



# International Security Certification Initiative (ISCI)

## EU Common Criteria Information Sharing and Analysis Centre

Terms of Reference (TOR)

## Traffic Light Protocol (TLP) Classification

TLP Level	Description	Sharing Scope
TLP:CLEAR	Disclosure is not restricted.	May be shared freely and published without limitation.

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## 1. Introduction

The EUCC ISAC is a non-for-profit association governed by Belgium law, ISCI is a technical group of the EUCC ISAC. Terms of Reference provide practicalities, details and procedure in relation with the working of ISCI which are not specified by the statutes of the EUCC ISAC.

ISCI has been originally addressing the concerns of vendors and SOG-IS national schemes related to Common Criteria methodology supporting the interpretation of the Common Criteria, with respect to Security IC domain (both HW and SW) security certifications, mainly driven historically by the banking and governmental market products. Gradually, ISCI has been widening its scope to the development of the smartcard industry with further referential schemes, i.e. EMVCo, IPA and members provided they could share the same values about high-level security evaluation approach and agree to the rules of collaboration. Recognized schemes refer to those pre-cited schemes.

ISCI is recognized in the industry for its harmonization added value in the CC and EMVCo domains. The harmonization work at ISCI is essential to preserve the ITSEFs applying equal methods and evaluations. This is crucial for acknowledgement of certificates coming from other participating certification countries and/or schemes.

The mission is that all participants gain an agreed common understanding of methodology supporting the interpretation of the Common Criteria, with respect to Security IC domain (both HW and SW) security certifications.

Within the last decade, the Security Evaluation standards evolved towards several directions:

- Changing form factors and business models (Smartcards to Secure ICs, Secure Element to Secure Subsystem within an SoC...);
- New markets growing with shorter timeframe and different levels of security (from traditional Banking, Passport to mobile Security, TPM and IoT ...);
- Emergence of main regional actors creating or influencing the standards (China, US, ...);
- Evolution of CCRA;
- Evolution of European cybersecurity regulations.

Meanwhile, ISCI still targets a worldwide harmonization and standardization of methodology supporting the interpretation of the Common Criteria, with respect to Security IC domain (both HW and SW) security certifications and new analysis methods are to be evaluated throughout all participating evaluation and certification schemes. Its mission is that all participants apply the same understanding of methodology supporting the interpretation of the Common Criteria, with respect to Security IC domain (both HW and SW) security certifications. This is fundamental for the mutual acceptance of certificates among the participating schemes, respectively countries. For this reason, the group consists of certification bodies, respectively authorities, accredited evaluation laboratories (ITSEFs), hardware and software vendors.

This group is driven by the vendors and schemes and has no educational mission.

The ISCI collaboration is conformant with European antitrust laws as it is managed as an ISAC subgroup under the ISAC antitrust bylaws.

This document contains the mission statement, organization and functioning rules for this subgroup.

The compliance to ToR by each ISCI Member is required to preserve each Member's sensitive assets, guarantee the trustworthiness in the subgroup exchanges and enable ISCI productivity. It is essential that ISCI Members share the same values and work towards agreed shared objectives.

## 2. Guiding principles

ISCI is led by voluntary consensus principles in accordance with the following attributes:

- Openness – the procedures or processes used for creation, revision, reaffirmation, and withdrawal of ISCI's technical documents are transparent and open to all the Members. ISCI's Members are provided meaningful opportunities to participate in the definition of the technical documents on a non-discriminatory basis.
- Balance and Lack of Dominance – ISCI's decision making process, and the development of deliverables should be balanced; there should be meaningful involvement from a broad range of parties, with no single interest dominating the decision-making.
- Due Process – due process shall include procedures, adequate notice of meetings and documentation development, a defined adequate period to review drafts and prepare views and objections, access to views and objections of other participants, within the limits imposed by the confidentiality of information and the strict respect of the antitrust compliance guidelines.
- Procedural Appeals – an appeal process shall be available for the impartial handling of procedural appeals.
- Consensus – consensus is the rule (general agreement, but not necessarily unanimity); during the development of consensus, comments and objections are considered using fair, impartial, open, and transparent processes. To validate this general agreement, votes can be organised pursuant to the following ISCI's Terms of Reference (ToR).

## 3. Mission and powers

ISCI is tasked with:

- supporting the interpretation of the Common Criteria, with respect to Security IC domain (both HW and SW) security certifications.
- producing documentation to enable ease of use of the Common Criteria to ensure certifications are optimized, clear, and concise.
- ensuring that the Common Criteria certifications are executed using the same criteria and analysis techniques across the Security IC (Smartcard and similar devices both HW and SW) certification domain.
- welcoming any new certification scheme for cooperation in the area of Security IC domain (both HW and SW) security certifications.
- ISCI consists of global experts from certification bodies, liaised security certification schemes and bodies, related security evaluation facilities, developers and end-user organisations as set out in Article 6 of the EUCC ISAC statutes. ISCI contributes to the security community, particularly by publishing and consulting about methodology and its interpretation. For clear delimitation, this group is neither a community of certifiers nor a community of security architects,
- Aiming to harmonise the interpretation of security certifications with respect to Security IC domain (both HW and SW) security certifications, thereby creating a fair and equal framework for all stakeholders. This enables certification schemes, policy makers, and users to robustly evaluate the security solutions they select, both in current and emerging domains.

- This group is not intended to educate the public to security certifications with respect to Security IC domain (both HW and SW) security certifications. Other schemes are welcome to use ISCI methodologies and outcomes but can only be recognized as such with formal and official authorization from ECCG (EsEm) or ENISA - ECCG authorities.

## 4. Membership

Members of ISCI are members of the EUCC ISAC and shall follow its Statutes. Membership to ISCI is open to those EUCC ISAC Members who meet the criteria set out in Article 6 of the EUCC ISAC Statutes as complemented by Terms of Reference (ToR).

ISCI membership is made of:

### 4.1. Executive members with voting rights:

- a. National Cybersecurity Certification Authorities (NCCAs) and Conformity Assessment Bodies (CABs) operated by a NCCA involved in the EUCC Subgroup on EUCC maintenance (EsEm);
- b. National Accreditation Bodies (NABs);
- c. Manufacturers and Providers of ICT products that have relevant and recent products within the last 3 years evaluated in Europe by a CAB under the EUCC Scheme and that expressed sufficient and motivated interests in EUCC;
- d. CABs that are not operated by an NCCA, accredited under the Cybersecurity certification framework by a qualified NAB – whether they act or not on behalf of a NCCA.
- e. Labs and Information Technology Security Evaluation Facilities (Labs/ITSEFs) that operate within the European Union and whose application is supported by an NCCA.
- f. End-user group or an organisation contributing to the development or using the EUCC Scheme certified products (e.g. Payment schemes, Telco's, trade associations etc.) and which have a significant part of their business in Europe.

### 4.2. Associate Members with no voting right:

- a. One or several representatives of ECCG subgroup for EUCC maintenance and review (EsEm);
- b. NCCAs or CABs operated by an NCCA involved in the EsEm;
- c. National Accreditation Bodies (NABs);

### 4.3. Observers:

- a. Cybersecurity certification authority operating outside the European Union;
- b. Non-European consortium made of laboratories, conformity assessment bodies, vendors and led by a third-country national cybersecurity certification authority.

Membership shall fulfil criteria and admission process pursuant to the chapter two of the EUCC ISAC Statutes.

### 4.4. Membership in Trial Status

Manufacturers or Providers of ICT products that have not yet completed an evaluation or certification under the EUCC but have demonstrated sufficient interest and commitment to EUCC topics

## 4.5. Historic Members

In accordance with Article 9 of the Statutes of the EUCC ISAC, ISCI (International Smartcards Certification Initiative WG-1) is incorporated as a Technical Group within the EUCC ISAC.

Organisations that were, as of 30 June 2024, members of the ISCI Working Group 1 (WG1) are recognised as Historic Members under Article 9 of the EUCC ISAC Statutes. These organisations, or their designated senior representatives, shall have the right to become Members of the Association without any membership assessment or admission procedure. Upon notification of their application in accordance with Article 9 of the EUCC ISAC Statutes, such Historic Members automatically become Members of the EUCC ISAC and ISCI.

## 5. Liaisons

ISCI may request the Steering Committee to establish transient or permanent liaison with any other entities. To this end, ISCI defines the conditions of participation and the content of the liaison statement to be submitted to the Steering Committee for approval pursuant to article 23 of the EUCC ISAC Statutes.

## 6. Other conditions specific to the group

Information discussed in the meetings or communicated in the reports is considered confidential and treated as such. ISCI discussions shall be free without suppressing opinions and meanings:

- Conflicts shall be discussed on technical level only,
- Individual business and other interests are not subject of ISCI discussions,
- Carrying out competitive relations by discrediting or denigrating other Members or influencing others against a certain Member, is strictly contrary to the principles of collaboration within ISCI. Such behaviour shall be immediately addressed and stopped by the Chairman and leads to the application of penalty: activating the *Non-Compliance and Exclusion Procedure* as defined in Article 10 of the TOR.
- The information discussed in the meetings or communicated in the documents may not be used for commercial activities other than the intended mission of ISCI.

Each Member can provide topics to the Chair, Vice-Chair for the agenda any time prior to a meeting.

- Whether a topic could be managed in the next meeting is a matter of time remaining prior to the meeting and of remaining meeting time of an already given agenda.
- The chair cannot guarantee that a late topic is included in the next meeting, but if not, it shall be a part of the agenda of one of the next meetings. Its urgency can be discussed in the plenary.

The collaboration using electronic media shall be based on the ISCI repository for upload and download.

The ISCI repository keeps a database of

- Meeting minutes,
- Presentations held.
- Participants being in the trial period (MITS) gain access when they become acting Members.

## 7. Applications

Applications are subjected to a validation procedure by ISCI and inform the Steering Committee of the EUCC ISAC.

ISCI defines here the application process within its group in accordance with the criteria as set out in article 6 on Membership of the EUCC ISAC Status:

Application requests should be supported through an existing member or the Chairman of ISCI. The member must write an email requesting membership, the email must contain, Company/Organization name, proposed attendee, details of organization, and experience with CC certification.

Each organization agrees by signing in as a member to the rules described in ISCI ToR described in this document. Applications from an authorized CB will follow a different process and have to be submitted to the chair of the ISAC Steering Committee.

The members should represent a spectrum as wide as possible of the parties involved in Secure IC products certifications. The main groups identified so far are IC-vendors, SW-vendors, card-vendors, certification bodies, IT security evaluation facilities (laboratories) and service providers.

**The acceptance criteria for new member application are based on the following main paradigms that are ISCI specific:**

1. Applicant profile, technical skills and competence
2. Motivation/Reciprocity Benefit
3. Acceptance of ISCI rules for collaboration
4. Acceptance of ISCI results for their own evaluation, respectively certification

### Applicant profile, technical skills and competence

The new applicant is expected to provide a comprehensive presentation of its entity:

- Entity status: vendor, laboratory
- Organization, regional origin, business profile, link to other company/schemes/University
- Related product and markets,
- Entity experience in the domain:
  - Product Security
  - Security certification/ used certification schemes...
  - Confidentiality management
- Entity representative for ISCI (member expertise and experience, technical publications)
- Sponsorship from an existing ISCI member
- The request email will be processed by the Chairman/Vice-chair.
- An invite to the applicant to present at the next full meeting will be delivered within 2 calendar weeks.
- During this meeting the applicant is expected to give a presentation detailing its organization and his relationship to Common Criteria Certifications.
- The Chairman or the Vice-chair will ask the members via e-mail if there are any concerns with the applicant's request.
- The period for replying to this membership request is 2 calendar weeks.
- After a period of 2 weeks the Chairman will
  - Contact the applicant to confirm or deny membership.
  - Inform the Steering Committee about the decision of ISCI.

## Objectives:

Assess the trustworthiness of the entity and the relevance to ISCI discussion. Avoid malicious members.

## Metrics:

### ***Elements to be provided by the applicant:***

- Guarantees provided by the member to ensure information confidentiality.
- Demonstrated skills and experience enabling an active contribution to ISCI topics.

### ***Examples of acceptable (non-exhaustive) evidence:***

- Evidence of Common Criteria (CC) evaluation activity within the EUCC scheme (at least initiated).
- CC evaluations.
- Members to provide evidence of interest and competence in evaluations targeting at least High resistance level, and potentially also Substantial.
- CC evaluations based on ISCI-related Technical Domains and relevant Protection Profiles (PPs) - e.g. BSI-CC-PP-0084, BSI-CC-PP-0117, BSI-CC-PP-0099, etc.

## Additional requirements/metrics:

- Conform to “Minimum ITSEF Requirements” (optional, for lab applicant)..

## Motivation / Reciprocal benefit

- Applicants have to declare how they intend to contribute to ISCI and for what purpose.

## Objectives:

- Ensure an active and valuable contribution to ISCI,
- Check reciprocal benefit of applicant and ISCI,
- Check recognition of ISCI works,
- Show long term interest about high-level security evaluation approach,
- Discard applicants that would not or could not participate actively to the ISCI Technical Group or that are interested by a short-term participation.

## Membership in Trial Status (MITS):

ISCI may grant a Membership in Trial Status (MITS) to Manufacturers or Providers of ICT products that have not yet completed an evaluation or certification under the EUCC scheme but have demonstrated sufficient interest and commitment to EUCC topics, in accordance with Article 9.6 of the Articles of Association of the EUCC ISAC.

MITS members are invited to attend ISCI meetings and may actively participate and contribute to ISCI activities, without voting rights.

ISCI shall reassess each MITS after a period of one (1) year from the date of admission.

- If the certification conditions listed in Article 6 of the EUCC ISAC Statutes and the Members' obligations listed in Article 6 of the ISCI Terms of Reference (ToR) are fulfilled, the MITS shall be considered an Executive Member with voting rights.

- If the certification conditions listed in Article 6 of the EUCC ISAC Statutes are not yet fulfilled, whereas the Members' obligations listed in Article 6 of the ISCI ToR are fulfilled, the MITS period may be extended for an additional one (1) year, upon decision of ISCI Members following the voting rules laid down in Article 9 of the ISCI ToR.

After the MITS extension period, if the certification conditions listed in Article 6 of the EUCC ISAC Statutes remain unfulfilled while the Members' obligations listed in Article 6 of the ISCI ToR continue to be fulfilled:

- ISCI Members may decide to exclude the MITS following the voting rules laid down in Article 9 of the ISCI ToR,
- or the EUCC ISAC Steering Committee or ISCI may vote to grant a derogation in accordance with Article 11 of the EUCC ISAC Statutes.

In all cases, the decision and status of the MITS - including any conversion, extension, exclusion, or derogation - shall be formally communicated to the EUCC ISAC Steering Committee.

## 8. Members obligations

It is expected that all Members work actively towards the goals of ISCI. This can take various forms such as regularly participating in the meetings.

It is discouraged to be merely an entry in the ISCI e-mail distribution list, and membership status may be under review by ISCI. Normal consensus rules apply here.

There will be 5 meetings per calendar year

Members are expected to physically attend a minimum of two out of the five meetings in a calendar year i.e. 40% minimal physical attendance.

The chair will record attendance to all meetings, physical and virtual, where attendance has dropped below the expected minimum, a discussion will take place to the future involvement of the individual party due to lack of interest/participation.

Members are expected to participate, in at least one of the following tasks:

- Participation in at least one sub-group or task
- Generating documents
- Editing documents
- Commenting and reviewing documents

It is not expected that Members fulfil all the items above, but a reasonable subset is expected.

Members should be courteous to other Members, aggressive behaviour or disrespecting behaviour should be reported to the Chair.

## 9. Non-Compliance and Exclusion Procedure

In the event that an ISCI Member does not comply with the EUCC ISAC Statutes, the EUCC Terms of Reference (ToR), or any of their annexes, the ISCI Chairman shall issue a written warning (by email) to the Member, clearly describing the infringement and setting a deadline for corrective action.

If normal behaviour does not resume within the defined timeframe, exclusion from the ISCI group may be considered in accordance with Articles 11.1 and 11.2 of the EUCC ISAC Statutes, depending on the

seriousness and impact of the misconduct, and after giving that Member the opportunity to be heard in its defence.

Exclusion may be temporary (gradually: suspension for three meetings or six months, then five meetings or one year) or permanent, depending on the circumstances.

The Chairman shall present the case to the ISCI during its next meeting and request a vote on the proposed exclusion. The decision shall be taken by simple majority, following the voting rules set out in Article 13 of these TOR.

## 10. Meetings

Face to Face meetings are recommended and should be held at least 5 times per year. Meetings are hosted by one of the group Members on a voluntary basis.

Each meeting shall commence with an overview of the agenda, approval of minutes from the previous meeting and a reminder of the EUCC ISAC Antitrust Compliance Guidelines. The following text may be used to meet this requirement:

*Attendees are kindly reminded that the EUCC ISAC is committed to complying with all relevant antitrust and competition laws and, to that end, has adopted Antitrust Compliance Guidelines. Failure to abide by competition laws can have extremely serious consequences for the EUCC ISAC and its participants, including heavy fines and, in some jurisdictions, imprisonment for individuals. In particular, it is strictly prohibited to discuss commercially sensitive information such as prices, costs, customer details or production plans with competitors. This applies not just to formal meetings but also to informal discussions. You are therefore asked to familiarise yourself with the Antitrust Compliance Guidelines and to strictly abide by the rules at all times.*

The Chair may request the presence of external antitrust counsel at meetings expected to involve a discussion on a potentially sensitive issue. In the event that a topic being discussed is considered to raise sensitive issues in particular relating to competition law compliance, the Chair or the Vice-Chair has the right to suspend the discussion pending external legal advice on the subject. This suspension shall be recorded in the minutes of the meeting concerned.

## 11. Late Membership fee policy

The following policy applies where membership fees due by a Member have not been received by EUCC ISAC within the timeframe aforementioned:

- a. After 60 days of the due date set in the invoice, the Secretariat sends a first reminder letter or email to the Member that the payment is now 60 days past due and notifies the Board.
- b. 45 days after the first reminder letter or email (1) the Secretariat sends a second letter or email that the membership rights and benefits will be temporarily suspended if payment is not received within 30 days and notifies the Board.
- c. 30 days after the second reminder letter or email (2) the membership rights and benefits are suspended. According to the bylaws, the Board may waive (or delay) the suspension based on individual case.

The Secretariat may use the services of a recovery fee company to collect unpaid membership fees, subject to approval from the Board.

## 12. Voting rules

Prior to a vote being required, it should be communicated to the Members that a vote will take place. This may be achieved by including a statement in the previous minutes, or by notifying Members at least 2 weeks prior to the next meeting. A failure to comply with this formality means that the vote must be postponed to the next meeting unless all ISCI ISAC Members first agree unanimously to proceed with the vote (for the avoidance of doubt, this means that all ISCI ISAC Members eligible to vote must be present in person or remotely at the meeting).

Although it is encouraged that Members should attend all meetings it is noted that this is not always possible, it is therefore allowed for Members to register a vote by email prior to a meeting.

All votes are tallied, and the majority is taken into account. For a measure to pass the yes votes must be more than 50% of the votes cast unless otherwise stated in these Terms of Reference.

A vote is considered as one vote from one Member of ISCI irrespective of the number of representatives (or subsidiaries) of the Member active in ISCI. This means that if an organization has multiple Members, then they have only one shared voting right.

If the two conditions are not met, the vote should be postponed until the next meeting.

In order to validly deliberate and take decisions, at least more than one half of the Members must be present or represented. Subject to a quorum being present, a decision of ISCI shall be taken by a simple majority of the votes.

A Member may give a power of attorney in order to be represented at a meeting of ISCI ISAC. An attending Member cannot receive more than 2 Power of attorney.

## 13. Alteration to the Terms of Reference

In order to validate any alteration to the Terms of Reference, a quorum shall consist of at least fifty percent (50%) of the voting Members, either present or represented. Subject to a quorum being present, any decision shall be taken by a two-thirds (2/3) majority of the votes cast.

A Member may give a power of attorney in order to be represented at a meeting of ISCI ISAC. An attending Member cannot receive more than two (2) Power of attorney.

Although it is encouraged that Members should attend all meetings it is noted that this is not always possible, it is therefore allowed for Members to register a vote by email prior to a meeting.

## 14. Output Materials

Documents generated by ISCI are owned by the EUCC ISAC and are made available to the members or public for non-commercial purposes.

Documents generated by the subgroups of ISCI shall be returned to the main group for final approval.

It should be noted that the host of the Output Material may require to review and send comments back to ISCI as part of its release process. Any substantive amendments must be approved by the ISCI Members by majority vote prior to resending it for final validation. The ISCI Chair shall then communicate the Output Material to the external party for publication.

The members can use information discussed in the meetings or communicated in the documents in their respective organization.

Nothing in this document shall cause prejudice to national laws and regulations of the Member States, including regarding public access to documents, government access to documents, the protection of personal data or the protection of classified information.

## 15. Chairman of ISCI

The Chairman oversees steering meetings and sub-group activities. The Chairman is responsible for chairing meetings and ensuring minutes of each meeting are recorded and distributed. The Chairman proposes the agenda for each meeting.

The mandate of ISCI Chair and Vice-Chair is from 1<sup>st</sup> January to 31<sup>st</sup> December per calendar year.

The Chair is accountable to gather and achieve the ISCI group objectives. These objectives can be self-assigned, or assigned to ISCI by ISAC steering Committee, ECCG (EsEm). The Chair is also accountable for ISCI outputs (in terms of operations/timing, not in terms of technical content<sup>1</sup>), ISCI way of working (checking Member participation, creation of subgroup, moderation of ISCI plenary meeting, the respect of Terms of References ...) and any external communication with all stakeholders (ISAC steering, ECCG (EsEm), Eurosmart...).

The Vice-Chair is the Chair deputy, assisting the Chair in all meetings and its tasks, in particular the consolidation and review of ISCI outputs.

The Chairman and the Vice-Chair seat at the steering committee of the EUCC.

The election of the ISCI Chair and Vice-Chair should take place once a year, normally during the last meeting per calendar year. Candidates should inform the Chair and the Members of their interest to become Chair or Vice-Chair at least two weeks prior to the proposed election. If there are no proposed new candidates, then the current Chair and/or Vice-Chair may continue in the role without a formal vote being required. The Chair and the Vice-Chair seats at the steering committee of the EUCC ISAC.

Members may bring any serious concerns relating to the conduct of the Chair or Vice-Chair to the attention of the ISCI Members and ask for an extraordinary vote, voting will then take place to agree to replace the Chair by a 75% majority. An election is then held at the next full meeting.

## 16. Sub-groups of ISCI

Sub-groups can be created to work on specific topics which cannot be managed during ordinary meetings of ISCI. Sub-groups are subjected to prior validation of the Group members pursuant to article 8 and shall be validated by the steering committee of the EUCC ISAC. The competence of the sub-group shall be limited to the scope of ISCI to avoid any prejudice to the work of the other EUCC ISAC technical groups.

ISCI defined the subgroups' roadmap, subgroups report to ISCI at least every 3 months. Due to workloads and precision of some tasks, ISCI may wish to establish one or more Sub-Group(s) to focus on issue concerned.

Any Member can propose the establishment of a Sub-Group and Tasks. The Members will vote on the establishment by majority vote. The vote follows the rules defined in Article 12.

The Chair will propose a Sub-Group leader. The Members will then vote to accept or propose another candidate following the rules in Article 12.

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<sup>1</sup> technical content accountability is conferred by the expertise of the Members.

The Sub-Group must follow the Terms of Reference and is answerable at all times to the ISCI Chair and Vice-Chair.

It is the responsibility of the Sub-Group leader to organize meetings and prepare or delegate the minutes for the Sub-Group. The Sub-Group leader must also report back to ISCI when required by the ISCI Chair or Vice-Chair.

Reporting includes:

- Timelines
- Output
- Meeting reports
- Status reports

The Sub-Group leader is entrusted to chair sub-group meetings and ensure that rules for Members are adhered to. If a sub-group requires to change the leader, then they may vote to replace the chair.

The proposal is then made to the main group by email. If no objections are made within a 2-week period, then the new sub-group leader is appointed. Any objections would then trigger a vote following the rules defined in Article 12.

A chairman oversees the work of the sub-group. They shall be appointed by ISCI pursuant to article 8 for a limited period of one year. Their mandate could be renewed.

## 17. Intellectual Property Rights (IPR) Policy

ISCI's activities are conducted in strict compliance to the IPR policy of the EUCC ISAC. (Annex A).

Each Member shall use its reasonable endeavour's to timely inform ISCI of that Member's Essential IPR that the Member is aware of and believes to be likely to fully or partially cover elements of Specifications that are being developed by a Member of ISCI prior to such Specifications being submitted to a voting procedure. In particular, each Member submitting a technical proposal for development of a Specification shall timely and on a bona fide basis draw the attention of ISCI to the IPR of that Member which might be Essential if the proposal is adopted.

## 18. Antitrust Compliance

The EUCC ISAC and ISCI's activities are conducted in strict compliance with applicable antitrust laws. ISCI's Members shall respect the Antitrust Compliance Guidelines (Annex B)..

The ISCI activities must not lead towards a restriction of competition between Members, nor must meetings of Members organized or supported by ISCI be used by Members to discuss or coordinate market behaviour resulting in a restriction of competition. More generally, the platform offered by ISCI to its Members must not be misused for activities prohibited by antitrust laws.

A reminder of general rules including antitrust will be done at each meeting start and in the minutes of meeting.

## 19. Anti-Corruption and Influence Peddling

The Members of the EU CC ISAC and ISCI shall always act in compliance with the applicable national and international laws and regulations governing the detection and prevention of corruption and influence peddling risks.

Neither Party, whether directly or through third parties, shall offer to, nor accept from, any person an offer, promise, gift, present, or any advantage that could be linked to an abuse by that person, committed or potentially committed, of their real or perceived influence, with the aim of obtaining for themselves or others a distinction, employment, contract, or any other favourable decision.

Neither Party shall solicit or accept for themselves any offer, promise, gift, present, or any advantage in exchange for abusing their influence to make or obtain any favourable decision.

## 20. Data Processing and Data protection

Members of ISCI may process personal data for the purposes of administrative management and the exchange of information related to the execution of the activities conducted by the EUCC ISAC.

The Members of ISCI respectively determine the purpose and means of the aforementioned processing, each acting as a data controller.

The Members of the Association undertake to comply with the regulations on personal data protection applicable to the agreement, including Regulation (EU) 2016/679 on the protection of natural persons with regard to the processing of personal data and the free movement of such data (GDPR).

The Members of the Association agree to process only the personal data strictly necessary for the execution of the activities conducted by the EUCC ISAC.

The personal data processed by the Members of the Association include the contact details of other Members and/or any third parties, such as their name, first name, professional identifier, role, professional email address, workplace, and phone number.

The Members of the Association commit to informing the aforementioned data subjects of the processing of their personal data.

## 21. Confidentiality and Information Protection

Members of ISCI acknowledge that participation in its activities may involve access to confidential information.

Members of ISCI acknowledge that participation to its activities may involve access to confidential information. Members shall agree to treat all such information with the same degree of care as they would their own confidential information, but in any case, no less than reasonable care. Confidential information shall not be disclosed to any third party except as expressly permitted by the ISCI confidentiality provisions.

Members shall ensure that their representatives respect these confidentiality obligations. Information shared within ISCI shall be presumed non-confidential unless designated otherwise in writing and accepted as such by the Chair.

Any confidential information disclosed remains the property of the disclosing party and must not be copied, used, or disseminated beyond the agreed scope.

These obligations shall survive the termination of a Member's participation for a period of 15 years from the date of disclosure, unless explicitly released in writing by the disclosing party.

## 22. Complaint Procedure

This section details procedures for complaints and appeals that concern the actions and decisions of ISCI and its Subgroups related to the release of a specification, a technical document or a publication.

### Conditions

Complaints may only be submitted by persons or organizations that are directly, materially, or adversely affected by the activities related to the complaint.

Complaints filed with the EUCC ISAC must:

- be introduced within 30 days after the EUCC ISAC has officially communicated a specification or a technical document or a publication;
- be accompanied by documentation providing all relevant details of the complaint;
- include any supporting evidence or documentation, such as statements and explanations related to the issue; and
- not be repeated unless a minimum of 6 weeks has passed.
- pay attention on that the complainant (person or organization) shall not derive any rights or presume the validity of the claim based on the fact that the EUCC ISAC is investigating the complaint.

### Process

The complaint shall be submitted by e-mail sent to the Secretariat at [contact@ccisac.eu](mailto:contact@ccisac.eu)

The complaint, along with the personal and/or company information of the complainant (full name, address, and other contact details), shall include the complainant's personal opinion about the assessment and/or conclusion, the reasons for disapproval with the decision reached, as well as the settlement being sought.

The Secretariat will acknowledge receipt of the complaint, assign a complaint reference number (CPYYYYMMnn), the Board appoints the person responsible for investigating and assessing the complaint, The selection is based upon competence, independence and impartiality. Then, the Secretariat notifies the person of the complaint.

The person responsible will investigate and assess the complaint, considering advice from the technical experts, where necessary, to determine the facts of the case and an appropriate response or resolution.

This investigation will be completed within 30 days of receipt of the complaint. If more time is needed, the complainant will be notified of progress and estimated timeline.

Proposed resolutions will be reviewed and ratified by the Steering Committee for determining a final decision prior to onward communication.

The Secretariat will communicate outcomes or proposed resolutions to the complainant.

If the complainant agrees with the outcome at this stage, then the complaint does not proceed to further stages and the complaint is closed.

If the complainant is not satisfied with the outcome, then they may submit an Appeal.

Records of complaints, investigations, and proposed resolutions will be provided to and maintained by the Secretariat.

## 23. Appeal Procedure

This procedure stipulates the way in which an appellant may appeal a decision of the EUCC ISAC with respect to a complaint.

### Filing

Appeals may only be submitted by persons or organizations that are directly, materially, or adversely affected by the activities related to the initial complaint / appeal.

The appeal must be submitted within 14 days after the decision on the disputed complaint is communicated to the complainant.

The appeal shall be submitted by e-mail sent to ISCI Chair and Vice-Chair email.

### Acceptance

The appellant can only submit an appeal after the Secretariat has communicated a final decision on the complaint.

If the appeal is submitted within the required timeline and by the appropriate person or organization and no prior appeal has been submitted, the appeal will be accepted by the EUCC ISAC, with no undue burden imposed on the appellant.

When an appeal has been accepted by the EUCC ISAC, the appeal is considered formal and will be dealt with according to this procedure.

### Process

Upon acceptance of an appeal, the Chair will promptly acknowledge receipt and assign an appeal reference number (APYYYYMMnn). The Steering Committee selects the person responsible for investigating and assessing the appeal. The selection is based upon competence and independence/impartiality.

The person responsible for investigating and assessing appeals will be notified of the filed appeal.

The person responsible will investigate and assess the appeal, taking into account advice from the technical experts where necessary, to determine the facts of the case and an appropriate response or resolution. This investigation will be completed within 30 days of receipt of the appeal. If more time is needed, the appellant will be notified of progress and estimated timeline.

All appeals will be handled by the relevant parties promptly and in a fair, unbiased, and impartial manner.

Proposed resolutions will be reviewed and decided expeditiously by the Steering Committee prior to onward communication.

The Secretariat will communicate outcomes of the final decision to the appellant and the appeal is closed. Note that appeals may not be repeated or re-submitted.

Records of appeals, investigations, and proposed resolutions will be provided to and maintained by the Secretariat.

## 24. Annexes

**Annex A:** IPR Policy of the EUCC ISAC – [https://ccisac.eu/wp-content/uploads/2025/07/2024\\_11\\_25\\_EU-CC-ISAC-IPR-policy.pdf](https://ccisac.eu/wp-content/uploads/2025/07/2024_11_25_EU-CC-ISAC-IPR-policy.pdf)

**Annex B:** Antitrust guidelines - [https://ccisac.eu/wp-content/uploads/2025/09/EUCCISAC\\_Antitrust-Compliance-Guidelines\\_.pdf](https://ccisac.eu/wp-content/uploads/2025/09/EUCCISAC_Antitrust-Compliance-Guidelines_.pdf)

### Reference:

- EUCCISAC Articles of Association EUCC ISAC AISBL V1.0 – 15 January 2025  
[https://ccisac.eu/wp-content/uploads/2025/07/EUCCISAC\\_articles-of-association.pdf](https://ccisac.eu/wp-content/uploads/2025/07/EUCCISAC_articles-of-association.pdf)



# About us

The EU Common Criteria Information Sharing and Analysis Centre (EUCC ISAC) is an international non-profit association dedicated to fostering collaboration, harmonization, and excellence in cybersecurity certification.

The EUCC ISAC acts as a central hub for collaboration between public and private stakeholders, ensuring the effective and consistent implementation of the EU Common Criteria (EUCC) certification scheme. It provides essential input to key entities—including the ECCG subgroup for EUCC maintenance (EsEm), the European Commission, ENISA, and Member States—to support the ongoing development and maintenance of the EUCC scheme. We aim to maintain state-of-the-art practices by providing technical interpretations, methodologies, attack quotations, and an up-to-date attack catalogue.

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