

Secure Signature Creation Devices (SSCDs)

...from different approaches

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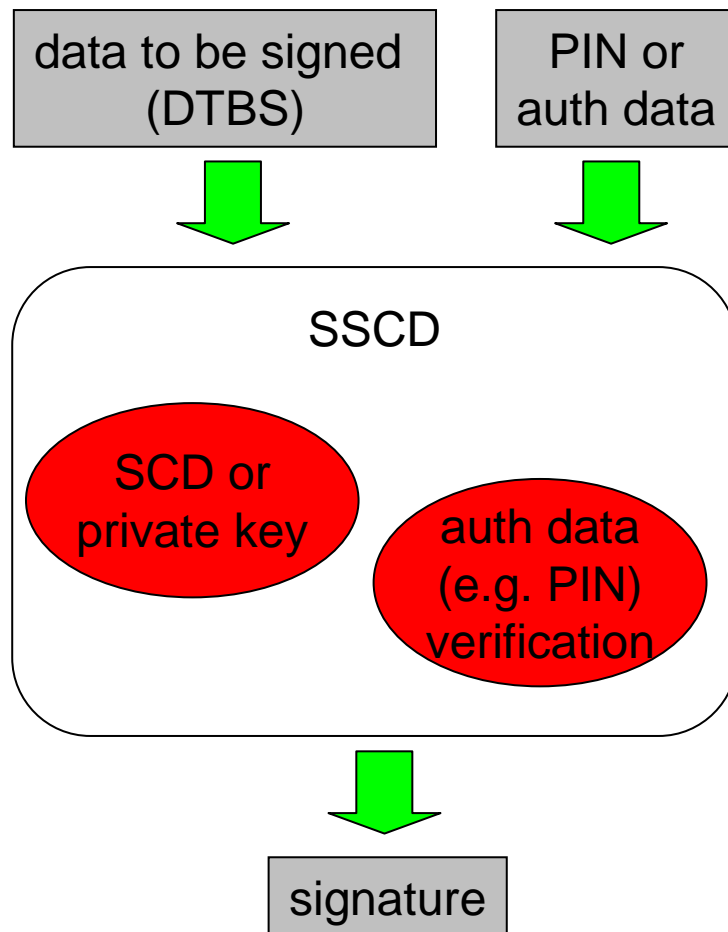
Requirements for SSCDs

Annex III of the e-Signature Directive, in plain words:

1. SSCDs must ensure that the signature creation data:
 - (a) is secret and unique;
 - (b) the signature is protected vs. forgery;
 - (c) is reliably protected, only the signatory can use it.
2. SSCDs must not
 - alter the data to be signed;
 - prevent the data to be signed from being presented to the signatory.

Very high level requirements.
More or less common sense.

SSCD as a crypto token



- Stores the private key of the signatory
- Capable of authenticating the signatory
- Outputs a signature if the signatory is authenticated only
- Private key or auth data cannot be retrieved from it
- Small and simple enough to be secure
- Usually it is a piece of hardware

Conformity assessment of SSCDs

- A device is considered an SSCD if its conformity had been assessed by a designated body.
- Lower level criteria for assessment:
 - ❑ **Common Criteria, SSCD PP, EAL4+**
 - ❑ other criteria based on FIPS 140-X or ITSEC
 - ❑ or anything that fulfills the criteria in Annex III of the Directive
- An SSCD assessed in one Member State is to be recognized in all other Member States

Different approaches to SSCDs

- Personal devices (e.g. smart card, USB token)
- Solutions based on a central server
- Solutions for mass creation of signatures
- Solutions based on mobile phones

etc...

Let's take a look at some examples!

Smart card

- Standardized device 😊
- People can relate to cards 😊
(as they use credit cards)
- Can be personalized 😊
- Needs a card reader 😞
- Driver problems, lack of support on various platforms 😞😞
- CSPs have little or no bargaining power vs card manufacturers 😞😞



USB token

- A personal crypto token, just like a smart card
- No card reader required 😊
- It is harder for people to relate to it ☹️
- PIN pad readers cannot be used
→ they are less secure ☹️ (?)
- Can be combined with a USB drive 😊/☹️
- Same driver problems as smart cards ☹️☹️☹️



Hardware Security Module (HSM)

- Personalized HSM storing the private key of one signatory
 - mass signing, great performance 😊
 - expensive 😞 → for large organizations only
- Multiple signatories have their keys in an HSM of a central server
 - I do not own my private key 😊
 - how do I authenticate to the HSM???
- Not accepted in every member state 😞

Pure software SSCD, without hardware?

- Why not? 😊 It works everywhere! 😊😊
- It is possible to backup the private key 😊/😞
- My experience: a natural person CANNOT take care of a software based private key 😞
- Questionable degree of security 😞😞

- Can be a viable solution for large organizations who can protect a software key 😊😊
- Why the signatory cannot choose the solution that fits her the best?

Mass signing with multiple smart cards

- Sometimes, in some legal environments...
 - ❑ mass signing is needed
 - ❑ qualified signatures are required
 - ❑ an HSM cannot be used as an SSCD

- Solution: A device containing multiple SSCD smart cards is used for mass creation of signature
Such a device is:
 - ❑ such a device should not exist ☹ ☹
 - ❑ a circumvention of legislation ☹ ☹
 - ❑ a logical response to bad regulation ☹ ☹

Mobile phones (1)




A mobile phone can be viewed as a personal device. 😊
How can we sign using mobile phones?

- SIM card as an SSCD
 - depends on the telco operator ☹
 - depends on the phone ☹
- Additional hardware SSCD connected to the phone
 - heavily depends on the phone ☹☹
 - at least the same driver & compatibility issues as hardware SSCDs in PCs ☹




Mobile phones (2)

- Software on the mobile phone, so the mobile phone becomes the SSCD
 - ❑ depends on the phone ☹
 - ❑ is it really secure? ☹☹
 - ❑ phones change a lot, hard to evaluate ☹☹
- Server-based solution, phone as authentication
 - ❑ does not depend on client platforms 😊😊
 - ❑ I do not have my private key in my pocket ☹
 - ❑ can a rouge telco operator sign on my behalf? ☹

Myths, fairy tales, urban legends (1)

-  ■ A QES must be extremely secure!
 - ❑ No, it is equivalent with handwritten signatures; a handwritten signature is not secure at all
 - ❑ it should be usable; otherwise it shall never be used
 - ❑ mass signing: a way of saving money
-  ■ QES is so important that it must be strictly separated from everything else!
 - ❑ the same card/PIN cannot be used for anything else?
 - ❑ this is unrealistic, and makes signatures unusable
-  ■ The signatory must view and accept the document before signing it!
 - ❑ this does not happen with handwritten signatures in over 90% of the cases

Myths, fairy tales, urban legends (2)

-  ■ A PIN must be provided for each QES created!
 - ❑ what about mass signing?
-  ■ An SSCD MUST establish a secure cypto channel...
 - ❑ with what? with the human signatory???
 - ❑ with the application? (rules out most applications)
 - ❑ with the driver? (what's the point in that?)
-  ■ Security assessment provides additional security
 - ❑ evaluation takes LONG, costs a lot of money
 - ❑ PC software are complex, there:
assessed product = product with known vulnerabilities
 - ❑ SSCDs are more simple; is their case different?

Myths, fairy tales, urban legends (3)



- Smart card readers with PIN pads are more secure

- PIN pad reader \leftrightarrow crypto channel



- The document must be hashed on the SSCD for security

- does not protect the signatory at all

- but: it may prevent the signatory from using encryption



- It is more secure to authenticate the signatory using biometry



- CEN SSCD PP is a common ground for SSCDs

- it focuses on crypto tokens only

- it has many-many different interpretations

- it encourages circumvention and 'evaluation tweaking'

Conclusions & Recommendations

- e-Signing should be simple, otherwise users will not accept it. Signing is not the purpose of existence, people have other things to do.
- Mass creation of e-signatures (or e-seals) is a requirement from the market.
- Natural persons cannot relate to software keys, they can handle a hardware device much better.
- SSCD PP is suits personal crypto tokens the most. It is often blocking innovation and is often circumvented.
- The current regulation or current situation with SSCDs is one of the obstacles blocking the market.
- Relax the requirements, make the technology usable!

Thank you very much! 😊

