

Business Practices Disclosure for S/MIME Certificates

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1 INTRODUCTION

This document defines the business activities performed by PSW GROUP GmbH & Co. KG (PSW GROUP) as Registration Authority (RA) of the Sectigo Web PKI of Sectigo Limited for S/MIME certificates. The Sectigo Web PKI regulates the issuance of S/MIME certificates that are to be trusted on the public Internet.

PSW GROUP acts as a Registration Authority for Sectigo, performing registrations and facilitating the trading of digital certificates under the Sectigo Web PKI.

1.1 Overview

PSW GROUP is one of the leading service providers for certificate solutions in Germany. We successfully cooperate with the largest certification authorities worldwide. An important part of PSW GROUP's business activities comprises the registration of organization-validated and sponsor-validated S/MIME certificates. For the Certification Authorities for which we perform these validation activities, we verify the identity of the subscriber/certificate holder, and typically conduct the validation call in German. In accordance with WEBTRUST PRINCIPLES AND CRITERIA FOR REGISTRATION AUTHORITIES, we provide the following information about the services we provide as part of our work for Sectigo.

1.2 Document Name and Identification

This document is an addendum by PSW GROUP to the combined S/MIME CP/CPS of Sectigo.

This Addendum specifies additional requirements for Registration Authorities (RAs) acting on behalf of Sectigo. The goal is to ensure compliance with the current WebTrust Principles and Criteria for Registration Authorities, supporting the integrity, traceability, and trustworthiness of registration processes.

PSW GROUP acts in accordance with the current specifications of the CA/B Forum:

- Baseline Requirements for the Issuance and Management of Publicly-Trusted S/MIME Certificates - Link: <https://cabforum.org/working-groups/smime/documents/>
- Network and Certificate System Security Requirements - Link: <https://cabforum.org/working-groups/netsec/documents/>

PSW GROUP complies with the current version of the following WebTrust documents by CPA Canada:

- WebTrust Principles and Criteria for Registration Authorities – Link: <https://www.cpacanada.ca/en/business-and-accounting-resources/audit-and-assurance/overview-of-webtrust-services/principles-and-criteria>

And according to the requirements of the Certification Authority (CA) Sectigo including the documents:

- S/MIME Certificate Policy and Certification Practice Statement v1.0.6 - Link: <https://www.sectigo.com/legal>

If any inconsistency exists between this document and the normative provisions of any applicable industry guideline or standard, the industry guideline or standard shall take precedence over this Business Practices Disclosure.

Our Business Practices Disclosure documents address our collaboration with Sectigo in the validation of TLS, S/MIME and Code Signing Certificates.

In sections that do not concern PSW GROUP as RA no stipulation is made to the combined CP/CPS of Sectigo. In these sections, "No stipulation." is noted.

1.2.1 Revisions

This document is reviewed at least annually and adopts changes in Sectigo S/MIME CP/CPS in a timely manner.

Document version	Effective Date	Changes
1.0	2025/08/19	Adoption of combined CP/CPS of Sectigo
1.1	2025/11/21	Compliance with Sectigo S/MIME Certificates CP/CPS 1.0.6 – no changes

1.3 PKI Participants

No stipulation.

1.3.1 Certification Authorities

No stipulation.

1.3.2 Registration Authorities

PSW GROUP collects and verifies the identity of each Subscriber and the information to be enrolled in the Subscriber's certificate. PSW GROUP performs its function in accordance with the CP/CPS approved by the Policy Authority. PSW GROUP regularly performs the following tasks:

- the registration process
- the identification and authentication process.

PSW GROUP operates locally within its own geographic or business partnerships, subject to approval and authorization by Sectigo, and in accordance with Sectigo's practices and procedures.

PSW GROUP does not itself issue digital certificates, nor does it arrange for their issuance. PSW GROUP registers some or all of the subject's identity information, but does not perform domain control validation.

The RA is responsible for recording all validation steps and maintaining tamper-evident logs of all registration-related actions. The CA reserves the right to audit these logs at any time. All RA staff involved in certificate approvals must be uniquely identified and actions must require dual control (two-person rule) where required by WebTrust.

Sectigo operates a number of intermediate CAs from which it issues certificates for which PSW GROUP has performed the registration process.

1.3.2.1 Internal Registration Authority

No stipulation.

1.3.2.2 External Registration Authority

PSW GROUP acts as an External Registration Authority for Sectigo. External Registration Authorities must comply with WebTrust for RAs, including maintaining their own documented controls and undergoing independent annual audits. Audit results must be shared with Sectigo and may be required for CA/Browser Forum compliance verification.

1.3.3 Subscribers (End Entities)

No stipulation.

1.3.4 Relying Parties

No stipulation.

1.3.5 Other Participants

No stipulation.

1.3.5.1 Reseller Partners

No stipulation.

1.3.5.2 EPKI Manager Accounts

No stipulation.

1.4 Certificate Usage

No stipulation.

1.4.1 Appropriate Certificate Uses

No stipulation.

1.4.2 Prohibited Certificate Uses

No stipulation.

1.5 Policy Administration

No stipulation.

1.5.1 Organization Administering the Document

PSW GROUP is responsible for administering this document.

1.5.2 Contact Person

PSW GROUP can be contacted as follows:

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Hessen, Germany

TEL: +49 (0) 661 480 276 10

E-MAIL: info@psw.de

URL: <https://www.psw-group.de>

Contact information for the Sectigo Policy Authority is provided in the Sectigo CP/CPS documents at sectigo.com/legal.

1.5.2.1 Problem Reporting Address

No stipulation.

1.5.2.1.1 Revocation Portal

No stipulation.

1.5.2.1.2 ACME revokeCert

No stipulation.

1.5.2.1.3 Notifying Us Via Email

No stipulation.

1.5.3 Person Determining CP/CPS Suitability for the Policy

No stipulation.

1.5.4 CP/CPS approval procedures

No stipulation.

1.6 Definitions and Acronyms

No stipulation.

1.6.1 Definitions

As defined in the Sectigo combined CP/CPS.

1.6.2 Acronyms

As defined in the Sectigo combined CP/CPS.

1.6.3 Conventions

As defined in the Sectigo combined CP/CPS.

2 PUBLICATION AND REPOSITORY RESPONSIBILITIES

Sectigo publishes its documents at <https://www.sectigo.com/legal>. There Sectigo makes available the combined CP/CPS documents, the Subscriber Agreement and the EV Certificate requests in the current version.

2.1 Repositories

PSW GROUP provides links to all relevant documents of the Certification Authorities whose digital certificates are offered by PSW GROUP at <https://www.psw-group.de/downloads>. In particular, all CP, CPS, and Subscriber Agreements of these Certification Authorities are linked there, where possible.

Sectigo documents are alternatively available at <https://www.sectigo.com/legal>.

2.2 Publication of Certification Information

No stipulation.

2.3 Time or Frequency of Publication

The documents are reviewed and updated at least annually, without a fixed date. In the event of relevant changes in the Sectigo CP/CPS or other material changes, this document will be updated and republished.

2.4 Access Controls on Repositories

The documents published in the repository are for public information and are freely accessible.

2.5 Accuracy of Information

PSW GROUP has taken measures to regularly check this information being up to date and to check the content for accuracy. This document will be reviewed at least annually. If Sectigo CP/CPS have relevant changes then this document will be updated accordingly. If information in this document contradicts the CP/CPS of Sectigo, the provisions from the CP/CPS shall apply.

3 IDENTIFICATION AND AUTHENTICATION

No stipulation.

3.1 Naming

No stipulation.

3.1.1 Types of Names

No stipulation.

3.1.2 Need for Names to be Meaningful

No stipulation.

3.1.3 Anonymity or Pseudonymity of Subscribers

No stipulation.

3.1.4 Rules for Interpreting Various Name Forms

No stipulation.

3.1.4.1 Non ASCII character substitution

No stipulation.

3.1.4.2 Geographic names

No stipulation.

3.1.5 Uniqueness of Names

No stipulation.

3.1.6 Recognition, Authentication, and Role of Trademarks

No stipulation.

3.2 Initial Identity Validation

No stipulation.

3.2.1 Method to Prove Possession of Private Key

No stipulation.

3.2.2 Validation of mailbox authorization or control

No stipulation.

3.2.2.1 Validating authority over mailbox via domain

No stipulation.

3.2.2.2 Validating control over mailbox via email

No stipulation.

3.2.2.3 Validating applicant as operator of associated mail server(s)

No stipulation.

3.2.2.4 Validating control over mailbox using ACME extensions

No stipulation.

3.2.3 Authentication of Organization Identity

No stipulation.

3.2.3.1 Attribute collection of organization identity

No stipulation.

3.2.3.2 Validation of organization identity

No stipulation.

3.2.3.3 Disclosure of verification sources

No stipulation.

3.2.4 Authentication of Individual Identity

No stipulation.

3.2.4.1 Attribute collection and validation of individual identity

No stipulation.

3.2.5 Non-Verified Subscriber Information

No stipulation.

3.2.6 Validation of Authority

No stipulation.

3.2.7 Criteria for Interoperation

No stipulation.

3.2.8 Reliability of verification sources

No stipulation.

3.3 Identification and Authentication for Re-Key Requests

No stipulation.

3.3.1 Identification and Authentication for Routine Re-Key

No stipulation.

3.3.2 Identification and Authentication for Re-Key after Revocation

No stipulation.

3.4 Identification and Authentication for Revocation Request

No stipulation.

4 CERTIFICATE LIFECYCLE OPERATIONAL REQUIREMENTS

No stipulation.

4.1 Certificate Application

The requirements for applying for a Sectigo certificate via PSW GROUP can be found for each product on the respective product page at <https://www.psw-group.de>, under the "Validierung" tab. This information is currently available in German.

The specifications in the combined CP/CPS for S/MIME certificates of Sectigo apply.

4.1.1 Who can Submit a Certificate Application

No stipulation.

4.1.1.1 EPKI Manager Account Holder Certificate Applications

No stipulation.

4.1.1.2 Reseller Partner Certificate Applications

No stipulation.

4.1.2 Enrollment Process and Responsibilities

No stipulation.

4.2 Certificate Application Processing

No stipulation.

4.2.1 Performing Identification and Authentication Functions

PSW GROUP performs identification and authentication functions, in part, as an RA for Sectigo, in accordance with the specifications of the S/MIME CP/CPS.

This includes:

- Verify the identity of the requester as specified in the combined CP/CPS.
- Verify the authority of the requester and the integrity of the information in the Certificate request as specified in the combined CP/CPS.
- Ask Sectigo to sign a Certificate if all Certificate requirements have been met.

4.2.2 Approval or Rejection of Certificate Applications

No stipulation.

4.2.3 Time to Process Certificate Applications

No stipulation.

4.2.4 Certificate Authority Authorization

No stipulation.

4.3 Certificate Issuance

No stipulation.

4.3.1 CA Actions during Certificate Issuance

No stipulation.

4.3.2 Notification to Subscriber by the CA of Issuance of Certificate

PSW GROUP provides the certificate to the Subscriber and notifies the Subscriber via e-mail after confirming that the Subscriber has formally acknowledged their obligations as described in the combined CP/CPS.

4.3.3 Refusal to Issue a Certificate

No stipulation.

4.4 Certificate Acceptance

No stipulation.

4.4.1 Conduct Constituting Certificate Acceptance

No stipulation.

4.4.2 Publication of the Certificate by the CA

No stipulation.

4.4.3 Notification of Certificate Issuance by the CA to Other Entities

No stipulation.

4.4.3.1 Reseller Partner

No stipulation.

4.4.3.2 EPKI Manager Account Holder

No stipulation.

4.5 Key Pair and Certificate Usage

No stipulation.

4.5.1 Subscriber Private Key and Certificate Usage

No stipulation.

4.5.2 Relying Party Public Key and Certificate Usage

No stipulation.

4.6 Certificate Renewal

No stipulation.

4.6.1 Circumstance for Certificate Renewal

No stipulation.

4.6.2 Who May Request Renewal

No stipulation.

4.6.3 Processing Certificate Renewal Requests

No stipulation.

4.6.4 Notification of New Certificate Issuance to Subscriber

No stipulation.

4.6.5 Conduct Constituting Acceptance of a Renewal Certificate

No stipulation.

4.6.6 Publication of the Renewal Certificate by the CA

No stipulation.

4.6.7 Notification of Certificate Issuance by the CA to Other Entities

No stipulation.

4.7 Certificate Re-key

No stipulation.

4.7.1 Circumstances for Certificate Re-Key

No stipulation.

4.7.2 Who May Request Certificate Re-key

No stipulation.

4.7.3 Processing Certificate Rekeying Requests

No stipulation.

4.7.4 Notification of Re-key to Subscriber

No stipulation.

4.7.5 Conduct Constituting Acceptance of a Re-Keyed Certificate

No stipulation.

4.7.6 Publication of the Re-Keyed Certificate by the CA

No stipulation.

4.7.7 Notification of Certificate Issuance by the CA to Other Entities

No stipulation.

4.8 Certificate Modification

No stipulation.

4.8.1 Circumstance for Certificate Modification

No stipulation.

4.8.2 Who May Request Certificate Modification

No stipulation.

4.8.3 Processing Certificate Modification Requests

No stipulation.

4.8.4 Notification of New Certificate Issuance to Subscriber

No stipulation.

4.8.5 Conduct Constituting Acceptance of Modified Certificate

No stipulation.

4.8.6 Publication of the Modified Certificate by the CA

No stipulation.

4.8.7 Notification of Certificate Issuance by the CA to Other Entities

No stipulation.

4.9 Certificate Revocation and Suspension

No stipulation.

4.9.1 Circumstances for Revocation

No stipulation.

4.9.2 Who Can Request Revocation

No stipulation.

4.9.3 Procedure for Revocation Request

No stipulation.

4.9.4 Revocation Request Grace Period

PSW GROUP processes revocation requests for certificates which have been applied for at PSW GROUP.

Revocation requests for Sectigo certificates are forwarded to Sectigo.

PSW GROUP ensures that the revocation request is made by the organization or individual entity that has made the Certificate application.

4.9.5 Time Within which CA Must Process the Revocation Request

No stipulation.

4.9.6 Revocation Checking Requirement for Relying Parties

No stipulation.

4.9.7 CRL Issuance Frequency

No stipulation.

4.9.8 Maximum Latency for CRLs

No stipulation.

4.9.9 On-Line Revocation/Status Checking Availability

No stipulation.

4.9.10 On-Line Revocation Checking Requirements

No stipulation.

4.9.11 Other Forms of Revocation Advertisements Available

No stipulation.

4.9.12 Special Requirements for Key Compromise

No stipulation.

4.9.13 Circumstances for Suspension

No stipulation.

4.9.14 Who can Request Suspension

No stipulation.

4.9.15 Procedure for Suspension Request

No stipulation.

4.9.16 Limits on Suspension Period

No Stipulation.

4.10 Certificate Status Services

No Stipulation.

4.10.1 Operational Characteristics

No Stipulation.

4.10.2 Service Availability

No Stipulation.

4.10.3 Optional Features

No stipulation.

4.11 End of Subscription

No Stipulation.

4.12 Key Escrow and Recovery

No Stipulation.

4.12.1 Key Escrow and Recovery Policy and Practices

No stipulation.

4.12.2 Session Key Encapsulation and Recovery Policy and Practices

No stipulation.

5 FACILITY, MANAGEMENT, AND OPERATIONAL CONTROLS

No stipulation.

5.1 Physical Controls

PSW GROUP protects equipment and systems used for RA activities through specific measures, and reviews associated risks annually and after significant changes.

5.1.1 Site Location and Construction

No stipulation.

5.1.2 Physical Access

No stipulation.

5.1.2.1 Physical Access for CA Equipment

No stipulation.

5.1.2.2 Physical Access for RA Equipment

No stipulation.

5.1.3 Power and Air Conditioning

No stipulation.

5.1.4 Water Exposures

No stipulation.

5.1.5 Fire Prevention and Protection

No stipulation.

5.1.6 Media Storage

No stipulation.

5.1.7 Waste Disposal

No stipulation.

5.1.8 Off-Site Backup

No stipulation.

5.2 Procedural Controls

5.2.1 Trusted Roles

PSW GROUP appoints individuals to trusted roles after evaluating their suitability for registration tasks and ensuring process security. Trusted roles are reviewed annually, and status is revoked immediately in the event of changes or a negative suitability assessment.

Individuals in trusted roles are granted access to Sectigo software for the registration process, relevant documentation, and secure areas as necessary.

5.2.1.1 CA Administrators

No stipulation.

5.2.1.2 CA Officers (e.g., CMS, RA, Validation and Vetting Personnel)

No stipulation.

5.2.1.3 Operator (e.g., System Administrators/ System Engineers)

No stipulation.

5.2.1.4 Internal Auditors

No stipulation.

5.2.2 Number of Persons Required per Task

No stipulation.

5.2.3 Identification and Authentication for Each Role

No stipulation.

5.2.4 Roles Requiring Separation of Duties

No stipulation.

5.3 Personnel Controls

No stipulation.

5.3.1 Qualifications, Experience, and Clearance Requirements

No stipulation.

5.3.2 Background Check Procedures

PSW GROUP conducts background checks for all individuals assigned to trusted roles.

5.3.3 Training Requirements

Employee training is conducted and reviewed in accordance with a defined training plan. Separate documented assessments are performed for trusted roles, and passing these assessments is mandatory for appointment to a trusted role.

5.3.4 Retraining Frequency and Requirements

No stipulation.

5.3.5 Job Rotation Frequency and Sequence

No stipulation.

5.3.6 Sanctions for Unauthorized Actions

No stipulation.

5.3.7 Independent Contractor Requirements

No stipulation.

5.3.8 Documentation Supplied to Personnel

No stipulation.

5.4 Audit Logging Procedures

No stipulation.

5.4.1 Types of Events Recorded

No stipulation.

5.4.1.1 Router and firewall activities log

No stipulation.

5.4.2 Frequency of Processing Log

No stipulation.

5.4.3 Retention Period for Audit Log

No stipulation.

5.4.4 Protection of Audit Log

No stipulation.

5.4.5 Audit Log Backup Procedures

No stipulation.

5.4.6 Audit Collection System (Internal vs. External)

No stipulation.

5.4.7 Notification to Event-Causing Subject

No stipulation.

5.4.8 Vulnerability Assessments

No stipulation.

5.5 Records Archival

No stipulation.

5.5.1 Types of Records Archived

No stipulation.

5.5.2 Retention Period for Archive

No stipulation.

5.5.3 Protection of Archive

No stipulation.

5.5.4 Archive Backup Procedures

No stipulation.

5.5.5 Requirements for Time-Stamping of Records

No stipulation.

5.5.6 Archive Collection System (Internal or External)

No stipulation.

5.5.7 Procedures to Obtain and Verify Archive Information

No stipulation.

5.6 Key Changeover

No stipulation.

5.7 Compromise and Disaster Recovery

No stipulation.

5.7.1 Incident and Compromise Handling Procedures

No stipulation.

5.7.2 Computing Resources, Software, and/or Data are corrupted

No stipulation.

5.7.3 Entity Private Key Compromise Procedures

No stipulation.

5.7.4 Business Continuity Capabilities after a Disaster

No stipulation.

5.8 CA or RA Termination

No stipulation.

6 TECHNICAL SECURITY CONTROLS

No stipulation.

6.1 Key Pair Generation and Installation

6.1.1 Key Pair Generation

6.1.1.1 Subscriber Key Pairs

No stipulation.

6.1.1.2 CA and subCA Key Pairs

No stipulation.

6.1.2 Private Key Delivery to Subscriber

No stipulation.

6.1.3 Public Key Delivery to Certificate Issuer

No stipulation.

6.1.4 CA Public Key Delivery to Relying Parties

No stipulation.

6.1.5 Key Sizes

No stipulation.

6.1.6 Public Key Parameters Generation and Quality Checking

No stipulation.

6.1.7 Key Usage Purposes (as per X.509 v3 key usage field)

No stipulation.

6.2 Private Key Protection and Cryptographic Module Engineering Controls

No stipulation.

6.2.1 Cryptographic Module Standards and Controls

No stipulation.

6.2.2 Private Key (n out of m) Multi-Person Control

No stipulation.

6.2.3 Private Key Escrow

No stipulation.

6.2.4 Private Key Backup

No stipulation.

6.2.5 Private Key Archival

No stipulation.

6.2.6 Private Key Transfer into or from a Cryptographic Module

No stipulation.

6.2.7 Private Key Storage on Cryptographic Module

No stipulation.

6.2.8 Method of Activating Private Key

No stipulation.

6.2.8.1 CA Administrator Activation

No stipulation.

6.2.8.2 Offline CAs Private Key

No stipulation.

6.2.8.3 Online CAs Private Keys

No stipulation.

6.2.9 Method of Deactivating Private Key

No stipulation.

6.2.10 Method of Destroying Private Key

No stipulation.

6.2.11 Cryptographic Module Rating

No stipulation.

6.3 Other Aspects of Key Pair Management

No stipulation.

6.3.1 Public Key Archival

No stipulation.

6.3.2 Certificate Operational Periods and Key Pair Usage Periods

No stipulation.

6.4 Activation Data

No stipulation.

6.4.1 Activation Data Generation and Installation

No stipulation.

6.4.2 Activation Data Protection

No stipulation.

6.4.3 Other Aspects of Activation Data

No stipulation.

6.5 Computer Security Controls

6.5.1 Specific Computer Security Technical Requirements

No stipulation.

6.5.2 Computer Security Rating

No stipulation.

6.6 Lifecycle Technical Controls

6.6.1 System Development Controls

No stipulation.

6.6.2 Security Management Controls

No stipulation.

6.6.3 Lifecycle Security Controls

No stipulation.

6.7 Network Security Controls

No stipulation.

6.7.1 Network Segmentation

No stipulation.

6.7.2 CA Infrastructure Security

No stipulation.

6.8 Time-Stamping

No stipulation.

7 CERTIFICATE, CRL, AND OCSP PROFILES

No stipulation.

7.1 Certificate Profile

No stipulation.

7.1.1 Version Number(s)

No stipulation.

7.1.2 Certificate Extensions

No stipulation.

7.1.2.1 Root CAs

No stipulation.

7.1.2.2 Subordinate CAs

No stipulation.

7.1.2.3 Subscriber Certificates

No stipulation.

7.1.2.4 All Certificates

No stipulation.

7.1.3 Algorithm Object Identifiers

No stipulation.

7.1.4 Name Forms

No stipulation.

7.1.4.1 Encoding

No stipulation.

7.1.4.2 Subject Information – Subscriber Certificates

No stipulation.

7.1.4.3 Subject Information – Root Certificates and Subordinate CA Certificates

No stipulation.

7.1.4.3.1 Subject Distinguished Name Fields

No stipulation.

7.1.5 Name Constraints

No stipulation.

7.1.5.1 E-mail Protection

No stipulation.

7.1.6 Certificate Policy Object Identifier

No stipulation.

7.1.7 Usage of Policy Constraints Extension

No stipulation.

7.1.8 Policy Qualifiers Syntax and Semantics

No stipulation.

7.1.9 Processing Semantics for the Critical Certificate Policies Extension

No stipulation.

7.2 CRL Profile

No stipulation.

7.2.1 Version Number(s)

7.2.2 CRL and CRL Entry Extensions

No stipulation.

7.3 OCSP Profile

No stipulation.

7.3.1 Version Number(s)

No stipulation.

7.3.2 OCSP Extensions

No stipulation.

8 COMPLIANCE AUDIT AND OTHER ASSESSMENTS

All RAs must undergo an annual independent WebTrust for RA assessment, covering all relevant processes and controls.

8.1 Frequency or Circumstances of Assessment

No stipulation.

8.2 Identity/Qualifications of Assessor

No stipulation.

8.3 Assessor's Relationship to Assessed Entity

No stipulation.

8.4 Topics Covered by Assessment

No stipulation.

8.5 Actions Taken as a Result of Deficiency

No stipulation.

8.6 Communication of Results

No stipulation.

8.7 Self-Audits

No stipulation.

8.8 Review of delegated parties

No stipulation.

9 OTHER BUSINESS AND LEGAL MATTERS

No stipulation.

9.1 Fees

No stipulation.

9.1.1 Certificate Issuance or Renewal Fees

No stipulation.

9.1.2 Certificate Access Fees

No stipulation.

9.1.3 Revocation or Status Information Access Fees

No stipulation.

9.1.4 Fees for Other Services

No stipulation.

9.1.5 Refund Policy

No stipulation.

9.1.6 Reissue Policy

No stipulation.

9.2 Financial Responsibility

9.2.1 Insurance Coverage

No stipulation.

9.2.2 Other Assets

No stipulation.

9.2.3 Insurance or extended Warranty Coverage

No stipulation.

9.3 Confidentiality of Business Information

No stipulation.

9.3.1 Scope of Confidential Information

No stipulation.

9.3.2 Information Not Within the Scope of Confidential Information

No stipulation.

9.3.3 Responsibility to Protect Confidential Information

No stipulation.

9.3.4 Publication of Certificate Revocation Data

No stipulation.

9.4 Privacy of Personal Information

9.4.1 Privacy Plan

PSW GROUP follows the specifications of Sectigo and the legal requirements in Germany and the EU.

9.4.2 Information Treated as Private

No stipulation.

9.4.3 Information not Deemed Private

No stipulation.

9.4.4 Responsibility to Protect Private Information

No stipulation.

9.4.5 Notice and Consent to Use Private Information

No stipulation.

9.4.6 Disclosure Pursuant to Judicial or Administrative Process

No stipulation.

9.4.7 Other Information Disclosure Circumstances

No stipulation.

9.5 Intellectual Property Rights

No stipulation.

9.6 Representations and Warranties

9.6.1 CA Representations and Warranties

No stipulation.

9.6.2 RA Representations and Warranties

The RA warrants ongoing compliance with WebTrust for RAs and agrees to immediately inform Sectigo of any incidents that may impact the integrity or trustworthiness of the registration process.

9.6.3 Subscriber Representations and Warranties

No stipulation.

9.6.4 Relying Party Representations and Warranties

No stipulation.

9.6.5 Representations and Warranties of other Participants

No stipulation.

9.7 Disclaimers of Warranties

9.7.1 Fitness for a Particular Purpose

No stipulation.

9.7.2 Other Warranties

No stipulation.

9.8 Limitations of Liability

No stipulation.

9.8.1 Damage and Loss Limitations

No stipulation.

9.8.2 Exclusion of Certain Elements of Damages

No stipulation.

9.9 Indemnities

9.9.1 Indemnification by Sectigo

No stipulation.

9.9.2 Indemnification by Subscriber

No stipulation.

9.9.3 Indemnification by Relying Parties

No stipulation.

9.10 Term and Termination

9.10.1 Term

No stipulation.

9.10.2 Termination

No stipulation.

9.10.3 Effect of Termination and Survival

No stipulation.

9.11 Individual Notices and Communications with Participants

No stipulation.

9.12 Amendments

No stipulation.

9.12.1 Procedure for Amendment

No stipulation.

9.12.2 Notification Mechanism and Period

No stipulation.

9.12.3 Circumstances Under Which OID Must be Changed

No stipulation.

9.13 Dispute Resolution Provisions

No stipulation.

9.14 Governing Law, Interpretation, and Jurisdiction

9.14.1 Governing Law

No stipulation.

9.14.2 Interpretation

No stipulation.

9.14.3 Jurisdiction

No stipulation.

9.15 Compliance with Applicable Law

No stipulation.

9.16 Miscellaneous Provisions

9.16.1 Entire Agreement

No stipulation.

9.16.2 Assignment

No stipulation.

9.16.3 Severability

No stipulation.

9.16.4 Enforcement (Attorneys' Fees and Waiver of Rights)

No stipulation.

9.16.5 Force Majeure

No stipulation.

9.16.6 Conflict of Rules

No stipulation.

9.17 Other Provisions

9.17.1 Subscriber Liability to Relying Parties

No stipulation.

9.17.2 Duty to Monitor Agents

No stipulation.

9.17.3 Ownership

No stipulation.

9.17.4 Interference with Sectigo Implementation

No stipulation.

9.17.5 Choice of Cryptographic Method

No stipulation.

9.17.6 Sectigo Partnerships Limitations

No stipulation.

9.17.7 Subscriber Obligations

No stipulation.