

# EFQTSP and CA/B Forum relations

---

2022. 06. 08.

CA/Browser Forum meeting, Warsaw

Attila Rozgonyi  
EFQTSP, Microsec



**European  
Federation  
of *QTSP***



# I. About

# I.1. About EFQTSP

- As a non-profit association, the EFQTSP is permanently dedicated to becoming a forum in which to **analyze and channel the initiatives and concerns of qualified trust service providers**, with the aim of contributing to the advancement and development of the information society, guaranteeing the security and privacy of transactions and data processing, for the benefit of the general interest.
- Currently, the EFQTSP represents the general interest of more than **twenty-five qualified trust service providers**, included in the trust list of the European Commission, from **eleven countries of the European Union**.



# 1.2 Participating countries



Austria



Sweden



Netherlands



Portugal



Slovenia



Romania



Spain



Belgium



Denmark



Greece



Hungary



Estonia



# I.3 Participating organizations





## II. Areas of Interest

# II.1 Participation of QTSPs on the development of eIDAS 2.0

- The eIDAS Regulation directly impacts the QTSPs, therefore, we understand that the **participation of the QTSPs is necessary**.
- QTSPs not only have subject matter expertise, but they also have **direct experience** administering and managing PKIs. Our vision can be enriching for the new eIDAS 2.0



## II.2 Development of a Conduct Code on data protection for the sector

- The General Data Protection Regulation sets out many requirements and leaves it to the discretion of the data controller. Not only to comply with them, but also **to demonstrate that they comply with them.**
- The GDPR itself **assumes that each sector** of activity **has areas** of data collection and processing that are **gray terrain**, and on which different interpretations are possible, which **generates** significant **legal uncertainty.**
- To resolve this situation, the GDPR **proposes the development of sectoral codes of conduct.**
- The code of conduct has the essential objective of **highlighting gray areas** of interpretation of the obligations or scope of the GDPR, and **establishing a common criterion** that guarantees compliance, having been previously approved by the Supervisory Body.
- It is evident that a QTSP has the **obligation to collect personal information** and that the data collected is extensive and the legal effects relevant to citizens.





## II.3 Eliminate the figure of unqualified trust service providers

- The **pandemic** has **encouraged telematic means** and has **confirmed the need to provide electronic transactions** with legal effectiveness. The **eIDAS services guarantee this legal security**, but it cannot be ignored that consumers, not only small and medium-sized companies, but also executives of large corporations, often lack a degree of maturity to discern between offers.
- The reality is that more and more companies, perhaps moved by the audacity caused by ignorance on the matter, **launch themselves into this market with the sole purpose of taking advantage** of what they consider a mere **business opportunity**. Experience proves that these companies carry out all kinds of outrages with total impunity, distort the market and cause their clients to take on processes that not only do not offer any legal effectiveness, but are often flagrant **breaches of legal regulations**.
- Initially, the controversy rises with companies that registered as non-qualified providers of trust services, but the degradation has reached such an extent that they **no longer care about registration**, and **directly advertise themselves as QTSPs with the eIDAS trust seal**.
- The Federation considers that **eIDAS 2.0 must legislatively consider these actions as acts of intrusion**. Moreover, if society is to be given clarity, the figure of the unqualified providers must be eliminated.



## II.4 Appropriation of eIDAS concepts for other purposes - confusion and insecurity for citizens

- Our experience: **misappropriation, confusion**
- **Does the market have the knowledge** to discern the difference between an electronic signature, advanced electronic signature, or qualified electronic signature?
- **Obviously not** and it should not surprise us at all. E.g., there is no adequate definition for advanced electronic signatures, thus we find European companies that believe that the mere fact of “press accept button” is equivalent to a handwritten signature.



## II.5 Specify the main cybersecurity requirements on eIDAS 2.0:

- In terms of cybersecurity, the **eIDAS2 proposal refers to** the fact that the obligations imposed on trust service providers will be established based on the legal framework established by the **NIS2 Directive**.
- This is a problem given that, being a Directive, the relevant national legal implementations, the dates of entry into force, the designated supervisory bodies, etc. they **may differ widely from each other and from the current uniform legislation**, therefore it is proposed to specify the relevant requirements without reference to the directive.





# III. Goals and Relations

# III.1 The main aims of EFQTSP

- To **promote and support initiatives** related to the use of electronic certification systems within the framework of the eIDAS Regulation.
- To **encourage confidence in and use of eIDAS services in the EU**, especially by promoting the creation of new services that improve the competitiveness and efficiency of companies and public institutions.
- To defend the **interests of the PC/SC** before the European institutions.
- To participate in the **development of any regulatory standard**, whether technical or fiscal, whether national or European in scope, that affects qualified trust service providers. In special regulations related to the eIDAS Regulation and the General Data Protection Regulation.
- To be a **common forum** to analyze and channel the suggestions and concerns of our members.
- To negotiate and establish **preferential purchase agreements for members** of the Federation, especially with manufacturers of technology used or likely to be used by QTSP.



## III.2 How do these relate to the CA/B Forum?

- The main opinion and concern of EFQTSP is that **the practice of all industry actors shall be completely in compliance with the current legislation.**
- Another main aspect of EFQTSP activities is that we consider it contraproductive that there are **many different criteria** set by different affiliated actors, thus it would be beneficial to all, if all laws and standards would be totally aligned with each other.
- For this reason, we understand **it is imperative that our organizations maintain constant communication and dialogue to share points of view between the parties and, of course, find points of convergence where we can define common positions, in accordance with our objectives, that allow optimal growth of our activities,** which are necessary for the development of society.



Any questions?



# Thank you for your attention

---

Attila Rozgonyi

EFQTSP, Microsec

<mailto:attila.rozgonyi@microsec.com>



**European  
Federation  
of *QTSP***