

Qualified Electronic Signature After the Discontinuation of AVDH

The AVDH (Document Authentication Service Based on Identification), widely used by individuals, was discontinued on December 31, 2024. This change has made the creation of digitally signed documents somewhat more complex.

Although AVDH was originally intended for private individuals, many businesses also made use of it. The rationale behind its discontinuation was to prioritize more secure and legally robust alternatives, especially for corporate use.

According to the **Domain Registration Policy** effective from January 1, 2025, a digitally signed document is defined as one that:

- is based on a qualified certificate recognized under the eIDAS Regulation (or its successor legislation) in the EU, or
- is signed using a qualified certificate-based advanced electronic signature, or
- qualifies as a private document with full probative value under Hungarian law and is electronically authenticated via a legally defined digital service.

In place of AVDH, **private individuals** can now use the eSignature feature provided under the Digital Citizenship Program (DCP, „DÁP”), which offers a qualified electronic signature authorized by the Hungarian National Media and Infocommunications Authority as of December 20, 2024.

It is important to highlight that the qualified electronic signature provided through the DCP is intended **exclusively for private use**. If an individual uses it, for example, in the capacity of a company executive, the digital signature will be considered invalid. This restriction is based on the provisions of Act CIII of 2023 on the Digital State and Rules of Digital Services (Dáptv), **which prohibits the use of this signature for representing legal entities or economic organizations**.

The **e-ID card signature function** is available to private individuals with ID cards issued after June 23, 2021, and can be used with a PIN code and an NFC-enabled device. However, it too is restricted to private use only.

Interestingly, under the Dáptv, associations and foundations without a tax number are not considered economic organizations. However, those with a tax number—such as certain associations, foundations, and ecclesiastical legal entities—are regarded as such.

Individuals who do not possess either a DÁP or an electronic ID card can apply for a market-based electronic signature service—also used by companies—such as the qualified electronic signature provided by Microsec Zrt. or NETLOCK Kft., which can be used on a smartphone.

Companies and legal entities are required to use qualified electronic signatures provided by trust service providers available on the market, such as those mentioned above. Alternatively, they may use services offered by any EU-recognized qualified trust service provider.