

# ANNEX 1: Catalogue of Measures

Criterion violated / Identified violation	Consequence / Action 1	Consequence / Action 2
<b>CSA Criteria: Mandatory requirements for the regulatory area of trust and transparency (section 1.1)</b>		
<p>Section 1.1.1 of the CSA Criteria</p> <p>The following information is not easily found on the company<sup>1</sup> website:</p> <ul style="list-style-type: none"> <li>the company's postal address; <u>and/or</u></li> <li>digital contact details in the form of an email address or contact form.</li> </ul>	Issuing of a warning	<p>In the event of a repeat offence (with regard to criteria 1.1.1 and 1.1.2):</p> <p>Procedure involving a generally complete, eight-week delisting</p> <p>Prerequisite(s):</p> <ul style="list-style-type: none"> <li>Five warnings within six months, and</li> <li>the warnings relate to more than one criterion in this regulatory area.</li> </ul>
<p>Section 1.1.2 of the CSA Criteria</p> <p>The company's privacy information</p> <ul style="list-style-type: none"> <li>is not easily found on a separate subpage of the company's website; <u>and/or</u></li> <li>do not contain any information on when and to what extent personal data (both from customers and end users) is collected and processed; <u>and/or</u></li> <li>do not contain any information on the measures taken to protect personal data from misuse.</li> </ul>	Issuing of a warning	<p>In the event of a repeat offence (with regard to criteria 1.1.1 and 1.1.2):</p> <p>Procedure involving a generally complete, eight-week delisting</p> <p>Prerequisite(s):</p> <ul style="list-style-type: none"> <li>Five warnings within six months, and</li> <li>the warnings relate to more than one criterion in this regulatory area.</li> </ul>
<p>Section 1.1.3 of the CSA Criteria</p> <p>Email dispatch is not compliant with the relevant Request for Comments (RFC) of the IETF:</p> <ul style="list-style-type: none"> <li>Structure and composition of the email sent not RFC-compliant; <u>and/or</u></li> <li>Envelope communication in the SMTP dialogue of the email transmission is not RFC-compliant.</li> </ul>	Issuing of a warning	<p>In the event of a repeat offence (relating to the violated criterion):</p> <p>Procedure involving a generally complete, eight-week delisting</p> <p>Prerequisite(s):</p> <ul style="list-style-type: none"> <li>Three warnings within six months</li> </ul>
<b>CSA Criteria: Mandatory requirements for abuse prevention (section 1.2)</b>		
<p>Section 1.2.1 of the CSA Criteria</p> <p>Requirements for general abuse and complaints address not met:</p> <ul style="list-style-type: none"> <li>Not available at all; <u>or</u></li> <li>not set up under the organisation's or company's domain; <u>or</u></li> <li>not a role account; <u>or</u></li> <li>not stored in the CSA's Certification Monitor; <u>or</u></li> </ul>	Issuing of a warning	<p>In the event of a repeat offence (relating to the violated criterion):</p> <p>Procedure involving a generally complete, eight-week delisting</p> <p>Prerequisite(s):</p> <ul style="list-style-type: none"> <li>Three warnings within six months</li> </ul>

<sup>1</sup> The term "company" refers to the certified company of IP-Platform-Certification.

Criterion violated / Identified violation	Consequence / Action 1	Consequence / Action 2
<ul style="list-style-type: none"> <li>no response to a message from the Complaints Office to the company's general abuse or complaints address, or no response within 24 hours on working days.</li> </ul>		
<p>Section 1.2.2 of the CSA Criteria</p> <p>No appropriate measures were implemented to ensure compliance with the CSA Criteria, including in relation to individual customers.</p>	Issuing of a notification	
<p>Section 1.2.3 of the CSA Criteria</p> <p>Unauthorised third parties have or had access to customer accounts.</p>	Issuing of a warning	<p>In the event of a repeat offence (in relation to the violated criterion):</p> <p>Procedure involving a generally complete eight-week delisting</p> <p>Prerequisite(s):</p> <ul style="list-style-type: none"> <li>Two warnings within six months</li> </ul>
<p>Section 1.2.4 of the CSA Criteria</p> <p>Requirements for handling redirect links not complied with, in particular:</p> <ul style="list-style-type: none"> <li>No deactivation within 24 hours (on working days) after notification by the eco Complaints Office that a redirect link used has been misused for phishing or similar purposes.</li> </ul>	Issuing of a warning	<p>In the event of a repeat offence (in relation to the violated criterion):</p> <p>Procedure involving a generally complete eight-week delisting</p> <p>Prerequisite(s):</p> <ul style="list-style-type: none"> <li>Two warnings within six months</li> </ul>
<p>Section 1.2.5 of the CSA Criteria</p> <p>Scenario 1:</p> <p>The company has been certified for more than four weeks and has sent emails in connection with CSA participation:</p> <ul style="list-style-type: none"> <li>that do not contain an "X-CSA-Complaints" header; <u>or</u></li> <li>whose "X-CSA-Complaints" header deviates from the specification "X-CSA-Complaints:csa-complaints@eco.de"; <u>or</u></li> <li>whose "X-CSA-Complaints" header was not included in the DKIM signature.</li> </ul> <p>Scenario 2:</p> <p>The company has sent emails outside of CSA participation with "X-CSA-Complaints" headers.</p>	Issuing of a warning	<p>In the event of a repeat offence (relating to the violated criterion):</p> <p>Procedure involving a generally complete, eight-week delisting</p> <p>Prerequisite(s):</p> <ul style="list-style-type: none"> <li>Three warnings within six months</li> </ul>
<p>Section 1.2.6 of the CSA Criteria</p> <p>Outgoing email server is not technically secured by appropriate measures.</p>	Issuing of a notification	
<p>Section 1.2.7 of the CSA Criteria</p> <p>Sending emails via a connection that is not secured by Transport Layer Security (TLS).</p>	Issuing of a warning	<p>In the event of a repeat offence (relating to the violated criterion):</p> <p>Procedure involving a generally complete, eight-week delisting</p> <p>Prerequisite(s):</p>

Criterion violated / Identified violation	Consequence / Action 1	Consequence / Action 2
		<ul style="list-style-type: none"> <li>Three warnings within six months</li> </ul>
<b>CSA Criteria: Mandatory authentication requirements (section 1.3)</b>		
Section 1.3.1 of the CSA Criteria  SPF entry requirements have not been met: <ul style="list-style-type: none"> <li>No SPF record for the MAIL FROM address specified in SMTP communication between the email servers; or</li> <li>The SPF record does not end with "-all" or "~all".</li> </ul>	Issuing of a warning	In the event of a repeat offence (relating to the violated criterion):  Procedure involving a generally complete, eight-week delisting  Prerequisite(s): <ul style="list-style-type: none"> <li>Three warnings within six months</li> </ul>
Section 1.3.2 of the CSA Criteria  DKIM signature requirements have not been met, in particular: <ul style="list-style-type: none"> <li>No valid DKIM (Domain Keys Identified Mail) signature available; <u>or</u></li> <li>For companies that provide a technical platform for sending commercial bulk emails as a service to third parties: The domain used in the "d=" tag does not correspond to the customer's sending domain; <u>or</u></li> <li>For companies that use their own technical platform for sending commercial bulk emails: The domain used in the "d=" tag does not correspond to the company's sending domain; <u>or</u></li> <li>At least one of the mandatory header elements "From", "X-CSA-Complaints", "Date" and "To" is missing; <u>or</u></li> <li>Use of the length parameter "l=".</li> </ul>	Issuing of a notification	
Section 1.3.3 of the CSA Criteria  DKIM alignment requirements have not been met: <ul style="list-style-type: none"> <li>Email does not contain DKIM alignment; or</li> <li>For companies that provide a technical platform for sending commercial bulk emails as a service to third parties: DKIM alignment is not present, even though a brand, company or organisation-related domain (or subdomain) of the customer exists for the customer.</li> </ul>	Issuing of a notification	
<b>CSA Criteria: Mandatory requirements for list hygiene (section 1.4)</b>		
Section 1.4.1 of the CSA Criteria  Requirements for the functionality of the "List-Unsubscribe" header and the "List-Help" header have not been met, in particular: <ul style="list-style-type: none"> <li>Functionality to insert both a "List-Unsubscribe" header and a "List-Help" header in every email is not provided by the company; <u>or</u></li> <li>With the functionality provided, the "List-Unsubscribe" header cannot be inserted using the URL method (according to RFC 2369) with a "POST HTTPS" link; <u>or</u></li> </ul>	Issuing of a warning	In the event of a repeat offence (in relation to the violated criterion):  Procedure involving a generally complete, eight-week delisting  Prerequisite(s): <ul style="list-style-type: none"> <li>Three warnings within six months</li> </ul>

Criterion violated / Identified violation	Consequence / Action 1	Consequence / Action 2
<ul style="list-style-type: none"> <li>With the functionality provided, the "List-Unsubscribe" header cannot be combined with the "List-Unsubscribe-Post" header; <u>or</u></li> <li>The "List-Unsubscribe-Post" header does not support the "One-Click-Unsubscribe" functionality (RFC 8058).</li> <li>With the functionality provided, the "List-Help" header does not contain at least one "mailto:" address or an HTTPS link.</li> </ul>		
<p>Section 1.4.2 of the CSA Criteria</p> <p>The company has not ensured that every email of an advertising nature contains a functional unsubscribe option (link or email address); <u>or</u></p> <p>the unsubscribe option provided requires a separate login.</p>	Issuing of a warning	<p>In the event of a repeat offence (relating to the violated criterion):</p> <p>Procedure involving a generally complete, eight-week delisting</p> <p>Prerequisite(s):</p> <ul style="list-style-type: none"> <li>Three warnings within six months</li> </ul>
<p>Section 1.4.3 of the CSA Criteria</p> <p>The company has not provided its customers with a technical functionality that allows an easily recognisable and functioning unsubscribe link to be inserted in every email (in the email body).</p>	Issuing of a warning	<p>In the event of a repeat offence (relating to the violated criterion):</p> <p>Procedure involving a generally complete, eight-week delisting</p> <p>Prerequisite(s):</p> <ul style="list-style-type: none"> <li>Three warnings within six months</li> </ul>
<p>Section 1.4.4 of the CSA Criteria</p> <p>Bounce management requirements have not been met, in particular:</p> <ul style="list-style-type: none"> <li>The company has not set up an MX entry for the envelope-from (mail-from) domain <u>or</u>, alternatively, an A record for bounce handling.</li> </ul>	Issuing of a warning	<p>In the event of a repeat offence (relating to the violated criterion):</p> <p>Procedure involving a generally complete, eight-week delisting</p> <p>Prerequisite(s):</p> <ul style="list-style-type: none"> <li>Three warnings within six months</li> </ul>
<p>Section 1.4.5 of the CSA Criteria</p> <p>Continued sending to email addresses where it has previously been determined that the mailbox does not exist.</p>	Issuing of a notification	
<b>CSA Criteria: Mandatory reputation requirements (section 1.5)</b>		
<p>Section 1.5.1 of the CSA Criteria</p> <p>The permissible spam complaint rate per company has been exceeded.</p>	Issuing of a warning (usually combined with a four-week remedy period)	<p>Delisting procedure (scope depending on affected IPs) without a remedy period:</p> <p>a) In the event of a repeat offence (in relation to the violated criterion)</p> <p>Prerequisite(s):</p> <ul style="list-style-type: none"> <li>Repeated exceeding of the threshold within four weeks after the end of the remedy period; <u>or</u></li> <li>Three warnings within six months</li> </ul> <p><u>or</u></p>

Criterion violated / Identified violation	Consequence / Action 1	Consequence / Action 2
		b) In the event of a serious violation Condition(s): <ul style="list-style-type: none"> <li>Exceeding the threshold by a factor of two or more</li> </ul>
Section 1.5.2 of the CSA Criteria  The company's permissible average DKIM missing rate has been exceeded.	Issuing of a warning (usually combined with a four-week remedy period)	Delisting procedure (scope depending on affected IPs) without a remedy period:  a) In the event of a repeat offence (in relation to the violated criterion)  Prerequisite(s): <ul style="list-style-type: none"> <li>Repeated exceeding of the threshold within four weeks after the end of the remedy period; <u>or</u></li> <li>Three warnings within six months <u>or</u></li> </ul> b) In the event of a serious violation  Condition(s): <ul style="list-style-type: none"> <li>Exceeding the threshold by a factor of two or more</li> </ul>
Section 1.5.3 of the CSA Criteria  Exceeding the permissible hard bounce rate <ul style="list-style-type: none"> <li>per mail server (IP address); <u>and/or</u></li> <li>per company.</li> </ul>	Issuing of a warning (usually combined with a four-week remedy period)	Delisting procedure (scope depending on affected IPs) without a remedy period:  a) In the event of a repeat offence (in relation to the violated criterion)  Prerequisite(s): <ul style="list-style-type: none"> <li>Repeated exceeding of the threshold within four weeks after the end of the remedy period; <u>or</u></li> <li>Three warnings within six months <u>or</u></li> </ul> b) In the event of a serious violation  Condition(s): <ul style="list-style-type: none"> <li>Exceeding the threshold by a factor of two or more</li> </ul>
Section 1.5.4 of the CSA Criteria  Existence of a significant reputation problem (IP- or DKIM-based) for the company with a participating mailbox or security provider, in particular based on <ul style="list-style-type: none"> <li>spam trap hits,</li> <li>content scanners and/or</li> <li>high spam complaint rates per mail server (IP address).</li> </ul>	In the event of excessive spam complaint rates per mail server: Issuing of a warning (usually combined with a four-week remedy period)	If spam complaint rates per mail server are too high: Delisting procedure (scope depending on affected IPs) without a remedy period:  a) In the event of a repeat offence (in relation to the violated criterion)

Criterion violated / Identified violation	Consequence / Action 1	Consequence / Action 2
	In all other cases: Issuing of a notification	Prerequisite(s): <ul style="list-style-type: none"> <li>The threshold is exceeded again within four weeks of the end of the remedy period; <u>or</u></li> <li>Three warnings within six months <u>or</u></li> </ul> b) In the event of a serious violation  Condition(s): <ul style="list-style-type: none"> <li>Exceeding the threshold by a factor of two or more</li> </ul>
<b>CSA Conditions of Participation: Rights and obligations of the company (2.2)</b>		
<b>Requirements for naming and using the outgoing email server: Sections 2.2.1-2.2.4</b>		
Section 2.2.1 of the CSA Conditions of Participation  Requirements for naming outgoing email servers to the CSA have not been complied with, in particular: <ul style="list-style-type: none"> <li>IPv4 address and associated host name (FQDN) of an email outgoing server used for commercial bulk mailing not uploaded to the Certification Manager or Monitor and, if applicable, other CSA tools, even though this server is controlled and monitored via the company's technical platform; or</li> <li>Uploading an IP address to the Certification Manager or Monitor and, if applicable, other CSA tools that belongs to the company but whose email delivery is not controlled by its own technology.</li> </ul>	Issuing of a warning	In the event of a repeat offence (with reference to the relevant provision in the Conditions of Participation):  Procedure involving a generally complete, eight-week delisting  Prerequisite(s): <ul style="list-style-type: none"> <li>Three warnings within six months</li> </ul>
Section 2.2.2 of the CSA Conditions of Participation  Sending non-commercial mass emails (e.g. internal "corporate traffic") via IPs that have been uploaded to the Certification Monitor.	Issuing of a warning	In the event of a repeat offence (with reference to the relevant provision in the Conditions of Participation):  Procedure involving a generally complete, eight-week delisting  Prerequisite(s): <ul style="list-style-type: none"> <li>Three warnings within six months</li> </ul>
Section 2.2.4 of the CSA Conditions of Participation  Sending emails via IPs/email outgoing servers for which the company has set the status "parked".	Issuing of a warning	In the event of a repeat offence (with reference to the relevant provision in the Conditions of Participation):  Procedure involving a generally complete, eight-week delisting  Prerequisite(s): <ul style="list-style-type: none"> <li>Three warnings within six months</li> </ul>
<b>Requirements regarding technical responsibility and authority over email correspondence (sections 2.2.5-2.2.6)</b>		
Section 2.2.5 of the CSA Conditions of Participation  Missing or incorrect proof that the company has technical responsibility and control over email traffic running through its	Issuing of a warning	In the event of a repeat offence (with reference to the relevant provision in the Conditions of Participation):

Criterion violated / Identified violation	Consequence / Action 1	Consequence / Action 2
<p>certified IPs, in particular:</p> <ul style="list-style-type: none"> <li>• No verification via CSA token or Whois entry; <u>or</u></li> <li>• CSA token incorrectly inserted into the DNS of the respective host name (e.g. syntax error); <u>or</u></li> <li>• The name of the certified company does not appear as the registering organisation in the WHOIS data or does not match the company name specified in the contract, without CSA having approved a deviation in this regard.</li> </ul>		<p>Procedure for a usually partial, four-week delisting</p> <p>Prerequisite(s):</p> <ul style="list-style-type: none"> <li>• Three warnings within six months</li> </ul>
<p>Section 2.2.6 of the CSA Conditions of Participation</p> <p>Reverse lookup requirements have not been met, in particular:</p> <ul style="list-style-type: none"> <li>• Outgoing email server does not resolve to at least one fully qualified domain name (according to RFC 4703) in reverse lookup via PTR; <u>and/or</u></li> <li>• The A record of the FQDN does not contain the IP address of the sender's mail server; <u>and/or</u></li> <li>• The FQDN is not specified in the SMTP dialogue (envelope) in the HELO/EHLO command; <u>and/or</u></li> <li>• The FQDN is not recognisable and readable in its designation as a server of an infrastructure for sending commercial bulk emails.</li> </ul>	Issuing of a warning	<p>In the event of a repeat offence (with reference to the relevant provision in the Conditions of Participation):</p> <p>Procedure for a usually partial, four-week delisting</p> <p>Prerequisite(s):</p> <ul style="list-style-type: none"> <li>• Three warnings within six months</li> </ul>
<b>General information requirements on the company website (Section 2.2.7)</b>		
<p>Section 2.2.7 of the CSA Conditions of Participation</p> <p>Requirements for the company website have not been met, in particular:</p> <ul style="list-style-type: none"> <li>• Website not functional; <u>or</u></li> <li>• Website does not contain any information about the business model; <u>and/or</u></li> <li>• Website does not clearly name and describe the services or products offered.</li> </ul>	Issuing of a warning	<p>In the event of a repeat offence (with reference to the relevant provision in the Conditions of Participation):</p> <p>Procedure involving a generally complete, eight-week delisting</p> <p>Prerequisite(s):</p> <ul style="list-style-type: none"> <li>• Three warnings within six months</li> </ul>
<b>Compliance with specific legal requirements (Section 2.2.8)</b>		
<p>Section 2.2.8 of the CSA Conditions of Participation</p> <p>The content of an email sent violates legal prohibitions and requirements, in particular:</p> <ul style="list-style-type: none"> <li>• Depictions of child abuse, or</li> <li>• Human trafficking and exploitation, or</li> <li>• Terrorist propaganda and instruction, or</li> <li>• Illegal drug and arms trafficking</li> </ul>	Issuing of a warning	<p>The warning is issued immediately and without a remedy period, in conjunction with a delisting procedure (scope depending on the IPs affected).</p>

## ANNEX 2: Applicable deadlines

Procedural situation	Scenario	Deadline/duration	Comments/special features
Information from the company required for informed decision on measures	Complaints office requests company to provide information, in particular: <ul style="list-style-type: none"> <li>• Before the issuing of a warning, <u>if</u> the underlying facts are unclear or inconsistent</li> <li>• At the start of proceedings for complete delisting</li> <li>• At the start of proceedings concerning the exclusion of a company</li> </ul>	Two weeks	The company must transfer the requested information within two weeks. The information must be substantiated and credible.
Decision on measures to be taken in the event of identified violations	Interval between the issuing of warnings	Two weeks	If the violation relates to the same clause in the criteria or conditions of participation, the interval between warnings is generally two weeks. In addition, there is a two-week interval between the date of the warning and the date of dispatch of the next email in which another violation has been identified.
	Warning for reputation violations/remedy period	Generally four weeks	In the case of reputation violations, a remedy period of four weeks is generally granted when the warning is issued. Exceptions: The remedy period is not granted <ul style="list-style-type: none"> <li>• if the threshold is exceeded again within four weeks of the end of the remedy period; <u>or</u></li> <li>• in the event of a third warning within six months; <u>or</u></li> <li>• if the respective threshold is exceeded by a factor of two (or more).</li> </ul>
	Partial delisting	Usually four weeks	The standard duration for a partial delisting is four weeks; the Complaints Office usually decides on a partial delisting. There are three working days between notification of the partial delisting to the

Procedural situation	Scenario	Deadline/duration	Comments/special features
			company and execution of the partial delisting.
	Complete delisting	Usually eight weeks	The standard duration for a complete delisting is eight weeks; a complete delisting is usually decided by the CCC
	Appeal by the company against a measure taken by the Complaints Office (warning or delisting decision)	Two weeks	The deadline for the company to lodge an appeal against a decision by the Complaints Office is two weeks, starting from the date on which the Complaints Office announces the measure. The reasons for the appeal must also be received by the Complaints Office within this period. The company bears the risk of delivery.
	Decision-making by the CCC: <ul style="list-style-type: none"> <li>• Decision on appeal against measures taken by the Complaints Office</li> <li>• Decision on complete delisting or termination thereof</li> <li>• Exclusion of a company</li> </ul>	Usually two weeks	The CCC usually makes its decision within two weeks of the Complaints Office submitting the facts of the case.
Company has been excluded by decision of the CCC	Application for reinstatement after exclusion	Application for reinstatement possible six months after exclusion	In this case, the application for reinstatement is treated as a new application for certification.  A complete re-examination of the application is therefore carried out.