



[27/08/2026]

[CT2274/2026 - Services - Tender for the Implementation of a Fully Compliant European Digital Identity Wallet (EUDIW), Supporting Trust Ecosystem and use cases for the Malta Digital Innovation Authority (MDIA)]

Clarification Note # [11]

To all prospective bidders

Reference is made to the above-captioned tender for which the deadline for submission of offers is [24/09/2026] at [09:30am].

Please find a set of clarifications which are construed to form an integral part of the tender document.

Question No. [01]: Requests for Clarification (Part 1)

General

- Please clarify how “large-scale” for the reference projects is defined.
- Please clarify what Versions of Android and iOS must be supported at a minimum.
- Please clarify whether the exclusion of “embedded or host-dependent HSM technologies (e.g. PCI/PCIe cards installed within servers)” refers to the deployment model i.e. cryptographic hardware installed into, and operationally dependent on, servers operated by the Contracting Authority or to the internal construction of the delivered appliance. We note that network-attached HSM appliances are commonly implemented as rack-mounted servers containing a cryptographic module in PCIe form factor, so that an assessment based on internal form factor would exclude a large part of the products available on the market. Please therefore confirm that a rack-mounted appliance whose cryptographic module is installed internally as a PCIe module complies with the requirement, provided the unit is delivered as a sealed, self-contained device, the Contracting Authority installs no hardware into its own servers and has no operating-system-level access to the appliance, and applications access it exclusively over the network (e.g. via PKCS#11).

Answer No. [01]:

Large-scale projects are projects that are comparable in technical and regulatory terms and similar to the nature of this project/ tender as defined Section 1 – Article 5 of this tender, namely: :

- Multi-million Euro budget projects and
- Volumetrics as specified in Appendix III and/or

- Developed by a number of teams, each team having expertise in different areas and/or
- Complexity and scope of the requirements.

The Solution's minimum supported Android and iOS operating system versions for the Mobile Application shall reflect the Maltese market share and that maximises the user reach and attainment of the Volumetrics as specified in Appendix III.

The exclusion is not intended to restrict the internal architecture of the HSM. Its purpose is to ensure that bidders propose an HSM solution that fully satisfies the networking, SLA, and disaster recovery requirements set out in the Call for Tenders.

Question No. [02]: *Requests for Clarification (Part 1)*

Key personnel

- *Please clarify, that for each key expert role, a formal Maltese professional authorisation at tender stage is required or can it be provided after award for experts not yet authorised in Malta?*

Answer No. [02]: The Key Experts Form states that “Qualifications required are defined with reference to the Malta Further & Higher Education Authority (MFHEA) (previously known as the Malta Qualifications Council) (<https://mfhea.mt/academic-qualifications/>).

It shall be the Tenderers' obligation to ascertain that the qualifications possessed by the Key Experts proposed by them are equivalent to the established MQF/EQF Level prior to tender submission.

The Evaluation Committee reserves the right to request the determination of the Malta Further & Higher Education Authority (MFHEA) (previously known as Malta Qualifications Council (MQC)) in checking the equivalency of the qualifications, which shall be final. The Malta Qualifications Recognition Information Centre (MQRIC) is the competent body within the Malta Further and Higher Education Authority (MFHEA) (previously known as NCFHE) that recognises qualifications against the Malta Qualifications Framework (MQF) and whose portal can be accessed here <https://mfhea.mt/>.

The necessary requirements for the Key Experts are to be submitted at tendering stage, and Key Experts whose qualifications do not meet the minimum requirements in terms of equivalency, or the equivalency of which is dubious or cannot be determined, shall be rejected in line with the applicable tendering regulations.

Question No. [03]: *Requests for Clarification (Part 1)*

Scope and architecture

- *Please clarify, that Wallet Provider, PID Provider, and related components be delivered using a mixture of bespoke and third-party modules?*

- *Please clarify, if the orchestration layer required to be entirely on-premise in GoM hosting, or may some non-production elements use external*

Answer No. [03]: The Ownership Matrix defined in Section 2, Article 14.7 defines which regime will apply to the different components in the solution.

Section 2, Article 14.6 states that “The Contractor hereby assigns to the Contracting Authority, with full title guarantee, all intellectual property rights in all Bespoke Deliverables, including all present and future copyright, database rights, and related rights. This assignment is effective at the moment of creation of each Bespoke Deliverable and covers without limitation: Wallet Provider, PID Provider, Relying Party Registrar, Signing Certificate Provider (PKI), WPRAC Provider, RP Verification Component and the Wallet Instances”.

The definition of 'Bespoke Deliverables' can be found in Section 2, Article 1.3 (1).

As per Section 3, Article 4.2.3.11.10 “The Solution shall be hosted in its entirety (including the PKI) in the GoM’s secure hosting environment, using Colocation within MITA data centres in accordance with the hosting and security schedules specified in Appendix III”. This requirement applies only to phases related to the Solution, defined in Section 3, Article 4.1.4 (10) as “the complete and integrated set of components, systems, services, and deliverables proposed and provided by the awarded bidder to fully meet the functional, technical, operational, and compliance requirements as specified in this document”.

Question No. [04]: *Requests for Clarification (Part 1)*

Certification and compliance

- *Please clarify, which certification scheme do you expect for Milestone 16 if the national/EU scheme is not yet final at the time of submission?*
- *Please clarify, what evidence level is required for the GDPR Questionnaire and high-risk processing assurance?*

Answer No. [04]: Milestone 16 in Section 2, Article 18.2 states that the economic operator will “Support the Contracting Authority attain certification of the Solution according to national or EU scheme, whichever is applicable at the time” within “21 months from signing of the contract”.

Bidders are expected to fill out the GDPR questionnaires found in the documents section of this publication, while attaching any documentation that they deem relevant as part of the reply.

Question No. [05]: *Requests for Clarification (Part 1)*

Security and support

- *Please clarify, whether it is expected that SAST/DAST is done for every deployment, including minor releases, or only before major releases?*
- *Please clarify, if you consider the PID issuer as a security relevant component and if therefore supplier of the software for the PID issuer has to be certified according to ISO27001.*

Answer No. [05]: Security Testing, Section 3, Clause 4.2.1.3.7.2 requires that “Static Application Security Testing (SAST) and Dynamic Application Security Testing (DAST) shall be executed prior to major releases or deployments.” In the BPQR Criteria, specifically 1.6 (b), bidders are asked to describe “whether and how:

- they will perform SAST and DAST on every deployment including minor ones and
- integrate such operations into secure CI/CD pipelines”

Two (2) add-on marks can be awarded for this.

Section 1, Article 5, Section B, (d) states that “The economic operator, as well as any subcontractors involved in the processing of data or delivery of security-relevant components, must be certified against ISO/IEC 27001.” The tender document does not identify which components are considered security relevant. It is the responsibility of bidders to identify any subcontractors involved in the processing of data or delivery of security-relevant components within their proposed solution and to ensure compliance with the ISO/IEC 27001 requirement.

Question No. [06]: *Requests for Clarification (Part 1)*

Intellectual property

- *Please clarify, whether all bespoke deliverables must be fully assigned to the Contracting Authority, including source code and IaC?*
- *Please clarify, what exactly is meant by “full ownership” for the Version 1 and SCA components? Does it hinder the bidder to re-use these components for other projects.*
- *Please clarify, if there are any preferred open-source licences beyond EUPL that are acceptable for third-party dependencies?*

Answer No. [06]:

- The CA makes reference to Section 2, Clause 14.5 stating that “Full source code for all Bespoke Deliverables including configuration files, infrastructure-as-code definitions, and automated test suites if applicable, in a version-controlled repository with full commit history”
- By the term “full ownership”, the CA makes reference to what is being described in the following articles.

Section 2, Clause 14.6 which states that “The Contractor hereby assigns to the Contracting Authority, with full title guarantee, all intellectual property rights in all

Bespoke Deliverables, including all present and future copyright, database rights, and related rights.”

Section 2, Clause 14.7 identifies the components where full ownership applies, and specifically mentions “source code delivery at every release” and “includes any documentation, policies, lifecycle management, runtime policy engine, infrastructure-as-code (IaC) definitions and configurations as applicable”.

Furthermore, in the BPQR Criteria, specifically 2.8 (a) and (b), bidders are asked to “describe the title in Intellectual Property for” Version 1 and the SCA respectively, “confirming full ownership”. Three (3) addon marks can be awarded for each of these criteria. Bidders should therefore prepare their proposals in accordance with the intellectual property provisions set out in the tender document. Where a bidder elects to obtain the BPQR marks associated with the Full Ownership option, the ownership and intellectual property arrangements applicable to that option shall apply to the relevant components. The bidder should therefore consider the implications of the proposed ownership model when preparing the offer.

- Reference to Section 2, Clause 14.7 specifies that “Permissive or EUPL licence” as the regime for “Licences for third-party open-source dependencies”.

All other tender documents, conditions and requirements, which are not superseded by this clarification remain in place.

Department of Contracts