

# *Qatar Trust services framework (Qualified) Trust service provider guidelines on the licensing process*

January 14, 2025

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## Revision history

Version	Date	Description
1.0	14/01/2025	First version

## References

Reference	Title
[eIDAS]	Regulation (EU) No 910/2014 of the European Parliament and of the Council of 23 July 2014 on electronic identification and trust services for electronic transactions in the internal market and repealing Directive 1999/93/EC <a href="https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=uriserv:OJ.L_.2014.257.01.0073.01.ENG">https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=uriserv:OJ.L_.2014.257.01.0073.01.ENG</a>
[Law]	the Electronic Commerce and Transactions Law promulgated by Decree Law No. 16 of 2010 or any amendment or law which repeals and replaces such Law;
[CSPs Regulation]	Regulation on the Licensing and the activities performed by Certification Service Providers issued under CRA President Decision No. [3] of 2025;
[Technical specifications]	All Technical specifications, relevant to the [Law] and [CSPs Regulation], issued by CRA in implementation thereof, setting corresponding technical controls
[LGL-FWK]	The [Law], the [CSPs Regulation] and corresponding [Technical specifications] setting technical controls
[TSP_GEN]	Technical Specifications on the General Requirements issued

	pursuant to Certified Service Providers Regulations on technical controls applicable to trust service providers or qualified trust service providers and the trust services or qualified trust services provided.
[CAB]	Technical specifications on the rules and conditions regulating the work of conformity assessment bodies
[TL-SPEC]	Specifications of TL standard and Guidelines on TL content
[ENISA-INIT-QTS]	ENISA report – Guidelines on Initiation of Qualified Trust Services, December 2017 <a href="https://www.enisa.europa.eu/publications/tsp-initiation/">https://www.enisa.europa.eu/publications/tsp-initiation/</a>
[ENISA-SUP-QTS]	ENISA report – Guidelines on Supervision of Qualified Trust Services, December 2017 <a href="https://www.enisa.europa.eu/publications/tsp-supervision">https://www.enisa.europa.eu/publications/tsp-supervision</a>
[ENISA-TER-QTS]	ENISA report – Guidelines on Termination of Qualified Trust Services, December 2017 <a href="https://www.enisa.europa.eu/publications/tsp-termination">https://www.enisa.europa.eu/publications/tsp-termination</a>
[TS 119 612]	ETSI TS 119 612 v2.1.1 (2015-07): Electronic Signatures and Infrastructures (ESI); Trusted Lists
[EN 319 401]	ETSI EN 319 401 v2.3.1 (2021-05): Electronic Signatures and Infrastructures (ESI); General Policy Requirements for Trust Service Providers

## Abbreviations

CAB	Conformity Assessment Body
CAR	Conformity Assessment Report
CRA	Communications Regulatory Authority of Qatar
ENISA	The European Union Agency for Cybersecurity
EU	European Union

GCC	Gulf Cooperation Council
MCIT	Ministry of Communications and Information Technology
QA	Qatar
QTS	Qualifier Trust Service
QTSP	Qualified Trust Service Provider
(Q)TSP	Trust Service Provider (be it qualified or not)
QTSP/QTS	Qualified Trust Service Provider and the Qualified Trust Service(s) it provides
(Q)TSP/(Q)TS	Trust Service Provider (be it qualified or not) and the trust services it provides (be they qualified or not)
SB	Supervisory Body
TLSO	Trusted List Scheme Operator
TSP	Trust Service Provider
TSP/TS	Trust Service Provider and the Trust Service(s) it provides

## 1. Introduction

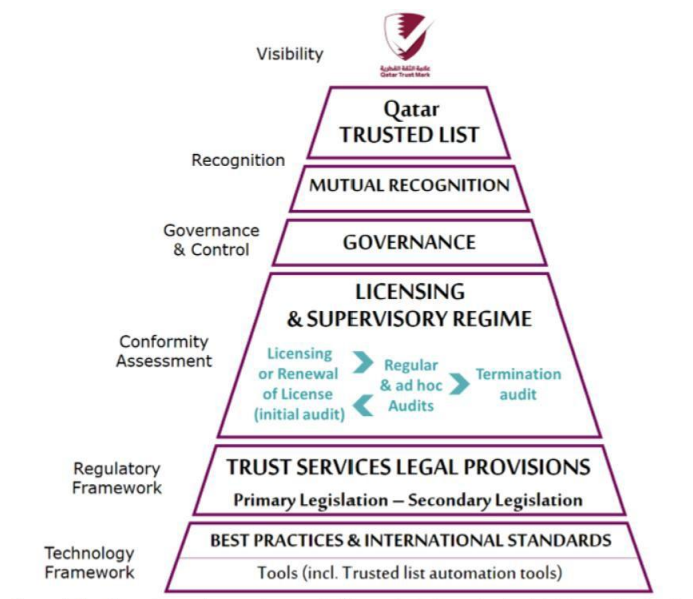
Economic development constitutes the third pillar of the Qatar National Vision 2030. Electronic transactions allow for more efficient business interaction, promoting economic growth and attractiveness for businesses. However, lack of trust in electronic transactions is a major set-back for businesses and individuals having the intention to perform online business. Building this trust is thus of major importance to drive economic growth, especially in the digital sector.

To that end the Ministry of Communications and Information Technology (MCIT), being in charge of the supervision and development of the sectors of Communications and Information Technology (ICT), establishes a national trust services framework. This framework has purpose to provide a secure, attractive, and regulated framework for the provision of trust services in the country. This trust services framework, composed of:

- A) International best practices and standards;
- B) A regulatory framework building on these technical practices and standards;
- C) A licensing and supervision regime enabled by the above laws;
- D) The publication of the licensing and supervision decisions in a national trusted list;
- E) The representation of the qualified status via a trust mark;

*can be seen as the building blocks of a complete pyramid of trust depicted by*

**Figure 1** *Error! Reference source not found.. It illustrates the different layers constituting the framework, and how those layers are interrelate*



*Figure 1 - The Qatar pyramid of trust*

## 1.1. Overview of Qatar's licensing and supervision of (Q)TSP/(Q)TS

The [CSPs Regulation] designates CRA as the authority responsible for the licensing, approval, monitoring and overseeing of (qualified) trust service providers and the (qualified) trust services they provide ((Q)TSPs/(Q)TSs) in The State of Qatar. As such, any entity intending to practice and offer to the public a (qualified) trust service ((Q)TS) in The State of Qatar will have to be licensed by CRA beforehand.

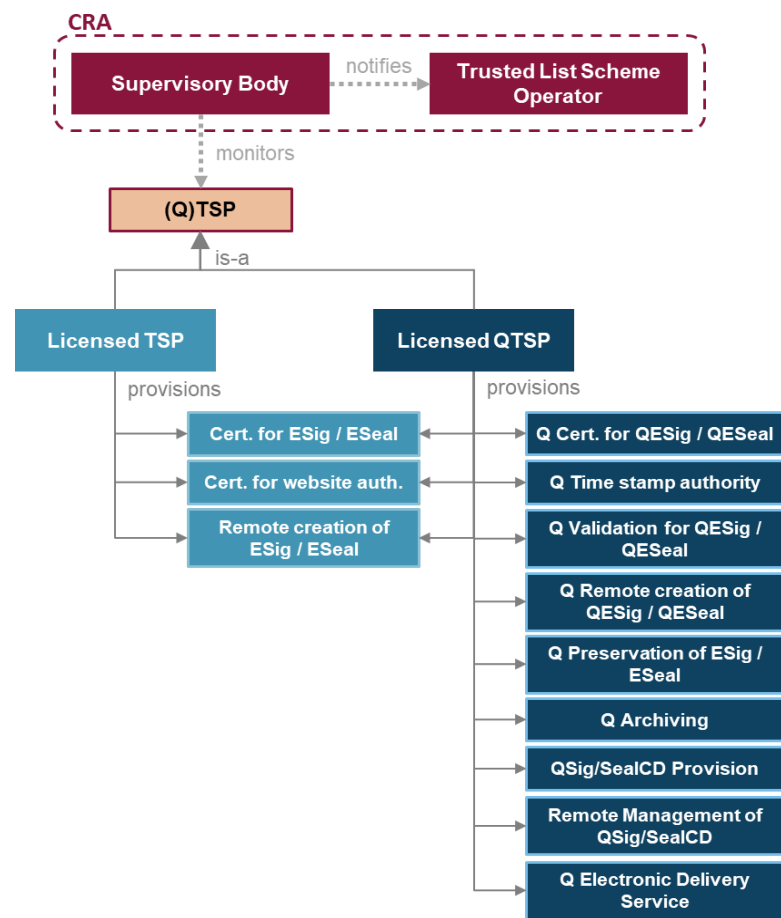


Figure 2 - Types of trust service providers

As per Article 2 of the [CSPs Regulation], (qualified) trust service providers ((Q)TSPs) is divided into two categories:

- **Licensed TSP** (hereafter referred to as 'TSP'): A person resident of The State of Qatar provisioning trust services in the State of Qatar. The provision is subject to the prior granting of a license by CRA, as described in this present document, and shall stop with the



revocation of that license;

- **Licensed QTSP** (hereafter referred to as 'QTSP'): A person resident of The State of Qatar provisioning qualified trust services in the State of Qatar. A QTSP and the QTS it provides (QTSP/QTS) shall comply to stricter requirements than TSP/TS, this compliance resulting in the grant of a license and qualified status by CRA. In return, QTSPs/QTSs provides stronger security guarantees and higher legal certainty, e.g., qualified electronic signatures are legally equivalent to handwritten signatures. A licensed QTSP may provide one or several QTS(s) as well as TS(s).

The most visible part of the pyramid of trust, depicted in

Figure 1, is the “Qatar Trust Mark”, whose use is restricted to qualified trust service providers. Each QTSP may, on a voluntary basis, use it to brand and promote the quality and trustworthiness of the QTS it provides. It is key to note that such a mark is not just another quality logo without any trust foundation.

To ensure trust in (Q)TSPs/(Q)TSs, CRA oversees the supervision of their compliance with the requirements laid down by the [LGL-FWK]. The [LGL-FWK] builds a supervision regime taking the form of pre-authorization (ex-ante) and post-authorization (ex-post) licensing and supervisory activities upon the quality/security requirements and obligations for (Q)TSP/(Q)TS. This regime aims to ensure that, from genesis up to their termination, the (Q)TSPs and the (Q)TSs they provide do meet the requirements laid down in the [LGL-FWK].

In line with The State of Qatar's ambition to become a digital hub in the Middle East and the aim for international recognition (GCC, EU, etc.) of Qatar's QTSs, the processes underlying the above-mentioned supervisory regime for (Q)TSP/(Q)TS has been aligned with the recommendations from ENISA ([ENISA-INI-QTS], [ENISA-SUP-QTS], [ENISA-TER-QTS]) regarding the initiation, supervision, and termination of European QTSP/QTS in the context of [eIDAS]. This regime is illustrated by Figure 3 below.

This supervisory regime for (Q)TSP/(Q)TS is executed by CRA, acting as the Supervisory Body (SB), and covers the entire life cycle of the (Q)TSPs and their (Q)TSs. This supervisory regime consists of three phases:

- (i) The **initiation** phase, which corresponds to the application for a license, and when applicable qualified status, for the first time (or the renewal of an existing license) for which an initial audit is required as a pre-requisite. As a result of the initiation phase, the requested license

may either be granted or rejected by CRA;

- (ii) The **supervision** regime phase, which corresponds to the monitoring and supervision of the licensed (Q)TSP/(Q)TS, during which regular (2-yearly) audits are required and ad hoc audits may be conducted at CRA's discretion;
- by CRA itself acting as SB;
  - by an entity delegated by CRA acting on CRA's behalf; or
  - by a conformity assessment body at the request of CRA.

Following the results of the supervision and its related audits, the license may be confirmed, revoked or suspended by CRA. The suspension of the license of a QTSP for the provision of a QTS will not automatically result in the withdrawal of its qualified status. The revocation of the license implies the withdrawal of the corresponding qualified status.

- (iii) The **termination** phase, which corresponds to the cessation, scheduled or unscheduled, of a (Q)TS. This termination may result from the revocation of its license or be at the (Q)TSP's initiative.

All currently licensed (Q)TSPs/(Q)TSs are listed in the electronically sealed or signed Qatar trusted list (cf. [TL-SPEC]). Such a list is established, maintained and published to disseminate in a trustworthy manner information related to the (Q)TSPs, together with information related to the (Q)TSs provided by them, including the *whole history* of their licensed status (i.e., whether the trust service owns a license, either active or suspended). The entity in charge of the trusted list is named the trusted list scheme operator (TLSO), this role is assigned to CRA.

The "Qatar Trust Mark", even though its use by QTSPs is voluntary, is aimed to be the consumer visible marker for qualification, conveying this information to the non-automated mass market. To facilitate the verification, QTSPs using the "Qatar Trust Mark" must provide a link to the Qatar trusted list wherever the mark is displayed.

The Qatar pyramid of trust, established by the [LGL-FWK], relies on and is strengthened by the use of best practices and international standards. Especially, CRA Technical specifications are built upon and amend such international standards (profiled for the Qatar specific requirements) in a *prescriptive* way. This both increases certainty of implementations compliant with the legal framework and secures investments made by (Q)TSP, while paying attention to providing a welcoming environment for them and not creating unnecessary barriers.

The below figure details (Q)TSP/(Q)TS initiation phase and the related supervision activities.

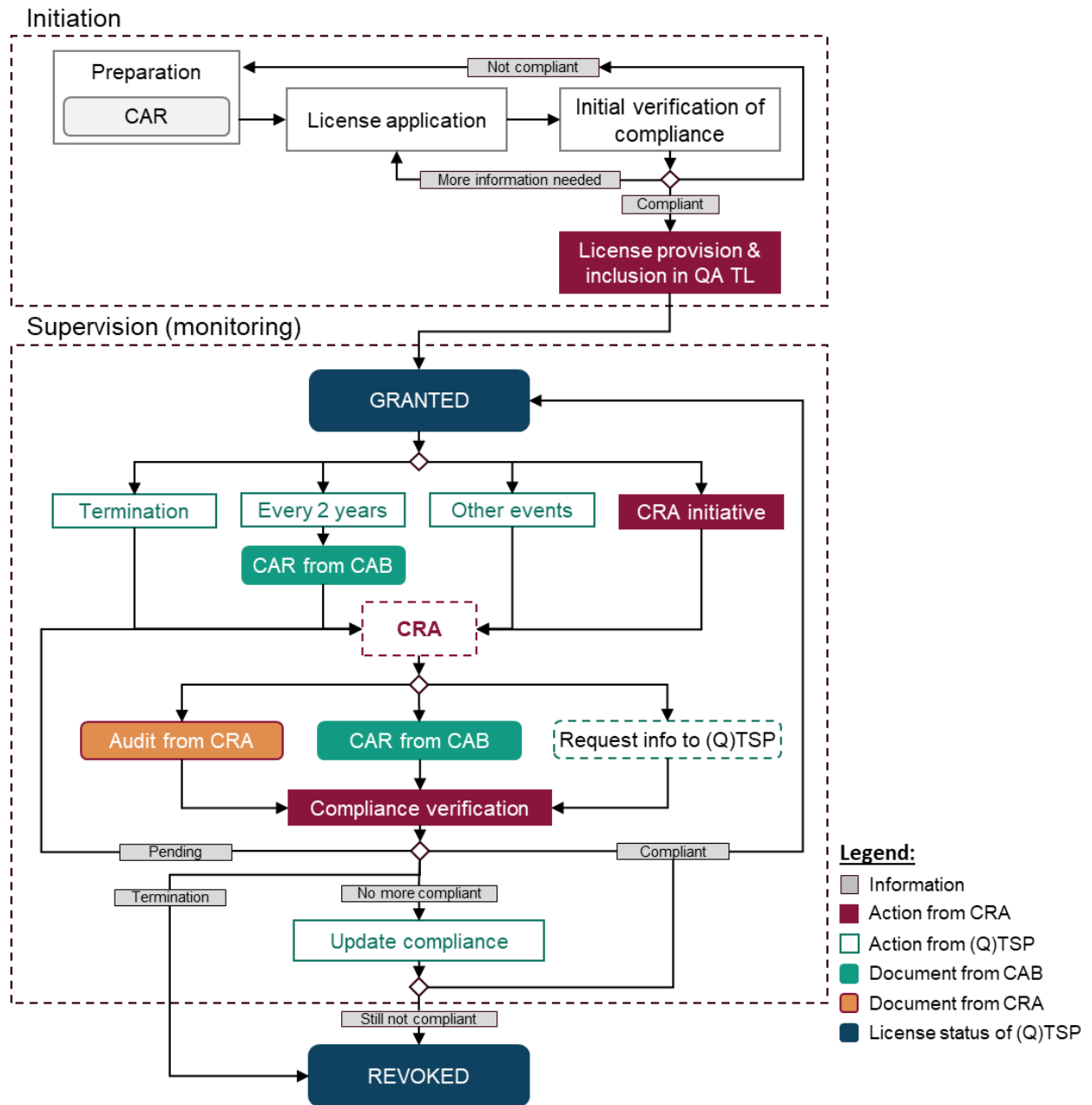


Figure 3 - Overview of Qatar's (Q)TSP/(Q)TS supervision model<sup>1</sup>

## 1.2. Scope of the document

Aligned with the goal of setting a clear legal framework for electronic trust services in a national and cross-border context and having a clear, attractive but regulated framework for electronic trust

<sup>1</sup> adapted from [ENISA-SUP-QTS]

services, this document presents implementation guidelines for (Q)TSPs.

As mentioned before, the supervisory regime is composed of three phases, namely the 'initiation', 'supervision' and 'termination' phases. The present document is structured in three main sections in such a way that each section covers one phase, namely:

- Section 2 "Initiation of the provision of a (Q)TS as a (Q)TSP";
- Section 3 "Supervision of the provision of (Q)TS as a (Q)TSP";
- Section 4 "Termination of (Q)TSP/(Q)TS".

Each section first provides an overview of its corresponding phase, then specifies corresponding requirements and guidelines in a step-by-step and chronological approach. These steps are intended to provide chronological guidance for QA (Q)TSP regarding the initiation and life cycle of their services.

## 2. Initiation of the provision of a (Q)TS as a (Q)TSP

The initiation process, highlighted in Figure 4 below, through which a person without licensing status intends to start providing a (Q)TS as a (Q)TSP or through which an already licensed (Q)TSP renews its license before its expiry, is made of the following steps:

- (a) **Preparation** (cf. Section 2.1): The applicant designs, sets up, implements, tests and deploys in pre-production the (Q)TS it intends to provide, in line with the requirements laid down in the [LGL-FWK]. In parallel, the applicant establishes the relevant documentation that will demonstrate its compliance with the applicable requirements. The applicant will need to require a conformity assessment body (CAB) to assess its conformity as future (Q)TSP and the conformity of the (Q)TS it intends to provide with the requirements of the [LGL-FWK]. The selected CAB shall be adequate based on the (Q)TS(s) the applicant aims to provision, as specified by [CAB]. The conformity assessment report (CAR) must confirm and demonstrate the compliance of the (Q)TSP and the (Q)TS it intends to provide with the requirements of the legal framework, including with the associated standards issued with or in terms of the Regulation for CSP.
- (b) **The license application** (cf. Section 2.2): The applicant notifies CRA, through license application forms, of its intention to be licensed for the provision of a (qualified) trust service, together with the CAR issued by the CAB.

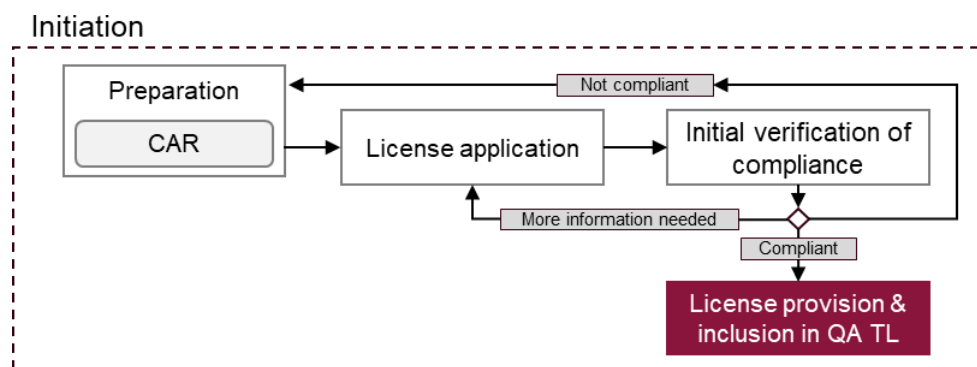


Figure 4 - (Q)TSP/(Q)TS Initiation process overview<sup>2</sup>

- (c) **Initial verification of compliance:** CRA verifies whether the applicant and the (Q)TS it intends to provide meet the requirements laid down in the [LGL-FWK] in order to be granted a license, and when applicable a qualified status. The final decision for such grants is in the

<sup>2</sup> Excerpt from Figure 3, adapted from [ENISA-SUP-QTS]

hands of CRA. This decision will be based on the information provided as part of the license application procedure, including the CAR. CRA is entitled to request further information and may take a duly justified decision that goes against the conclusions of the CAR. In that case, as for all its decisions, CRA should particularly respect the principles of good administration, including the obligation to give reasons for its decisions, as well as the principle of proportionality.

- (d) **Publication in the Qatar trusted list** (cf. Section 2.3): Upon positive decision by CRA following the initial verification of compliance that the applicant and the (Q)TS it intends to provide meet the requirements of the [LGL-FWK], CRA grants the license, and when applicable the qualified status, to the applicant becoming a (Q)TSP for the provision of the notified (Q)TS. CRA updates the Qatar trusted list in accordance.

It is only when its licensed status is published in the Qatar trusted list that the (Q)TSP is authorized to provide the corresponding (Q)TS.

The steps presented above are detailed in the following subsections, together with requirements and guidelines regarding the (Q)TSP/(Q)TS initiation process.

## 2.1. Preparation

**STEP-INIT-2.1-1:** The applicant shall be a legal or physical person who is a resident of the State of Qatar.

**STEP-INIT-2.1-2:** The applicant should gather all available documentation specific to the (Q)TSP and the (Q)TS it intends to provide from CRA's website. Especially, the applicant should get acquainted with:

- Applicable requirements laid down in technical specifications for both general provisions for (Q)TSP/(Q)TS and specific provisions of the (Q)TS the applicant intends to provide (see [TSP]), available at [\[https://www.cra.gov.qa/en/Services/Trust-Services/Technical-Specifications\]](https://www.cra.gov.qa/en/Services/Trust-Services/Technical-Specifications);
- License application forms and its submission process, available at [\[https://www.cra.gov.qa/Services/Trust-Services/Forms\]](https://www.cra.gov.qa/Services/Trust-Services/Forms);

**STEP-INIT-2.1-3:** The applicant should preliminarily interact with CRA and indicate its intention to provide the (Q)TS. The relevant contact information is: [<https://www.cra.gov.qa/Services/Trust-Services/Contact-Information>]

**STEP-INIT-2.1-4:** The applicant shall design, set up, implement, test and deploy in pre-production the (Q)TS it intends to provide, in line with the requirements of the [LGL-FWK].

**STEP-INIT-2.1-5:** The applicant shall establish the relevant documentation that will demonstrate its compliance with the applicable requirements stated in the [LGL-FWK] and more specifically in the [CSPs Regulation], including:

- The risk assessment related documentation;
- Security and personal data breach notification plan;
- The termination plan for which guidelines are specified in Section 4.1;
- Declaration of practices, policies, security concept, procedures, and guidelines the (Q)TSP will use to provide the (Q)TS aimed to support the demonstration of the other applicable requirements of the [LGL-FWK]; and
- The extended list of documentation supporting the application.

**STEP-INIT-2.1-6:** The applicant should select a CAB following the definition of a conformity assessment body in the [CSPs Regulation]. The selected CAB should comply with Article 18 of the [CSPs Regulation] and meet the specifications established in the [CAB]. In case of any doubt about the relevance of a specific CAB, the applicant should contact CRA with relevant information about this CAB (e.g., name and website of the CAB, exchanged information between the applicant and the CAB).

**STEP-INIT-2.1-7:** In accordance with Article 17 of the [CSPs Regulation], the applicant shall request an audit from the selected CAB, at its own expense. The CAB will assess the conformity of the applicant as a future (Q)TSP and the conformity of the (Q)TS it intends to provide with the requirements of the [LGL-FWK]. The CAR must confirm and demonstrate the compliance of the (Q)TSP and the (Q)TS it intends to provide with the requirements of the [LGL-FWK], including with the associated Technical specifications and standards.

**STEP-INIT-2.1-8:** The applicant should verify that the CAR includes enough and detailed

information to demonstrate fulfillment of the requirements of the Qatar [LGL-FWK]. Then, the applicant can pursue with **STEP-INIT-2.2-1**.

## 2.2. License application

**STEP-INIT-2.2-1:** The applicant shall pay the applicable fees, if any, related to the license application or renewal (the information regarding fees is retrieved during step **STEP-INIT-2.1-2**) and keep a proof of this payment as it will have to be provided as part of the license application.

**STEP-INIT-2.2-2:** In accordance with Article 17.7 of the [CSPs Regulation], no later than five (5) working days after receiving the CAR from the CAB, the applicant shall notify CRA through the license application forms (retrieved from step **STEP-INIT-2.1-2**) of its intention to be licensed. The applicant attaches the CAR, the proof of payment from **STEP-INIT-2.2-1** and the required documentation together with the application forms.

**STEP-INIT-2.2-3:** Within the next three (3) working days, the applicant should ensure the receipt of the license application and related fees via an acknowledgment sent by CRA.

**STEP-INIT-2.2-4:** The applicant shall wait for CRA to verify whether the applicant and the (Q)TS it intends to provide meet the requirements of the [LGL-FWK], for the corresponding (Q)TS, in order to be granted a license, and when applicable a qualified status. This verification shall take at most sixty (60) days, as per Article 8.1 of the [CSPs Regulation]. In cases where more time is required, CRA shall inform the applicant with the new time frame by the end of which CRA may provide such a decision.

CRA is entitled to request further information from the applicant and may take a duly justified decision that goes against the conclusions of the CAR. In that case, as for all its decisions, CRA follows the principles of good administration, including the obligation to give reasons for its decisions (whether the decision is positive or negative), as well as the principle of proportionality.

**STEP-INIT-2.2-5:** When the verification results in a negative decision by CRA, the applicant should repeat the process starting from **STEP-INIT-2.1-1**, taking into consideration the conclusions of CRA.

**STEP-INIT-2.2-6:** When the verification results in a positive decision by CRA, that is the applicant and the (Q)TS it intends to provide do meet the requirements of the [LGL-FWK], CRA grants the license, and when applicable the qualified status, to the applicant becoming a (Q)TSP for the provision of the (Q)TS it applied for. CRA then reflects its decision by updating the Qatar trusted list



as specified in **STEP-INIT-2.3-1**. The applicant is not authorized to provide the (Q)TS before CRA's decision is reflected in the Qatar trusted list.

### 2.3. Publication in the Qatar trusted list

**STEP-INIT-2.3-1:** Once the (Q)TSP and the (Q)TS it provides is published in the Qatar trusted list with the “granted” status, the applicant is now a (Q)TSP licensed to provide the (Q)TS and is authorized to operate its activities and provide its services as such.

**STEP-INIT-2.3-2:** If the trust service is qualified, the QTSP can use the “Qatar Trust Mark” to promote its QTS. The detailed specifications of the presentation, the composition, the colors, the size, and the design of the “Qatar Trust Mark” is provided by means of the relevant Technical specifications pursuant to Article 37 of the [CSPs Regulation].

### 3. Supervision of the provision of (Q)TS as a (Q)TSP

Once a license, and when applicable a qualified status, is(are) granted, the supervision process flow can be split into the following steps of related supervisory activities, as sketched in Figure 5, for each (Q)TS provided:

- The detection or notification of **events**: Those events will condition the next steps in the supervision process as each of those events may lead CRA to confirm, suspend or revoke the license of the corresponding (Q)TSP/(Q)TS:
  - 2-yearly anniversary from initial grant of a license, corresponding to the expiration of the license;
  - Events monitored and detected by CRA;
  - Termination of one, more or all (Q)TS(s);
  - Other events notified by (Q)TSPs:
    - Changes in the provision of a (Q)TS;
    - Security breach;
    - Personal data breach;
    - Results of surveillance audits, when applicable.
  - Other events notified by third parties, e.g.:
    - Complaints;
    - Issues notified by third parties;
    - Request for cooperation from other supervisory bodies in the context of international cooperation programs, or international recognition programs.
- The **need for additional evidence**: This can consist in
  - CRA requesting additional information or evidence from the (Q)TSP;
  - CRA conducting or delegating an authorized entity to conduct an ad hoc audit;
  - CRA requesting a CAR from a CAB.
- The **verification of compliance**: based on the event(s) data and the potential additional evidence, CRA will verify the compliance of the concerned (Q)TSP and its related (Q)TS(s) with the requirements laid down by the [LGL-FWK]. During that step, CRA may also face the need to request or collect additional evidences.

- The **decision on status change**: based on the results of the verification of compliance, CRA may decide to confirm or suspend the (Q)TSP license for the provision of its (Q)TS, or to revoke the previously granted license. Once the license is revoked for a (Q)TS, the corresponding (Q)TSP may no longer provide the (Q)TS.

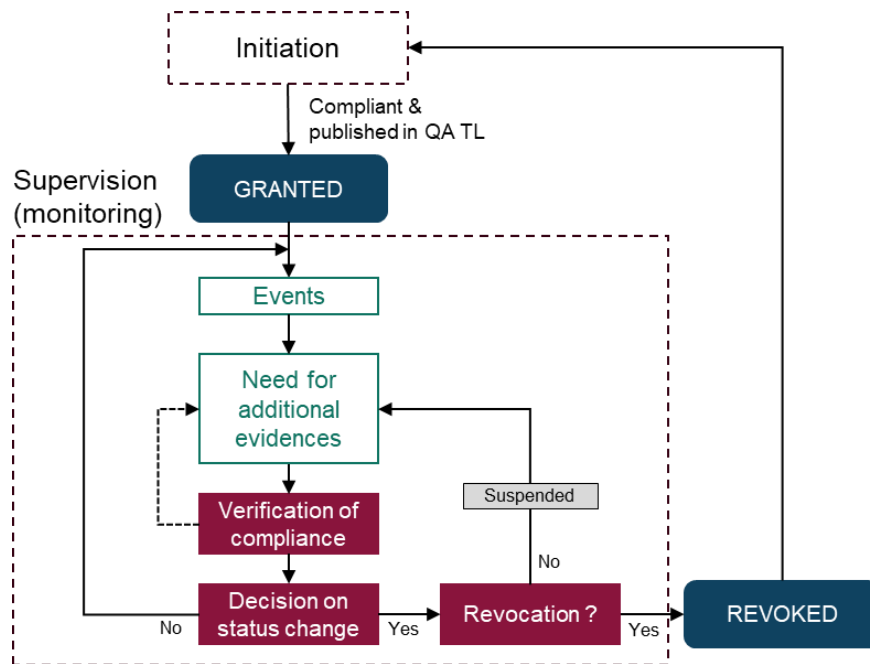


Figure 5 - Supervisions process flow<sup>3</sup>

This above information is further listed in the chronological order under the form of security controls, including requirements and guidelines for the (Q)TSP/(Q)TS regarding supervision process.

### 3.1. Provision of a (Q)TS as a (Q)TSP

**STEP-SUPV-3.1-1:** The (Q)TSP should retrieve all available documentation specific to the (Q)TS(s) it provides from CRA's website. Especially, the (Q)TSP should get acquainted with:

- Notification forms and related procedures, including for instance:
  - Security incident notification forms (for both "first incident notification" and "final incident" forms) available at <https://www.cra.gov.qa/Services/Trust-Services/Forms>;
  - Changes notification form available at <https://www.cra.gov.qa/Services/Trust-Services/Forms>.

**STEP-SUPV-3.1-2:** The (Q)TSP should continuously manage and update a consolidated schedule

<sup>3</sup> Adapted from [ENISA-SUP-QTS]

about supervisory activities that are planned (hereafter referred to as “Due Date File” or DDF). Especially, the DDF should at least contain:

- A complete overview of all deadlines related to each (Q)TS a (Q)TSP is licensed, e.g.:
  - 2-yearly license renewal audit and, if applicable, the correction of non-conformities as the result of this audit;
  - The expiration of CA certificates;
  - Payment of license fees.
- Reminders before those deadlines;
- The owners of the deadlines (i.e., peoples in charge of managing related tasks).

**STEP-SUPV-3.1-3:** The (Q)TSP shall constantly redesign, retest, re-implement the (Q)TS it provides in line with the requirements of the [LGL-FWK] as well as maintaining its documentation up to date (e.g. termination plan, risk assessment, financial resources-related documentation).

**STEP-SUPV-3.1-4:** In accordance with Article 5 of the [CSPs Regulation], three (3) months prior to the expiry of its (Q)TS(s)’ license(s), the (Q)TSP shall notify CRA of its intention to renew its license by submitting a license renewal application. This license renewal application is done by performing the same procedure as when preparing for the application and applying for a license. The (Q)TSP renewing its license shall follow controls specified in Section 2.1 “Preparation” and Section 2.2 “License application”.

**STEP-SUPV-3.1-5:** At any time, following monitored or notified events (e.g. complaints) by CRA, CRA can request additional evidence or an ad-hoc audit to the (Q)TSP to confirm that the (Q)TSP still fulfills the requirements of the [LGL-FWK]. This audit can be performed by CRA services, by using a delegated entity or by a CAB, at the expense of the (Q)TSP.

Following the principles of good administration, including the obligation to give reasons for its decisions as well as the principle of proportionality, CRA should duly justify its decisions to require such additional information, ad hoc audit or ad hoc conformity assessment by a CAB.

**STEP-SUPV-3.1-6:** Should an audit prove that the (Q)TSP violates the provisions of the [Law], [CSPs Regulation] or [Technical specifications] issued thereunder, or if the (Q)TSP fails to comply with personal data protection rules in force, CRA may suspend or revoke the license of the (Q)TSP. In such a case, CRA shall notify the (Q)TSP accordingly.

Following the principles of good administration and in accordance with the severity of the identified

non-conformities, prior to such revocation, CRA may allow a reasonable time limit for the (Q)TSP to remedy identified failure to fulfill requirements laid under the [LGL-FWK].

When its license is suspended, the (Q)TSP/(Q)TS may not contract any new customer, may not issue new outputs for the suspended (Q)TS but shall maintain the existing customers and, in the context of certificates issuance shall continue to manage the life-cycle support of the existing certificates (e.g., revocation facilities, certificate validity status information). The respect of those obligations by the suspended (Q)TSP are monitored by CRA in accordance with the conditions imposed to the suspended (Q)TSP as part of its suspension.

**STEP-SUPV-3.1-7:** As per Article 29 of the [CSPs Regulation], the (Q)TSP shall notify any change in the provision of its (Q)TS. Procedures and relevant changes affecting the licensing are established by CRA and communicated to (Q)TSPs. When such a change occurs, the (Q)TSP shall follow controls specified in Section 3.2.1 “Change in a (Q)TSP or its (Q)TS”.

**STEP-SUPV-3.1-8:** As per Article 22 of the [CSPs Regulation], the (Q)TSP shall notify CRA of any breach of security or loss of integrity that has a significant impact on the (Q)TSP or on the personal data it maintains. When such an event occurs, the (Q)TSP shall follow controls specified in Section 3.2.2 “Security or personal data breaches”.

**STEP-SUPV-3.1-9:** When the (Q)TSP intends to terminate the provision of a (Q)TSP/(Q)TS, it shall follow controls specified in **Error! Reference source not found. “Error! Reference source not found.”**.

**STEP-SUPV-3.1-10:** When the (Q)TSP intends to provide an additional (Q)TS, it shall follow controls specified in Section 2.1 “Preparation”.

## 3.2. Notification

### 3.2.1. Change in a (Q)TSP or its (Q)TS

**STEP-SUPV-3.2.1-1:** Should a change in the (Q)TSP/(Q)TS occur, the (Q)TSP shall notify CRA accordingly to the changes notification forms and processes shared by CRA (retrieved from step **STEP-SUPV-3.1-1**). Example of changes that must be notified are:

- Any change in the (Q)TSs policies and related (Q)TSP practices affecting the trust service;
- Any change in the initial license application files provided to CRA must be notified (e.g., change in the (Q)TSP liability provisions, changes in the financial capacity or insurance

coverage of the (Q)TSP, changes in the termination plan(s));

- Major changes in the (Q)TSP/(Q)TS documentation;
- Any change to the termination plan;
- Any security-relevant change;
- Changing the issuing CA / (root) CA hierarchy corresponding to the one audited/notified to CRA and for which one or more corresponding (Q)TS entries are listed in the Qatar trusted list;
- (Q)TSP-related changes such as the *TSP name*, *TSP trade name*, *TSP address* (both postal and electronic addresses), *TSP information URI* (cf. ETSI [TS 119 612]);
- (Q)TS-related changes such as the Service name, Service digital identity, Scheme service definition URI, Service supply points, TSP service definition URI, Service information extensions (cf. [TL-SPEC] and [TS 119 612]).

**STEP-SUPV-3.2.1-2:** The (Q)TSP should ensure the receipt of the notification by receiving an acknowledgment from CRA and should wait for the approval from CRA before implementing the notified change(s).

**STEP-SUPV-3.2.1-3:** If the change requires a modification to the (Q)TSP/(Q)TS entry listed in the trusted list, the (Q)TSP should ensure the correctness of this change by verifying the new content of the trusted list.

### 3.2.2. Security or personal data breaches

**STEP-SUPV-3.2.2-1:** The (Q)TSP shall notify CRA with a first notification without undue delay but in any event within 24 hours after having become aware of a security incident as part of its activities, at least:

- (a) when the information systems of the (Q)TSP are exposed to any danger affecting the security and safety of the (Q)TS provided;
- (b) when the subscriber's information or documents are exposed to unauthorized disclosure; and
- ( c ) at the occurrence of any breach of security or loss of integrity that has a significant impact on the (Q)TS provided or on the personal data maintained therein.

This first notification, for which a form is available on CRA's website, only contains descriptive information.

**STEP-SUPV-3.2.2-2:** The (Q)TSP should ensure the receipt of the notification by receiving an acknowledgment from CRA.

**STEP-SUPV-3.2.2-3:** The (Q)TSP shall be available to clarify the situation with CRA and other authorities on the proper understanding of the first incident notification form content, in order to avoid any ambiguity or bias (e.g., underestimation or overreaction).

**STEP-SUPV-3.2.2-4:** Once the incident has been solved and analyzed, the (Q)TSP shall, as a second step, issue a final incident notification form and share it with CRA. This final incident notification form, for which a template is available on CRA's website, contains more detailed information (e.g., root cause, impacts, mitigation / improvements).

**STEP-SUPV-3.2.2-5:** The (Q)TSP should ensure the receipt of the final incident notification form by receiving an acknowledgment from CRA.

**STEP-SUPV-3.2.2-6:** Where CRA determines that disclosure of the security breach or integrity loss is in the public interest, CRA shall inform the public (where the (Q)TSP might be involved) or require the (Q)TSP to do so. In a similar way, CRA determines that disclosure of the breach is in the interest of subscribers or other relying parties, CRA might require the (Q)TSP to inform them.

## 4. Termination of (Q)TSP/(Q)TS

To ensure sustainability and durability of trust services, and in particular of their qualified version, as well as to ensure proper termination and user's confidence in the continuity of (Q)TSs, (Q)TSP have to maintain an up-to-date termination plan, established during the initiation process as part of the request for a license to operate as a (Q)TSP.

Elaborating such a termination plan from/before the start of the provisioning of a (Q)TS is crucial to ensure minimizing the impacts of the disruption of the (qualified) trust service to its subscribers and relying parties. It essentially aims to ensure the sustainability, legal certainty and evidentiary value of (Q)TS generated evidence (outputs of (Q)TS) that were created before the effective termination of the service. This means making sure that, for example, a qualified electronic signature/seal, a qualified time stamp, or a qualified electronic delivery service (QEDS) evidence, which was created before the termination of the corresponding (Q)TS will not lose its trustworthiness or validity because of that termination; it should furthermore still be possible to validate them afterward.

Termination plans must be verified as compliant to the [LGL-FWK] by CRA upon initiation and regularly checked for compliance during the lifetime of the (Q)TSP/(Q)TS. Furthermore, the [CSPs Regulation] requires (Q)TSPs to inform CRA of its intention to cease those activities.

The above information is further listed in the [CSPs Regulation] and in [TSP] under the form of security controls, including requirements and guidelines for the (Q)TSP/(Q)TS regarding termination plans and the termination process.

### 4.1. Termination plan establishment and management

**STEP-TERM-4.1-1:** The (Q)TSPs must maintain, at all times, an up-to-date termination plan. That plan is to be agreed by CRA as part of the initial grant of the license and regularly checked for compliance during the life of the (Q)TSP/(Q)TS.

**STEP-TERM-4.1-2:** The execution of a termination plan may imply transferring activities or artifacts to a third-party (e.g., another licensed (Q)TSP, an archiving provider). In most cases, a scheduled termination will require the transfer to an archive custodian, which may be a non-TSP entity. Besides its role in verifying the correct execution of an up-to-date version of the plan, CRA may be actively involved in a termination plan (e.g., unplanned) as a fallback solution for a lack of such third party (e.g., a licensed (Q)TSP is not able to take over the custody of the necessary records).



**STEP-TERM-4.1-3:** The recommended structure and table of content for the termination plan can be found in [TSP].

**STEP-TERM-4.1-4:** The termination plan should cover, at least, expected and unexpected cessation of activities, the cessation of one, more or all the (Q)TSs from a (Q)TSP, the potential take-over of ceased activities by a third party or as a last resort by CRA, and the obligation of the preservation and availability of the information referred to in Article 16 of the [CSPs Regulation].

Following [TSP], the documentation associated to the termination plan should include:

- Formal termination procedures, including:
  - Formal termination procedures internal assessment (including regular internal assessment of the practical feasibility of the implementation of the termination plan);
  - Formal termination procedures training;
  - Formal termination procedures internal assessment reports;
  - Formal termination procedures auditing reports;
  - Formal termination (contractual) arrangements with third parties (incl. subcontractors, taking over parties, CRA, etc.);
- (Q)TS terms and conditions, practices and policy documents;
- Up-to-date documentation for personal data protection rules compliancy:
  - Treatment registers and data (and metadata) mapping;
  - Privacy impact assessments;
  - Documents (e.g., binding corporate rules) for particular cases of transfer outside the State of Qatar.
- Analysis of the termination-specific risks and associated mitigation measures. As part of the risk management obligations from the [CSPs Regulation], a termination-specific risk analysis should be undertaken, documented and the associated mitigation measures should be documented, and their implementation regularly controlled. This should include a personal data impact assessment and documentation of the associated mitigation measures.
- Analysis of the impacts on relying parties when withdrawing the (Q)TS from the trusted list;
- Procedures to ensure no output (e.g., signatures, seals) will be created any longer by using

(Q)TS outputs (e.g., certificates, qualified signature/seal creation device) previously used to create such outputs;

- Where applicable, as a best practice and specified in standards (e.g., ETSI [EN 319 401]), procedures to destroy all (Q)TSP private keys, including backup copies, or procedures to withdraw from use, in a manner such that the private keys cannot be retrieved.
- Procedures to make available and maintain the (Q)TSP records (e.g., issued and received information, created outputs) for a determined duration, as for instance, for the purposes of sustainability, verification of correctness, legal certainty, and evidence value in legal proceedings of previously created (Q)TS outputs.
- A communication plan targeting relying parties affected by this termination (e.g., subscribers, public).

**STEP-TERM-4.1-5:** The (Q)TSP should maintain sufficient financial resources and/or obtain appropriate insurance to cover the costs related to the termination plan, in case of both expected and unexpected cessation of activities.

## 4.2. (Q)TSP or (Q)TS(s) termination

**STEP-TERM-4.2-1:** The (Q)TSP should preliminarily interact with CRA and indicate its intention to cease the provision of one or all the (Q)TS it provides.

**STEP-TERM-4.2-2:** The (Q)TSP shall formally notify CRA of its intention to cease the provision of one or all the (Q)TS it provides, at least 90 days before planned effective cessation, with an updated version of its termination plan.

**STEP-TERM-4.2-3:** The (Q)TSP should ensure the receipt of the notification by receiving an acknowledgment from CRA within thirty (30) days from the sending of the notification sent in **STEP-TERM-4.2-2**.

**STEP-TERM-4.2-4:** The (Q)TSP shall follow the requirements laid down in article 16 of the [CSPs Regulation] and [TSP].

**STEP-TERM-4.2-5:** Once the (Q)TS is withdrawn from the trusted listed, the (Q)TSP is not allowed to provide the (Q)TS anymore.