



ATHEX
Χρηματιστήριο Αθηνών

**DIGITAL CERTIFICATION
SERVICES**

ATHEX TIME-STAMPING AUTHORITY
(TSA)
DISCLOSURE STATEMENT

Version 1.0 - 15/06/2017

Important Notice about this Document

This document is the Time-Stamping Authority (TSA) Disclosure Statement herein after referred to as the TSA Disclosure Statement. This document does not substitute or replace the ATHEX Time-Stamp Policy/Practice Statement

The purpose of this document is to provide a set of statements about the policies and procedures of the TSA that require particular emphasis or disclosure to subscribers and relying parties This version of the TSA Disclosure Statement has been approved for use by the ATHEX Policy Management Committee (PMC) and is subject to amendment and change in accordance with the policies and guidelines adopted, from time to time, by the PMC. The date on which this version of the TSA Disclosure Statement becomes effective is indicated on this document.

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1. ENTIRE AGREEMENT

This TSA Disclosure Statement provides high level disclosures regarding the ATHEX Time-stamp Authority (ATHEX-TSA). It does not replace or override the definitive ATHEX policy and practice documents which are available at <http://www.athexgroup.gr/digital-certificates-pki-regulations> .

2. TSA CONTACT INFO

The ATHEX-TSA is operated by Hellenic Exchanges - Athens Stock Exchange (ATHEX).

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3. TIME-STAMP TOKEN TYPES AND USAGE

The ATHEX-TSA aims to deliver time-stamping services in accordance with the Regulation (EU) No 910/2014 (“eIDAS Regulation”). However, ATHEX time-stamps may be equally applied to any application requiring proof that a datum existed before a particular time. Supported signing algorithms are sha256WithRSAEncryption (2048 bit key length).

Acceptable Time Stamp Request Hashes include SHA-256, SHA-384 and SHA-512. The ATHEX digital signature on the Time-Stamp Token (TST) has a validity period of up to ten years.

Refer to section 6 below for information on how to verify a TST. Use of the ATHEX TSA may be limited to Certificate Holders of a valid ATHEX digital certificate. ATHEX may charge fees for the services provided by the ATHEX TSA.

The object-identifier (OID) of the ATHEX Time-Stamping Policy is: 1.3.6.1.4.1.29402.1.1.4.1.1.0. This OID is referenced in every ATHEX-issued time-stamp and also the ATHEX-TSP. This ATHEX Time-Stamping Policy is based on the ETSI BTSP best practices policy for time-stamps (OID 0.4.0.2023.1.1).

The ATHEX-TSA has responsibility for the operation of one or more Time-Stamping Units (TSU) which create and sign TSTs on behalf of the TSA. Each TSU has a different key. Refer to the “ATHEX Timestamping Authorities” section of the following ATHEX web page <http://www.athexgroup.gr/digital-certificates-repository>

Below is a summary of the current ATHEX TSUs and their issuers:

ATHEX TSU Subject Distinguished Name	TSU Issuer
CN = Athexgroup Timestamping Authority 01 O = Athens Stock Exchange . C = GR	ATHEX Root CA G2

4. RELIANCE LIMITS

ATHEX does not set reliance limits for timestamp services, however reliance limits may be set by applicable law or by agreement. See Limitation of Liability below. The ATHEX-TSA assures time with ± 1 second of a trusted UTC time source. If a trusted UTC time source cannot be acquired the time stamp will not be issued. ATHEX maintains secure records concerning the operation of the ATHEX-TSA for a period of 11 years for the purpose of providing evidence in legal proceedings.

5. OBLIGATIONS OF SUBSCRIBERS

Subscribers must verify that the time-stamp token has been correctly signed and check the ATHEX CRL to confirm that the private key used to sign the time-stamp token has not been compromised. Subscribers must use secure cryptographic functions for time-stamping requests a method or software toolkit approved by ATHEX to create time-stamps, unless otherwise specifically authorised in writing by ATHEX. Subscribers must inform its end users (including any relevant Relying Parties) about the ATHEX-TSP, the CP/CPS.

6. TIME-STAMPING UNIT (TSU) PUBLIC KEY STATUS CHECKING OBLIGATIONS OF RELYING PARTIES

Before placing any reliance on a Time-Stamp, relying parties must verify that the TST has been correctly signed and that the associated TSU certificate has not been revoked. ATHEX CA Certificates, TSU Certificates and the related CRLS are published at <http://www.athexgroup.gr/digital-certificates-repository>. If this verification takes place after the end of the validity period of the certificate, the Relying Party should follow the guidance denoted in Annex D of ETSI EN 319 421.

The Relying Party should take into account any limitations on usage of the time-stamp indicated by this ATHEX-TSP, the Time-Stamping Authority Subscriber Agreement and any other precautions documented by ATHEX.

Note that ATHEX may have a number of different TSU Certificates, signed by different ATHEX Issuing CAs. It is important that Relying Parties refer to <http://www.athexgroup.gr/digital-certificates-repository> to determine the relevant TSU as this may also impact reliance.

ETSI EN 319 421 contains some additional requirements for Qualified electronic time-stamps as per Regulation (EU) No 910/2014. ETSI EN 319 421 states:

“The relying party is expected to use a Trusted List to establish whether the time-stamp unit and the timestamp are qualified. If the public key of the TSU is listed in the Trusted List and the service it represents is a qualified time-stamping service, then the time-stamps issued by this TSU can be considered as qualified.”

ATHEX is currently undergoing an audit so as to be certified as a Qualified timestamping provider. The public keys of the ATHEX TSUs are not currently listed on any Trusted List. The issuer of ATHEX TSU is listed on Trusted Lists.

7. RETENTION OF EVENT LOGS

TSA event logs are retained for 11 years in accordance with the retention period for audit logs in the CP/CPS.

8. LIMITED WARRANTY AND DISCLAIMER/LIMITATION OF LIABILITY

ATHEX undertakes to operate the ATHEX-TSA in accordance with the ATHEX-TSP, the CP/CPS, and the terms of agreements with the Subscriber. ATHEX makes no

express or implied representations or warranties relating to the availability or accuracy of the time-stamping service.

ATHEX shall not in any event be liable for any loss of profits, loss of sales or turnover, loss or damage to reputation, loss of contracts, loss of customers, loss of the use of any software or data, loss or use of any computer or other equipment save as may arise directly from breach of the ATHEX-TSP or CP/CPS, wasted management or other staff time, losses or liabilities under or in relation to any other contracts, indirect loss or damage, consequential loss or damage, special loss or damage, and for the purpose of this paragraph, the term “loss” means a partial loss or reduction in value as well as a complete or total loss.

ATHEX bears specific liability for damage to Subscribers and Relying Parties in relationship to valid qualified digital certificates relied upon in accordance with specific national laws and regulations

9. APPLICABLE AGREEMENTS AND PRACTICE STATEMENT

See the ATHEX-TSP and the ATHEX CP/CPS at <http://www.athexgroup.gr/digital-certificates-pki-regulations> .

10. PRIVACY POLICY

The ATHEX-TSA complies with applicable legal requirements, as well as the requirements of the European Data Protection Directive [Dir 95/46/EC]. ATHEX-TSA records shall be completely protected from disclosure unless with Subscriber agreement or by court order or other legal requirement.

11. REFUND POLICY

ATHEX does not refund fees for time-stamp services.

12. APPLICABLE LAW, COMPLAINTS AND DISPUTE RESOLUTION

The ATHEX-TSA aims to deliver time-stamping services used in support of qualified electronic signatures (i.e., in line with the eIDAS Regulation), as well as under other applicable laws and regulations.

Any controversy or claim between two or more participants in the ATHEX-PKI (for these purposes, ATHEX shall be deemed a "participant within the ATHEX-PKI") shall be referred to an arbitration tribunal in the manner set out in the ATHEX CP/CPS.

13. TSA AND REPOSITORY LICENCES, TRUST MARKS AND AUDIT

Refer to <http://www.athexgroup.gr/digital-certificates-pki-regulations> for a list of ATHEX audits and accreditations.