

ECD_CO_1001.01_ Registered Email Service with Opening – Openum Service Policy

Documentation control

History of versions

Version	Date	Author	Description
1	02/8/2021	Eva Pané	Initial version
2	5/12/2022	Jordi Ramon	Review of standards
2.1	03/05/2023	Gloria Salvador	ONAC accreditation references

Distribution list

Company
Lleida SAS

Classification and status

Ranking	Status
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Documents referenced

Description

Table of contents

1. Introduction	1
1.1 Aim	1
1.2 Scope	1
1.3 Distribution.....	1
1.4 Review	1
2. Preliminary Considerations	2
Petitions, Complaints, Claims, Applications and Appeals	4
3. Policy Administration	4
4. Operational requirements for the Open Registered Email service - Openum	5
Description	5
Service request.....	5
Who can apply for the service.....	6
Registration process and responsibilities.....	6
Service Application Procedure	6
<i>Verification of documentation</i>	6
<i>Approval or rejection of service requests</i>	7
<i>Deadline for processing service requests</i>	7
Acceptance of the Service	7
<i>How the service is accepted</i>	7
Using the Registered Email Service with Open - Openum	7
<i>Use of the service by the user</i>	7
Renewal of the Service.....	8
Modification of the Service	8
Cancellation and Suspension of Service.....	9
<i>Circumstances for Cancellation</i>	9
<i>The user can voluntarily request cancellation of the service at any time, but they are obligated to request cancellation in the following situations:</i>	9
(i) <i>Loss or disablement of credentials (username and password)</i>	9
(ii) <i>Exposure or risk of misuse of credentials</i>	9
(iii) <i>Changes in circumstances that Lleida.net authorized the service</i>	9
<i>If the responsible party fails to request service cancellation in the situations mentioned above, they will be liable for any loss or damage incurred by third parties in good faith who relied on the service.</i>	9
<i>The user acknowledges and accepts that the Openum Registered Email Service must be canceled when Lleida SAS is aware of or has indications or confirmation of any of the following circumstances:</i>	9
(i) <i>User's request or a third party acting on behalf of the user.</i>	9
(ii) <i>Change of user.</i>	9
(iii) <i>User's death</i>	9
(iv) <i>Liquidation of legal entities (entities) that acquired the service</i>	9

<i>(e) Confirmation or evidence of false information.</i>	9
<i>(f) Cessation of certification body activities.</i>	9
<i>(g) Court or competent administrative body order.</i>	9
<i>(h) Compromise of security in any manner or circumstance.</i>	9
<i>(i) Supervening incapacity of the person or entity responsible.</i>	9
<i>(j) New events that render the original data inconsistent with reality.</i>	9
<i>(k) Application of the terms and conditions document as per the contract grounds.</i>	9
<i>(l) Any cause that reasonably leads to the belief that the service used with a digital certificate has been compromised to the extent that the service's trustworthiness is in doubt.</i>	10
<i>(m) Improper handling by the person responsible for the service.</i>	10
<i>(n) Breach by the user or the legal entity they represent or are bound to by the terms and conditions document.</i>	10
<i>(o) Knowledge of events modifying the initial data status provided, including termination of legal representation, employment relationship, liquidation or extinction of legal status, cessation of public function, or change to a different one.</i>	10
<i>(p) Evidence of false information provided by the applicant, subscriber, or person responsible.</i>	10
<i>(q) Failure by Lleida SAS, the Subscriber, or the person responsible to meet the obligations established in the Policy.</i>	10
<i>(r) Non-compliance with payment for the certification services agreed upon between the applicant and Lleida SAS.</i>	10
<i>Additionally, Lleida SAS reserves the right to cancel the Openum Registered Electronic Mail service when, in its judgment, such action is necessary to protect the credibility, reliability, commercial value, good name of the ECD, legal or moral suitability of the entire certification system.</i>	10
<i>Who can request Cancellation</i>	10
<i>Cancellation Request Procedure</i>	10
5. Tariffs	11
6. Service Security Policies	12
7. Obligations	13
8. Map of CAA-3.0-07 Controls	13

1. Introduction

1.1 Aim

To inform the general public of the guidelines established by Lleida SAS for providing the Openum Registered Electronic Mail service (ECD) in accordance with the provisions of Law 527 of 1999, Law 1437 of 2011, and the regulations that modify or complement them in the territory of Colombia, as indicated in the Certificate of Accreditation issued by ONAC to Lleida SAS (22-ECD-009.pdf - onac.org.co).

1.2 Scope

All members of Lleida SAS, Digital Certification Body, as well as all third parties identified in the scope of the Digital Certification Body Management System.

1.3 Distribution

Approved by the Management of Lleida SAS, this policy must be accessible to all individuals listed in the document control distribution list through the established channels outlined in procedure ECD_CO-3001, which pertains to the management of the documentation repository.

1.4 Review

This Service Policy shall undergo an annual review and approval by the Security Committee. However, in the event of any significant changes to the organization, whether they are operational, legal, regulatory, or contractual in nature, the policy shall be reviewed as needed to ensure its continued relevance.

2. Preliminary Considerations

The Openum Registered Email Service Policy (hereinafter referred to as the 'Policy') is a document prepared by Lleida SAS (hereinafter referred to as 'Lleida.net'), acting as a Digital Certification Entity (hereinafter referred to as 'ECD'). This Policy contains the rules and procedures that Lleida.net follows as guidelines for providing the Openum Registered Email service in compliance with the provisions of Law 527 of 1999, Law 1437 of 2011, and any regulations that may amend or supplement them, within the territory of Colombia. The Policy aligns with the following guidelines:

- Specific Accreditation Criteria for Digital Certification Bodies (CEA 3.0-07, hereinafter referred to as 'CEA'), which must be met to obtain accreditation as an ECD (Electronic Certification Entity) from the National Accreditation Body of Colombia (ONAC).
- Law 527 of 1999
- Decree 2364 of 2012
- Standards and protocols:

Short Message Peer to Peer (SMPP)

https://smpp.org/SMPP_v3_4_Issue1_2.pdf

<https://smpp.org/smppv50.pdf>

Universal Computer Protocol (UCP)

https://support.nowSMS.com/discuss/messages/1/EMI_UCP_Specification_40-8156.pdf

Mobile Application Part SS7 protocol (MAP):

https://www.etsi.org/deliver/etsi_gts/09/0902/05.03.00_60/gsmmts_0902v050300p.pdf

Hypertext Transfer Protocol (HTTP)

<https://www.ietf.org/rfc/rfc2616.txt>

HTTP Over TLS (HTTPS)

<https://datatracker.ietf.org/doc/html/rfc2818>

Simple Mail Transfer Protocol (SMTP) RFC 821, 822, 2822, 5321, 5322

<https://tools.ietf.org/html/rfc821>

<https://tools.ietf.org/html/rfc822>

<https://tools.ietf.org/html/rfc2822>

<https://tools.ietf.org/html/rfc5321>

<https://tools.ietf.org/html/rfc5322>

Hypertext Transfer Protocol (HTTP)

<https://www.ietf.org/rfc/rfc2616.txt>

Multipurpose Internet Mail Extensions (MIME) RFC 1847, 2045, 2046, 2047, 4288, 4289, 2049, 2231, 2387

<https://tools.ietf.org/html/rfc1847>

<https://tools.ietf.org/html/rfc2045>

<https://tools.ietf.org/html/rfc2046>

<https://tools.ietf.org/html/rfc2047>

<https://tools.ietf.org/html/rfc4288>

<https://tools.ietf.org/html/rfc4289>

<https://tools.ietf.org/html/rfc2049>

<https://tools.ietf.org/html/rfc2231>

<https://tools.ietf.org/html/rfc2387>

<https://tools.ietf.org/html/rfc1521>

Secure/Multipurpose Internet Mail Extensions (S/MIME) RFC 5751

<https://datatracker.ietf.org/doc/html/rfc5751>

CAAdES (CMS Advanced Electronic Signatures). ETSI TS 101 733

https://www.etsi.org/deliver/etsi_ts/101700_101799/101733/02.02.01_60/ts_101733v02020p.pdf

PAdES (PDF Advanced Electronic Signatures). ETSI TS 102 778

https://www.etsi.org/deliver/etsi_ts/102700_102799/10277801/01.01.01_60/ts_10277801v010101p.pdf

RFC 3126 Electronic Signature Formats for long term electronic signatures

<https://datatracker.ietf.org/doc/html/rfc3126>

RFC 5126 CMS Advanced Electronic Signatures (CAAdES)

<https://datatracker.ietf.org/doc/html/rfc5126>

RFC 3161 Internet X.509 Public Key Infrastructure Time-Stamp Protocol (TSP)

<https://datatracker.ietf.org/doc/html/rfc3161>

RFC 5905 Network Time Protocol Version 4: Protocol and Algorithms Specification

<https://datatracker.ietf.org/doc/html/rfc5905>

DETAILS OF THE ENTITY PROVIDING LEGAL CERTIFICATION SERVICES

Company name:	LLEIDA S.A.S.
N.I.T.	900571038-3
Address:	81st Street # 11 - 55 Office 903
City/Country	Bogotá/Colombia
Telephone:	+5713819903
E-mail:	info@lleida.net
Website:	www.lleida.net/co
Accreditation Certificate No.	22-ECD-009
Accreditation Certificate	22-ECD-009.pdf (onac.org.co)

DETAILS OF THE REGISTERING ENTITY

The registration authority is the same digital certification service provider.

Petitions, Complaints, Claims, Applications and Appeals

Requests, complaints, claims, and appeals related to services provided by Lleida SAS will be addressed through various mechanisms available to subscribers and will be resolved by impartial and relevant personnel

- By e-mail to clientes@lleida.net . You must attach the template available at www.lleida.net/co ECD_CO 4501 Template PQRSA Lleida SAS
- By telephone on +57 1 381 9903

Within a maximum period of 15 days they must be resolved and notified, after filing, analysis and drafting of a formal report that will be delivered to the subscriber.

3. Policy Administration

The administration of the Service Policies is the responsibility of the Integrated Management System process.

Contact Person:

Name: Eva Pané Vidal

Position: ECD Supervisor

Contact telephone number: +57 1 381 9903

E-mail: compliance@lleida.net

The policies must be approved by the Security Committee, once approved it is the responsibility of the ECD Supervisor to update the latest version on the web portals.

4. Operational requirements for the Open Registered Email service - Openum

Description

This service enables Lleida.net users to compose and utilize a notification process for PDF documents. Users can choose from various notification methods, including sending notifications via Registered Email with or without opening confirmation (Openum), registered SMS, and viewing PDF documents.

The service is highly flexible, allowing senders to configure several aspects such as branding, notification type, communication preferences for both sender and signatory, document upload requests to recipients, sending display reminders, and receiving delivery status notifications, among others.

Senders can initiate notification requests by defining recipients, specifying the PDF documents to be notified, determining the number of recipients, indicating if notifications need to occur in a specific order, and specifying the required number of views for the notification to be considered effective.

In all cases, the service generates a timestamped, digitally signed evidence document that compiles the entire traceability of registered communications and recipient actions. This evidence serves as proof of successful notification. If the notification process expires, a corresponding evidence document is issued.

This revision aims to make the text more organized and easier to understand while retaining the original meaning.

The service is offered through a user web tool (admin.opneum.eu) and API for sending, consulting and downloading documents.

Service request

Any individual requiring the Registered Electronic Mail service with opening (Openum) can request this service through the Lleida.net website. The Registration Authority (RA) forwards the request to the Commercial Department, which then contacts the interested party to request identification documentation.

Users who place orders for our products agree to the terms and conditions specified in this Policy.

Lleida.net reserves the right to request additional documents, either in their original or copy, to verify the identity of the applicant. Furthermore, Lleida.net may waive the requirement for certain documents if the applicant's identity has been sufficiently verified through other means.

The applicant acknowledges that Lleida.net has the discretionary authority to reject an application for the Openum Registered Email service if, in its judgment, such approval could jeopardize the credibility, commercial value, reputation of GSE, or the legal and moral integrity of the certification system. In such cases, Lleida.net will notify the applicant of the non-approval without the need to provide specific reasons."

This revised version maintains the original meaning while addressing any mistakes or potential areas of improvement in terms of clarity and precision.

Who can apply for the service

Any natural or legal person, who is legally authorized and properly identified, is eligible to apply for the Openum Registered Electronic Mail service.

Registration process and responsibilities

Once the authentication and verification requirements of the applicant's data have been met, the Lleida.net RA will approve and digitally sign the service activation request. All related information will be registered in the RA system.

Service Application Procedure

Verification of documentation

The verification of applicant documentation is conducted by Lleida.net's Registration Authority (RA), responsible for authorizing service activation. The RA assesses the validity of the provided information and checks whether the attached documentation complies with the requirements outlined in this Policy.

The following documents must be attached to the service application:

- Contract for the provision of services
- Applicant's identification document
- Document confirming the existence and legal representation of the company, which should be valid for no more than thirty (30) days.
- Single Tax Register (RUT)

Documents can be submitted in scanned or electronic original format, provided that legibility is maintained for the information's use.

Approval or rejection of service requests

If, after validating the applicant's documentation, the provided information complies with the requirements outlined in this Policy, the application will be approved. If it's not possible to validate the applicant's documentation or if the provided information is not entirely authentic, the application will be rejected, and the Openum Registered Email Service will not be activated. Lleida.net bears no responsibility for any consequences resulting from the non-approval of the Openum Registered Email Service, and the applicant, who has been denied the issuance of the respective service, accepts and acknowledges this.

Furthermore, Lleida.net reserves the right to refrain from activating the Openum Registered Email Service, even if the applicant's identification or provided information has been fully authenticated, for reasons related to legal requirements, commercial convenience, or protection of Lleida.net's reputation, which might otherwise jeopardize the digital certification system.

Deadline for processing service requests

The RA at Lleida.net aims to approve an application within three (3) working days after receiving all required documentation and information. Once the complete documentation is received, the service will be activated within five (5) working days.

Acceptance of the Service

How the service is accepted

No confirmation from the responsible party is required to accept the service. The Openum service is considered accepted from the moment of the request. Therefore, if the information in the service activation communication is not accurate or was not provided correctly, the responsible party must request its cancellation. The responsible party accepts this, following the cancellation procedure described in section 5.11.

Using the Registered Email Service with Open - Openum

Use of the service by the user

By requesting the activation of the service provided by Lleida.net, the user automatically accepts the conditions of use outlined in this Policy. The service may only be used for the purposes explicitly mentioned and authorized within this Policy. Consequently, the Openum Registered Email service must not be utilized for any activities beyond those specified.

Upon the service's expiration, the user is obligated to cease using the associated credentials. In light of this, the user acknowledges and accepts sole responsibility for any damage, loss, or harm caused to third parties as a result of using the service after its validity has expired. Lleida.net bears no liability for any unauthorized use.

Renewal of the Service

The Openum Registered Email service is automatically renewed. If a user no longer wishes to use the service, they must inform the RA.

Modification of the Service

The Openum - Openum Registered Email service is delivered with all the features and functionalities of the service, so no requests for modification of the service can be made.

Cancellation and Suspension of Service

Circumstances for Cancellation

The user can voluntarily request cancellation of the service at any time, but they are obligated to request cancellation in the following situations:

- (a) Loss or disablement of credentials (username and password).
- (b) Exposure or risk of misuse of credentials.
- (c) Changes in circumstances that Lleida.net authorized the service.

If the responsible party fails to request service cancellation in the situations mentioned above, they will be liable for any loss or damage incurred by third parties in good faith who relied on the service.

The user acknowledges and accepts that the Openum Registered Email Service must be canceled when Lleida SAS is aware of or has indications or confirmation of any of the following circumstances:

- (a) User's request or a third party acting on behalf of the user.
- (b) Change of user.
- (c) User's death.
- (d) Liquidation of legal entities (entities) that acquired the service.
- (e) Confirmation or evidence of false information.
- (f) Cessation of certification body activities.
- (g) Court or competent administrative body order.
- (h) Compromise of security in any manner or circumstance.
- (i) Supervening incapacity of the person or entity responsible.
- (j) New events that render the original data inconsistent with reality.
- (k) Application of the terms and conditions document as per the contract grounds.

(l) Any cause that reasonably leads to the belief that the service used with a digital certificate has been compromised to the extent that the service's trustworthiness is in doubt.

(m) Improper handling by the person responsible for the service.

(n) Breach by the user or the legal entity they represent or are bound to by the terms and conditions document.

(o) Knowledge of events modifying the initial data status provided, including termination of legal representation, employment relationship, liquidation or extinction of legal status, cessation of public function, or change to a different one.

(p) Evidence of false information provided by the applicant, subscriber, or person responsible.

(q) Failure by Lleida SAS, the Subscriber, or the person responsible to meet the obligations established in the Policy.

(r) Non-compliance with payment for the certification services agreed upon between the applicant and Lleida SAS.

Additionally, Lleida SAS reserves the right to cancel the Openum Registered Electronic Mail service when, in its judgment, such action is necessary to protect the credibility, reliability, commercial value, good name of the ECD, legal or moral suitability of the entire certification system.

Who can request Cancellation

The request for service cancellation may be initiated by the responsible party, a bona fide third party, or any interested party who has **demonstrable knowledge of the circumstances mentioned** in Section 5.11.1 of this Policy or when the service has been used for purposes other than those outlined in Section 5.8.1 regarding the **use of the service by the responsible party**.

Any interested person with demonstrable proof that the service is no longer in the possession of the subscriber or responsible party may request cancellation.

The IT teams of both the RA and the CA, serving as the highest control bodies responsible for managing the security of Lleida SAS's technological infrastructure, have the authority to request service cancellation if they become aware of or suspect the compromise of credentials or any other event indicating potential misuse of the service by the responsible party or Lleida SAS.

Cancellation Request Procedure

Persons interested in requesting the cancellation of the service for the reasons specified in this Policy can do so using the following procedures:

- By telephone
- By email to clientes@lleida.net

Requests for service cancellation must be processed with the utmost urgency, and the cancellation process should not take more than three (3) working days once the request has been validated.

Upon completion of the cancellation formalities, if, for any reason, the service cancellation is not effective as per the terms established in this Policy, Lleida SAS, as a certification service provider, assumes liability for any damages caused to subscribers or third parties in good faith due to errors, omissions, or bad faith on the part of Lleida SAS administrators, legal representatives, or employees in the execution of authorized activities. For this purpose, Lleida SAS maintains liability insurance as required by Article 9 of Decree 333 of 2014. Lleida SAS does not assume any other commitments, provide additional guarantees, or accept any other liabilities for certificate holders or trusted third parties, except as outlined in this Policy.

It is the user's responsibility, and they acknowledge this, to inform bona fide third parties about the necessity to verify the validity of the email service they are using at any given time.

Within 24 hours following the cancellation of the Openum Registered Electronic Mail service, Lleida SAS informs the subscriber or person responsible via email regarding the service cancellation. Consequently, the applicant accepts and acknowledges that once they receive the email, their request has been processed. The email notifying the cancellation of the service is considered received when it enters the information system designated by the applicant at the email address provided on the application form."

This revised version maintains the original meaning while simplifying the wording for better comprehension.

5. Tariffs

The service combines several elements for the purpose of accrediting access to a document. The elements used by the service are the following:

- OPENUM START: the registered SMS or mail that initiates the process including a link to a URL where the document(s) to be notified are hosted. Mandatory.
- OPENUM BASE: proves that the URL has been accessed. Mandatory.
- OPENUM REMINDER: SMS or registered mails to send as reminders to the recipient. Optional.

The Openum Registered Email Service can be used on a prepaid or postpaid basis.

In the case of prepaid mode, it is charged by credits (CRE):

Element	CRE consumed by the service per recipient	Price per CRE (COP)	Total price (COP)
OPENUM START	7	213,57	1,495.00
CLICK&SIGN BASE	10	213,57	2.357.00
OPENUM REMINDER	7	213,57	1,495.00

In the case of post-payment mode (at month-end) it is priced per Unit (UN):

Element	UN consumed by the service per recipient	Price per UN (COP)	Total price (COP)
OPENUM START	1	1,495.00	1,495.00
OPENUM BASE	1	2.357.00	2.357.00
OPENUM REMINDER	1	1,495.00	1,495.00

Prices excl. VAT

The cancellation request is free of charge

The rates indicated here may vary according to special commercial agreements that may be reached with users, in the development of promotional campaigns.

6. Service Security Policies

The service and the system that manages it address the various aspects of security:

- Insurance

The system does not allow unauthorised access to information, through the platform and direct attacks on the servers on which it runs.

- Traceable

All user actions involving a modification to a document are logged.

In some services such as registered communications, the event audit is signed and stamped with TSA to ensure its authenticity.

- Fidedigno

The originals of the documents remain unchanged

- Integrity

The expert evidence generated remains unchanged.

- Good Information Security Practices

The Openum - Open Registered Email Service Management System is periodically audited according to ISO 27001 standards, maintaining the current accreditation available at the following link: https://www.lleida.net/docs/es/IS_632576_lleidanet.pdf

- Audited

In addition, technical and Ethical Hacking reviews are carried out in accordance with OWASP.

7. Obligations

Obligations of Lleida.net as a Certification Service Provider:

Lleida.net, in accordance with the current regulations in the Certificate Policies for Electronic Mail Services and in the CPD, is obligated to:

1. Adhere to the provisions of the current regulations, the CPD, and the Certificate Policies.
2. Publish the CPD and each of the Certificate Policies on the Lleida.net website.
3. Inform ONAC (National Accreditation Body of Colombia) about any modifications to the CPD and the Certificate Policies.
4. Maintain the CPD and Certificate Policies with their latest versions published on the Lleida.net website.
5. Issue the service in accordance with the Certificate Policies and defined standards.

8. Map of CAA-3.0-07 Controls

Standard	Section
CEA- 3.0-07	N/A