

# BALTSTAMP TSA DISCLOSURE STATEMENT V5.8

## Valid from 2026-03-03

**1. Purpose.** The BaltStamp time-stamping authority (further – TSA) of the joint stock company “BaltStamp” (further – the BaltStamp) discloses the general terms and conditions of the time-stamping services to the subscribers and relying parties. The time-stamps provided by the BaltStamp TSA comply with the requirements stated in the Regulation (EU) No 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, and the standards ETSI EN 319 421 “Policy and Security Requirements for Trust Service Providers issuing Time-Stamps” (previously published as ETSI TS 102 023 “Policy requirements for time-stamping authorities”) and ETSI EN 319 422 “Time-stamping protocol and time-stamp token profiles” (previously published as ETSI TS 101 861 “Time stamping profile”). The terms and conditions stated here can be complemented by the contracts between the TSA and the subscribers.

**2. Contact information.** All issues concerning the time-stamp provision can be addressed to the contacts below:

|                 |                                                                       |
|-----------------|-----------------------------------------------------------------------|
| <b>Person:</b>  | Sabina Sinicienė, the director of the joint stock company “BaltStamp” |
| <b>Address:</b> | Dariaus ir Girėno St. 40, LT-02189 Vilnius                            |
| <b>Phone:</b>   | +370-673-23045                                                        |
| <b>URL:</b>     | <a href="https://baltstamp.lt/en/">https://baltstamp.lt/en/</a>       |
| <b>E-mail:</b>  | <a href="mailto:info@baltstamp.lt">info@baltstamp.lt</a>              |

A time-stamp can be obtained by accessing the service located at <http://tsa2.baltstamp.lt>, using the standard RFC 3161 protocol. However, a limitation applies to non-registered users: no more than 100 requests within one month; the beginning and the end of the month are defined in UTC time. Requests of the registered users are serviced using:

- A secure (https) protocol and identified by a username and password combination, according to the HTTP “basic” scheme.
- An open (http) protocol and identified by IP address.

The flow of requests is limited to 5 requests per second and 1000 requests per hour unless otherwise is specified in the contract with the subscriber.

For user registration, the above contact information can be used.

**3. Time-stamp policy.** All time-stamps are issued according to the best practices time-stamp policy (BTSP, OID: 0.4.0.2023.1.1), defined in the standard ETSI EN 319 421.

The time-stamp allows proving that the electronic signature has been created before the time indicated in the time-stamp. However, it is possible to time-stamp unsigned data too. Such a time-stamp confirms that the data have been created before the time indicated in the time-stamp.

The users of the time-stamps provided by the TSA can be legal or natural persons needing the services provided by the TSA.

**4. Hash of the data.** The following algorithms can be used for computing a hash of the data to be time-stamped: SHA256, SHA384, SHA512.

**5. The TSU key generation algorithm, the resulting signing key length, and signature algorithm used for signing time stamp tokens; period of validity of the keys and the public key certificates.** TSA uses in its two time-stamping units (TSUs) 384 bits-long ECC keys; the signing algorithm is sha384ECDSA. The keys used in both TSUs are valid until 2030-03-01. Validity periods of the public key certificates published on TSA’s website and used in the TSUs to form the time-stamp tokens issued are the same as those of the corresponding keys.

**6. Precision of time-stamp tokens.** The value of time specified in a time-stamp token denotes the time-stamp generation moment with the precision of *two tenths of a second*, which is based upon permanent traceability of the TSA equipment to the State Standard of Time and Frequency realizing the Lithuanian universal coordinated time scale UTC(LT), which traceability to UTC is ensured by means of continuous comparison at the Time and Frequency Standard Laboratory of the Center for Physical Sciences and Technology, which takes part in the generation of the universal coordinated time, as required by the standard ETSI EN 319 421. The characteristics of the traceability are published in the "Circular T" by the Bureau International des Poids et Mesures (BIPM).

**7. Availability.** TSA does not have any undertakings regarding the availability of the service other than those stated in the contracts with subscribers.

**8. Limitations on the use.** TSA does not set any limitations on the use of its time stamps. They can be used when signing and carrying out electronic transactions, submitting applications and proposals, archiving electronic documents, etc.

**9. Subscriber obligations.** Having obtained a time-stamp token, the subscriber shall verify that the time-stamp token has been correctly signed, and the private key used has not been compromised.

**10. Relying party obligations.** The relying party, when relying upon a time stamp token, shall verify that the time-stamp token has been correctly signed, and the private key used has not been compromised (disclosed to third-parties or unusable for other reasons) until the time of verification.

**11. Verification of a time-stamp token.** If the time-stamp token is verified during the TSU's certificate validity period, the validity of the signing key can be checked by making sure that the TSU's certificate has not been revoked. But, if the time of verification is beyond the end of the validity period of the corresponding certificate, time-stamp verification may be impossible because certification authorities are not obliged to publish revocation data of expired certificates, including the revocation due to key compromise. However, the time-stamp can be verified even when the validity period of the certificate is expired provided that at the moment of verification it can be known that:

- a) The TSU private key has not been compromised at any time up to the time of the time stamp verification.
- b) The hash algorithms used in the time-stamp token exhibit no collisions at the time of verification.
- c) The signature algorithm and signature key size under which the time stamp token has been signed are still technologically reliable and beyond the reach of cryptographic attacks at the time of verification.

Information necessary to verify the time-stamps is constantly available.

**12. Event logs.** Records related to time-stamps that can be used as a legal evidence to prove the correctness of the time-stamps are maintained during the validity period of the certificate they are signed with, and at least for 2 years after its expiration. Other journals of the TSA system operation and activity registration (event logs) are maintained at least for 2 years.

**13. Applicable law.** TSA operates in the Republic of Lithuania and follows its laws and normative legal acts. The main laws and normative legal acts are the following:

- The Regulation (EU) No 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.
- The Law on electronic identification and trust services for electronic transactions of the Republic of Lithuania issued on April 26, 2018.
- The Procedure for granting qualified status to trust services providers and trust services they provide and for provision of qualified trust service provider reports to supervisory body, established by the order No. 1V-588 of the director of Communications Regulatory Authority of the Republic of Lithuania issued on April 21, 2018.
- The procedure for reporting security and/or integrity incidents in the trust services, established by the order No. 1V-594 of the director of Communications Regulatory Authority of the Republic of Lithuania issued on June 4, 2019.

- The standard ETSI EN 319 421 "Policy and Security Requirements for Trust Service Providers issuing Time-Stamps", previously published as ETSI TS 102 023 "Policy requirements for time-stamping authorities".
- The standard ETSI EN 319 422 "Time-stamping protocol and time-stamp token profiles", previously published as ETSI TS 101 861 "Time stamping profile".

**14. Settlement of disputes and complaints.** All the complaints and disputes between the TSA and its users are resolved by positive-minded negotiations. In a case of failing to settle a dispute, it is addressed to the institutions of law enforcement.

**15. Liability, warranty and its limitations.** The TSA is responsible for its illegal actions and for intentionally or damage caused by negligence to a natural or legal person as a result of non-compliance with obligations under Regulation (EU) No 910/2014 as it is stated in Article 13, part 1 of this Regulation. TSA damage to subscribers indemnifies in accordance with the procedure established by the laws of the Republic of Lithuania and does not assume any additional obligations, except those set out in the service contracts concluded.

**16. Applicable agreements and practice statement.** TSA provides the time-stamping services according to the Best practices time-stamp policy (OID: 0.4.0.2023.1.1), following the Practice statement (OID: 1.3.6.1.4.1.38424.1.4.4), the Disclosure statement as well as the contracts with the subscribers.

**17. Audit.** The compliance of the TSA's activities with the time-stamp policy and the time-stamping practice statement is verified in a way determined by the TSA. Compliance with the requirements of the Regulation (EU) No 910/2014 is confirmed at least every 24 months by an audit performed by an accredited conformity assessment body.