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Remote identification

Challenges from supervisory perspective

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Remote identification in Austria

Identity interface and identity record since 2010

Signed record for passing identity information from an identification service provider to a trust service provider

Video identification since 2016

Decision of Austrian supervisory body (still under Directive 1999/93/EC) containing specific requirements

- Machine-readable zone of photo ID including checksum to be verified
- Verification of identity and security features to be documented photographically
- Use of unsupervised third-party services prohibited
- Specific requirements to be considered in conformity assessment (camera resolution, lighting conditions, additional risks due to video-based components)



Innovative remote identification methods (1)

Abstract proof that every identification under money-laundering legislation meets eIDAS requirements

The devil is in the detail ...

- Specific legal requirements on identification in each Member State
- Proof does not refer to specific requirements
 - Transfer of identity data and identification data (personal data) to TSP
 - TSP's obligation to keep records of identification
- Supervisory bodies for different sectors involved
- Proof cannot replace confirmations for specific identification methods under eIDAS Article 24(1), point (d)



Innovative remote identification methods (2)

Two-step procedure for reuse of remote identification

- Original remote identification by some trusted third party
 - Identification methods not under TSP's control
 - Possibly but not necessarily complying with eIDAS Article 24(1)
- Evidence that applicant's identity matches previous identification
 - Two-factor authentication in customer portal of trusted third party
 - Up-to-date passport photograph, scan of valid official photo ID

Problem: Scope of confirmations under eIDAS Article 24(1), point (d)

- Confirmations for original remote identification methods sufficient?
- Confirmation for two-step procedure possible?



General problems

Need for harmonised conformity assessment of identification methods

- Requirements of eIDAS Article 24(1), ETSI EN 319 411-1 and -2 very abstract, leaving too much room for interpretation by CABs
- Still no consensus on security requirements for video identification
- Future standard ETSI TS 119 461 desperately needed

Transparency

- Identification services are integral part of qualified trust services
- Supervision by Member State where qualified TSP is established
- Identification services indirectly supervised by several Member States
- Confirmations under eIDAS Article 24(1), point (d), not always shared with foreign TSPs and supervisory bodies



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Thank you for your attention!