

## IMPRESSION SIGNATURES (PTY) LTD MANAGEMENT'S ASSERTION

### To whom it may concern,

Impression Signatures (Pty) Ltd ("Impression Signatures") operates a Registration Authority (RA) for Advanced Electronic Signatures service chained to the GlobalSign Certificate Authority (CA). Impression Signatures provides the following RA services:

- Subscriber registration
- Subscriber management and validation for certificate lifecycle management process, including:
  - Certificate issuance
  - Certificate distribution
  - Certificate revocation
  - Certificate validation
- Subscriber key generation and management

The management of Impression Signatures is responsible for establishing and maintaining effective controls over its RA operations, including its RA business practices disclosure, RA business practices management, RA environmental controls, RA subscriber key life cycle management controls and RA certificate lifecycle management controls. These controls contain monitoring mechanisms, and actions are taken to correct deficiencies identified.

There are inherent limitations in any controls, including the possibility of human error, and the circumvention or overriding of controls. Accordingly, even effective controls can only provide reasonable assurance with respect to Impression Signatures' Registration Authority operations. Furthermore, because of changes in conditions, the effectiveness of controls may vary over time.

Impression Signatures management has assessed its disclosures of its business practices and controls over its RA services. Based on that assessment, in Impression Signatures management's opinion, in providing its Registration Authority (RA) services at Waterfall Office Park, Howick Close, Allandale Road & Bekker Road, Midrand, Impression Signatures specifically asserts that, for the period 01 September 2019 to 13 December 2019, it has:

- Disclosed in its Certification Practice Statement (CPS) those business practices required by the relevant provisions of the CA's business practices disclosures in the CA's Certificate Policy (CP) and CPS;
- Disclosed in its CPS any additional business practices undertaken that were not contained in the CA's business practice disclosure relevant to comply with WebTrust Principles and Criteria for Registration Authorities, Version 1.0, and those provisions contained within Chapter 3 of the Accreditation Regulations of the Electronic Communications and Transaction Act of 2002;
- Maintained effective controls to provide reasonable assurance that Impression Signatures provides its services in accordance with its CPS;
- Maintained effective controls to provide reasonable assurance that:
  - logical and physical access to RA systems and data was restricted to authorised individuals;
  - the continuity of RA operations is maintained; and
  - systems development, maintenance and operations were properly authorised and performed to maintain RA systems integrity;
- Maintained effective controls to provide reasonable assurance that subscriber information was properly authenticated (for the registration activities performed by Impression Signatures);

in accordance with WebTrust Principles and Criteria for Registration Authorities, Version 1, and those provisions contained within Chapter 3 of the Accreditation Regulations of the Electronic Communications and Transaction Act of 2002.

Furthermore, Impression Signatures specifically asserts that, for the period 1 September 2019 to 13 December 2019, it has:

- Maintained effective controls to provide reasonable assurance that the integrity of subscriber keys it manages is established and protected throughout their life cycles in accordance with those provisions contained within Chapter 3 of the Accreditation Regulations of the Electronic Communications and Transaction Act of 2002.

The above assertion includes the following:

**RA Business Practices Disclosure**

- Certification Practice Statement (CPS)
- Certificate Policy (CP)

**RA Business Practices Management**

- Certificate Policy Management
- Certification Practice Statement Management
- CP and CPS Consistency

**RA Environmental Controls**

- Security Management
- Asset Classification and Management
- Personnel Security

**Certificate Lifecycle Management Controls**

- Subscriber registration
- Subscriber management and validation for certificate lifecycle management process, including:
- Certificate issuance
- Certificate distribution
- Certificate revocation
- Certificate validation

**Subscriber Key Lifecycle Management Controls**

- RA-Provided Subscriber Key Generation Services
- RA-Provided Subscriber Key Storage and Recovery Services
- Requirements for Subscriber Key Management

Impression Signatures does not provide certificate renewal services, certificate rekey services, escrow CA keys, nor certificate suspension services. Accordingly, our assertion does not extend to controls that would address those criteria.

Yours truly,

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Andrew Keneth Anthony Papastefanou  
**Managing Director**  
27/06/2020