



DIGITAL AND  
POPULATION DATA  
SERVICES AGENCY

# CERTIFICATE POLICY HEALTH SO- CIAL TEMPORARY CERTIFICATES

For the temporary certificate of social welfare and  
healthcare professionals

OID: 1.2.246.517.1.10.307

OID: 1.2.246.517.1.10.357

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## Table of contents

<b>1</b>	<b>Introduction.....</b>	<b>13</b>
1.1	General points .....	13
1.2	Identifiers.....	14
1.3	Certification authority and applications of certificates.....	15
1.3.1	Certification authority .....	15
1.3.2	Registration authority.....	15
1.3.3	Manufacturer and identifier of the replacement card or microchip .....	16
1.3.4	Revocation service .....	16
1.3.5	Publishing the data of a temporary certificate .....	16
1.3.6	Certificate holder.....	17
1.3.7	The trusting party.....	17
1.3.8	Certificate usage.....	17
1.4	Contact details.....	17
1.4.1	Organisation administering the certificate policy .....	17
1.4.2	Contact person .....	18
<b>2</b>	<b>General terms and conditions.....</b>	<b>19</b>
2.1	Obligations.....	19
2.1.1	Certification authority's obligations.....	19
2.1.2	The registration authority's obligations.....	20
2.1.3	Certificate holder's obligations .....	20
2.1.4	Obligations of the party trusting a temporary certificate.....	21
2.1.5	Obligations pertaining to the publishing of a temporary certificate.....	21
2.2	Liabilities.....	21
2.2.1	Certification authority's liabilities .....	21
2.2.2	Registration authority's liabilities .....	22
2.2.3	Certificate holder's liabilities.....	22
2.2.4	Liabilities of a party trusting a temporary certificate.....	23
2.2.5	Limitations of liability .....	23
2.3	Financial liability.....	24
2.3.1	Certification authority .....	24
2.3.2	Other parties.....	24
2.3.3	Certification authority's financial administration.....	24
2.4	Interpretation and implementation.....	24
2.4.1	Applicable legislation .....	24
2.4.2	Settling of disputes .....	25



2.5	Fees .....	25
2.5.1	Granting and renewing a temporary certificate.....	26
2.5.2	Fees related to the use of a temporary certificate .....	26
2.5.3	Fees related to the revocation list entry of a temporary certificate.....	26
2.5.4	Other fees.....	26
2.6	Publishing and availability of data .....	26
2.6.1	Publication frequency .....	27
2.6.2	Availability of data.....	27
2.6.3	Repositories.....	27
2.7	Information security audit.....	27
2.7.1	Audit frequency.....	27
2.7.2	Auditor .....	27
2.7.3	Audit objects and scope.....	27
2.7.4	Communicating the result of an audit.....	28
2.8	Publication of data .....	28
2.8.1	Data published by the certification authority .....	28
2.8.2	Public data.....	28
2.8.3	Data disclosed to authorities.....	28
2.8.4	Other data.....	29
2.8.5	Disclosure of data on the request of the certificate holder.....	29
2.8.6	Other principles concerning disclosure of information .....	29
2.9	Intellectual property rights.....	29
<b>3</b>	<b>Identification of certificate applicant.....</b>	<b>29</b>
3.1	Registration .....	29
3.1.1	Naming policies .....	30
3.1.2	Delivery of private keys to the certificate holder .....	30
3.2	Renewal of key pair .....	30
3.3	Renewing a key pair after inclusion on revocation list .....	30
3.4	Identification of the requester of revocation.....	31
<b>4</b>	<b>Operational requirements .....</b>	<b>32</b>
4.1	Applying for a certificate.....	32
4.2	Granting of a certificate.....	32
4.3	Receiving a certificate.....	32
4.4	Termination and interruption of the validity of a certificate.....	32
4.4.1	Prerequisites for revoking a certificate .....	32
4.4.2	Requester of revocation.....	32



[Yksikkö] / [Kirjoita teksti tähän]

1.6.2021

[Numero]

4.4.3	Revocation transaction .....	32
4.4.4	Timing of a revocation event.....	33
4.4.5	Requirements for terminating the validity of a certificate .....	33
4.4.6	Creator of revocation request.....	33
4.4.7	Making a revocation request.....	33
4.4.8	Limitations of the revocation period.....	33
4.4.9	Publishing frequency of the revocation list .....	33
4.4.10	Revocation list requirements.....	34
4.4.11	Online certificate status check .....	34
4.4.12	Requirements related to online certificate status check.....	34
4.4.13	Special requirements pertaining to the exposure of the certificate holder's private key 34	
4.5	System supervision.....	34
4.6	Archiving of data pertaining to certificates.....	34
4.6.1	Material stored.....	34
4.6.2	Protection of archives .....	35
4.6.3	Backup methods for archived data.....	35
4.6.4	Acquisition and backup methods for archived data .....	35
4.7	Management of the continuity of operations and handling of deviations.....	35
4.7.1	The certification authority's private key has become disclosed or the certification authority's certificate has been revoked .....	35
4.7.2	Compromised security because of a natural disaster or other catastrophe .....	35
4.8	End of the certification authority's operations .....	35
<b>5</b>	<b>Physical, operational and staff security requirements.....</b>	<b>37</b>
5.1	Arrangements related to physical security.....	37
5.1.1	Location and building properties .....	37
5.1.2	Physical access to facility .....	37
5.1.3	Auxiliary arrangements .....	37
5.2	Operational requirements .....	37
5.2.1	Division of responsibility.....	37
5.2.2	Number of staff required for the duties.....	38
5.2.3	Task-specific identification .....	38
5.3	Personal security .....	38
5.3.1	Carrying out a background check on the staff .....	38
5.3.2	Procedure adhered to in the security clearance .....	38
5.3.3	Requirements on training.....	39
5.3.4	Maintenance of expertise and skills .....	39



[Yksikkö] / [Kirjoita teksti tähän]

1.6.2021

[Numero]

5.3.5	Requirements for task rotation .....	39
5.3.6	Measures resulting from deviations.....	39
5.3.7	Staff representing the organisation .....	39
5.3.8	Documents given to the staff.....	39
<b>6</b>	<b>Technical security arrangements .....</b>	<b>40</b>
6.1	Generation and storage of key pairs .....	40
6.1.1	Generating key pairs.....	40
6.1.2	Delivery of a private key to certificate holder.....	40
6.1.3	Delivery of the certificate holder's public key to the certification authority.....	40
6.1.4	Distribution of the certification authority's public key to the certificate holder.....	40
6.1.5	Key lengths.....	40
6.1.6	Intended use of keys.....	40
6.2	Protection of private key .....	41
6.2.1	Standards for the hardware security module.....	41
6.2.2	Staff participating in the handling of the certification authority's private key .....	41
6.2.3	Disclosure of private key to a trusted party .....	41
6.2.4	Backup of a private key.....	41
6.2.5	Archiving of private keys .....	42
6.2.6	Administration of private keys in hardware security modules .....	42
6.3	Other key management issues .....	42
6.3.1	Public key archiving .....	42
6.3.2	Usage period of public and private keys .....	42
6.4	Activation data .....	42
6.4.1	Creation and commissioning of activation data .....	42
6.4.2	Protection of activation data.....	42
6.4.3	Other activation data issues.....	42
6.5	Security requirements pertaining to the use of and access to computers .....	42
6.5.1	Hardware security.....	42
6.6	Certificate system life cycle management .....	43
6.6.1	Supervision related to developing the system .....	43
6.6.2	Security management.....	43
6.7	Telecommunication network security .....	43
6.8	Monitoring of the use of the hardware security module .....	43
<b>7</b>	<b>Certificate and revocation list profiles .....</b>	<b>44</b>
7.1	Technical certificate data .....	44
7.2	Revocation list profile.....	44



[Yksikkö] / [Kirjoita teksti tähän]

1.6.2021

<b>8</b>	<b>Specification document management.....</b>	<b>44</b>
8.1	Changing of specifications .....	44
8.2	Publishing and communication .....	44
8.3	Certificate policy change and approval procedure.....	44





## Definitions and abbreviations

### Definitions

**Activation data:** Confidential data (PIN code) that is needed to activate private keys stored in a microchip and to use them in public key methods.

**Key pair:** A pair of interconnected keys, one public and one private, which are used in public key methods. The keys' purpose of use is defined in the certificate (see certificate holder's authentication and encryption certificate).

**Asymmetric encryption:** A pair of one public key and one private key is used in asymmetric encryption. A message that has been encrypted using a public key can only be opened by the private key of the key pair in question.

**Public key:** The public component of a key pair used in asymmetric encryption in public key methods. The certification authority certifies with its digital signature that the public key belongs to the certificate holder. The public key is part of the data content of the certificate.

**Public key infrastructure:** A data security infrastructure in which security services are provided by public key methods.

**Public key method:** A data security service, such as electronic identification, which is provided by using public and private keys, certificates and asymmetric encryption.

**Card reader software:** Card reader software is used in workstations as a so-called end-user application. It enables users to use their cards and certificates stored on it in various user and application environments, such as public e-services, secure email and logging on to workstations.

**Trusting party:** A party that trusts the certificate data and uses the certificate for various data security services such as electronic identification of the certificate holder.

**Payment card:** Generic term for debit, credit, combination, prepaid and delayed debit cards.

**Microchip:** A technical platform that is used to store the certificate and private keys, integrated into a smart card, identity card, payment card or mobile terminal card.

**Mobile terminal:** A mobile telephone or other mobile terminal that can use a certificate and private keys on a microchip.

**Organisation certificate:** A qualified certificate issued by the Digital and Population Data Services Agency to a natural person; the data content of the certificate is determined by the Act on Strong Electronic Identification and Trust Services.

**PIN code:** Activation data that activates a private key held on a microchip. PIN 1: the basic code for authentication and encryption.

**PUK code:** A code that is needed to unblock a locked PIN code.





**Registration authority:** The registration authority identifies the certificate applicant in accordance with the certificate policy and certification practice statement on behalf of and at the responsibility of the certification authority.

**RSA algorithm and RSA key:** The RSA algorithm is a common public key algorithm. The private and public keys associated with a temporary certificate are RSA keys.

**Revocation list:** A list of certificates revoked before the end of their validity period and the revocation dates, electronically signed and published by the certification authority. The revocation list specifies the publication dates of the current and next revocation list. Revoked certificates are added to the list.

**Revocation service:** A technical service provider that receives certificate revocation requests and submits them to the certificate system on behalf of the certification authority.

**Terhikki register:** Central register of healthcare professionals.

**Regulated healthcare professional:** A person who, on the basis of the Act on Health Care Professionals, has been given the right to practise a profession (licensed professional) or the authorisation to practise a profession (authorised professional) and a person who, on the basis of the Act, is entitled to use the occupational title of a health care professional as laid down by Government decree (professional with a protected occupational title) and who is registered in the central register of health care professionals.

**ID card for regulated social welfare and healthcare professional: an ID card issued by DPDSA to a regulated social welfare and healthcare professional which contains a professional certificate.**

**Non-regulated healthcare workers:** healthcare service providers, as referred to in the Act on Health Care Professionals (559/1994), who are not regulated healthcare professionals. This group includes e.g. workers in the support services, office and IT services of a healthcare unit. A person who works for a healthcare service provider organisation and is not a regulated healthcare professional.

**ID card for non-regulated social welfare and healthcare worker:** an ID card issued by DPDSA to a non-regulated healthcare worker which contains a certificate.

**Healthcare student:** Subject to the conditions laid down by Government decree, the tasks of a licensed professional may, on a temporary basis, be carried out by a person studying for the profession in question under direction and supervision of a professional who has been licensed to practise the profession independently. The provisions concerning healthcare professionals laid down in the Act apply to students as appropriate. Medical, dentistry and pharmacy students are issued with an ID card for regulated healthcare professional. Students of other healthcare professions who meet the conditions for practising the profession in question on the basis of Government decree are issued with an ID card for non-regulated healthcare worker which is specific to the organisation in question.

**Non-clinical healthcare sector staff:** employees of healthcare service providers who are not regulated healthcare professionals or non-regulated healthcare workers.



[Yksikkö] / [Kirjoita teksti tähän]

1.6.2021

[Numero]

This group includes other individuals and specialist groups who have access to the national information systems, such as data protection officers, IT system suppliers, consultants, etc.

**ID card for non-clinical healthcare sector staff:** An ID card issued by DPDSA to non-clinical healthcare sector staff which contains a certificate.

**Temporary certificate:** A certificate issued by DPDSA to a natural person which can be used for authentication and encryption or authentication, encryption and electronic signing.

**Replacement card:** A replacement for an organisation-specific ID card which contains the cardholder's temporary certificate in its technical component (microchip). In special circumstances, a replacement card can be issued to a person who does not hold an ID card of the organisation in question.

**Certificate:** A electronic certificate which enables a person's authentication and data encryption, links the signature verification data to the signatory and identifies the signatory. A certificate contains an OID (object identifier) that identifies the certification practice statement in question.

**Certificate system:** A technical data system used to create certificates and sign revocation lists.

**PKI disclosure statement:** A document that contains the main points of the certificate policy and certification practice statement.

**Certificate policy:** A document that describes the principles of certification and the responsibilities of the trusting parties. The certificate policies published by DPDSA are publicly available. Each certificate policy is identified by an OID.

**Certificate register:** A register maintained by a certification authority that issues certificates to the public. Data are held for at least 5 years after the expiry of the certificate.

**Certificate management system:** A data system consisting of certificate systems, data communications, a certificate directory, revocation list service, advice and revocation service, certificate management and card management. CPS OID is part of the data content of the certificate.

**Certification practice statement:** A description of how the certification authority implements its certificate policy. Each certification practice statement is identified by an OID.

**Certification authority:** An organisation that issues certificates, is responsible for their provision and draws up the certificate policy that describes its operation and the associated certification practice statement.

**CA certificate:** Contains the name, country and public key of the certification authority.

**CA's private key:** The private key used by the certification authority to sign its issued certificates and published revocation lists.



**Certificate applicant:** A person who requests a temporary certificate and is reliably identified in conjunction with the request.

**Certificate holder:** A person whose identity and public key are verified by the CA's digital signature and who holds the private keys linked with the certificate in question.

**Certificate holder's authentication and encryption certificate:** A certificate used for electronic personal identification and data encryption. The certificate holder uses the private authentication and encryption key for electronic identification and decryption of encrypted data or messages. The use of the key requires a basic PIN code (PIN 1).

**Certificate usage and purpose:** In this document, certificate usage refers to the use of the certificate and the associated keys.

**Private key:** The private component of a key pair used in asymmetric encryption in public key methods. The private keys of the certificate holder are stored on a micro-chip to protect them from unauthorised usage.

## List of abbreviations

<b>CA</b>	Certification Authority
<b>CP</b>	Certificate Policy
<b>CPS</b>	Certification Practice Statement
<b>CRL</b>	Certificate Revocation List
<b>ECC</b>	Elliptic Curve Cryptography
<b>FINEID</b>	Finnish Electronic Identification
<b>HSM</b>	Hardware Security Module
<b>EPI</b>	Electronic Personal Identification
<b>HTTP</b>	Hypertext Transport Protocol
<b>ISO 27001</b>	ISO/IEC 27001
<b>LDAP</b>	Lightweight Directory Access Protocol
<b>OCSP</b>	Online Certificate Status Protocol
<b>OID</b>	Object Identifier
<b>PDS</b>	PKI Disclosure Statement



[Yksikkö] / [Kirjoita teksti tähän]

1.6.2021

[Numero]

<b>PIN</b>	Personal Identification Number, PIN
<b>PKI</b>	Public Key Infrastructure
<b>PUK</b>	PIN Unblocking Key, PUK code
<b>RSA</b>	Rivest, Shamir, Adleman, a public key algorithm, asym- metric algorithm
<b>DPDSA</b>	Digital and Population Data Services Agency

## References

This document refers to regulations and specifications presented in the following documents. They are binding with respect to functions described in this document.

- The references used with respect to date of publishing or version numbers are either specific or non-specific.
- For specific references, only the cited version applies.
- For non-specific references, only the latest version of the referenced document applies.

Material related to this document is available at the following location, among others: <http://docbox.etsi.org/Reference>. ETSI does not guarantee the long-term functionality of the link.

### Compelling references:

[1] ETSI EN 319 401: "Electronic Signatures and Infrastructures (ESI); General Policy Requirements

for Trust Service Providers".

[2] ETSI EN 319 411-1: "Electronic Signatures and Infrastructures (ESI); Policy and security

requirements for trust service providers issuing certificates; Part 1: General requirements".

[3] Guidelines for The Issuance and Management of Extended Validation Certificates v1.5.5,

CA/Browser Forum.

[4] ETSI EN 319 412-5: "Electronic Signatures and Infrastructures (ESI); Certificate Profiles; Part 5:

QCStatements".



### Guideline references:

Regulation (EU) N 910/2014 of the European Parliament and of the Council on electronic identification and trust services for electronic transactions in the internal market and repealing Directive 1999/93/EC.

ETSI 8 Draft ETSI EN 319 411-2 V2.0.6 (2015-06)

[ETSI TS 101 456: "Electronic Signatures and Infrastructures (ESI); Policy requirements for certification authorities issuing qualified certificates".

Baseline Requirements for the Issuance and Management of Publicly-Trusted Certificates, CA/Browser Forum.

IETF RFC 3647: "Internet X.509 Public Key Infrastructure Certificate Policy and Certification Practices Framework".

Directive 95/46/EC of the European Parliament and of the Council of 24 October 1995 on the protection of individuals with regard to the processing of personal data and on the free movement of such data.

### Terminology descriptions:

ETSI EN 319 401 [1], ETSI

EN 319 411-1 [2], the Regulation (EU) N° 910/2014 [i.1] and the following apply:

**EU Qualified Certificate:** qualified certificate as specified in Regulation (EU) No. 910/2014 [i.1]

**Qualified Electronic Signature/Seal Creation Device:** As specified in Regulation (EU) No. 910/2014 [i.1].



## 1 Introduction

The certificate policy is a document drawn up by the Certification Authority (CA) which describes the practices and principles used in certification. The certification practice statement is a more detailed description of the CA's activities than the certificate policy.

This certificate policy is applied to the Digital and Population Data Services Agency's temporary certificate for non-regulated healthcare workers. The certificate data are relayed to a public directory for use by a party trusting the certificate with the certificate applicant's approval, or otherwise according to an agreement with social welfare and health care.

The temporary certificates for non-regulated healthcare workers is a certificate that supports the use of the certificate for non-regulated healthcare workers granted by Digital and Population Data Services Agency, OID: 1.2.246.517.1.10.306 and 1.2.246.517.1.10.356.

### 1.1 General points

A certificate is an electronic certificate that links the signature authentication data to the signatory and identifies the signatory. The certificate data are signed electronically by the CA's private key. Certificates under this certificate policy are based on a public key infrastructure and public key methods. The data contents of certificates under this certificate policy are determined by the Act on Strong Electronic Identification and Trust Services .

A temporary certificate is an authentication and encryption certificate and signature certificate. Identification is verified by the Digital and Population Data Services Agency.

A temporary certificate conformant to this policy for regulated social welfare and healthcare professionals can be granted to a regulated social welfare and healthcare professional. When a social and healthcare service provider registers temporary certificates for regulated social and healthcare workers, all parties referred to in this certificate policy shall comply with the certificate policy and the requirements of the act on the electronic processing of client data in social and health care (159/2007) and the act on electronic prescriptions (61/2007) and associated regulations.

The Digital and Population Data Services Agency, which acts as the certification authority, uses an identifier to identify the certificate holder. This identifier is also a part of the data content of the certificate. The identifier is a technical data item created separately for e-service access, and it does not contain any personal information. A temporary certificate can be stored on various ID cards.

Both the certificate policy and the certification practice statement of DPDSA have a unique object identifier (OID).

The certification authority's activities include the provision of certification, directory and revocation services, registration, and ID card creation and identification. These activities are described in Chapter 1.3.



DPDSA draws up a separate certificate policy for each type of certificate issued by it, and a separate certification practice statement for each technical platform. The certificate policy contains a general description of the practices, terms and conditions, responsibility allocation and other matters related to certificate usage for each type of certificate. The certification practice statement contains a detailed description of the applicable practices.

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 shall apply with regard to signature certificates in trust services as of 1 July 2016. This document describes the procedural requirements concerning the activities and administrative practices of certification authorities that issue identification and signature certificates under the Regulation. The use of a secure signature creation device is described in the procedural requirements specified in this document.

The certification authority is a certification service provider issuing certificates to the public.

According to the Act on Strong Electronic Identification and Trust Services (617/2009), the DPDSA acts as an identification service provider when it offers certificate-based identification devices to the public. The providers of identification and signature services are monitored by the Finnish Transport and Communications Agency (Traficom) in Finland.

In addition, DPDSA has acted as a statutory certification authority for health care since 1 December 2010 and as a statutory certification authority for social care since 1 April 2015 following the amendment of the act on the electronic processing of client data in social and health care (159/2007), the act on electronic prescriptions (61/2007) and the act on the population information system and the Digital and Population Data Services Agency's certificate services (304/2019). DPDSA's Certificate Services are responsible for the agency's certification activities.

## 1.2 Identifiers

The title of this certificate policy is the Certification Policy for DPDSA Temporary Certificate for social and healthcare regulated workers, OID 1.2.246.517.1.10.307 and 1.2.246.517.1.10.357.

This certificate policy refers to the root certificate authority's certificate practice statement, OID 1.2.246.517.1.10.301 and 1.2.246.517.1.10.351.

The OIDs of the signature certificate policies defined in this document are:

Digital and Population Data Services Agency adheres to a certificate policy concerning signature certificates issued to the public as per trust services under Regulation No. (EU) 910/2014. The document reference as per ETSI EN 319 411-1 [2], QSCD is: OID: 0.4.0.194112.1.2. Signature certificates issued in accordance with this certificate policy can be used to authenticate digital signatures that correspond to approved certificates and creation devices for digital signatures as referred to in the Regulation and provided for in Articles 28 and 29 of the Regulation.



The level of the identification certificate meets the requirements of High level of assurance in accordance with the Regulation and the regulation on levels of assurance.

The certificate policy and the certification practice statement are available at [www.fin-eid.fi](http://www.fin-eid.fi).

## 1.3 Certification authority and applications of certificates

The Certification Authority provides certificate services according to the terms and conditions specified in this certificate policy and guarantees their functioning to the certificate holder in accordance with Chapter 2.2.1 on the responsibilities of the Certification Authority. The certification authority is responsible for the functioning of the certificate system as a whole, including on behalf of any registration authorities and technical suppliers it may use. This certificate policy has been registered by DPDSA. It is a government authority that maintains a personal data register and is responsible, under the Act on the Population Information System and the Certificate Services of the Digital and Population Data Service Agency (304/2019), the act on the electronic processing of client data in social and health care (159/2007) and the act on electronic prescriptions (61/2007), for providing certified electronic services. The DPDSA Certificate Service is comprised of the following functions.

### 1.3.1 Certification authority

The certification authority's task is to:

- provide certificate and directory services in accordance with its certificate policy and certification practice statement, and certification revocation services
- identify certificate applicants
- ensure the accuracy of the data content of certificates
- revoke certificates and publish certificate revocation lists
- adhere to high data security standards and good data processing practices when processing the personal information of certificate holders
- create client IDs for the purpose of personal identification
- provide a card order and management system for registration and revocation purposes.

### 1.3.2 Registration authority

Temporary certificates are registered in accordance with the Act on Strong Electronic Identification and Trust Services and the practices described in the certification practice statement document. The organisation's temporary certificates located on replacement cards are registered by DPDSA's partner with whom DPDSA has concluded a registration agreement. A more detailed procedure is described in the certificate practice statement that describes the technical platform in question.





- The registration authority acts on behalf of and at the responsibility of the certification authority.
- The registration authority shall comply with the certification authority's certificate policy and certification practice statement.
- The registration authority identifies certificate applicants in accordance with the certification practice statement.
- Certificates are created based on personal identification details related to the certificate application, which are provided by the registration point.
- The registration authority adheres to the principles of good personal data processing.
- DPDSA oversees that the client organisation adheres to the terms and conditions of the registration agreement and the relevant provisions of the Act on Strong Electronic Identification and Trust Services.
- The registration authority uses the order and management system provided by the Certification Authority to carry out registrations and to order replacement cards and revoke temporary certificates.

### 1.3.3 Manufacturer and identifier of the replacement card or microchip

- With regard to certificates, the associated key pairs and activation data, the manufacturer and identifier act on behalf of the certification authority, at its responsibility and in accordance with the agreement.
- The manufacturer and identifier shall comply with the certification authority's certificate policy and certification practice statement.
- Replacement cards and microchips are uniquely identified in accordance with data provided by the registration authority.

### 1.3.4 Revocation service

The certificate revocation service which is in place for other cards does not apply to replacement cards; instead, they are revoked by the registration authority of the certificate holder organisation in the card order and management system. A certificate is revoked when the certificate holder wishes to revoke it before its stipulated expiry date. Revoked certificates are added to the revocation list.

### 1.3.5 Publishing the data of a temporary certificate

The directory service is a public Internet-based service which can be used to retrieve the certification authority's certificates and revocation list. Temporary certificates are not published in the directory. The directory service is available at <ldap://ldap.fineid.fi>.



### 1.3.6 Certificate holder

Temporary certificates under this certificate policy can be issued to persons identified in accordance with the Act on Strong Electronic Identification and Trust Services and in accordance with the act on the electronic processing of client data in social and health care (159/2007) and the act on electronic prescriptions (61/2007) and associated regulations and requirements. The holder of a temporary certificate for social and healthcare regulated workers may only be a social and healthcare regulated worker.

The certificate holder must comply with the certification authority's certificate policy and certification practice statement.

### 1.3.7 The trusting party

The trusting party is a natural person or an organisation that trusts the certificate information and uses the certificate for authentication, encryption and electronic signing. The trusting party must verify that the certificate is valid and not on a revocation list.

### 1.3.8 Certificate usage

Digital and Population Data Services Agency adheres to this certificate policy when granting temporary certificates to social and healthcare regulated workers. Certificate holders and trusting parties must comply with this certificate policy.

Temporary certificates issued under this certificate policy can be used for personal authentication and encryption or electronic signing. The certificate can be used without limitation according to its purpose in administrative applications and services and those provided by private organisations.

The certificate policy and certification practice statement contain requirements concerning the obligations of the certification authority, registration authority, certificate holder and trusting party as well as matters related to legislation and dispute resolution.

## 1.4 Contact details

### 1.4.1 Organisation administering the certificate policy

This certificate policy has been registered by the Digital and Population Data Services Agency, a public authority which administers a personal information register and, under the Act on the Population Information System and the Certificate Services of the Digital and Population Data Service Agency (304/2019), is responsible for providing certified electronic services in addition to its other tasks. DPDSA is responsible for the administration and updating of this certificate policy.

Copyright under this certificate policy belongs to DPDSA.



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1.6.2021

[Numero]

#### 1.4.2 Contact person

Questions regarding this certificate policy should be addressed to:

**Digital and Population Data Services Agency**

P.O. Box 123 (Lintulahdenkuja 2)      Tel. +358 295 535 001

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Questions regarding the certificate policy are handled by the Certificate Services of DPDSA.

**Digital and Population Data Services Agency (DPDSA) Certificate Services**

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## 2 General terms and conditions

This certificate policy is effective as of 1 June 2021. The amendment and publication procedure of this policy is described in section 8 of this document.

### 2.1 Obligations

#### 2.1.1 Certification authority's obligations

- The DPDSA is a statutory certification authority.
- The client organisation is for its part responsible for revoking certificates in accordance with the agreement made between DPDSA and the client organisation.
- The client organisation shall verify the accuracy of information about end users in accordance with the agreement made between DPDSA and the client organisation.
- The certification authority shall act in accordance with current legislation.
- The certification authority shall perform its duties duly and reliably.
- The certification authority has the necessary technical ability, financial resources and ability to cover its liability for damages.
- The certification authority is responsible for all areas of the certification activity, including the reliability and functioning of services and products produced by any technical suppliers or persons who assist the certification authority, such as registration authorities and card manufacturers.
- The certification authority draws up and maintains a certificate policy which describes at a general level the procedures for the issuance, maintenance and management of temporary certificates, the terms and conditions, the allocation of responsibilities, and other matters related to the use of temporary certificates.
- The certification authority draws up and maintains certification practice statements which describe how the certification authority applies its certificate policy.
- The certification authority complies with its certificate policy and certification practice statement.
- The certification authority makes the certificate policy and the certification practice statement publicly available.
- The certification authority shall employ sufficient staff with the expertise, experience and competence required for producing certificate services.
- The certification authority shall use reliable systems and products protected against unauthorised use.



- The certification authority shall keep information regarding the certificate and certificate activities publicly available, based on which the operations and reliability of the certification authority can be assessed.
- It is possible that Digital and Population Data Services Agency issues a certificate for its own purposes. In that case it follows the same requirements than issuing certificates for other organisations.

### 2.1.2 The registration authority's obligations

- The registration authority shall comply with the certificate policy and the certification practice statement in its registration activities.
- The registration authority identifies the certificate applicant personally and reliably in a way described in the certification practice statement and so that the applicant's identity and other information pertaining to the applicant's person needed in the granting of the certificate will carefully be inspected.
- The registration authority shall see to the careful handling and confidentiality of personal data.
- The registration authority shall provide the certificate applicant with data of the terms of use of the certificate.
- The registration authority shall adhere to registration procedures agreed upon with the certificate authority.

### 2.1.3 Certificate holder's obligations

- The purpose of the certificate is specified in the certificate policy and certification practice statement of each certificate type and in the certificate holder's instructions. Certificates may only be used in conformance with their intended use for authentication or data encryption or digital signature.
- The holder of a temporary certificate shall see to it that the data stated when applying for temporary certificates are correct.
- The holder of a temporary certificate is responsible for the use of the temporary certificate, legal actions taken with the temporary certificate and their financial consequences.
- The holder of a temporary certificate shall store its private key contained on a microchip and the PIN code required for using it separately from each other and aim to prevent the loss, access by third parties, alteration or unauthorised use of the private key. Transferring the microchip or disclosing the PIN code to a third party, for example by lending, releases the certificate authority and the party trusting the temporary certificate from any liability arising out of the use of the microchip.
- The temporary certificate shall be handled and protected with the same care as other corresponding microchips, cards or documents, such as credit cards,



driving licence or passport. Personal PIN codes must be stored physically in a different location than the microchip containing the temporary certificate and private key.

- The loss or potential misuse of the microchip must be reported without delay to the registration authority of the certificate holder's organisation, who will close the certificate in the order and administration system.

#### 2.1.4 Obligations of the party trusting a temporary certificate

It is the obligation of the party trusting a certificate to ensure that the certificate is used according to its intended use. The intended use of an authentication and encryption certificate is the authentication of a person and encryption of data. The intended use of a signature certificate is electronic signing.

A party trusting the certificate must adhere to the certificate policy and certification practice statement.

A party trusting a temporary certificate may bona fide trust a temporary certificate after verifying that the certification chain is intact, the temporary certificate is valid, for example based on the OCSP service, and is not contained on a revocation list. A party trusting a temporary certificate shall check the certificates on the revocation list or OCSP service. In order to reliably verify the validity of a temporary certificate, the trusting party must comply with the following procedure for revocation list checks.

If a party trusting a temporary certificate copies the revocation list from a directory, it must verify the genuineness of the revocation list by checking the digital signature of the revocation list's certification authority. In addition, the validity period of the revocation list must be checked.

If the most recent revocation list cannot be obtained from the directory because of hardware or directory service malfunction, the temporary certificate must not be accepted if the validity period of the last obtained revocation list has expired. All approvals of a temporary certificate after the validity period take place at the risk of the party trusting the temporary certificate.

#### 2.1.5 Obligations pertaining to the publishing of a temporary certificate

Closed temporary certificates are published on a revocation list where a party trusting the certificate must check the certificate's validity. Temporary certificates are not published in the directory.

## 2.2 Liabilities

### 2.2.1 Certification authority's liabilities

Digital and Population Data Services Agency as a certification authority is liable for the safety of the entire certificate system. The certification authority is liable for services it has commissioned as if for its own.

Digital and Population Data Services Agency ensures that the temporary certificate is created in accordance with the procedures defined in the Act on Strong Electronic



Identification and Trust Services, the certificate policy and the certification practice statement. In addition, the temporary certificate must be created according to the data provided by the certificate applicant and it must meet the certification authority's liability for damages set forth in legislation. In addition to the above, the regulations set forth in the act on the electronic processing of client data in social and health care (159/2007) and the act on electronic prescriptions (61/2007) and the requirements set on the basis of the above are also adhered to. Digital and Population Data Services Agency is liable only for the data it has stored in the certificate.

Digital and Population Data Services Agency is liable for the usability of the temporary certificate, when used appropriately, throughout its validity period, unless it has been placed on a revocation list. The temporary certificate has been given to a person identified in a manner required for temporary certificates. The certificate holder has been given instructions pertaining to the use of the temporary certificate prior to the signing of the agreement.

When signing a temporary certificate with its private key, the certification authority assures it has checked the personal data in the temporary certificate according to the policies described in the certificate policy and the certification practice statement.

The certification authority is liable for the certificates revoked by the certificate holder's organisation being included in the revocation list within the time specified in this certificate policy.

### 2.2.2 Registration authority's liabilities

The registration authority of a temporary certificate is a registration point that registers the certificate applicant for Digital and Population Data Services Agency, which acts as the certification authority, on the basis of an agreement concluded for this purpose. The registration authority is liable for the registration it has carried out and for revoking the certificate. Registrations are subject to the requirements set out in the Act on Strong Electronic Identification and Trust Services and in the certification practice statement. In addition to the above, the regulations set forth in the act on the electronic processing of client data in social and health care (159/2007) and the act on electronic prescriptions (61/2007) and the requirements set on the basis of the above are also adhered to.

### 2.2.3 Certificate holder's liabilities

The holder of a certificate is liable for the use of the temporary certificate, legal actions taken with it and their financial consequences.

Leaving a card containing a microchip in a reader may enable the abuse of the temporary certificate. When terminating a terminal session, it is the responsibility of the certificate holder to remove the microchip containing the temporary certificate from the reader device and close the applications used appropriately or otherwise closing the technical connection needed for the use of the certificate.

The certificate holder's liability for the use of the certificate ends when they have notified the registration authority of the certificate holder's organisation on the need to revoke the certificate and upon receiving a notice of the receipt of the revocation



request. In order to terminate liability, the revocation request must be made immediately upon noticing the reason for the request.

## 2.2.4 Liabilities of a party trusting a temporary certificate

A party trusting a certificate may not bona fide trust the correctness of a temporary certificate if the validity of the temporary certificate has not been verified with a revocation list. Accepting a temporary certificate in the above cases releases Digital and Population Data Services Agency of liability. A party trusting a temporary certificate must verify that the certificate chain is intact and the certificate granted corresponds to its intended use in the legal action in which it is used.

## 2.2.5 Limitations of liability

Digital and Population Data Services Agency's liability for damages pertaining to the production of certificate services is determined pursuant to the Act on Strong Electronic Identification and Trust Services and, where applicable, the Tort Liability Act (412/1974).

Digital and Population Data Services Agency is not liable for damage caused by the disclosure of a PIN code or a certificate holder's private key unless said disclosure is the direct result of Digital and Population Data Services Agency's direct actions.

The maximum extent of Digital and Population Data Services Agency's liability to the certificate holder and a party trusting the certificate is for direct damage incurred, in case the damage is the result of Digital and Population Data Services Agency's direct actions, however at most 15% of the amount of certificate invoicing for the client organisation in question for the preceding 3 months (share payable to DPDSA).

Digital and Population Data Services Agency is not liable for indirect or consequential damage caused to the certificate holder. Neither is Digital and Population Data Services Agency liable for the indirect or consequential damage incurred by a party trusting a temporary certificate or by another contractual partner of the certificate holder.

Digital and Population Data Services Agency is not responsible for the operation of public telecommunication connections, such as the Internet, or for the inability to execute a legal transaction because of the non-functionality of a device or card reader software used by the certificate holder or for the use of a certificate in contradiction to its intended use.

The certification authority has the right to interrupt the service for changes or maintenance. Changes to or maintenance of the revocation list will be announced in advance.

The certification authority has the right to further develop the certificate service. A certificate holder or a party trusting a certificate must bear their own expenses thus incurred, and the certification authority is not liable to compensate the certificate holder or a party trusting the certificate for any expenses caused by the certification authority's development work.

The certification authority is not liable for errors in the online service or applications intended for end users and based on a certificate or any resulting expenses.





## 2.3 Financial liability

### 2.3.1 Certification authority

Digital and Population Data Services Agency's liability for damages pertaining to the production of certificate services is determined pursuant to the Act on Strong Electronic Identification and Trust Services and, where applicable, the Tort Liability Act (412/1974).

Digital and Population Data Services Agency is liable at most for the direct damage incurred by a party trusting a certificate in accordance with the provisions of the section Limitations of Liability.

### 2.3.2 Other parties

A party trusting a temporary certificate may trust the correctness of the temporary certificate if they have verified that the temporary certificate has not been included in a revocation list, the validity of the certificate has not expired and the party has no other justifiable reason to doubt the correctness of the use of the certificate.

The certification authority is responsible for the temporary certificate in accordance with the certification authority's commitments in this certificate policy and the certification practice statement on temporary certificates.

### 2.3.3 Certification authority's financial administration

The certificate services produced by Digital and Population Data Services Agency are covered by a financial administration system and supervision as has separately been set forth.

The certification authority's financial administration is described in detail in the certification practice statement.

## 2.4 Interpretation and implementation

### 2.4.1 Applicable legislation

Digital and Population Data Services Agency's liability for damages pertaining to the production of certificate services is determined pursuant to the Act on Strong Electronic Identification and Trust Services and, where applicable, the Tort Liability Act (412/1974). In addition to the above, the regulations set forth in the act on the electronic processing of client data in social and health care (159/2007) and the act on electronic prescriptions (61/2007) and the requirements set on the basis of the above are also adhered to.

Digital and Population Data Services Agency conforms to the principles of good personal data processing set forth in the Personal Data Act (523/1999) and to the good information management practices of the Act on the Openness of Government Activities (621/1999). Digital and Population Data Services Agency also secures information security with continuous training. Digital and Population Data Services Agency has also prepared policy rules for information services and certificate services.



Digital and Population Data Services Agency procures the duties pertaining to registration and personal identification under a separate, private-law contract pertaining to registration measures. Digital and Population Data Services Agency may obtain a service, for example, by adhering to the regulations set forth in the act on the government's joint services (223/2007).

The position of Digital and Population Data Services Agency is prescribed in the act on the Digital and Population Data Services Agency (304/2019).

The Digital and Population Data Services Agency ensures that temporary certificates are created in accordance with the procedures defined in the Act on Strong Electronic Identification and Trust Services, the certificate policy and the certification practice statement and according to the data provided by the certificate applicant. In addition to the above, the regulations set forth in the act on the electronic processing of client data in social and health care (159/2007) and the act on electronic prescriptions (61/2007) and the requirements set on the basis of the above are also adhered to.

The operations of Digital and Population Data Services Agency are supervised by Finnish Transport and Communications Agency (Traficom), a body conformant to the Act on Strong Electronic Identification and Trust Services, which provides the necessary regulations and recommendations for the operations.

With respect to the processing of personal data, Digital and Population Data Services Agency conforms to the Personal Data Act. Digital and Population Data Services Agency works in constant collaboration with the Office of the Data Protection Ombudsman with respect to the processing of personal data.

Applicable legislation is adhered to in settling appeals and disputes, in administrative supervision and implementation of law.

#### 2.4.2 Settling of disputes

When granting certificates, Digital and Population Data Services Agency is responsible for the temporary certificate for a social and healthcare regulated worker meeting the requirements set in this certificate policy.

Applicable legislation is adhered to in settling appeals and disputes, in administrative supervision and implementation of law. When issuing a temporary certificate for a social and healthcare regulated worker, the Act on Strong Electronic Identification and Trust Services and the supervision and appeals procedure described therein must, in particular, be taken into account.

When granting certificates, Digital and Population Data Services Agency is responsible for the temporary certificate for a social and healthcare regulated worker meeting the requirements set in this certificate policy. Any disputes shall be settled according to Finnish law in the District Court of Helsinki.

## 2.5 Fees

This section specifies the fees related to the use of a temporary certificate.





### 2.5.1 Granting and renewing a temporary certificate

Temporary certificates are applied for according to the description of the certification practice statement.

The price of acquiring a backup card is determined according to the then-valid Decree of the Ministry of Finance on the payment of Digital and Population Data Services Agency fees.

Temporary certificates are priced according to Digital and Population Data Services Agency's price list pertaining to commercial services.

### 2.5.2 Fees related to the use of a temporary certificate

The certification authority does not separately charge the certificate holder for the use of the certificates, the revocation service or a public directory. Individual online service providers may charge for the use of their services. The use of a certificate does not require a specific announcement or permit from the certification authority.

### 2.5.3 Fees related to the revocation list entry of a temporary certificate

Reporting a temporary certificate to a revocation list is free of charge. Also the retrieval of revocation lists from the directory and the checking of the validity of temporary certificates against the revocation list are free of charge.

### 2.5.4 Other fees

The use of advisory services is subject to a separate fee according to the then-valid price list.

If the service provider wishes to arrange for information maintenance service between the unique identifier of the temporary certificates and the identifiers of its own background system or between other updated data, the service provider may apply for information disclosure permission in the information service from Digital and Population Data Services Agency. This service will be priced according to the then-valid Act on Criteria for Charges Payable to the State and the Decree of the Ministry of Finance on the payment of Digital and Population Data Services Agency fees.

The terms of use of a temporary certificate are given to the holder of the temporary certificate when receiving the temporary certificate.

## 2.6 Publishing and availability of data

Publishing of the certification authority's data

The certification authority publishes the certification authority's certificates and revocation lists in a non-chargeable, publicly available, public directory. The created temporary certificates are not published. The certification authority publishes the certificate policy, the certification practice statements, the PKI disclosure statement (PDS) and other public documents pertaining to the production of certificate services on its website.



### 2.6.1 Publication frequency

The certification authority publishes a revocation list that is valid for 72 hours from its publication. This revocation list is updated once per hour with a new one.

### 2.6.2 Availability of data

Directory and revocation list data are publicly available. The FINEID specifications published by the certification authority are available on the certification authority's website. In addition, the certificate policies and certification practice statements are available on the certification authority's website.

### 2.6.3 Repositories

The data published by the certification authority are available on the certification authority's website and, in conformance with this certificate policy, in a public directory. The certificate system's confidential data are stored in the certification authority's own, confidential repository. The certification authority's data are archived according to the valid archiving rules. Particular attention is paid to the processing of personal data. Digital and Population Data Services Agency has published specific policy rules conformant to the Personal Data Act on the production of certificate services. The certification authority has also prepared the certificate system's register description conformant to the Personal Data Act with respect to the processing of personal data.

## 2.7 Information security audit

Finnish Transport and Communications Agency (Traficom), which supervises the providers of identification services, may audit the operation of an identification service provider under the prerequisites set forth in the Act on Strong Electronic Identification and Trust Services.

### 2.7.1 Audit frequency

Digital and Population Data Services Agency audits the facilities, devices and operations of its technical suppliers in an appropriate fashion.

The detailed audit method is described in the certification practice statement.

### 2.7.2 Auditor

Digital and Population Data Services Agency's information security audit is carried out by Digital and Population Data Services Agency's Head of Information Management or an external auditor specialised in auditing technical vendors pertaining to certificate services.

### 2.7.3 Audit objects and scope

The objects of the audit are determined by the Act on Strong Electronic Identification and Trust Services or, if Digital and Population Data Services Agency is carrying out the audit, the information security standard ISO/IEC 27001, Digital and Population Data Services Agency's information security policy or the technical terms of delivery.



The audit is carried out considering the implementation of the eight areas of information security. Audited information security properties include confidentiality, integrity and availability.

The audit compares the policy, certification practice statement and application instructions to the operation of the entire certificate organisation and system. Digital and Population Data Services Agency ensures that the application instructions are consistent with the certificate policy.

The audits will consider administrative information security and also service providers.

Observed deviations are recorded in the audit report and reacted to in accordance with legislation, the information security standard ISO/IEC 27001 and the valid terms of delivery.

#### 2.7.4 Communicating the result of an audit

The results of an audit are communicated according to the law, the information security standard ISO/IEC 27001, Digital and Population Data Services Agency's information security policy and the valid terms of delivery. A detailed, fixed-form audit result intended for internal use is confidential and will not be disclosed to the public. Fixed-form reports are prepared separately for use outside of the organisation.

Digital and Population Data Services Agency communicates the results of audits to Finnish Transport and Communications Agency (Traficom) among others.

## 2.8 Publication of data

### 2.8.1 Data published by the certification authority

The data in the certificate system are confidential unless they are based on the regulations on information disclosure set forth in the Personal Data Act, the Act on the Openness of Government Activities, the Act on Strong Electronic Identification and Trust Services or for purposes set forth in the certificate policy or certification practice statement.

### 2.8.2 Public data

The data of the public directory and the revocation list are public, as are the certification practice statements and the data specified in the certificate policy and the published FINEID specifications.

Data pertaining to the expiry or revocation of a temporary certificate

The time of validity start and end of a temporary certificate are contained in the temporary certificate. Certificates revoked during their validity period are published on a revocation list available to all.

### 2.8.3 Data disclosed to authorities

The data disclosed to authorities are specified according to the valid legislation.





#### 2.8.4 Other data

The data of the certificate system are not disclosed for purposes other than those listed above in this section.

#### 2.8.5 Disclosure of data on the request of the certificate holder

The holder of a certificate has the right to receive information pertaining to him/her, for example personal data, in accordance with the applicable legislation.

#### 2.8.6 Other principles concerning disclosure of information

It is material for the reliability of the certification authority that Digital and Population Data Services Agency take all measures to see to the secrecy of confidential material it obtains in connection with the certificate activities and to the good administration of data unless otherwise required by legislation pertaining to the right of authorities to obtain information on the operation of the certificate system.

Digital and Population Data Services Agency conforms to the Personal Data Act and specific legislation in the processing of personal data. Digital and Population Data Services Agency has prepared the policy rules for the processing of personal data in connection with information disclosure and with the certificate activities. Special care must be taken when processing personal data.

### 2.9 Intellectual property rights

Digital and Population Data Services Agency owns all data pertaining to the certificates and documentation in accordance with the technical terms of delivery. Digital and Population Data Services Agency has full ownership and utilisation rights to this temporary certificate policy.

## 3 Identification of certificate applicant

### 3.1 Registration

Sections 4.1–4.3 present the procedures and processes that are adhered to in the identification and authentication of certificate holders.

The application document clearly states that the applicant for a temporary certificate confirms the correctness of the information provided with his/her signature and approves the creation of the temporary certificate. At the same time, the applicant accepts the rules and terms pertaining to the use of temporary certificates and sees to the storage of temporary certificates and PIN codes and the reporting of any misuse or lost card.

Agreements have been concluded between the certification authority and registration authority, card manufacturer and other vendors that produce parts of the certificate services, indisputably specifying the rights, liabilities and obligations of all parties. The applicant of temporary certificates is responsible for the correctness of all material data that the applicant of a temporary certificate has given the certification



authority or registration authority. The holder of temporary certificates must use the temporary certificates only for their intended use.

When a certification authority grants a temporary certificate, it also approves the application for certificate.

It is the responsibility of the holder of temporary certificates to prevent the use of the private key and the related PIN codes belonging to him/her in a way contradictory to the terms of use and to take care of them as set forth in the terms of use.

The certificate holder must immediately report the need to revoke a temporary certificate to the registration authority of the certificate holder's organisation if he/she suspects the possibility of use in contradiction to the terms of contract.

### 3.1.1 Naming policies

The naming policies are described in detail in the certification practice statement.

The certification authority's public key is part of the certification authority's certificate. The certification authority's certificate is available in a public directory. If a temporary certificate is located on a backup card, the certification authority's certificate is also placed on the microchip of the backup card.

Data pertaining to the certificate holder unambiguously identify the certificate holder. The certification authority will determine the official identity of the certificate holder, if necessary.

### 3.1.2 Delivery of private keys to the certificate holder

A private key pertaining to a temporary certificate, created on a microchip or other secure environment, is delivered to the certificate holder in connection with delivery.

A detailed description of the delivery of the private key is described in the certification practice statement.

## 3.2 Renewal of key pair

The public keys in the temporary certificates and the private keys in the microchip cannot be renewed. The creation of a new key pair requires a new temporary certificate.

The renewal of the temporary certificate adheres to the same procedures as when applying for the certificate for the first time.

## 3.3 Renewing a key pair after inclusion on revocation list

The public keys in the temporary certificates and the private keys in the microchip cannot be renewed. The creation of a new key pair requires a new temporary certificate.

The renewal of the temporary certificate adheres to the same procedures as when applying for the certificate for the first time.



### 3.4 Identification of the requester of revocation

The holder of a temporary certificate may have the certificate revoked before the expiration of the temporary certificate's validity period.

The registration authority of the certificate holder's organisation carries out the revoking of the certificate upon detecting that the certificate has become misplaced or the possibility of its misuse.

The certificate must be revoked immediately when suspecting the misuse of a certificate, for example because of loss or theft.

All electronic transactions related to the revoking are archived.

The revocation of a certificate is described in detail in the certification practice statement.





## 4 Operational requirements

### 4.1 Applying for a certificate

The rights and obligations of a certificate applicant are specified in contract documents and general instructions for use, which comprise an agreement concluded with the certificate applicant. The application document contains the details of the rights and obligations of both parties. When an applicant for a temporary certificate applies for a temporary certificate, he/she also accepts the general terms of use.

The application document and instructions for use clearly state that the applicant for temporary certificate, with his/her signature, approves the correctness of the information provided and the creation of the certificate. At the same time, the applicant accepts the rules and terms pertaining to the use of temporary certificate and sees to the storage of temporary certificates and PIN codes and the reporting of any misuse or lost certificates/microchip.

### 4.2 Granting of a certificate

The certification authority grants a temporary certificate upon accepting the application for certificate. When granting a temporary certificate, the certification authority is responsible for its data content being correct at the time of delivery of the certificate.

### 4.3 Receiving a certificate

Temporary certificates are retrieved personally at a point of registration.

At the time of handing out the certificate, it is emphasised to the certificate applicant that there are no copies of the private keys and no copies can be made later.

### 4.4 Termination and interruption of the validity of a certificate

#### 4.4.1 Prerequisites for revoking a certificate

A temporary certificate must be included in a revocation list when there is reason to suspect misuse, for example because of loss or theft.

#### 4.4.2 Requester of revocation

The revoking of the certificate is done by the registration authority in the certificate holder's organisation.

#### 4.4.3 Revocation transaction

The revocation of a certificate can be done through the card ordering and administration system offered by Digital and Population Data Services Agency.

Information of the inclusion of a certificate on a revocation list will be publicly available within an hour of the revocation request having been deemed valid and approved. Revocation lists are valid for 72 hours.



The revoking of a certificate and its effects are described in detail in the certification practice statement.

Closing certificates at the request of Digital and Population Data Services Agency

Digital and Population Data Services Agency does not carry out certificate revocation in any cases except the following:

- Digital and Population Data Services Agency may revoke certificates signed with its private key if there is reason to believe that Digital and Population Data Services Agency's private keys have become disclosed or accessed by unauthorised parties.
- All certificates that are valid and have been granted with the exposed key must be closed on one or several revocation lists whose validity period does not expire until the validity of the last revoked certificate has expired.
- If the private key used by Digital and Population Data Services Agency in certificate creation or another technical method has become exposed or otherwise unusable, Digital and Population Data Services Agency must notify all cardholders of the event.
- Digital and Population Data Services Agency may also revoke a certificate for other special reasons.

#### 4.4.4 Timing of a revocation event

Certificates are revoked immediately in connection with a revocation request. Revoked temporary certificates cannot be reinstated.

#### 4.4.5 Requirements for terminating the validity of a certificate

The validity of temporary certificates cannot be interrupted temporarily.

#### 4.4.6 Creator of revocation request

The validity of temporary certificates cannot be interrupted temporarily.

#### 4.4.7 Making a revocation request

The validity of temporary certificates cannot be interrupted temporarily.

#### 4.4.8 Limitations of the revocation period

The validity of temporary certificates cannot be interrupted temporarily.

#### 4.4.9 Publishing frequency of the revocation list

Information of the inclusion of a certificate on a revocation list will be publicly available within an hour of the revocation request having been deemed valid and approved. Revocation lists are valid for 72 hours.

The revocation list contains the time of publication of the next revocation list.



The new revocation list will be published by the expiration of the validity of the valid revocation list.

In case of system updates and other exceptional situations, DPDSA has published revocation lists at a different frequency and extended validity periods.

#### 4.4.10 Revocation list requirements

The obligations of a party trusting the certificate are described in section 2.1.4.

#### 4.4.11 Online certificate status check

The certification authority provides an online certificate status check service that implements OCSP. The certification authority publishes a revocation list of revoked certificates.

#### 4.4.12 Requirements related to online certificate status check

The certification authority provides an online certificate status check service.

#### 4.4.13 Special requirements pertaining to the exposure of the certificate holder's private key

It is the certificate holder's responsibility to protect the use of their private key by taking care of their microchip or card and PIN code as described in the instructions for use. The certificate holder must immediately report the need to revoke a temporary certificate to the registration authority of the certificate holder's organisation if he/she suspects the possibility of use in contradiction to the terms of contract.

### 4.5 System supervision

The supervision of the system is described in the certification practice statement.

### 4.6 Archiving of data pertaining to certificates

#### 4.6.1 Material stored

The provisions of the Archive Act (831/1994) are applied as the general law for archiving. The right to obtain information is determined according to the Act on the Openness of Government Activities (621/1999). With respect to the archiving of certificates, the provisions pertaining to archiving in electronic services legislation are also applied. Certificate register data are held for at least 5 years after expiry of the certificate. In addition to the above, the regulations set forth in the act on the electronic processing of client data in social and health care (159/2007) and the act on electronic prescriptions (61/2007) and the requirements set on the basis of the above are also adhered to.

The data archived by the certification authority are described in detail in the certification practice statement.

The archive data are stored in accordance with regulations pertaining to authorities.



#### 4.6.2 Protection of archives

Archived data are stored on high-security premises with access control.

#### 4.6.3 Backup methods for archived data

Backups are stored in a place physically separate from the original data.

#### 4.6.4 Acquisition and backup methods for archived data

The certification authority ensures the availability and readability of the archives even in the event that the certification authority's operations are interrupted or terminated.

### 4.7 Management of the continuity of operations and handling of deviations

Digital and Population Data Services Agency has a continuity and preparedness plan that enables the continuity of the operations of Digital and Population Data Services Agency.

The preparation for deviations is described in the certification practice statement.

#### 4.7.1 The certification authority's private key has become disclosed or the certification authority's certificate has been revoked

In each certification practice statement, the certification authority states the measures that the certificate holders, parties trusting the certificate and registration authorities and the certification authority's staff must take if the certification authority's private key has become disclosed or otherwise unusable.

#### 4.7.2 Compromised security because of a natural disaster or other catastrophe

Digital and Population Data Services Agency's security policy takes into account the measures necessitated by the compromising of external security. Digital and Population Data Services Agency is ISO/IEC 27001 certified with respect to information security, setting the requirements for Digital and Population Data Services Agency's operations also after the occurrence of a catastrophe.

### 4.8 End of the certification authority's operations

The termination of the certification authority is considered to be a situation where all services related to the granting of the certification authority's certificate are permanently terminated. The termination of the certification authority does not refer to a situation where the certification service is transferred from one organisation to another.

The certification authority communicates the termination of the certificate services to the parties specified in section 4.7.1 as soon as possible, however at least one month before the time of termination.

Before the termination of the certification authority, at least the following measures will be taken:



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- All certificates that are valid and have been granted are closed on one or several revocation lists whose validity period does not expire until the validity of the last revoked certificate has expired.
- The certification authority will revoke all authorisations of its contractual partners to carry out tasks pertaining to the granting process of certificates on behalf of the certification authority.
- The certification authority ensures that access to the certification authority's archives as set forth in section 4.6 will be maintained also after the termination of the certification authority.
- The certification authority is responsible for the archiving of the required data as per the Act on Strong Electronic Identification and Trust Services and otherwise complies with the Archives Act. In addition to the above, the regulations set forth in the act on the electronic processing of client data in social and health care (159/2007) and the act on electronic prescriptions (61/2007) and the requirements set on the basis of the above are also adhered to.



## 5 Physical, operational and staff security requirements

An information security certificate has been granted to Digital and Population Data Services Agency, affirming that DPDSA's information security meets the requirements of the ISO/IEC 27001 standard.

### 5.1 Arrangements related to physical security

An information security certificate has been granted to Digital and Population Data Services Agency, affirming that DPDSA's information security meets the requirements of the ISO/IEC 27001:1999 standard. Digital and Population Data Services Agency uses technical vendors for carrying out the information technology tasks of the certificate service. DPDSA is responsible, as the certification authority, for the safety and operation of certificate production in an appropriate way in all of its sub-areas.

A detailed description of security-related arrangements is contained in the certification practice statement.

#### 5.1.1 Location and building properties

The certification authority's systems are located in high-security data centres and meet the instructions and orders imposed on data centres regarding security.

Facility safety has been implemented in such a way that access to the facilities by unauthorised parties is prevented.

#### 5.1.2 Physical access to facility

Facilities where production duties for the certificate system are carried out have controlled physical access. The access control system detects authorised and unauthorised entry. Access to data centre facilities requires the identification of the person, whereby the person is identified and the access right is verified and the transactions are registered. Data centre facilities are guarded at all times of the day.

#### 5.1.3 Auxiliary arrangements

The hardware solutions have been implemented according to good information administration practice in such a way that in the event of system failure, a backup system can be used without compromising the confidentiality, integrity or availability of the data contained in the system.

The supply and maintenance of spare parts for important devices has been ensured.

## 5.2 Operational requirements

### 5.2.1 Division of responsibility

Digital and Population Data Services Agency uses technical vendors for the registration and information technology duties of certificate production. Digital and Population Data Services Agency serves as the certification authority that is responsible for certificate activities.



The duties of the certification authority are divided into areas of responsibility by duty, described in detail in the certification practice statement.

### 5.2.2 Number of staff required for the duties

The creation, activation, backup and recovery of the certification authority's private key are carried out under supervision when two persons authorised to carry out maintenance on the system are present.

The revocation of the certification authority's private key is possible only under the supervision of two authorised persons.

At least two persons authorised to carry out maintenance on the system are present when the certification authority's private key's hardware security module is initialised.

The use of the system requires the presence of at least one person authorised to do so.

The registration and identification of a temporary certificate requires the presence of one person.

### 5.2.3 Task-specific identification

The identification of the registration authority, certificate system administrator and certificate system user and task descriptions are described in detail in the certification practice statement.

## 5.3 Personal security

Digital and Population Data Services Agency serves as the certification authority that is responsible for certificate activities. The technical vendors have been selected through competition and work at the responsibility and on behalf of Digital and Population Data Services Agency.

Digital and Population Data Services Agency pays particular attention to the reliability of both its own staff and the technical vendors and registration authorities and to their skills needed for the execution of the tasks.

### 5.3.1 Carrying out a background check on the staff

Digital and Population Data Services Agency has a basic security clearance done for its staff and the persons of the technical vendors who work with the certificate information system.

### 5.3.2 Procedure adhered to in the security clearance

The staff's work experience is surveyed when starting the employment. A security clearance is carried out for the person based on the information he/she has provided on a fixed-form form.

The security clearance procedure is described in detail in the certification practice statement.



### 5.3.3 Requirements on training

Digital and Population Data Services Agency's staff must be trained so that duties can be carried out in the best possible way. Digital and Population Data Services Agency has a training plan the implementation of which is the responsibility of Digital and Population Data Services Agency's administration unit.

### 5.3.4 Maintenance of expertise and skills

Staff training is planned and maintained in such a way that the expertise related to the management of the task is always at the best possible level required by the task.

### 5.3.5 Requirements for task rotation

When task rotation is planned for the certification authority's tasks, they are organised in such a way that the person can see to his/her new duties in the best possible way. The implementation of task rotation must also take into account the retention of good information administration practice and the maintenance of sufficient task-specific skill levels.

Task rotation also adheres to Digital and Population Data Services Agency's information security policy and information security plan as well as Digital and Population Data Services Agency's other general instructions.

### 5.3.6 Measures resulting from deviations

Digital and Population Data Services Agency's staff work subject to official liability and in accordance with the internal instructions of Digital and Population Data Services Agency. The position of a public official is set forth in the State Officials Act (750/1994).

### 5.3.7 Staff representing the organisation

When recruiting staff, it must be seen to that the staff's skills correspond to the requirements of the task and that there is nothing detected in the person's background check that would put the person's interests at odds with the production of certificate services.

### 5.3.8 Documents given to the staff

The staff always has access to Digital and Population Data Services Agency's quality and security documents.





## 6 Technical security arrangements

### 6.1 Generation and storage of key pairs

#### 6.1.1 Generating key pairs

##### **Certification authority:**

The certification authority generates its private signature keys and the public keys corresponding to the private signature keys. The certification authority's private key is stored in a hardware security module.

##### **Certificate holder:**

A certificate holder's key pair is generated in a safe way. The public key is used for creating the certificate, and the private key is stored on a microchip protected against reading and writing.

#### 6.1.2 Delivery of a private key to certificate holder

The PIN code required for using the certificate is delivered to the certificate holder in connection with the registration.

In connection with the delivery of the backup card, the certificate holder receives his/her private key stored on a microchip.

#### 6.1.3 Delivery of the certificate holder's public key to the certification authority

Using the microchip's public keys, a certificate generation request is created, combining the certificate applicant's registration data with the public key in question. This generates a temporary certificate for the certificate holder.

The temporary certificate contains the public key of the certificate holder.

#### 6.1.4 Distribution of the certification authority's public key to the certificate holder

The certification authority's certificate contains the certification authority's public key. The certification authority's certificate is stored in a public directory. The certification authority's certificate is available in the certification authority's website.

#### 6.1.5 Key lengths

The certification authority's private key and the public key corresponding to the private key, used in the signing of the temporary certificate, also 4096-bit RSA keys and 384-bit ECC keys.

The certificate holder's private and public key are 2048-bit RSA keys and 384-bit ECC keys.

#### 6.1.6 Intended use of keys

The data content of the certificate has a field that determines the intended use, determining the intended use of the related key (e.g., authentication and encryption). The



use of the key is restricted to its intended use. A key intended for authentication and data encryption must be used only for this purpose and a key intended for signing only for digital signing.

CA certificate:

Purpose: Signing of certificates and revocation lists. Technical description in FINEID S2 specifications.

Certificate holder's authentication and encryption certificate:

Purpose: Electronic identification or data encryption.

Certificate holder's signature certificate

Purpose: Digital signature.

## 6.2 Protection of private key

### 6.2.1 Standards for the hardware security module

The certification authority's private keys are stored in hardware security modules administered by the certification authority, meeting the requirements of the necessary security standard.

The certification authority sees to it that the certification authority's private keys are protected against disclosure and unauthorised use. A backup is made of the certification authority's private keys in a manner conformant with critical information security.

### 6.2.2 Staff participating in the handling of the certification authority's private key

The environment required for the generation and use of the private key requires the simultaneous presence of or activation of operation by at least two persons.

### 6.2.3 Disclosure of private key to a trusted party

The certificate holders' private key is generated in a safe way required for the certificate. Key pairs generated by the certificate holder are not accepted. A private key cannot be transferred or copied from a backup card. The certification authority and the card manufacturer do not have access to the private keys of the persons they certify.

When the keys are generated, they have not been allocated to any person.

### 6.2.4 Backup of a private key

The certification authority's private keys and their backups are stored with strong encryption in devices that meet the requirements of critical information security.



## 6.2.5 Archiving of private keys

The certification authority's private keys are stored in hardware security modules administered by the certification authority.

## 6.2.6 Administration of private keys in hardware security modules

The certification authority's private signature keys are protected with physical and logical security measures of high reliability. They are used only in a system placed in a secure environment.

The administration of the private key is described in detail in the certification practice statement.

## 6.3 Other key management issues

### 6.3.1 Public key archiving

The certification authority archives all public keys it has certified.

### 6.3.2 Usage period of public and private keys

The usage period of a temporary certificate is as agreed, however at most three (3) months. The certificate can be revoked during its validity.

## 6.4 Activation data

### 6.4.1 Creation and commissioning of activation data

The card manufacturer creates activation data, i.e., a PIN code, that enables the use of the keys.

The detailed method is described in the certification practice statement.

### 6.4.2 Protection of activation data

The PIN code is protected so that it cannot be read or copied from the card. It is the certificate holder's responsibility to protect the use of his/her keys by taking care of his/her microchip or card and PIN code as described in the instructions for use.

### 6.4.3 Other activation data issues

It is explained to the holder of a temporary certificate that he/she has the possibility to change the original PIN code to a new one. The program for changing the PIN code is available free of charge for the cardholders at [www.fineid.fi](http://www.fineid.fi).

The detailed method is described in the certification practice statement.

## 6.5 Security requirements pertaining to the use of and access to computers

### 6.5.1 Hardware security

Only equipment suitable for their intended use is used in the certificate system.



The detailed method is described in the certification practice statement.

## 6.6 Certificate system life cycle management

Digital and Population Data Services Agency maintains a classification of importance on certificate service objects and systems, their backups, priorities and minimum maintenance levels.

### 6.6.1 Supervision related to developing the system

The development and testing of the system are done in a separate test environment. Only tested, functional and approved solutions are transferred to the production system.

### 6.6.2 Security management

Digital and Population Data Services Agency's information security is managed according to Digital and Population Data Services Agency's information security policy and the standard ISO/IEC 27001.

## 6.7 Telecommunication network security

The security of telecommunication is implemented in such a way that the certificate system's telecommunication network is a consistent whole isolated from other telecommunication networks and has doubled critical components.

A more detailed description of the telecommunication network's security is contained in the certification practice statement.

## 6.8 Monitoring of the use of the hardware security module

The certification authority sees to it that the certification authority's private keys are protected against disclosure and unauthorised use. A backup is made of the certification authority's private keys in a manner conformant with critical information security.

The detailed method is described in the certification practice statement.



## 7 Certificate and revocation list profiles

### 7.1 Technical certificate data

The data content of the root certificate, certification authority certificate and certificate holder's certificates is described in the document FINEID S2. The document is available at the certification authority's website at [www.fineid.fi](http://www.fineid.fi).

### 7.2 Revocation list profile

The data content of the revocation lists published by the certification authority is described in the document FINEID S2. The document is available at the certification authority's website at [www.fineid.fi](http://www.fineid.fi).

## 8 Specification document management

### 8.1 Changing of specifications

The certification authority may change the specifications because of legislation or functional requirements. Changes to the specifications must be recorded in the certificate policy and certification practice statement documents as described below.

### 8.2 Publishing and communication

The certification authority publishes a certificate policy and a certification practice statement, available at the website [www.fineid.fi](http://www.fineid.fi).

The certification authority's public specifications pertaining to the production of certificates can be obtained from the same websites.

Agreements concluded with information technology vendors on the delivery of certificates and production system descriptions and product-related specifications are confidential.

### 8.3 Certificate policy change and approval procedure

Digital and Population Data Services Agency approves the certificate policy and certification practice statement pertaining to temporary certificates. The documents may be amended according to Digital and Population Data Services Agency's internal change policy.

Digital and Population Data Services Agency will communicate the changes well in advance of their entry into force on its website.

Digital and Population Data Services Agency maintains version management of the documents and archives all certificate policy and certification practice statement documents. Typographic corrections and changes of contact details are possible with immediate effect.



[Yksikkö] / [Kirjoita teksti tähän]

1.6.2021

1. All items of the certificate policy and certification practice statement can be amended by communicating the main upcoming changes 30 days before their entry into force.
2. Items that Digital and Population Data Services Agency does not deem to have significant effect on certificate holders and trusting parties may be amended with communication 14 days in advance.



[Yksikkö] / Aarnio Ville

**For the temporary certificate  
of social welfare and  
healthcare professionals**

[Tarkenne]

1.4.2021

[Numero]

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