



Aangetekend Mailen (Plus) / Registered Email (Plus) Practice Statement

Version 1.2

This document describes what practices are in place for the provisioning of the Trust Services from Aangetekend B.V.

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1. Scope

This document describes the practices applied by Aangetekend B.V. with her office at Computerweg 5, 3542 DP Utrecht, registered with the Dutch Chamber of Commerce under number 52455289 for the provisioning of a qualified Electronic Registered Delivery Service (ERDS).

This Practice Statement includes a set of rules that Aangetekend B.V. applies in connection with its role as qualified Trust Service Provider in compliance with the Regulation (EU) No 910/2014 (eIDAS-Regulation).

2. Standards conformity

This Practice Statement claims conformity with the Regulation (EU) No 910/2014 (eIDAS-Regulation), in particular with the Articles 3.36, 5.1, 13, 15, 19.1, 19.2, 20, 21.3, 23.2, 24.2, 26, 36 and 44.

3. Overview

Aangetekend B.V. was founded in April 2011 to implement the service Aangetekend Mailen / Registered Email. This service replaces a large portion of the physical post process of organizations and thus aligns with the digitization of the supporting business processes: from filing cabinet to the cloud. Not only documents that have to be proven as valid to the addressee, but also all other documents.

Via a 'track and trace' system, the sender can follow exactly where, when and how a document follows the digital route to the addressee and how it is subsequently handled. As a result of the speed and effectiveness of this way of mailing, an important - substantially cost-saving - contribution is made to the digital transformation of organizations. Hardly handling costs, no postage costs, no difficult conversion from digital to physical, certainty for the integrity of the content of the transmission and maximum conversion with the addressees are just a few advantages of the use of Aangetekend Mailen/ Registered Mail within the business processes. The motto is 'Secure and legally send your documents' (see websites www.aangetekendmailen.nl or www.e-registeredmail.com)

Aangetekend B.V. delivers two variants of the ERDS:

1. Aangetekend Mailen/ Registered Email (in short AM), whereby the mail can be sent to the recipient after an alert to the address of that recipient known to the sender (article 43.1 of the eIDAS Regulation);
2. Aangetekend Mailen Plus / Registered Email Plus (in short AM Plus), the qualified variant according to the eIDAS-requirements whereby - after the sender has properly identified - the recipient must first go through an identification procedure before the mail becomes available (articles 43.2 and 44 of the eIDAS Regulation).

This qualified variant will be offered in the Dutch-speaking countries under the name Aangetekend Mailen Plus (AM Plus) and in other countries under the usual translations with the addition 'Plus'.

The Aangetekend Mailen / Registered Email service is also delivered in several European countries under the names: Digitaal Aangetekend (BE), Recommandé Electronique (BE/FR), Digital Einschreiben (DE), Registered Email (UK/IE) and E-Mail Certificado (ES).

Aangetekend B.V. has been ISO-27001 certified by Lloyds Register since 2016 and eIDAS certified by T-Systems since 2019.

4. Policies and practices

4.1 Trust Service Practice statement

The current Practice Statement is approved by the Management Board of Aangetekend B.V. This document will be periodically reviewed by the Management Board which is scheduled in the ISMS calendar. This Practice Statement is made publicly available for subscribers and relying parties via the document repository of the website <https://www.aangetekendmailen.nl/repository/>

Any changes to this Practice Statement shall lead to a publication of the revised Practice Statement to the document repository. Old versions of the Practice Statement will still be available in the document store. Changes that have no impact on the subscribers or relying parties will not be notified up front. Changes that impact subscribers or relying parties and that do not impact the secure and compliant operation of the services will be notified via the Aangetekend Mailen – Registered Email website at least 2 weeks in advance of the implementation of the change. In case of changes that impact subscribers or relying parties that are urgent because they are required to maintain the security or compliance of the solution, a best effort will be performed to notify via the website as soon as possible.

The present Practice Statement supports the provisioning of the Electronic Registered Delivery Service (ERDS) that meets the eIDAS qualified level.

4.2 Terms and Conditions

Aangetekend B.V. publishes its General Terms and Conditions on the www.aangetekendmailen.nl/ / www.e-registeredmail.com websites and the Repository <https://www.aangetekendmailen.nl/repository/>

5. TSP Management

5.1 Internal organization

Aangetekend B.V. has a clear 'lean and mean' structure in terms of organization: TSP deliberately examine which activities can be performed in-house and which can be outsourced to reliable ISO27001 and/or ISO9001 and/or eIDAS-certified partners.

Aangetekend B.V. operates in a network of suppliers, resellers, business partners and (potential) subscribers. The supplying actors are always checked for delivery reliability and meeting the high requirements.

5.2 Human resources

For Aangetekend B.V. it is important to have a team of employees who, not only in terms of competency but also in terms of commitment and empathy capacity, are able to perform any related work. The team fully meets these job requirements.

The background of all internal employees is thoroughly investigated at the start of their employment relationship.

There is a procedure in place which provides the necessary instructions for checking the training, skills, experience and qualifications. These checks are aligned with the applicable laws and regulations.

5.3 Asset management

The TSP ensures that its information and other assets receive an appropriate level of protection. In particular, the TSP maintains an inventory of all assets and assigns a classification for the protection requirements to those assets consistent with the risk analysis. All media are handled securely in accordance with the requirements of the information classification scheme. Media containing sensitive data are securely disposed of when no longer required.

5.4 Physical and environmental security

To avoid compromise or theft of information and information processing facilities the following controls have been implemented:

- physical and logical access control;
- all equipment is protected from physical and environmental threats.

Therefore, the office fully meets the security requirements that can be set for this, such as permanent camera surveillance, compartmentalization, colocation, logging of access, external monitoring after office hours, motion detectors, etc. The datacentre is heavily protected, is located above sea level on Dutch territory and is ISO27001 certified.

5.5 Operation security

Aangetekend B.V. ensures that the access to virtual infrastructure is limited to properly authorized individuals. In particular:

- a) A firewall is implemented to protect the TSP's internal systems from unauthorized access.
- b) The TSP ensures effective administration of user access required for the work of operators, administrators and auditors. In this way, the system security, including user account management, auditing, and timely modification or removal of access, is maintained.
- c) Access to information and application system functions is restricted in accordance with the access control policy, and the TSP system provides sufficient computer security controls for the separation of trusted roles identified in the TSP, including the separation of security administrator and operation functions. Particularly, use of system utility programs is restricted and tightly controlled.

- d) TSP personnel are properly identified and authenticated before using critical applications.
- e) TSP personnel are accountable for their activities; to this end, event logs are retained
- f) The local network components (e.g. routers) are kept in a physically secure environment, and their configurations are periodically audited for compliance with the requirements specified by the TSP.
- g) Continuous monitoring and alarm facilities are provided to enable the TSP to detect, register, and react in a timely manner upon any unauthorized and/or irregular attempts to access its resources.
- h) Interface connections are firewalled and are encrypted.

5.6 Incident management

In case of incidents and calamities, it is necessary to be able to act systematically in case of unforeseen incidents and calamities, so that the consequences can be mitigated as quickly as possible. TSP incident management is aimed at a fast and correct recovery of the processes affected by an incident or disaster in such a way that reliable services are provided to customers in the shortest possible time.

5.7 Business continuity management

Continuity of service to all customers is of the utmost importance. For this reason, it is necessary to be able to act systematically in case of unforeseen incidents, calamities and/ or crisis, so that the consequences can be mitigated as quickly as possible.

The Business Continuity Plan focuses on the action perspective of those who are involved in any way in restoring the execution of the primary and secondary processes. In the continuity policy of Aangetekend B.V. the undisturbed service with regard to Aangetekend Mailen (Plus)/ Registered Email (Plus) has the highest priority for all customers. This means that in the preventive sphere the necessary measures are taken to mitigate risks in the service provision. This involves, among other things, the continuous inventory of potential risks, the SLA's with subcontractors, the necessary attention to guaranteeing continuity, determining the Single Points of Failure and determining the Recovery Time to Objective.

6. TSP Operations

6.1 Identification and authentication of sender

Before a legal person, as a sender/ subscriber¹ (hereafter described as sender), is allowed to access to the platform he/ she has to go through the enrolment procedure. A natural person or non-subscriber cannot use the service as a sender. An authorized eIDAS Administrator has to register the sender in the platform by email address and date of birth.

¹ General Terms & Conditions; definitions 25: Subscriber: the person who acts in the exercise of a profession or business with whom the Supplier enters into an Agreement for the delivery of the Service.

There are two methods for identifying the sender for the first time, namely using an eIDAS qualified identity provider and also through the implementation of a so-called ‘physical presence’.

In the case of an eIDAS qualified identity provider the sender receives an activation link in their mailbox, when clicked, it allows them to identify themselves through their process.

In the physical presence method, the concerning delegate/ user is actually compared with his or her passport or other government-issued identity card, so that the identity can be determined on the spot. Supplier delegates can carry out these procedures.

In both cases, after validation of the name and the date of birth via the eIDAS qualified identity provider or on the official identity document, these personal details are unambiguously registered in the database by the eIDAS Administrator.

First time login of user, the name and date of birth received from the eIDAS qualified identity provider is stored in the database and when the name of the sender and the date of birth is validated compared with the information that was available by the eIDAS Administrator, access will be granted.

After the initial identifying the sender, the sender is asked for the phone number for two factor authentication. The next time the sender wants to access the platform, the sender is asked to provide their email address and password first after which they receive a code via SMS to their phone which they can enter on the login page. This code is validated and only then they are logged in.

6.2 Identification and authentication of recipient/ receiver

A Recipient can be a legal and/ or a natural person. It is not necessary to be a subscriber of the Service to receive an Aangetekend Mailen (Plus)/ Registered Email (Plus).

There are **different** ways in which the **recipient²** can be identified:

1. Email address (Aangetekend Mailen/ Registered Email)
2. Email address plus 2FA using SMS (Aangetekend Mailen (Plus)/ Registered Email (Plus))
3. Email address plus 2FA using SMS plus personal data: name, surname and date of birth (Aangetekend Mailen Plus/ Registered Email Plus)
4. Email address plus personal data: name, surname and date of birth using qualified identity providers like eID and itsme (Aangetekend Mailen Plus/ Registered Email Plus)

After the identification process the Aangetekend Mailen (Plus)/ Registered Email (Plus) is shown to the recipient. The relevant data is attached to the “proof of receive” ticket for the sender.

Depending on the type of communication, the sender must choose the level of identification.

² General Terms & Conditions Definitions 4: Addressee / Recipient/ Receiver: the person or organization with which User conducts or wishes to conduct e-mail correspondence via the user of the Authorized E-Mail Address with the intervention of the Service.

6.3 Sending Aangetekend Mailen Plus – Registered Email Plus

The use of Aangetekend Mailen Plus - Registered Email Plus begins after contracting and execution of the enrollment procedure with the customer.

If the end-user is connected to the Aangetekend Mailen Plus - Registered Email Plus service, a Registered Email Plus can easily be created via the used mail program, such as Outlook. Next to the well-known 'New Email' button there is a similar button with the title 'Registered Email Plus'. For workflow integration, a special suffix can be used instead of this button, as described in the Service Manual.

The content of email does not require any special treatment; it is a regular email, to which documents can also be added. When 'Send' is pressed, the mail - whether or not in batch - is sent to the company-specific mail server of Aangetekend B.V. via a secure connection. After this, the authorization process and the liability of the TSP starts in accordance with the eIDAS Regulation. The authorized Sender can be the identified end-user himself or a mandated manager, who has the mandate to approve and send a Registered Email Plus in accordance with the recorded data.

The approval for the sending can be done in batch. In this case, the messages are placed in a queue, which must be approved by the mandated person.

Optionally, the mobile phone numbers of recipients can be indicated if the 2FA is required by the sender via telephone validation. Other authentication options are personal data like: name, surname and date of birth.

After sending the notification(s) to the recipient(s), a proof of sending is created with the sender's name and integrity information, the proof of sending is sealed and timestamped and added to the proof of sending.

A detailed specification of this process can be found in the Service Manual.

6.4 Receiving Aangetekend Mailen Plus – Registered Email Plus

The receiver/receiver does not need to register or install any specific software. Upon receipt of a notification email, the recipient can accept or decline the email via a button in this notification email. Unlike the standard Service, a recipient must identify themselves before they can view the mail with attached documents. Identification can be at a substantial level when using qualified identity providers or at a low level when using 2FA with SMS and/ or given personal data: name, surname and date of birth.

Once the e-mail and attachments have been downloaded and are visible through a secure web service, the recipient may individually choose to send the e-mail to their mailbox as well. The latter process falls outside the scope of Aangetekend Mailen Plus - Registered Email Plus.

A detailed specification of this process can be found in the Service Manual.

6.5 User Agents

Several plug-ins (Outlook 2010, 2013, 2016, Thunderbird and Lotus Notes) and or app for Office365 are available. To install the buttons Registered Email (Plus) in the email client you need an auto install plug-in.

Users do not need to install any plug-ins or apps to use the Service for workflow integration. For more information contact TSP.

6.6 Delivery evidence

During the sending and receiving process, different relevant statuses in the process are logged and displayed in a so-called ticket.

The proof of send and proof of receive tickets are created, sealed and timestamped the moment the message is sent / received, containing the identity information of the sender / receiver. The sealing is done and is available to inspect by the sender. The proof of send includes the integrity information, subject, send and receiver information, the name of the sender and a timestamp. The proof of receive contains the id of the message and the identifying information of the receiver that opened the message, their name from their identity provider or their phone number. The seal of the proof of send is used to verify message integrity when displaying the message to the receiver.

6.7 Interoperability

Aangetekend Mailen Plus - Registered Email Plus is a service in which, from the point of view of information security, it has been expressly chosen to deposit interoperability with other REMS with the sender or recipient of such a mail. The saving and reporting style of messages forwarded by another (non-) REMS is not supported.

6.8 Store and notify

Each Aangetekend Mailen Plus - Registered Email Plus server can be configured according to client specific wishes of which one on them is set the time period for acceptance/ rejection. Final setting depends on determined legislation, policy rules or parameters given by client. The repetition of the notification email can also be set given by client.

The Service temporarily stores the content of the messages (Store) until it has been retrieved/rejected/deleted by the Notify email due to the expiry of the collection period by the recipient.

The retention period of the evidence, the so-called ticket, is stored at least 7 years or longer when agreed with the customer and/or applicable legislation. There are no limitations on the evidence validity period.

Aangetekend Mailen (Plus) – Registered Email Plus will archive at least:

- a) users identification data;
- b) users authentication data;
- c) proof that the sender identity has been initially verified;

- d) logs of ERDS operation, identity verification of sender and recipient, and communication;
- e) proof of the recipient's identity verification before the consignment/handover of the user content;
- f) means to prove that the user content has not being modified during transmission;
- g) a reference to or a digest of the complete user content submitted; and
- h) time-stamp tokens corresponding to the date and time of sending, consigning and handing over and modifying the user content, as appropriate.

The provided evidence, the so-called ticket, are accessible to the user by a received email with a ticket included and/ or using the webservice dashboard with an enumeration of all created tickets and/ or downloadable from this mentioned dashboard.

The modalities of reversibility and portability apply in the sense that the content of the ticket cannot be changed and that it can be retrieved by means of the standards customary at that time.

6.9 Limitations on the use of Aangetekend Mailen Plus – Registered Email Plus

The limitations on the use of the QERDS Aangetekend Mailen Plus – Registered Email Plus are described in the General Terms and Conditions articles 2, 3, 4, 10 and 11.

6.10 Support

Although the use of Aangetekend Mailen (Plus) / Registered Email (Plus) is extremely simple, we help organizations with extensive support. The approach here is to explain key users / subscribers within the client organization how the product works, so that they can further implement this within their organization. Support therefore proceeds mainly through the designated contact persons within the client organization.

Our business partners provide for the most part first-line support with the use of Aangetekend Mailen (Plus) / Registered Email (Plus). This means Aangetekend B.V. as second line support at the moment that the questions become more specific or more technical. In addition, Aangetekend B.V. gives support to the recipient of Aangetekend Mailen (Plus) / Registered Email (Plus). This is possible via the self-service helpdesk on the website of Aangetekend Mailen / Registered Email <https://support.aangetekendmailen.nl/support/home> and also via email support@aangetekendmailen.nl and telephone contact +31 346 58 17 31.

7. QTSPs involved

Below the complete list of QTSPs involved in the provision of the QERDS Aangetekend Mailen Plus – Registered Email Plus.

Modul Name	Modul Service	Module Provider	Adress	Conformity Certificate acc. to eIDAS	
				ID	Valid until
QuoVadis Qualified Seal	Issuing service certificates for qualified	QuoVadis Trustlink B.V.	Company number: 30237459	Cert-ID ETS 010 as of 03.08.2017	02.08.2021

Modul Name	Modul Service	Module Provider	Adress	Conformity Certificate acc. to eIDAS	
				ID	Valid until
	electronic seals		Nevelgaarde 56 noord 3436 ZZ Nieuwegein	BSI	Validity of the service certificate issued to TSP: Until 05.06.2022
QuoVadis Qualified Timestamp	Qualified timestamp service	QuoVadis Trustlink B.V.	Company number: 30237459 Nevelgaarde 56 noord 3436 ZZ Nieuwegein	Cert-ID 147/2019 as of 23.12.2019 KPMG Liechtenstein AG	23.12.2021

8. Security policy

8.1 Information security policy

Aangetekend B.V. has set out all the security requirements and operational procedures in the information security policy that are required to implement the chosen risk management measures.

TSP has developed and implemented an Information Security Management System (ISMS) in accordance with ISO27001:2013. The scope of this ISMS includes all services provided by TSP. The scope also includes the internal organization, employees, assets, data centre and suppliers that independently support the services. It therefore relates to the management of information and all business activities that support these services.

Message integrity is secured against modification during transmission by sealing the message hashes with an eIDAS certified HSM using an eIDAS qualified e-Seal. Message hash and signature will be added to the Aangetekend Mailen Plus/ Registered Email Plus ticket, which creates an audit trail that proves that data has not been altered. Transmitted data is protected against the risk of loss, theft and damage by the use of TLS connections.

8.2 Risk assessment

The risk assessment is periodically updated in accordance with the ISO27001 standard by the management, supported by the privacy and security officer, of Aangetekend BV.

8.3 Cryptographic controls

The TSP ensures the security of cryptographic keys and cryptographic devices throughout their lifecycle.

Part of the information used or generated by Aangetekend B.V. is sent via an encryption. In the context of adequately securing the information, the management has established procedures for the

management of the cryptographic control measures used.

8.4 Periodical audits

Aangetekend B.V. will be audited as a qTSP every 24 months, for ISO27001 every 12 months. The Certificates needed for ERDS are delivered by third party qTSP QuoVadis.

9. Obligations and liability

9.1 General

To enable a fully secured transport of data traffic from sender to receiver, various parties are involved, each with their own obligations and associated liabilities. For TSP services these are outlined in more detail in this chapter.

9.2 Subscriber/ Sender obligations

The obligations of Subscriber are defined in the General Terms and Conditions where is stated:

The Subscriber is and remains the party that is responsible and liable when using the Service at all times:

- a. for all actions performed by Users via the Service; and
- b. to verify when sending e-mail (s) to natural persons, whether the e-mail address that is entered actually belongs to the natural person to whom the User wishes to address the e-mail; and
- c. when sending to natural persons who act on behalf of a company, to check whether the natural person to whom the e-mail is addressed is actually connected to - and authorized to communicate on behalf of - the company.
- d. for the correctness of the link between the email address of the Addressee provided by or on behalf of the Supplier and the relevant natural or legal person.
- e. in the case of the use of SMS with Registered Email Plus / Aangetekend Mailen Plus for identification of the Recipient that access to both the e-mail address and the SMS is expressly reserved for the authorized person.

Subscriber acknowledges that the Supplier is not responsible for the management and use of the e-mail client (including the inbox) of neither User nor Recipient. The Supplier is only responsible for the execution of the Service once the Registered Email has been received on the Registered Email-server.

The Subscriber must ensure that Users abstain from unauthorized use of the Service. This means that Users do not violate the applicable laws and regulations and behave in accordance with what may be expected of a careful User of the Service by the Supplier and third parties.

In the case of the use of AM Plus by an organization, the Delegate must carefully keep a list in which the subscribers who are authorized to use this service are registered.

The Subscriber as well as the Recipient / Addressee is independently at all times responsible for the maintenance and use of its E-mail client.

More obligations can be found in the General Terms and Conditions.

9.3 Recipient obligations

The liability of Subscriber are defined in the General Terms and Conditions where is stated:

The Subscriber as well as the Recipient / Addressee is independently at all times responsible for the maintenance and use of its E-mail client.

More obligations can be found in the General Terms and Conditions.

9.4 Relying party obligations

The provision of the service is based on chain liability that is covered by SLA's. At least ISO27001 is required from the key suppliers. The CAB, T-Systems GmbH, has included the most important suppliers in its eIDAS conformity audit.

9.5 Liability TSP

The liability of Aangetekend B.V. are defined in the General Terms and Conditions where is stated:

As a provider of trust services the TSP is liable for damage caused intentionally or negligently to any natural or legal person due to a failure to comply with the obligations under the eIDAS-Regulation.

The intention or negligence of the Supplier as an eIDAS qualified trust service provider shall be presumed unless the Supplier proves that the damage referred to in the previous paragraph has occurred without the intention or negligence of the Supplier.

When using Registered Email Plus, the Supplier acknowledges the possible legal consequences of electronic stamps and electronic time stamps in accordance with Articles 35 and 41 of the eIDAS Regulation.

More liability conditions can be found in the General Terms and Conditions.

10. Compliance

Aangetekend B.V. complies with all applicable laws, rules, regulations, regulations, decisions and orders when providing services based on this Practice Statement. Therefore provides TSP qualified trust services in accordance with the provisions of Regulation (EU) No 910/2014

11. Procedures for changes in the Practice Statement

This Practice Statement will be changed in the case a mistake is detected, the need in updating arises, or proposals for changes come from related parties.

Periodical (and scheduled in the ISMS calendar) the Practice Statement will be updated by the Management under supervision of the Privacy and Security Officer.

12. Termination plan TSP

Although the 'set-up, existence and operation' are important focal points for every company to see if there are adequate control measures, the phase 'termination' must also be added to this.

Voluntary or unforeseen forced termination of all or part of the business activities must also be settled in the correct manner, with obligations towards suppliers and buyers being fulfilled.

Aangetekend B.V. has created a Termination Plan that deals with termination notification, subcontractors management, information maintenance, termination phasing and updating of the termination plan procedure.