

To: State Secretary for the Interior and Kingdom Relations
Sir drs. R.W. Knops
P.O. Box 20011
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The Netherlands

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Response to the 'Besluit bedrijfs- en organisatiemiddel Wdo'

Introduction of Signicat

Signicat is a European market leader in providing verified digital identity and electronic signature solutions for regulated industries. Signicat connects to over 20 electronic IDs (eIDs, including iDIN and DigiD) around Europe and dedicated to providing regulated businesses with verified digital identity solutions. We achieve this through our secure digital onboarding, identity verification services, and regulatory compliance offerings. Through Signicat's API, you get access to the identity methods via a single point of integration. The identity methods are available for the electronic signing of documents, digital onboarding, and authentication.

Signicat was founded in 2007 and has been active on the Dutch market since 2016, growing rapidly. Signicat's headquarters are located in Trondheim, Norway, and has offices across Europe, The Hague being one of them. Signicat is a member of the European Association for e-Identity & Security (EEMA), is an eIDAS Qualified Trust Service Provider and is compliant with the ISO 27001 information security standard.

Response to the intended 'Besluit bedrijfs- en organisatiemiddel Wdo'

We have studied the documentation published on the internet consultation site as we believe some of the intended decisions may reflect on our (potential) customers and business.

We fully understand the need and drive from the Dutch government to regulate the use of eIDs. Fully online digital processes can be a blessing when it comes to a quicker response to your citizens and companies demanding an ever increasing service level of their government. On the other hand it forms a risk, when so much personal data, financial transactions and other important processes depend on systems that need to be hacker proof and always on.

We believe that as Signicat we can be one of the recognised ('erkende') service providers as 'Ontsluitende dienst', as this is a role we already offer in Scandinavia and other European countries. What surprises us is the mandatory requirement to cooperate (art. 9 'Samenwerkingsplicht') with all other recognised service providers. This article mentions the need to cooperate on interoperability and change management on functionality.

We understand the need to cooperate between recognised entities that differ in role. A 'Machtigingsdienst' needs to cooperate with an 'Ontsluitende dienst'. The same applies between an 'Authenticatiedienst' and an 'Ontsluitende dienst'. However, as it is formulated now, it would also mean mandatory cooperation between entities offering services in the same role, for instance between all 'Ontsluitende diensten'. We see no real reason for this. What's more, from a competitive point of view this can be a very unsavoury regulation indeed. There are two important issues here:

- We believe that part of the cutting edge technologies provided by 'Ontsluitende diensten' is the unburdening of the 'Dienstverlener' when it comes to the complexities of the eID landscape. If they are all required to offer the same product with the same technology, the potential for innovation, resilience, competition and efficiency will be severely limited, to the detriment of the 'Dienstverleners' and the Dutch market in general.
- Despite the additional requirements about accession to existing agreements it will mean that competitors are able to withhold or at least hinder the entrance of new players in the market. Even without intending the existing players may feel the need to agree on additional requirements or conditions, without a real need.

Therefore we recommend to make a slight adjustment to the intended 'Besluit bedrijfs- en organisatiemiddel Wdo', assuring that recognised service providers need to cooperate only when they have a different role in the ecosystem. This would allow the benefits of the different market players and their unique characteristic to be available to all citizens, corporates, 'Dienstverleners' and the market as a whole.

Concluding, we would like to thank you for the possibility to respond to the aforementioned intended regulation and hope that you will take into serious consideration the comments given from our experience in the European market. Of course we are open for further discussion or provide additional information in a meeting.

Kind regards,

On behalf of Signicat AS

Allard Keuter