continuous control regarding their functionality and any possible security incident is managed according to the related management procedure.

Private keys in the secure electronic creation devices are prevented from removal, export, modification or copying.

### 6.2.2. Private Key (n\*m) Multi-Person Control

The access to e-tuğra “TSP” private key and public key can be conducted by more than one “secure staff” performing necessary security and identification procedures. In addition to physical and technical access controls, the use of such private keys is only possible by two separate authorized persons connecting to the relevant module and approval by the system.

The access to cryptographic modules where private keys of root and intermediate certificates take place is allowed only by the presence of two authorized persons in a trusted role at the same time.

### 6.2.3. Private Key Escrow

“e-tuğra” does not give “TSP” private keys to any third party, even if the request for access is for official purposes. E-tuğra does not keep or copy private keys of end user certificates.

### 6.2.4. Private Key Backup

“e-tuğra” keeps copies of “TSP” private keys for routine purposes and for protection against disasters. These data are backed up in cryptographic hardware modules and the relevant key storage devices by taking necessary technical and physical security measures, in secure hardware’s that are EAL 4+ or FIPS 140-2 Level 3 certified in an encrypted form according to key generation and backup procedures. These backup copies are kept in safety boxes outside of the “Trust Center”.

In cases when there is a need for key recovery, these backup copies are brought by e-tuğra’s authorized signatory and they can be used only by authorized persons to reload the private keys into the relevant cryptographic hardware modules. These backup and recovery operations for private keys are conducted under the presence of at least two authorized personnel on trusted roles, in a technically and administratively secured environment by the entry of necessary access information.

Private keys of end user certificates are not backed up.

### **6.2.5. Private Key Archival**

Private keys related to e-tuğra “TSP” root and intermediate certificates are not kept for the purpose of forming archives. On the other hand, public keys are kept for further possible conflicts for 20 years. “e-tuğra” does not keep private keys of certificate owners in order to form archives.

### **6.2.6. Private Key Transfer into or from a Cryptographic Module**

“e-tuğra” generates private keys of “TSP” root and intermediate certificates in secure cryptographic hardware modules. These keys cannot in any way be taken out of the module except for transfer into secure modules used for backup purposes. The transfer of private key for backup purposes to another cryptographic module can be conducted under the presence of at least two trusted personnel, in a technically and administratively secured environment. If a Subordinate CA’s Private Key has been communicated to an unauthorized person or an organization not affiliated with the Subordinate CA, then all certificates that include the Public Key corresponding to the communicated Private Key are revoked by “e-tuğra”.

Where key generation takes place on the certificate owner side, it is the certificate owner’s responsibility to ensure the control of the private key and its security during a possible transfer.

### **6.2.7. Private Key Storage on Cryptographic Module**

Private keys of root and intermediate certificates of e-tuğra are stored on cryptographic hardware modules where they are generated and which have security levels specified in the Regulations.

### **6.2.8. Method of Activating Private Key**

The activation of private keys of e-tuğra’s root and intermediate certificates can be conducted in the presence of more than one authorized “trusted staff”, under appropriate technical and physical security measures, by the entry of necessary access information.

The activation of private keys of Standard (DV) SSL, Premium (OV) SSL, EV SSL, CSC and EV CSC is done on the software and hardware of the certificate owner and it is under the responsibility of the certificate owner.

The certificate owner is responsible for an unauthorized use of the activation data by third parties and for taking necessary measures to prevent data theft or loss.

### **6.2.9. Method of Deactivating Private Key**

Private keys of e-tuğra’s root certificates are kept active only during its usage; when the usage is completed, they are out of active status.

### **6.2.10. Method of Destroying Private Key**

Private keys and backups of e-tuğra’s root certificates are destroyed upon expiry of the validity term of the certificate or because of necessary technical and security measures, only by multiple authorized “trusted staff” under appropriate technical and physical measures; the operations performed are logged according to the procedures.

Private keys belonging to certificates of Standard (DV) SSL, Premium (OV) SSL, EV SSL, CSC and EV CSC are under the responsibility of the certificate owner.

### **6.2.11. Operational Limits of Cryptographic Module**

Private keys of e-tuğra are generated and stored according to the security level specified in the Regulations.

## **6.3. Other Aspects of Key Pair Management**

### **6.3.1. Public Key Archival**

“e-tuğra” root and intermediate certificates, end user certificates and relevant public keys are stored for at least 10 years. During this storage period, all necessary measures are taken in order to ensure the data integrity.

### **6.3.2. Operational Period of the Certificate and Key Pair Usage Period**

The validity term of certificates ends upon the expiry date or when it is revoked. The validity period of the key pair is the same as the relevant certificate, but the public key can be used for the verification of the signature. The validity terms of e-tuğra’s certificates are determined at the certificate application by certificate owner, corporate application owner and/or the authorized person.

“e-tuğra” terminates the functionality of the private key to sign certificates at an appropriate date before the validity term of the certificate ends.

The validity term of e-tuğra’s root certificates cannot exceed 25 (twenty-five) years.

The validity term of e-tuğra’s intermediate certificates cannot exceed 10(ten) years.

The validity term for Standard, Premium and EV SSL certificates is 1 (one) year and it cannot exceed 13 (thirteen) months.

The validity term for CSC and EV CSC is 1 (one) year, 2 (two) years or 3 (three) years and it cannot exceed 39 (thirty-nine) months.

The validity term for other certificates cannot exceed 1 (one) and it cannot exceed 13 months.

## **6.4. Activation Data**

Activation data are passwords and access codes used by “trusted staff” in operations requiring technical security; passwords for cryptographic modules where private keys of root and intermediate certificates take place.

### **6.4.1. Activation Data Generation and Installation**

The generation of the keys of e-tuğra’s root and intermediate certificates and the creation of access codes to them is done according to the ceremony described in the relevant e-tuğra procedure. The use of private keys of root and intermediate certificates is described in section 6.2.2.

Certificate owners of Standard (DV) SSL, Premium (OV) SSL, EV SSL, CSC and EV CSC are responsible for creation and protection of the access passwords belonging to their certificate keys.

### **6.4.2. Activation Data Protection**

Private keys belonging to e-tuğra root and intermediate certificates are stored according to procedures.



While creating their access passwords, e-tuğra recommends that an access password should be at least 6 (six) characters long, a character in it should not be repeated, not to use birth date, name and data which can be easily guessed. E-tuğra recommends to change the activation data at least once in 6 (six) months and determine a new activation data to all certificate owners.

#### **6.4.3. Other Aspects of Activation Data**

Not applicable.

### **6.5. Computer Security Controls**

#### **6.5.1. Specific Computer Security Technical Requirements**

All tasks and operations carried out within the process of e-tuğra “TSP” are performed in accordance with information security management requirements. “e-tuğra”’s information security management requirements are met by the use of secure and licensed software and hardware, the containment of attack detection systems in the network, access and operation control through identification methods based on information and ownership, storage and backup of all necessary operations and records.

#### **6.5.2. Operational Limits of Computer Security**

Not applicable.

### **6.6. Life Cycle Technical Controls**

#### **6.6.1. System Development Controls**

System development controls of e-tuğra’s certificate life cycle are conducted according to quality management procedures of e-tuğra and risk reducing methods which arise as a result of TS ISO/IEC 27001 audits.

"e-tuğra" has mechanisms in place to control and monitor the acquisition and development of its CA systems. "e-tuğra" only installs software on CA systems if the software is part of the CA’s operation. CA hardware and software are dedicated to performing operations of the CA.

#### **6.6.2. Security Management Controls**

“e-tuğra” executes routine internal audit procedures to ensure the safety of operations controls of certificate life cycle management; also, in accordance with the compliance controls for ISO / IEC 27001, subject to the supervision of the independent auditor for safety management controls once a year.

"e-tuğra" has mechanisms in place to control and monitor the security-related configurations of its CA systems. All system checks and monitors are performed according to predeveloped procedures and instructions in yearly, quarterly or monthly time plans.

#### **6.6.3. Life-cycle Management Controls**

Not applicable.

### **6.7. Network Security Controls**

Key generation, certificate life cycle management and other systems of e-tuğra “Trust Center” have the required network security infrastructure. In providing network security, hardware such as firewalls,

switches and routers are structured with necessary configurations. E-tuğra's "Network Security Management" is conducted according to "Network Management Procedures". In case where RAs transmit data to the "Trust Center", an electronic environment, they use secure network connection. According to the related procedures, such network elements are constantly monitored, internal or external attacks and unauthorized access attempts are detected and by means of other security controls intrusions are blocked. Furthermore, it is ensured to resolve the found vulnerabilities and breaches as a result of the systemic vulnerability and penetration tests.

Any kind of external access to the "e-tuğra" network is ensured via encrypted channels and only access to the provided services is allowed. Access to the systems which have sensitive data can be performed only by authorized networks that are present in the Trust Center.

Registration authorities under "e-tuğra" communicate records relating to their certification operations to "e-tuğra" over the Internet by secure network connection.

"e-tuğra" performs its operations regarding network security according to Communication and Operation Management Procedure, meeting the requirements of ETSI EN 319 411-1, Baseline Requirements, EV Guidelines and Network and Certificate System Security documents.

### **6.8. Time-Stamping**

During the certification services of e-tuğra, electronic records for relevant operations contain time information synchronized by the time source used for time stamping services. Data integrity is preserved by keyed hash method and time stamping is used at the phase of preparing archives.

## 7. CERTIFICATE, CRL, AND OCSP PROFILES

### 7.1. Certificate Profile

“e-tuğra” certificate profiles are based on the documents “ISO/IEC 9594-8/ ITU-T Recommendation X.509: “Information Technology- Open Systems Interconnection-The Directory: Public –key and attribute certificate frameworks” and “IETF RFC 5280: “Internet X.509 Public Key Infrastructure Certificate and Certificate Revocation List (CRL) Profile”.

On issuer field of certificates, “e-tuğra” is written as “O=E-Tuğra EBG Bilişim Teknolojileri ve Hizmetleri A.Ş.” or “E-Tugra EBG A.Ş.”.

#### 7.1.1. Version Numbers

Root and sub-root certificates and end user certificates issued by “e-tuğra” support the X.509 v3 version pursuant to the “IETF RFC 5280 Internet X.509 Public Key Infrastructure Certificate and Certificate Revocation List (CRL) Profile” document.

#### 7.1.2. Certificate Extension

On “e-tuğra” root certificates and all other certificates, all extensions are supported in the X.509 V.3 (2000) and ETSI TS 101 862.

“e-tuğra” certificates basically contain the following fields;

- **Serial Number:** is an unique number within issuer scope, and is a non-sequential number greater than 0 containing at least 64 bits of output from a CSPRNG
- **Start of Validity:** UTC time encoded in accordance with RFC 5280
- **End of Validity:** UTC time encoded in accordance with RFC 5280
- **Public Key:** Key value encoded in accordance with RFC 5280
- **Signature:** Signature value encoded in accordance with RFC 5280.

In all certificate types, the following extensions are contained by certificates as standard fields:

- **Authority Key Identifier:** Public key hash value of the issuer “e-tuğra” certificate.
- **Subject Key Identifier:** Public key hash value of the certificate.
- **Basic Constraints:** CA marked as “false”.
- **CRL Distribution Points:** URL of the CRL signed by the issuer of the certificate.
- **Authority Information Access:** URL Addresses of the “e-tuğra” issuer certificate and the “e-tuğra” OCSP service.

Root Certificates are issued by “e-tuğra” according to Baseline Requirements (BR) 7.1.2.1 and RFC 5280

Subordinate CA Certificates are issued by “e-tuğra” according to Baseline Requirements (BR) 7.1.2.2 and RFC 5280. e-tuğra ensures that any Subordinate CA Certificates created after January 1, 2019 for publicly trusted certificates, with the exception of cross- certificates that share a private key with a corresponding root certificate: will contain an EKU extension; and cannot include the anyExtendedKeyUsage KeyPurposeId, and e-tuğra no longer includes both the id-kp- serverAuth and id-kp-emailProtection KeyPurposeIds in the same certificate.

According to certificate type the following extensions are set if needed,

- Key Usage,
- Certificate Policies,
- Subject Alternative Name,
- Extended Key Usage.

All other fields and extensions are set in accordance with RFC 5280.

### 7.1.3. Algorithm Object Identifiers

“e-tuğra” uses the following algorithms and indicates their object identifiers on signing certificates, with the condition of the complying the regulations subject to and the up-to-date documents “Guidelines for Issuance and Management of Extended Validation Certificates” and “Baseline Requirements for the Issuance and Management of Publicly-Trusted Certificates,” and other Guides published by “CA/Browser Forum” on <http://www.cabforum.org>,

- SHA256WithRSAEncryption {iso(1) member-body(2) us(840) rsads (113549) pkcs(1) pkcs-1(1) 11}
- SHA384WithRSAEncryption {iso(1) member-body(2) us(840) rsads (113549) pkcs(1) pkcs-1(1) 12}
- ECDSAWithSHA256 {iso(1) member-body(2) us(840) ansi-X9-62 (10045) signatures(4) ecdsa-with-SHA2(3) 2 }
- ECDSAWithSHA384 {iso(1) member-body(2) us(840) ansi-X9-62 (10045) signatures(4) ecdsa-with-SHA2(3) 3 } ECDSAWithSHA512 {iso(1) member-body(2) us(840) ansi-X9-62 (10045) signatures(4) ecdsa-with-SHA2(3) 4 }

### 7.1.4. Name Forms

Certificate names issued by “e-tuğra” conform to the format of X.500 distinguished names.

On issuer field, “e-tuğra” is written in “O” (organization) as value “O=E-Tuğra EBG Bilişim Teknolojileri ve Hizmetleri A.Ş. “

The content of the Certificate Issuer Distinguished Name field MUST match the Subject DN of the Issuing CA to support Name chaining as specified in RFC 5280

### 7.1.5. Name Constraints

The anyExtendedKeyUsage KeyPurposeId MUST NOT appear within the extended key usage field of subordinate CAs..

If the Subordinate CA Certificate includes the id-kp-serverAuth extended key usage, then a technically constrained Subordinate CA Certificate includes the Name Constraints X.509v3 extension with constraints on dNSName, iPAddress and DirectoryName as follows:

- For each dNSName in permittedSubtrees, the “e-tuğra” confirms that the Applicant has registered the dNSName or has been authorized by the domain registrant to act on the registrant's behalf in line with the verification practices of Baseline Requirements section 3.2.2.4.
- For each iPAddress range in permittedSubtrees, “e-tuğra” confirms that the Applicant has been assigned the iPAddress range or has been authorized by the assigner to act on the assignee's behalf.
- For each DirectoryName in permittedSubtrees the “e-tuğra” confirms the Applicant’s and/or Subsidiary’s Organizational name(s) and location(s) such that end entity certificates issued from the subordinate CA Certificate will comply with section 7.1.2.4 and 7.1.2.5 of the Baseline Requirements. If the Subordinate CA Certificate is not allowed to issue certificates with an iPAddress, then the Subordinate CA Certificate specifies the entire IPv4 and IPv6 address

ranges in excludedSubtrees. The Subordinate CA Certificate includes within excludedSubtrees an IPAddress GeneralName of 8 zero octets (covering the IPv4 address range of 0.0.0.0/0). The Subordinate CA Certificate also includes within excludedSubtrees an IPAddress GeneralName of 32 zero octets (covering the IPv6 address range of ::0/0). Otherwise, the Subordinate CA Certificate includes at least one IPAddress in permittedSubtrees.

If the Subordinate CA is not allowed to issue certificates with dNSNames, then the Subordinate CA Certificate includes a zero-length dNSName in excludedSubtrees. Otherwise, the Subordinate CA Certificate includes at least one dNSName in permittedSubtrees.

#### 7.1.6. Certificate Policy Object Identifier

In the “certificate policy” extension of certificates, the relevant certificate policy object identifier number (OID) indicated in Section 1.2 of this document is used according to certificate type.

#### 7.1.7. Usage of Policy Constraints Extension

On sub-root certificates, policy constraints extension may be contained if necessary.

#### 7.1.8. Policy Qualifiers Syntax

In the “certificate policy” extension of certificates, the access URL information for the CPS document has been provided as policy qualifier.

#### 7.1.9. Processing Semantics for the Critical Certificate Policies Extension

Not Applicable.

### 7.2. “CRL” profile

“e-tuğra” arranges CRLs appropriate to RFC 5280. CRLs contain “e-tuğra” electronic signature, CRL’s date of publication, date of publication for the next CRL, and serial numbers of revoked certificates and dates and times of revocation.

#### 7.2.1. Version Number

CRLs published by “e-tuğra” are prepared in accordance with the format ITU X.509 V.2. CRLs that may contain the following fields per requirements.

- **Issuer:** The Subject DN of the issuing CA
- **Effective date:** Date and Time
- **Next update:** Date and Time
- **Signature Algorithm:** Depending Issuer CN
  - sha-256WithRSAEncryption [1 2 840 113549 1 1 11];
  - sha-384WithRSAEncryption [1 2 840 113549 1 1];
  - sha-512WithRSAEncryption [1 2 840 113549 1 1 13];
  - ecdsa-with-sha256 [1 2 840 10045 4 3 2]; OR
  - ecdsa-with-sha384 [1 2 840 10045 4 3 3]
- **Signature Hash Algorithm:** sha256 etc. (Depending upon CA)
- **Serial Number(s):** List of revoked serial numbers
- **Revocation Date:** Date of Revocation

### 7.2.2. CRL and CRL Entry Extensions

On CRLs published by “e-tuğra”, Extensions defined in RFC 5280 are used.

CRLs have the following extensions:

- **CRL Number:** Increasing serial number for each CRL
- **Authority Key Identifier:** AKI of the issuing CA for chaining/validation requirements
- **ReasonCode:** Identifies the reason for the Certificate revocation.

The extension is present for a CRL entry for a Root CA or Subordinate CA Certificate, including Cross Certificates. Supported values are keyCompromise (1), affiliationChanged (3), superseded (4), cessationOfOperation (5).

The extension may be present for a CRL entry for a Subscriber end entity Certificate. Supported values are keyCompromise (1), affiliationChanged (3), superseded (4), certificateHold (6).

The value certificateHold (6) is not supported for SSL Certificates.

The encoding of the issuer field in the CRL is byte-for-byte equivalent with the encoding of the issuer in the certificate.

### 7.3. “OCSP” profile

OCSP is an uninterrupted on-line certificate status protocol. OCSP responses comply with the requirements of Baseline Requirements. “e-tuğra” operates an Online Certificate Status Profile (OCSP) responder in compliance with RFC 6960 / RFC 5019 and highlights this within the AIA extension via an OCSP responder URL.

“e-tuğra” issues OCSP responses with following fields:

- Responder ID SHA-1: Hash of responder’s Public Key
- Produced Time: The time at which this response was signed
- Certificate Status: Certificate status referenced (good/revoked/unknown)
- ThisUpdate/NextUpdate: Recommended validity interval for the response
- Signature Algorithm: SHA1 RSA, SHA256 RSA etc. (depending upon product)
- Signature: Signature value generated by the responder
- Certificates: The OCSP Responder’s Certificate

An OCSP request must contain the following data:

- Protocol version
- Service request
- Target Certificate identifier

Following fields are supported:

- Revocation Reason Identifies the reason for the Certificate revocation. The CRLReason indicated contains a value permitted for CRLs, as specified in Section 7.2.2.

“e-tuğra” responds “unknown” for non-issued Certificates

#### 7.3.1. Version Number

“e-Tuğra” configures OCSP responses in accordance with industry standards.

### 7.3.2. “OCSP” Extensions

The singleExtension of an OCSP response cannot contain the reasonCode (OID 2.5.29.21) CRL entry extension for TLS certificates.

## 8. COMPLIANCE AUDIT AND OTHER ASSESSMENTS

Pursuant to the provisions of the Electronic Signature legislation “e-tuğra”s “TSP” services and operations are subject to audits carried out by the Information and Communications Technologies Authority. Furthermore, the Information and Communications Technologies Authority audits “e-tuğra”s compliance to applicable standards and legislation at least once every two years.

Pursuant to the ETSI EN 319 411-1 standard and TS ISO/IEC 27001 certification “e-tuğra”s “TSP” processes are subject to audits for data security periodically. In addition, according to the TS ISO/IEC 27001 Information Security Management System certification risk assessments are performed. Consequently, business risks are analyzed and the security conditions and operating procedures needed are identified. The risk analysis is updated regularly and updated as needed.

Pursuant to Standard ETSI EN 319 411-1, the Standard (DV) SSL, Premium (OV) SSL, EV SSL, CSC and EV CSC processes are subject to audits by an authorized independent auditor.

In addition to the above compliance audits, “e-tuğra” staff continuously carry out internal audits.

### 8.1. Frequency or Circumstances of Assessment

The Information and Communications Technologies Authority decides on the frequency of the audits, which are conducted at least once every two years. During the audit, any request from the auditors to access all documents and records, management areas, buildings and extensions, collect written and oral information, take samples, and audit operations must be fulfilled.

The compliance audits for the TS ISO/IEC 27001 certification are carried out on an annual basis.

Pursuant to the ETSI EN 319 411-1 audit standard, Standard (DV) SSL, Premium (OV) SSL, EV SSL, CSC and EV CSC services are subject to full audits on an annual basis.

Apart from periodic internal audits, authorized “e-tuğra” staff may conduct internal audits as needed.

### 8.2. Identity/Qualifications of Assessor

The Information and Communications Technologies Authority’s audits are carried out by authorized Agency personnel.

The compliance audit for the TS ISO/IEC 27001 certification is carried out by an authorized auditor.

The auditor to conduct the ETSI EN 319 411-1 audit must be competent in the areas of Public Key Infrastructure (“PKI”) technology, information security systems and techniques, information technologies and security controls, and third-party independent reporting. In addition, the auditor conducted in accordance with any one of the ETSI standards) must accredited in accordance with ISO 17065 applying the requirements specified in ETSI EN 319 403;

Internal “e-tuğra” audits are carried out by authorized “e-tuğra” “trusted staff”.

### 8.3. Assessor's Relationship to Assessed Entity

The Information and Communications Technologies Authority determines the principles and procedures governing the audits that it carries out.

The TS ISO/IEC 27001 certification audit is carried out by an independent auditor.

The ETSI EN 319 411-1 audit is carried out by an independent and authorized auditor.

“e-tuğra”s “trusted staff” carry out internal “e-tuğra” audits.



#### 8.4. Topics Covered by Assessment

The Information and Communications Technologies Authority carries out audits to determine whether “e-tuğra” fulfills its statutory obligations related to electronic signatures.

The TS ISO/IEC 27001 certification audits cover “e-tuğra”s “Trust Center” operations and “TSP” operations.

The ETSI EN 319 411-1 audit covers all standard processes related to Standard (DV) SSL, Premium (OV) SSL, EV SSL, CSC and EV CSC services as well as the technical infrastructure and facilities used to deliver these services.

“e-tuğra”s internal audits cover all provisions related to controls laid down in the ISO/IEC 27001 and ETSI EN 319 411-1 standards.

#### 8.5. Actions Taken as a Result of Deficiency

In the event that any non-conformity is identified during “e-tuğra”s internal audits, the authorized “e-tuğra” staff shall take corrective and preventive action as soon as possible.

“e-tuğra” shall correct any minor non-conformities identified during the TS ISO/IEC 27001 audits until the next audit. The certificate shall be revoked in the case of any major non-conformity.

“e-tuğra” shall correct any minor non-conformities identified during the audits for compliance to the ETSI EN 319 411-1 standards until the next audit. The certificate may be revoked in the case of any major non-conformity, depending on the nature of the non-conformity.

If “e-tuğra” fails to fulfill its obligations arising from the legislation and applicable standards, as identified during the Information and Communications Technologies Authority’s audits, the sanctions and penalties laid down in the applicable legislation shall be imposed on “e-tuğra”.

#### 8.6. Communication of Results

The results of the audit conducted by the Information and Communications Technologies Authority pursuant to the Law shall be officially notified to “e-tuğra” if deemed necessary. The absence of any feedback from the Authority shall be construed to mean that there is no negative assessment.

The auditing body conducting the TS ISO/IEC 27001 audits shall submit the results to “e-tuğra”. The results of internal “e-tuğra” audits are submitted to the management team and relevant “trusted staff”.

The auditing body conducting the ETSI EN 319-411-1 audits shall submit the results to “e-tuğra” and to the browsers via a letter that they accepted.

The results of internal “e-tuğra” audits are submitted to the management team and relevant “trusted staff”. The results of internal audits are published in the internal audit reports and submitted to the relevant authorities for review.

#### 8.7. Self-Audit

“e-tuğra” performs regular internal audits for validations against a randomly selected sample of at least three percent of its server and code signing Certificates Certificate types certificates issued since the last on quarterly basis, internal audit. Self-audits on these Certificates are performed in accordance with Guidelines adopted by the CA / Browser Forum.

## 9. OTHER BUSINESS AND LEGAL MATTERS

### 9.1. Fees

#### 9.1.1. Certificate Issuance and Renewal Fees

Certificates issued by “e-tuğra” are priced according to their validity, the extent of the material transactions limits, the issuance costs, and market conditions. The material transaction limits and certificate financial and commercial general liability insurance premiums are reflected in the certificate prices. Current certificate fees are published on “e-tuğra”'s website and other appropriate communication channels.

#### 9.1.2. Certificate Access Fees

No access service fees shall be charged for certificates made publicly available by “e-tuğra” subscribers.

#### 9.1.3. Revocation and Status Data Access Fees

“e-tuğra” communicates revocation and status data to the relevant parties for the certificates it issues through “CRLs” and “OCSPs”. “e-tuğra” does not charge any access fees for access to “CRLs” and “OCSPs”.

#### 9.1.4 Fees for Other Services

“e-tuğra” does not charge any fees for manuals and documents such as “CP”, “CPS”, subscriber and certificate user agreements that it publishes pursuant to applicable laws and practices. Fees applicable to all other value added products and services offered to customers are published on “e-tuğra”'s website and through other communication channels.

“e-tuğra” does not allow usage of the documents except reproduction, distribution, and processing of its documents for the purpose of reviewing certificates or for certificate processes.

#### 9.1.5. Refund Policy

“e-tuğra” does not refund certificate service fees.

Only in cases where the certificate contains information different than that on the application due to “e-tuğra”, the certificate shall be revoked and a new certificate shall be issued upon application without any fee whatsoever.

The fee for the remaining validity of a revoked certificate, starting from the date of revocation, shall not be refunded or set-off.

Certificate applications that are rejected as a result of “e-tuğra”'s conduct shall be refunded upon request.

### 9.2. Financial Responsibility

Pursuant to the ETSI EN 319 411-1 and CAB Forum Documents standard “e-tuğra” carries commercial general liability insurance and professional liability insurance for Standard (DV) SSL, Premium (OV) SSL, EV SSL, CSC and EV CSC services.

### **9.2.1. Insurance Coverage**

Standard (DV) SSL, Premium (OV) SSL and EV SSL certificates are covered by commercial general liability insurance and professional liability insurance. The commercial general liability insurance covers legal liabilities for all types of damages arising directly or indirectly from SSL services. Professional liability/errors and omissions insurance cover legal liabilities for damages arising as a result of “e-tuğra”’s professional activities in relation to the SSL services.

### **9.2.2. Other Assets**

Not applicable.

### **9.2.3. Scope of Insurance or Warranties for End Users**

See Section 9.2.1.

## **9.3. Confidentiality of Business Information**

### **9.3.1. Scope of Confidential Information**

Confidential information includes: all information and documents deemed confidential for data security purposes as part of “e-tuğra”’s technical and operational activities; business plans; sales information; partnership agreements; all classified information and documents pertaining to the commercial activities of business partners; root and intermediate certificate private key; action logs; information pertaining to subscribers deemed “personal data” pursuant to the “Law”; audit and assessment records; all confidential information and documents related to the “Trust Center”; technical security data related to hardware and software; access passwords to on-site areas and devices; and, facility layout and interior design plans.

### **9.3.2. Non-Confidential Information**

Non-confidential information includes: information such as “CPS” and “CP” documents that need to be made public pursuant to the Law and practices and which are available on “e-tuğra”’s website and repository; certificates published by “e-tuğra” in a public directory upon the subscriber’s consent; “e-tuğra”’s root and sub-root certificates; and “CRLs”.

### **9.3.3. Responsibility to Protect Confidential Information**

All “e-tuğra” employees are responsible for protecting confidential information. In accordance with the security policies no person or third party other than the authorized is allowed to access confidential information. All employees must strictly abide by the procedures related to data security.

## **9.4. Privacy of Personal Information**

### **9.4.1. Privacy Plan**

“e-tuğra”, in the scope of the services provided and pursuant to its obligations by law, protects the personal information of subscribers and other participants.

#### **9.4.2. Private Information**

The information obtained from the subscriber at the time of application and which are not included in the certificate content and “CRLs” are private information.

#### **9.4.3. Non-Private Information**

Information made publicly available through certificates and “CRLs” are non-private information.

#### **9.4.5. Notice and Consent to Use Private Information**

“e-tuğra” may use the certificate and the information obtained at the time of application for the purposes laid down in the “CPS”, “CP”, and subscriber commitment.

#### **9.4.6. Disclosures for Judicial and Administrative Purposes**

“e-tuğra” subscribers and relevant parties agree that “e-tuğra” is authorized to disclose confidential/private information to competent authorities pursuant to applicable legislation provided that such a request is placed by the respective competent authority in accordance with the applicable legislation.

During the audits carried out by the Information and Communications Technologies Authority “TSPs” are legally obliged to present all information and documents requested by the respective officials.

#### **9.4.7. Disclosures in Other Circumstances**

Not applicable.

### **9.5. Intellectual Property Rights**

“e-tuğra” holds the intellectual property rights for all certificates and root certificates issued by “e-tuğra”, certificate revocation data, “CPS” and “CP” documents, user agreements, all documents produced by “e-tuğra”, all databases created by “e-tuğra”, websites owned by “e-tuğra”, and all text, and audio-visual content on its websites.

Certificate owners and corporate application owners reserve the rights (if any) to all commercial brands, service brands, service marks or commercial names and titles that they own and given in certificate applications.

### **9.6. Representations and Warranties**

#### **9.6.1. “TSP” Responsibilities and Warranties**

“e-tuğra” warrants that the contents of all issued certificates are accurate, the identity validation processes have been duly performed, the certificate has been issued and delivered to the applicant authorized to make an application, the certificate status data is updated and accurate, and that all requirements and obligations set forth in the “CP” and “CPS” shall be fulfilled.

“e-tuğra” warrants that it shall fulfill its obligations set forth in the ETSI EN 319 411-1 standard to deliver SSL certificate products.

As regards EV SSL certificates “e-tuğra” warrants that, as of the date that the certificate was issued, the subject named in the certificate legally exists as a valid organization or entity and that its legal name matches official records. In short, “e-tuğra” warrants the legal existence and identity of the

subject. To this end, “e-tuğra” has taken all necessary steps to verify that, as of the date that the certificate was issued, the subject named in the certificate has the exclusive rights to use all of the domain names listed in the certificate (Right to Use Domain Name) and has authorized the issuance of the certificate (Authorization) and has verified the accuracy of all other information contained in the certificate (Accuracy of Information). Accordingly, the subject named in the certificate shall enter into a legally valid and binding letter of commitment with “e-tuğra” that fulfills the requirements of the “CP” and “CPS” or the applicant’s representative shall duly acknowledge and accept the relevant terms and conditions.

The EV SSL certificate warranties apply to the below parties:

- The certificate subscriber entering into the EV SSL certificate user agreement;
- The subject named in the certificate;
- All application software suppliers with whom “e-tuğra” has agreed or entered into a contract to include its root certificate in the software distributed and/or operated by such application software suppliers;
- All third parties that rely on such certificates throughout its validity term.

As regards EV SSLs, “e-tuğra” fulfills the requirements of this “CP” document and maintains a repository, accessible online 24/7, containing up-to-date information about the validity and revocation of its certificates. “e-tuğra” shall revoke EV SSL certificates in accordance with the provisions for revocation set forth in this “CP” document and the CA-Browser Forum manual.

### **9.6.2. Registration Authority Responsibilities**

“RAs” can only get applications and send them to “e-tuğra” for verification and issuing of certificates for all SSL and CSC certificates.

### **9.6.3. Certificate Subscriber and Corporate Applicant Responsibilities**

Certificate owners are responsible for submitting accurate information and documents to “e-tuğra” at the time of certificate application, renewal and revocation, use their certificates in accordance with the terms and conditions set forth in the “CP” and “CPS” documents, and fulfill all obligations laid down in the certificate user agreement.

Certificate owners are responsible for checking the validity of their certificate prior to use, and refraining from using certificates that have expired, suspended or revoked.

### **9.6.4. Third Party Responsibilities and Warranties**

Standard (DV) SSL, Premium (OV) SSL, EV SSL, CSC and EV CSC subscribers, and third parties are responsible for validating the content and validity of the certificates when accepting, using and ensuring the security of the certificates.

Third parties represent that, prior to relying on a “e-tuğra” Certificate, it:

- Obtained sufficient knowledge on the use of certificates,
- Studied the applicable limitations on the usage of certificates and agrees to “e-tuğra” limitations on liability related to the use of certificates,
- Has read, understands, and agrees to the e-tuğra Relying Party Agreement published on “e-tuğra” repository and this CPS,

- Verified both the certificate and the certificates in the certificate chain using the relevant CRL or OCSP,
- Will not use a certificate if the certificate has expired or been revoked.

### **9.6.5. Responsibilities and Warranties of Other Participants**

“e-tuğra” may enter into service agreements with third parties to deliver certain services during its “TSP” operations. The responsibilities of third parties are determined as per the respective service agreement. Service agreements contain provisions guaranteeing that third parties shall not disclose “e-tuğra”’s business processes and confidential or private information pertaining to its customers.

### **9.7. Disclaimers of Warranties**

Not applicable.

### **9.8. Limitations of Liability**

“e-tuğra”’s liabilities are limited to the material transaction limits included in the certificate and the responsibilities set forth in the user agreement.

### **9.9. Indemnities**

Where certificate subscribers fail to perform their obligations under the user agreements, the subscriber is responsible for indemnifying any damage that e-tuğra”, third parties may incur.

Where there is official evidence that “e-tuğra” fails to perform its obligations under the “Law” and relevant legislation or according to the principles and practices in the “CPS” and “CP”, “e-tuğra” is responsible for indemnifying any officially proven damage that certificate subscribers and third parties may incur due to such failure.

Where certificate subscribers fail to perform their obligations under the certificate subscriber commitment or agreement as well as the obligations set forth in the “CP” and “CPS” documents, the certificate subscriber should indemnify “e-tuğra” or third parties for any damage that they may incur due to such failure.

“e-tuğra” shall indemnify each Application Software Vendor against any claim, damage, or loss suffered by an Application Software Vendor related to an EV Certificate, regardless of the cause of action or legal theory involved, except where the claim, damage, or loss suffered by the Application Software Vendor was directly caused by the Application Software Vendor’s software displaying either (1) a valid and trustworthy EV Certificate as not valid or trustworthy or (2) displaying as trustworthy (i) an EV Certificate that has expired or (ii) a revoked EV Certificate where the revocation status is available online but the Application Software Vendor’s software failed to check or ignored the status.

### **9.10. Term and termination**

#### **9.10.1. Validity of the “CP” Document**

This “CP” is valid from the date of publication in “e-tuğra”’s repository and remains valid until a new version is available.

#### **9.10.2. Termination of the “CP” Document**

This “CP” shall become null and void as of the publication of a new version.

### 9.10.3. Effects of Termination and Survival

“e-tuğra” publicly communicates the effects of the expiration of the “CP” document via the repository on its website. In any case, “e-tuğra”’s obligations to protect confidential information continue. All User Agreements are valid until the revocation or expiration of a certificate. The new version of the “CP” is produced before the former “CP” expires and the replacement is made without any interruption of services. In case of any amendment to the certificates generated according to updated “CP” documents, certificate subscribers and third parties shall be duly notified and the necessary actions taken.

### 9.11. Individual Notices and Communications with Participants

Communications from “e-tuğra” to certificate subscribers and corporate applicants are made by e-mail, telephone or in writing. Certificate subscribers communicate with “e-tuğra” using the contact information provided in Section 1.5.2.

Public releases or notices to third parties are made through “e-tuğra”’s website, by e-mail or in writing. If “e-tuğra” deems necessary, it may include notes and clauses regarding communications in the user agreements.

### 9.12. Amendments

Where an amendment needs to be made in the published version of the “CP” document, the “CP” document containing the amendments is published as a new version upon the approval of “e-tuğra”’s Security Board.

While the new version may contain minor amendments that do not affect the certificates generated according to the previous “CP” there may also be major amendments that affect the current certificates. “e-tuğra” takes the necessary measures in case of any amendments that affect the use of certificates.

#### 9.12.1. Amendment Procedure

“e-tuğra” evaluates its Certificate Policy and Certification Practice Statement documents in accordance with related legislation and standards at least once a year in the management review meeting. Due to this evaluation or any requirements arising throughout the year, those documents are revised if necessary.

In case of any amendment or update in “e-tuğra”’s operations, “e-tuğra” updates such amendments in both “CP” and “CPS”, and publishes as a new version.

In case of any amendment or update in the “CP” document the relevant sections of the “CPS” are updated. The “CPS” document is published as a new version. The “CPS” document and relevant practices are reviewed annually at the management review meetings and a new version of the CPS is published annually, even if no changes are made.

Where minor amendments are made to the “CP” and “CPS” documents the certificates issued prior to the update remain in force according to the new “CP” and “CPS” version. If a new “CP” and “CPS” version has been published due to major amendments, the certificates issued prior to the update and which are associated with the amended “CP” and “CPS” may not be compatible with the new “CP” and “CPS”.

### 9.12.2. Notification Mechanism and Period

“e-tuğra” shall notify the Information and Communications Technologies Authority of any amendments to the “CPS” within seven (7) days.

The new “CP” and “CPS” versions shall be made available to all relevant parties on “e-tuğra”'s repository together with the older versions and detailed information about the version.

#### Articles Amendable without Notification

“e-tuğra” publishes amendments and/or corrections made on the “CP” and “CPS” that do not affect the rights and responsibilities of the related parties on its website without any prior notification.

“e-tuğra” is authorized to make any necessary amendments to the “CP” and “CPS” for the security of its operations without any prior notification. Amendments made in such cases become effective after the amendment and correction is published in the repository.

#### Articles Amendable with Notification

As regards “CP” and “CPS” amendments and/or corrections that affect the rights and responsibilities of the parties covered by the “CP” and “CPS”, “e-tuğra” shall notify such amendments and/or corrections as a proposal/draft in advance as it deems appropriate depending on the significance of the amendments and/or corrections.

“e-tuğra” notifies certificate subscribers and other relevant parties of any proposals/drafts through its website. “e-tuğra” makes the necessary amendments taking into account the feedback received for the proposed/draft document within the given deadlines and enforces such amendment and/or correction upon publication in the repository.

### 9.12.3. Circumstances Requiring an Object Identifier Number Change

In cases where “e-tuğra” publishes a new certificate policy for use in a new certificate practice area or where the certificate policy's object identifier numbers need to be changed, the new certificates issued for use in the certificate field shall contain the object identifier numbers of the new certificate policy to be implemented.

### 9.13. Dispute Resolution Provisions

**Settlement:** In case of any dispute, problem or dissidence between “e-tuğra” and certificate subscribers or third parties, both parties shall notify the other party in writing and shall use the best endeavours to resolve the dispute in good faith in accordance with the principles and practices laid down in the “CP” and “CPS” documents as well as the procedures, commitments and agreements.

**Reconciliation:** If within one (1) month of the dispute date one party documents to the other party in writing that such endeavours have failed, the parties' attorneys shall try to reconcile both parties, by virtue of their powers set forth in Article 35/A of the Legal Practitioner's Law, according to the principles and practices laid down in the “CP” and “CPS” documents as well as the procedures, commitments and agreements. The Law Regulations shall apply to disputes related to qualified electronic certificates.

**Arbitration:** In cases where the parties' attorneys fail to reach reconciliation the Ankara Courts in Turkey shall have jurisdiction for the resolution of disputes.

### 9.14. Governing Law

The laws of the Republic of Turkey shall apply for the implementation and interpretation of the “CP”.



### **9.15. Compliance with Applicable Law**

“e-tuğra” performs and implements its services in accordance with the Electronic Signature Law the Republic of Turkey, CabForum / ETSI Regulations and other legislation.

### **9.16. Miscellaneous Provisions**

#### **9.16.1. Entire Agreement**

Not applicable.

#### **9.16.2. Assignment and Transfer**

Not applicable.

#### **9.16.3. Severability**

Where any section of the “CP” is deemed or becomes invalid permanently or temporarily, the other sections that are not affected from such section shall remain in force.

Each provision of this CP that provides for a limitation of liability, disclaimer of a warranty, or an exclusion of damages is severable and independent of any other provision.

#### **9.16.4. Sanctions (Waiver of Rights)**

Not applicable.

#### **9.16.5. Force Majeure**

In case of force majeure “e-tuğra” may not be able to perform its obligations arising from the “CP”. Force majeure includes situations that prevent “e-tuğra” from performing its operations and are beyond its control under normal circumstances such as wars, mobilization, natural disasters, fires, failures in telecommunications lines, and circumstances such as legislation changes where, based on the principle of integrity, any demand to perform such change would impose a significant administrative and financial burden on the other party.

### **9.17. Other Provisions**

Not applicable.