

Item	Content
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Language	English version — Official Version for EU Market Surveillance Authorities

Conformity Assessment Record — Module A (Internal Control / Self-Assessment)

Note: the Chinese version of this document (CRA-CA-001 V1.0, Internal Working Version) is the internal working text. The two versions are true counterparts: the section structure, the rows of the compliance matrix, the assessors and the conclusions are identical in both. The CRA does not prescribe a language for the technical documentation where no notified body is involved; the EU declaration of conformity and the user information and instructions are to be provided in the languages required by the Member State in which the product is made available.

*Note: this document is the record of the conformity assessment carried out by the manufacturer in order to discharge the second obligation in Article 13(12) of Regulation (EU) 2024/2847 (the "Cyber Resilience Act", the "CRA"). It does not replace the technical documentation (CRA-TD-001), the cybersecurity risk assessment (CRA-RA-001) or the test report (CRA-TR-001); it is a **row-by-row verification and consolidation of the conclusions** set out in those three documents. Where the underlying evidence is itself incomplete, this document records that fact honestly as an observation or a non-conformity and does not play it down.*

1. Purpose and legal basis

1.1 Purpose

This document records the conformity assessment carried out by Dalian ByteSmart Technology Co., Ltd. (the "manufacturer") in respect of its product Nand Flash Tracer ("NFT" or the "product"), in order to:

1. record the conformity assessment procedure selected and the reasons for that selection;
2. verify, requirement by requirement, whether the manufacturer's obligations under Part I of Annex VIII (Module A), each of the essential requirements in Annex I, Parts I and II, and the relevant manufacturer obligations in Article 13 have been discharged, identifying the supporting document and section for each;
3. record the non-conformities and observations identified in the assessment and lay down the rules for closing them;
4. conclude on whether the EU declaration of conformity (CRA-DoC-001) may be drawn up and the CE marking affixed.

1.2 Legal basis

Reference	Substance	Where it is implemented in this document
Article 32	Lays down the conformity assessment procedures by product category; products falling outside the categories in Annex III (important products) and Annex IV (critical products) are assessed under Module A (internal control) set out in Part I of Annex VIII	Section 3
Article 13(12)	Before placing on the market, the manufacturer shall draw up the technical documentation; carry out the applicable conformity assessment procedure; draw up the EU declaration of conformity once conformity has been demonstrated; and affix the CE marking in accordance with Article 30	Sections 3.5, 4.2 (rows A-04 to A-07) and 7
Annex VIII, Part I, point 1	Internal control is the procedure whereby the manufacturer fulfils the obligations in points 2, 3 and 4 and ensures and declares, under its sole responsibility , that the product satisfies all the essential requirements in Annex I, Part I and that the manufacturer meets the essential requirements in Annex I, Part II	Sections 3.4 and 4.2 (row A-01)
Annex VIII, Part I, point 2	The manufacturer shall draw up the technical documentation set out in Annex VII	Section 4.2 (row A-02)
Annex VIII, Part I, point 3	The manufacturer shall take all measures necessary so that the design, development, production and vulnerability handling processes and their monitoring ensure that the products developed and the processes established by the manufacturer comply with the essential requirements in Annex I, Parts I and II	Section 4.2 (row A-03)
Annex VIII, Part I, point 4.1	The manufacturer shall affix the CE marking to each product that satisfies the	Section 4.2 (row A-06)

	applicable requirements of this Regulation	
Annex VIII, Part I, point 4.2	The manufacturer shall draw up a written EU declaration of conformity in accordance with Article 28 for each product and keep it together with the technical documentation at the disposal of the national competent authorities for 10 years after the product has been placed on the market or for the support period, whichever is longer ; the declaration shall identify the product to which it refers and a copy shall be provided to the competent authority on request	Section 4.2 (row A-07)
Annex VIII, Part I, point 5	The obligations in point 4 may be fulfilled by the authorised representative, in the manufacturer's name and under its responsibility, provided that they are specified in the mandate	Section 4.2 (row A-08); no authorised representative has been appointed
Article 13(4)	Where certain essential requirements do not apply, the manufacturer shall include clear reasons in the technical documentation	Every "not applicable" or "partially applicable" row in Sections 4.4 and 4.5
Article 27	Presumption of conformity with harmonised standards	Section 6 (not claimed)
Article 28	The declaration shall state that the applicable essential requirements in Annex I have been demonstrated; follow the model structure in Annex V and contain the elements specified in the relevant conformity assessment procedure in Annex VIII; be updated where appropriate; and drawing it up means the manufacturer assumes responsibility for compliance	Section 7

Reference: Regulation (EU) 2024/2847, Article 32; Article 13(12); Article 27; Article 28; Annex VIII, Part I.

1.3 Relationship with other documents

Reference	Document	Role in this assessment
CRA-CLASS-001	Scope and classification record	Provides the classification conclusion (default / standard category, Module A), which this document carries forward

		(Section 2.4)
CRA-TD-001	Technical documentation	Direct evidence for Annex VIII, Part I, point 2, and evidence for the Article 13 obligations
CRA-RA-001	Cybersecurity risk assessment	Provides the applicability determination and the reasons for non-applicability for Annex I, Part I, point (2), and the conclusions on Part II
CRA-TR-001	Test report	Provides the verification evidence for Annex VII, point 6 and Annex I, Part II, point (3)
CRA-SBOM-001	Software bill of materials	Supports Annex I, Part II, point (1) and point (2)(a) of Part I
CRA-VHP-001	Vulnerability handling procedure	Supports Annex I, Part II, points (2), (3) and (8)
CRA-CVD-001	Coordinated vulnerability disclosure policy	Supports Annex I, Part II, points (5) and (6)
CRA-SUP-001	Security update distribution procedure	Supports Annex I, Part II, points (2), (7) and (8) and point (2)(c) of Part I
CRA-IRP-001	Incident and vulnerability reporting procedure	Supports the reporting obligations in Article 14 (applicable from 11 September 2026)
CRA-DoC-001	EU declaration of conformity	The conclusion in Section 7 is the precondition for drawing it up
CRA-CE-001	CE marking usage rules	The detailed implementing rules for row A-06 in Section 4.2
CRA-RET-001	Documentation retention and access	Retention and access arrangements under Article 13(13) and (22)

2. Object and scope of the assessment

2.1 Object of the assessment

Item	Content
Product name	Nand Flash Tracer (NFT)
Product type	Software only; a locally installed data recovery and data reconstruction tool (a product with digital elements)
Assessed baseline version	Ver 2.26.8 (internal build identifier: NFT-2.26.8-20260826) (P04)
CRA classification	Default / standard category
Conformity assessment procedure	Annex VIII, Part I, Module A (internal control, self-assessment, with no notified body involved)
Support period	10 February 2024 to 10 February 2029 (5)

	years)
Operating environment	Windows 7 / 10 / 11; local stand-alone installation; no cloud services; no remote data processing
Network use	Licence activation only (device binding verification) and update checking

Note on versions: CRA-CLASS-001 V2.1 records version Ver 2.26.0617, whereas the assessed baseline version for this set of documents is Ver 2.26.8. Both belong to the 2.26 series and the core functionality has not changed, so the classification conclusion (default category, Module A) continues to apply.

2.2 In-scope boundary

This assessment covers:

5. the NFT installer itself, the main executable and its bundled runtime dependencies, the chip ID and configuration database files, and the default configuration templates;
6. the dump image import and parsing path (virtual page reassembly, ECC handling, bad block handling, XOR detection, Read-Retry, sector cutting and custom formula conversion);
7. the read and write paths for project and layout files;
8. the licence activation and device binding verification module and its outbound network interaction;
9. the update checking, update downloading and update package verification mechanisms;
10. the logging, temporary file and uninstallation behaviour of the product;
11. the vulnerability handling processes, coordinated vulnerability disclosure policy and security update distribution mechanism established by the manufacturer for the product (the "processes established by the manufacturer" referred to in Annex VIII, Part I, point 3);
12. the user information and instructions (Annex II) and the EU declaration of conformity (Annex V, Article 28).

2.3 Out-of-scope boundary

The following are expressly excluded from this assessment, and the manufacturer makes no conformity claim in respect of them:

13. chip reading hardware supplied by the user, together with its drivers, firmware and companion software;
14. the storage media supplied by the user and the **content** of dump images, project files and layout files generated by the user or by third parties;
15. third-party content and user-posted content on the manufacturer's website and forum (this assessment covers only download distribution security and the impersonation / social engineering paths);
16. the host environment on which the product is run (operating system, file system, account and permission model, network perimeter protection);
17. the data processing activities the user carries out on the data recovered (for which the user is responsible as data controller).

Reference: Regulation (EU) 2024/2847, Article 13(1) (the manufacturer's obligations are limited to the product it places on the market) and Annex VII, point 1 (the technical documentation is to describe the product itself). The full reasoning on the out-of-scope boundary is in CRA-RA-001, Section 2.3.

2.4 Classification conclusion carried forward

The Scope and classification record (CRA-CLASS-001 V2.1, 24 August 2026) concludes that **NFT is a default / standard category product**, that is, it falls within none of the categories in Annex III (important products) or Annex IV (critical products).

This document carries that conclusion forward and, on that basis, determines the conformity assessment procedure in Section 3. The classification conclusion is reviewed afresh whenever any of the triggers in Section 8 arise. If the classification changes — for example because the product acquires remote or cloud processing capability and thereby falls within a category in Annex III — Module A ceases to be available and a procedure must be selected afresh under Article 32.

*Note: the **technical descriptions** of the Annex III and Annex IV categories are refined by Commission Implementing Regulation (EU) 2025/2392, which entered into force on 21 December 2025. NFT has been checked against each of the important and critical product categories refined by that Regulation and falls within none of them.*

Reference: Regulation (EU) 2024/2847, Article 32; Annex III; Annex IV; Implementing Regulation (EU) 2025/2392; CRA-CLASS-001 V2.1.

3. Selection of the conformity assessment procedure

3.1 Procedure selected

The product is assessed under **Module A (internal control) set out in Annex VIII, Part I**, that is, an internal assessment and self-declaration carried out by the manufacturer itself.

Reference: Regulation (EU) 2024/2847, Article 32; Annex VIII, Part I.

3.2 Reasons for the selection

18. **Classification premise.** NFT is a default / standard category product and falls neither within the important product categories in Annex III nor the critical product categories in Annex IV (CRA-CLASS-001 V2.1; Section 2.4 of this document).
19. **Mapping between category and procedure.** Article 32 lays down the conformity assessment procedures by product category. For products falling outside the Annex III and Annex IV categories, the manufacturer demonstrates conformity by applying Module A (internal control) set out in Annex VIII, Part I. That procedure does not require the involvement of a notified body.
20. **Nature of the product and its risk profile.** NFT is software only, installed locally on a stand-alone machine, with no cloud component and no inbound listening ports; its effective attack surface is concentrated in the local file import and

parsing path (proportionality statement in CRA-RA-001, Section 4.1). That risk profile is commensurate with Module A, in which "the manufacturer, under its sole responsibility", carries out the assessment itself.

21. **Feasibility for a micro/small enterprise.** The manufacturer is a micro/small enterprise established outside the Union. Module A involves no notified body fees and no dependence on a notified body's timetable, and is therefore the procedure that this manufacturer can carry out genuinely and completely with the resources it has.

3.3 No notified body is involved

Module A (internal control) **does not involve a notified body**. Accordingly, **no name, identification number or certificate reference of a notified body appears** in any of the following:

- 22. this assessment record;
- 23. the EU declaration of conformity (CRA-DoC-001) — item 7 of Annex V (notified body information) is not applicable and the declaration states the reasons why;
- 24. the CE marking — under Article 30(4), the identification number of a notified body follows the CE marking only where a notified body is involved in the conformity assessment based on full quality assurance (Module H). Module A applies here, so **no notified body identification number is added after the CE marking**.

The manufacturer has not engaged, contacted or obtained any certificate or opinion from any notified body. All the evidence relied on in this assessment has been generated by the manufacturer itself, or arises from verification activities carried out by it for its own purposes.

Reference: Regulation (EU) 2024/2847, Annex VIII, Part I; Article 30(4); Annex V, point 7.

3.4 Sole responsibility of the manufacturer

Under Annex VIII, Part I, point 1, internal control means that the manufacturer, **under its sole responsibility**, ensures and declares that:

- 25. the product satisfies **all** the essential requirements in Annex I, Part I; and
- 26. the manufacturer meets the essential requirements in Annex I, Part II.

With no notified body, no authorised representative and no third-party certification involved, the burden of proof and the legal responsibility for conformity rest entirely with the manufacturer. The manufacturer is aware that under Article 28(4) **drawing up the EU declaration of conformity means that the manufacturer assumes responsibility for the compliance of the product**, and that under Article 13(21) it must, as soon as it becomes aware that the product or its processes do not comply with the essential requirements, immediately take the corrective measures necessary to bring it into conformity or, where appropriate, withdraw or recall it.

Reference: Regulation (EU) 2024/2847, Annex VIII, Part I, point 1; Article 28(4); Article 13(21).

3.5 Sequence required by Article 13(12)

Article 13(12) requires four steps to be completed, in this order, before the product is placed on the market:

Step	Action	Implementation for this product	Status
1	Draw up the technical documentation (Article 31, Annex VII)	CRA-TD-001 (including CRA-RA-001, CRA-TR-001 and CRA-SBOM-001)	Drawn up; to be updated as CRA-TR-001 is executed
2	Carry out the applicable conformity assessment procedure	This document (CRA-CA-001)	The present assessment
3	Draw up the EU declaration of conformity once conformity has been demonstrated	CRA-DoC-001	To be signed once the conditions in Section 7.2 are met
4	Affix the CE marking in accordance with Article 30	CRA-CE-001 sets out the locations and preconditions for affixing	To be carried out after CRA-DoC-001 is signed

Important: the CE marking may not be affixed before conformity has been demonstrated and the declaration of conformity has been signed (Article 30(3), read with Article 13(12)). The manufacturer treats the order of steps 3 and 4 as a mandatory check at the signing and affixing stages; see the pre-condition checklist in CRA-CE-001, Section 6.

Reference: Regulation (EU) 2024/2847, Article 13(12); Article 30(3); Article 31.

4. Compliance matrix

4.1 Decision rules

Conclusion	Meaning	Conditions for use
Conform	The obligation has been discharged. Final evidence exists and can be traced to a named document and section	The requirement applies in full and the evidence is complete
Conform with observation	The obligation has been discharged, but a supporting item remains to be verified, finalised or confirmed	The measure is in place but the evidence is outstanding (for example, pending execution of CRA-TR-001 or closure of a placeholder). Every observation is recorded in Section 5
Not applicable with justification	The requirement does not apply to this product, by reason of its own qualifier or of the nature of the product	An explicit justification must be given and included in the technical documentation under Article 13(4)

Note: for each essential requirement that CRA-RA-001 has determined to be "partially applicable", the reasons for the part that does not apply are given in CRA-RA-001, Section 6, under Article 13(4). This document does not repeat those reasons in full; it identifies the section in which they are to be found and records compliance with the applicable part as "conform" or "conform with observation".

4.2 Module A procedural obligations and the Article 13(12) sequence

Row	Reference	Requirement	Conformity evidence (document · section)	Assessor	Conclusion
A-01	Annex VIII, Part I, point 1	Ensure and declare, under the manufacturer's sole responsibility, that the product satisfies all the essential requirements in Annex I, Part I and that the manufacturer meets the essential requirements in Annex I, Part II	This document as a whole (row-by-row verification in Sections 4.3 to 4.6); conclusion in Section 7	Zhou Yang	Conform with observation: the conditions for the conclusion to take effect are in Section 7.2
A-02	Annex VIII, Part I, point 2	Draw up the technical documentation set out in Annex VII	CRA-TD-001 (Sections 1 to 12 correspond item by item to Annex VII, points 1 to 8); Annex VII point 3 is carried by CRA-RA-001, point 6 by CRA-TR-001, points 2(b) and 8 by CRA-SBOM-001, and point 7 by CRA-DoC-001	Jin Cancan	Conform with observation: the conclusion in CRA-TR-001, Section 8 remains to be completed (P09, TR-23)
A-03	Annex VIII, Part I, point 3	Take all measures necessary so that the design, development, production and vulnerability handling processes and their monitoring ensure that the products developed and the processes established comply with the essential requirements	Design: CRA-TD-001, Section 3 (secure by design and secure by default, including the mapping to Annex I, Part I); development: CRA-TD-001, Sections 3.4 and 5.2; production: CRA-TD-001, Sections 5.1, 5.3, 5.6 and 5.7 (build, pre-release security gate, integrity protection, release records); vulnerability handling: CRA-VHP-001, CRA-CVD-001, CRA-SUP-001 and CRA-TD-001, Section 4; monitoring: CRA-	Zhou Yang	Conform with observation: the conclusions of the process exercise remain to be completed (TR-21)

		in Annex I, Parts I and II	TD-001, Section 5.3 (annual review) and CRA-TR-001, Section 6 (process exercise)		
A-04	Article 13(12), first indent	Draw up the technical documentation before placing on the market	Version record and date of preparation of CRA-TD-001; the check on the sequence relative to the date of signature of CRA-DoC-001 is in Section 3.5	Jin Cancan	Conform
A-05	Article 13(12), second indent	Carry out the applicable conformity assessment procedure	This document (CRA-CA-001)	Jin Cancan	Conform (this assessment is the carrying out of that procedure)
A-06	Annex VIII, Part I, point 4.1	Affix the CE marking to each product that satisfies the applicable requirements	CRA-CE-001 (location, graphic specification, preconditions, prohibitions); evidence of affixing retained as set out in CRA-CE-001, Section 9	Jin Cancan	Conform with observation: affixing takes place after CRA-DoC-001 is signed; the location of the verification record remains to be confirmed (CA-06)
A-07	Annex VIII, Part I, point 4.2; Article 28	Draw up a written EU declaration of conformity in accordance with Article 28 for each product, following the model structure in Annex V; keep it with the technical documentation for 10 years after placing on the market or for the support period, whichever is	CRA-DoC-001 (structured item by item under Annex V, points 1 to 8); retention arrangements in CRA-TD-001, Section 12.2 and CRA-RET-001	Jin Cancan	Conform with observation: the date of signature remains to be confirmed (CA-01); the address of publication remains to be confirmed (P11)

		longer; the declaration shall identify the product and a copy shall be provided on request			
A-08	Annex VIII, Part I, point 5	The obligations in point 4 may be fulfilled by the authorised representative, in the manufacturer's name and under its responsibility, provided that they are specified in the mandate	Not applicable with justification: the manufacturer has appointed no authorised representative. Article 18(1) provides that the manufacturer may appoint an authorised representative by written mandate; appointment is an option, not a mandatory obligation . The manufacturer currently discharges the point 4 obligations itself and issues and keeps all declarations and documentation directly. If an authorised representative is appointed in future, the mandate must specify the relevant obligations under Article 18(3) and item 2 of CRA-DoC-001 must be amended accordingly (CA-05)	Zhou Yang	Not applicable with justification

Reference: Regulation (EU) 2024/2847, Annex VIII, Part I, points 1, 2, 3, 4.1, 4.2 and 5; Article 13(12); Article 18(1) and (3); Article 28.

4.3 Annex I, Part I, point (1)

Row	Reference	Requirement	Conformity evidence (document · section)	Assessor	Conclusion
A-09	Annex I, Part I, point (1)	Products shall be designed, developed and produced so as to ensure an appropriate	Applies in its entirety and is implemented through the whole risk assessment: CRA-RA-001, Sections 2 and 3 (scope and assets), Section 4 (methodology),	Zhou Yang	Conform with observation: the effectiveness of the controls for items whose residual risk

		level of cybersecurity based on the risks	Section 5 (threat scenarios), Sections 6 and 7 (requirement-by-requirement determination and measures) and Section 8 (treatment and residual risk); implementation in design in CRA-TD-001, Section 3.4; verification in CRA-TR-001		is "medium" is subject to the results of CRA-TR-001 (CRA-RA-001, Section 8.3, point 2; P09)
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Reference: Regulation (EU) 2024/2847, Annex I, Part I, point (1); Article 13(2) and (3).

4.4 Annex I, Part I, point (2), sub-points (a) to (m)

*The full reasoning on applicability, including the justification for each "partially applicable" determination, is in **CRA-RA-001, Section 6** (and in Section 6.1 for sub-point (c)). This table verifies whether the **applicable part has been discharged**.*

Row	Reference	Requirement (summary)	Conformity evidence (document · section)	Assessor	Conclusion
A-10	Annex I, Part I, point (2)(a)	Be made available on the market without known exploitable vulnerabilities	CRA-SBOM-001 (dependency inventory); pre-release dependency vulnerability scanning, static analysis, malformed input and fuzz testing: CRA-TR-001, TC-01 to TC-04 and TC-25; pre-release security gate: CRA-TD-001, Section 5.3	Zhou Yang	Conform with observation: this conclusion holds once CRA-TR-001 has been executed and confirms that no unresolved High or Critical issue remains (CRA-RA-001, Section 9, point 2; P09)
A-11	Annex I, Part I, point (2)(b)	Be made available on the market with a secure by default configuration, including the possibility to reset the product to its original state	CRA-TD-001, Section 3.4 (secure defaults) and Annex A.8(a) (reset and reinstallation route); verification: CRA-TR-001, TC-22	Zhou Yang	Conform
A-12	Annex I, Part I, point (2)(c)	Ensure that vulnerabilities can be addressed through security updates,	Applicable part discharged: security updates released as a separate revision number and free of charge: CRA-SUP-001 and CRA-VHP-	Zhou Yang	Conform with observation: the initial state of the automatic update switch and the steps

		including, where applicable, automatic security updates enabled by default (with an opt-out mechanism), notification of available updates, and the option to postpone them	001; notification of available updates through the in-product "check for updates" function, the website notice board, forum announcements and email: CRA-TD-001, Section 4.3 and Annex A.8(c); postponement option: CRA-TR-001, TC-17 and TC-18. The "automatic installation enabled by default" element does not apply , by virtue of the qualifier "where applicable"; the reasoning is in CRA-RA-001, Section 6.1 (recital 56) and six compensating measures have been put in its place		for turning it off remain to be confirmed (P16); how the expiry-of-support-period notice is implemented remains to be confirmed (P17)
A-13	Annex I, Part I, point (2)(d)	Ensure protection from unauthorised access by appropriate control mechanisms, including authentication, identity or access management systems, and report on possible unauthorised access	Licence activation and device binding verification (issue-date and device binding verification added in the version of 23 May 2025): CRA-TD-001, Sections 3.1 and 3.3; local access control relies on the host operating system's account model and file system permissions, and the user instructions require day-to-day operation under a standard user account: CRA-TD-001, Annex A.8(a); verification: CRA-TR-001, TC-16. "Authentication, identity or access management systems" and "reporting on possible unauthorised access" do not apply ; the reasoning	Zhou Yang	Conform with observation: whether the product offers local session locking or password protection for project files remains to be confirmed (RA-08)

			is in CRA-RA-001, Section 6, sub-point (d)		
A-14	Annex I, Part I, point (2)(e)	Protect the confidentiality of stored, transmitted or otherwise processed data, personal or other, such as by encrypting relevant data at rest or in transit by state of the art mechanisms, or by using other technical means	Other technical means: data processed locally, with no upload, no retention, no cloud processing and no telemetry: CRA-TD-001, Section 3.4; encryption in transit: HTTPS (TLS) throughout for activation and update checking; encryption at rest relies on the operating system and configuration guidance is given: CRA-TD-001, Annex A.4 and A.8(a); verification: CRA-TR-001, TC-11, TC-14, TC-15 and TC-23. Product-level encryption at rest does not apply; the reasoning is in CRA-RA-001, Section 6, sub-point (e), and point (2)(e) expressly permits "or by using other technical means"	Zhou Yang	Conform
A-15	Annex I, Part I, point (2)(f)	Protect the integrity of data, commands, programs and configuration against manipulation or modification not authorised by the user, and report on corruptions	Structure and ECC/checksum status of imported images checked and corruptions reported; project and configuration files structurally validated; update packages subject to integrity and origin verification (SHA-256) and a monotonic version number check; output paths containing path traversal fragments rejected: CRA-TD-001, Sections 3.2, 3.4, 4.3 and 5.6; verification: CRA-TR-001, TC-06, TC-09, TC-10 and TC-16	Zhou Yang	Conform with observation: whether Authenticode code signing is used remains to be confirmed (P03)

A-16	Annex I, Part I, point (2)(g)	Process only data that are adequate, relevant and limited to what is necessary (data minimisation)	Only files explicitly selected by the user are read; no personal data is collected; activation transmits only licence and device identifier fields; no telemetry; logs contain no image content or personal data: CRA-TD-001, Sections 3.3 and 3.4; verification: CRA-TR-001, TC-14, TC-15 and TC-20	Zhou Yang	Conform with observation: the specific list of fields transmitted in the activation request remains to be confirmed (P07)
A-17	Annex I, Part I, point (2)(h)	Protect the availability of essential and basic functions, also after an incident, including resilience and mitigation against denial-of-service attacks	Local availability: input size limits, chunked processing, cancellable long-running tasks, persistent job state enabling recovery after interruption, exception handling with safe fallback, explicit error messages: CRA-TD-001, Sections 3.3 and 3.4; verification: CRA-TR-001, TC-05, TC-07, TC-08 and TC-24. Resilience against network or remote denial-of-service attacks does not apply (the product provides no external service, has no inbound listening ports and no cloud component); the reasoning is in CRA-RA-001, Section 6, sub-point (h)	Zhou Yang	Conform
A-18	Annex I, Part I, point (2)(i)	Minimise the negative impact of the product or connected devices on the availability of services provided by other devices or networks	No inbound listening ports, no residence as a service, no network scanning or broadcast behaviour, no self-propagation capability; the only network activity is user-perceptible outbound HTTPS: CRA-TD-001, Section 3.3; verification: CRA-TR-001, TC-19	Zhou Yang	Conform

A-19	Annex I, Part I, point (2)(j)	Be designed, developed and produced to limit attack surfaces, including external interfaces	Attack surface inventoried with mitigation noted for each item; the import path applies a format allow-list, structural validation, bounds checking and size limits; custom formulas use a restricted evaluator; no inbound listening ports or debug interfaces; third-party dependencies controlled and recorded in the SBOM: CRA-TD-001, Sections 3.3 and 3.4; CRA-SBOM-001; verification: CRA-TR-001, TC-19	Zhou Yang	Conform
A-20	Annex I, Part I, point (2)(k)	Reduce the impact of an incident using appropriate exploitation mitigation mechanisms and techniques	Implemented at design level: input validation and bounds checking, restricted expression evaluator, least-privilege operation, no residence as a service, no unsafe dynamic load paths: CRA-TD-001, Sections 3.3, 3.4 and 5.1; verification: CRA-TR-001, TC-04. Sandboxing or containerised isolation does not apply ; the reasoning is in CRA-RA-001, Section 6, sub-point (k)	Zhou Yang	Conform with observation: compiler and linker exploitation mitigation options at binary level (ASLR, DEP/NX, control flow guard, stack protection) remain to be confirmed (P06)
A-21	Annex I, Part I, point (2)(l)	Provide security related information by recording and monitoring relevant internal activity, with an opt-out mechanism for the user	A local job log records parsing tasks, errors and anomalous events and contains no image content, recovered data or personal data; the user may adjust the log level or switch logging off in the settings (opt-out): CRA-TD-001, Section 3.2; verification: CRA-TR-001, TC-20.	Zhou Yang	Conform

			Centralised continuous monitoring and security alerting (SIEM, SOC) does not apply ; the reasoning is in CRA-RA-001, Section 6, sub-point (l)		
A-22	Annex I, Part I, point (2)(m)	Provide the possibility for users to securely and easily remove on a permanent basis all data and settings and, where data can be transferred, ensure that this is done securely	Within the product's control: deletion of the settings, project files, logs and temporary files that the product itself generates, and an uninstallation route; guidance on manual clean-up together with a list of residual files: CRA-TD-001, Annex A.8(d); portability: results exported in standard image formats; verification: CRA-TR-001, TC-21. The product offers no wiping function for the user's own images and output ; the reasoning and the alternative are in CRA-RA-001, Section 6, sub-point (m)	Zhou Yang	Conform with observation: the uninstaller, the default location of user data and the implementation status of the "clear user data" function remain to be confirmed (P15); the clean-up policy for temporary files and cache images remains to be confirmed (RA-07)

Reference: Regulation (EU) 2024/2847, Annex I, Part I, point (2), sub-points (a) to (m); Article 13(3) and (4); CRA-RA-001, Sections 6 and 6.1.

4.5 Annex I, Part II, points (1) to (8) (the manufacturer's vulnerability handling obligations)

Row	Reference	Requirement (summary)	Conformity evidence (document · section)	Assessor	Conclusion
A-23	Point (1)	Identify and document vulnerabilities and components, including by drawing up an SBOM in a commonly used, machine-readable format	SBOM in SPDX 2.3 (JSON), updated before each release: CRA-SBOM-001; CRA-TD-001, Section 11 and Annex A.9	Zhou Yang	Conform with observation: the storage path, file name and generation tool of the SBOM remain to be confirmed (P12)

		covering at least the top-level dependencies			
A-24	Point (2)	Address and remediate vulnerabilities without delay, including by providing security updates; where technically feasible, new security updates shall be provided separately from functionality updates	Closed loop from intake to release, with time limits by severity: CRA-VHP-001; security updates released as a separate revision number, with reasons given in the release note where separation is not possible: CRA-SUP-001 and CRA-TD-001, Section 4.3	Zhou Yang	Conform with observation: the specific remediation time limits by CVSS severity remain to be confirmed (RA-10)
A-25	Point (3)	Effectively and regularly test and review the security of the product	Security testing and review at least every 12 months, with additional testing before major releases; pre-release security gate; an annual process exercise: CRA-TR-001, Section 1.3; CRA-TD-001, Sections 5.3 and 8	Jin Cancan	Conform with observation: the date and conclusions of the first execution remain to be confirmed (P09, TR-19)
A-26	Point (4)	After a security update, share and publicly disclose information about the fixed vulnerability (description, information enabling users to identify the product affected, impacts, severity, and clear and accessible information helping users remediate); disclosure may be	Announcements published simultaneously on the website notice board and the forum; delayed disclosure only where the manufacturer judges the security risk of disclosure to outweigh the security benefit, with publication once users have had the opportunity to apply the patch: CRA-CVD-001 and CRA-SUP-001	Jin Cancan	Conform

		delayed where justified			
A-27	Point (5)	Establish and enforce a coordinated vulnerability disclosure policy	A CVD policy has been drawn up and published, covering reporting channels, response time limits, the disclosure timeline and a commitment not to pursue good-faith reporters: CRA-CVD-001; CRA-TD-001, Section 4.2	Jin Cancan	Conform with observation: evidence of the URL on which it is published on the website and of the date of first publication remains to be confirmed (P01)
A-28	Point (6)	Take measures to facilitate the sharing of information about potential vulnerabilities in the product and in third-party components it contains, including by providing a contact address for reporting vulnerabilities	Single point of contact nandflashtacer@gmail.com, allowing users to choose their preferred means of communication and not limited to automated tools, included in the user information and instructions: CRA-CVD-001; CRA-TD-001, Section 4.2 and Annex A.2	Jin Cancan	Conform with observation: as above (P01); whether a dedicated vulnerability reporting mailbox is to be established remains to be confirmed (DoC-02)
A-29	Point (7)	Provide mechanisms for the secure distribution of updates; distribute security updates in an automatic manner where applicable	Official channels only, HTTPS throughout, SHA-256 checksums published, monotonic version number check to prevent downgrading: CRA-SUP-001; CRA-TD-001, Sections 4.3, 5.5 and 5.6. "Distribute security updates in an automatic manner" does not apply , by virtue of the qualifier "where applicable" and the reasoning in CRA-RA-001, Section 6.1; update notification plus user-confirmed installation have been put in its place	Zhou Yang	Conform with observation: code signing remains to be confirmed (P03); the download page URL and the TLS configuration of the distribution server remain to be confirmed (P02)
A-30	Point (8)	Ensure that security updates that	Security updates free of charge; advisory published at the same time as the	Zhou Yang	Conform

		can address identified security problems are released without delay once available, free of charge, together with an advisory informing users of relevant information including possible actions	release, with notification of known affected users by website, forum and email: CRA-SUP-001 and CRA-VHP-001; CRA-TD-001, Section 4.3		
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Reference: Regulation (EU) 2024/2847, Annex I, Part II, points (1) to (8); Article 13(3) and (8); CRA-RA-001, Section 7.

4.6 Obligations of the manufacturer under Article 13

Row	Reference	Requirement (summary)	Conformity evidence (document · section)	Assessor	Conclusion
A-31	Article 13(15)	Products shall bear a type, batch or serial number or other element allowing their identification; where that is not possible, the information may be provided on the packaging or in a document accompanying the product	For software, the version number together with the internal build identifier serves as the identifying element, shown in the "About" dialog and in the user information and instructions: CRA-TD-001, Sections 2.1 and 5.4 and Annex A.3	Zhou Yang	Conform with observation: the internal build identifier for Ver 2.26.8 remains to be confirmed (P04)
A-32	Article 13(16)	Indicate the manufacturer's name, registered trade name or registered trade mark, postal address, email address or other digital contact, and website, on the product, on its packaging or in a document accompanying	Manufacturer name, registered address in both Chinese and English, telephone number, email address and website are shown in the "About" dialog and in the user information and instructions: CRA-TD-001, Annex A.1; the same information appears in item 2 of CRA-DoC-001	Jin Cancan	Conform

		it			
A-33	Article 13(17)	Designate a single point of contact enabling users to communicate directly and rapidly in order to report vulnerabilities; it shall be easily identifiable, included in the user information and instructions, allow users to choose their preferred means of communication and not be limited to automated tools	Single point of contact nandflashtracer@gmail.com , with three channels offered (email, website contact form and forum private message) and no mandatory form or bot as the sole channel: CRA-TD-001, Section 4.2 and Annex A.2	Jin Cancan	Conform with observation: evidence of the URL on which it is published on the website and of the date of first publication remains to be confirmed (P01)
A-34	Article 13(18)	Products shall be accompanied by the information and instructions in Annex II, in a language easily understood by users and market surveillance authorities; that information shall be kept for at least 10 years after placing on the market or for the support period, whichever is longer; where provided online it shall remain accessible and online for the same period	Annex II, points 1 to 9 implemented item by item: CRA-TD-001, Annexes A.1 to A.9; means of accompanying the product (documentation in the installation directory plus a page on the website) and retention arrangements: CRA-TD-001, Section 12.2 and CRA-RET-001	Jin Cancan	Conform with observation: the placeholders in Annex A.6 (declaration URL), A.8(c) and A.8(e) (automatic update switch), A.8(d) (data deletion) and A.9 (SBOM) remain to be closed (P11, P16, P15, P12)
A-35	Article 13(19)	The end date of the support period (at least year and	Support period 10 February 2024 to 10 February 2029; end date (February 2029) shown on the purchase	Jin Cancan	Conform with observation: the location of the

		month) shall be clearly stated in an easily accessible manner at the time of purchase, where appropriate on the product, on its packaging or in a digital form; where technically feasible, users shall be shown a notification that the support period has ended	page and the order confirmation page: CRA-TD-001, Sections 6.1 and 6.3 and Annex A.7; how the expiry notification is implemented: CRA-TD-001, Section 6.4		screenshots evidencing the purchase page and order confirmation page remains to be confirmed (P18); how and in which release the expiry notification is implemented remains to be confirmed (P17)
A-36	Article 13(20)	Provide a copy of the EU declaration of conformity, or a simplified declaration (which shall contain the exact internet address at which the full declaration can be consulted)	A simplified declaration accompanying the product together with the exact internet address is used; the full declaration CRA-DoC-001 is published on the compliance page of the website	Jin Cancan	Conform with observation: the date of signature and the address of publication of the full declaration remain to be confirmed (CA-01, P11); the form in which the simplified declaration accompanies the product and its file location remain to be confirmed (DoC-03)
A-37	Article 13(9)	Each security update provided to users during the support period shall remain available for at least 10 years or for the remaining support period, whichever is longer , after its	Archiving and availability commitment for security updates: CRA-SUP-001; CRA-TD-001, Section 4.3 and Annex A.7, point 2; CRA-RET-001	Zhou Yang	Conform with observation: the archive location, the responsible person and the backup strategy remain to be confirmed (P08, P14)

		release			
A-38	Article 13(1) and (2)	Ensure that the product is designed, developed and produced in accordance with the essential requirements in Annex I, Part I when placed on the market; carry out a risk assessment and take its results into account at every stage	Sections 4.3 and 4.4 of this document; CRA-RA-001, Section 9, point 3 (how the results of the assessment are taken into account in the seven lifecycle stages)	Zhou Yang	Conform with observation: as for A-10
A-39	Article 13(5) and (6)	Exercise due diligence in relation to third-party components, including free and open-source components that are not commercialised ; report component vulnerabilities to the component manufacturer or maintainer and share remediation information	SBOM maintenance and dependency scanning: CRA-SBOM-001 and CRA-TR-001, Section 4.2; reporting to maintainers and sharing: CRA-VHP-001 and CRA-TR-001, Section 7.2, point 5	Zhou Yang	Conform
A-40	Article 13(7) and (8)	Systematically record relevant cybersecurity matters and update the risk assessment where appropriate; ensure that vulnerabilities are handled effectively when placing on the market and during the support period; the support period shall be	Support period of 5 years (10 February 2024 to 10 February 2029) and the factors taken into account in determining it: CRA-TD-001, Sections 6.1 and 6.2; vulnerability recording and updating of the assessment: CRA-RA-001, Section 10; policies and procedures: CRA-VHP-001 and CRA-CVD-001	Jin Cancan	Conform

		at least 5 years; establish appropriate policies and procedures, including a coordinated vulnerability disclosure policy			
A-41	Article 13(10)	Where a substantially modified version has subsequently been placed on the market, security updates may be provided only for the latest version placed on the market, provided that users can obtain them free of charge without having to adjust their environment at additional cost	Not applicable with justification: as at the date of completion of this assessment the manufacturer has placed no substantially modified version of the product on the market , so the optional simplification in this paragraph has no object. If a substantially modified version is placed on the market in future and the manufacturer intends to rely on this paragraph, the assessment must be repeated and the fact stated in the user information	Zhou Yang	Not applicable with justification
A-42	Article 13(11)	The manufacturer may maintain a public software archive, in which case it shall clearly inform users of the risks of using unsupported software	Not applicable with justification: the manufacturer maintains no public software archive , this being an optional ("may") case with no object. The risks of continuing to use the product after the support period ends are already stated in the user information (note below the table in CRA-TD-001, Annex A.7)	Zhou Yang	Not applicable with justification
A-43	Article 13(13)	Keep the technical documentation and the EU declaration of conformity at the disposal of market surveillance authorities for at least 10 years after the	CRA-TD-001, Section 12.2; the "Notes on use" section of CRA-DoC-001; CRA-RET-001	Jin Cancan	Conform with observation: the start date for placing on the EU market remains to be confirmed (P13); that date determines the start of the 10-year

		product has been placed on the market or for the support period, whichever is longer			retention period
A-44	Article 13(14)	Establish procedures to ensure that series production remains in conformity	Controlled build and packaging procedure, pre-release security gate, build identifier written in, release records: CRA-TD-001, Sections 5.1 to 5.7	Zhou Yang	Conform with observation: the build toolchain and build machine controls, and the storage and backup arrangements for release records, remain to be confirmed (P06, P08)
A-45	Article 13(21) and (22)	As soon as the manufacturer becomes aware of non-conformity, immediately take corrective measures or, where appropriate, withdraw or recall; on a reasoned request from a market surveillance authority, provide all information and documentation necessary to demonstrate conformity in a language understandable to it and cooperate in eliminating risks	Corrective measures and recall procedure: CRA-VHP-001 and Section 5 of this document; cooperation and provision: CRA-RET-001 and CRA-TD-001, Section 12.5	Jin Cancan	Conform with observation: the person responsible for retrieving documentation and the backup strategy remain to be confirmed (P14)
A-46	Article 14(1) to (8)	On becoming aware of an actively exploited vulnerability in the product or of a severe incident, notify	Reporting procedure, templates and time limits: CRA-IRP-001; verification by exercise: CRA-TR-001, Section 6	Jin Cancan	Conform with observation: the reporting obligations in Article 14 apply from 11 September 2026 (Article

		the coordinator CSIRT and ENISA simultaneously through the single reporting platform (early warning within 24 hours / notification within 72 hours / final report within 14 days or one month), and inform affected users			71(2)); the ENISA single reporting platform (SRP) is planned to become operational from 11 September 2026; the manufacturer has no principal place of business in the Union, has appointed no authorised representative and has no importer, so the reporting route under Article 14(7) must be determined item by item and recorded (CA-07)
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Reference: Regulation (EU) 2024/2847, Article 13(1), (2), (5), (6), (7), (8), (9), (10), (11), (13), (14), (15), (16), (17), (18), (19), (20), (21) and (22); Article 14; Article 71(2).

4.7 Summary

Conclusion	Number of rows	Row references
Conform	13	A-04, A-05, A-11, A-14, A-17, A-18, A-19, A-21, A-26, A-30, A-32, A-39, A-40
Conform with observation	30	A-01, A-02, A-03, A-06, A-07, A-09, A-10, A-12, A-13, A-15, A-16, A-20, A-22, A-23, A-24, A-25, A-27, A-28, A-29, A-31, A-33, A-34, A-35, A-36, A-37, A-38, A-43, A-44, A-45, A-46
Not applicable with justification	3	A-08, A-41, A-42
Total	46	A-01 to A-46

*Note: the predominance of "conform with observation" is explained by the fact that **this assessment is being drawn up in parallel with CRA-TD-001, CRA-RA-001 and CRA-TR-001, and the placeholders listed in Section 10 of this assessment had not all been closed as at 3 September 2026.** That does not mean the product is defective; it means that **the conformity conclusion is not yet fully supported by verification activity.** Section 7.2 sets out everything required for the conclusion to become unconditional.*

5. Non-conformities and corrective actions

5.1 Record

*Note: the table below records the **non-conformities and observations** identified in this assessment. As at 3 September 2026, no substantive non-conformity has been identified in the sense of "the product fails to satisfy an applicable essential requirement"; every entry is an **evidence gap or a matter awaiting verification**. Where an evidence gap affects the conclusion on a row, that row has been recorded as "conform with observation" in Section 4. No finding may be recorded as closed unless it has actually been closed.*

No.	Finding	Requirement affected	Corrective action	Owner	Target date	Status
NC-01	The test cases in CRA-TR-001 were executed on 27 August 2026 with the result "Passed"; the result / test date / tester columns have been completed. Raw test records to be retained and countersigned by the reviewer.	Annex VII, point 6; Annex I, Part II, point (3); Annex I, Part I, point (2)(a); Annex VIII, Part I, point 2	Execute the first complete test and review in accordance with CRA-TR-001, Section 1.3; complete the result for each case; have the reviewer check and sign; dispose of findings under the closure rules in Section 7.2	Jin Cancan (execution); Zhou Yang (review)	August 27, 2026 (P09, TR-19)	Closed - subject to verification of the raw test records
NC-02	Compiler and linker exploitation mitigation options at binary level (ASLR, DEP/NX, control flow guard, stack protection) not confirmed	Annex I, Part I, point (2)(k)	Verify and record the build toolchain configuration; enable any option not yet enabled and regression-test; update CRA-TD-001, Section 5.1 and CRA-RA-001, Section 6, sub-point (k)	Zhou Yang	Before placing on the market	Open
NC-03	Whether Authenticode code signing is used is not confirmed; currently only a SHA-256 checksum is provided	Annex I, Part I, points (2)(f) and (k); Annex I, Part II, point (7)	Assess and adopt code signing; if not adopted, state on the download page that only a SHA-256 checksum is provided and how to verify it; update CRA-TD-001,	Zhou Yang	Before placing on the market	Open

			Sections 4.3 and 5.6			
NC-04	The uninstaller, the default storage location of user data and the implementation status of the "clear user data" function are not confirmed	Annex I, Part I, point (2)(m); Annex II, point 8(d)	Verify the implementation status; record the default paths and the list of residual files; schedule anything not yet implemented for the next release and give manual clean-up instructions in the user information	Zhou Yang	Before placing on the market (items not implemented scheduled for the next release)	Open
NC-05	The initial state of the automatic security update switch, the name of the setting and the steps for turning it off are not confirmed	Annex I, Part I, point (2)(c); Annex II, points 8(c) and 8(e)	Verify and state in the user information; keep consistent with the reasoning in CRA-RA-001, Section 6.1	Zhou Yang	Before placing on the market	Open
NC-06	How the expiry-of-support-period notification is implemented in the product, and the release in which it is planned, are not confirmed	Article 13(19), second sentence	Determine the implementation (start-up prompt / "About" dialog / update module prompt) and the release; state reasons where it is not technically feasible	Zhou Yang	Planned for the current release; target date 3 September 2026. (P17)	Open
NC-07	The URL on which the single point of contact and the CVD policy are published on the website, the date of first publication and the archived	Annex VII, point 2(b) (evidence that the contact address for reporting vulnerabilities has been provided); Annex I, Part II, points (5)	Complete publication on the website and retain the screenshot and date as evidence; enter the URL in CRA-TD-001, Section 4.2 and Annex A.2	Jin Cancan	Before placing on the market	Open

	screenshot are not confirmed	and (6); Article 13(17) and (18)				
NC -08	The location of the screenshots evidencing the display of the end date of the support period (February 2029) on the purchase page and the order confirmation page is not confirmed	Article 13(19), first sentence	Complete the changes to the pages and retain the screenshots as evidence	Jin Cancan	Before placing on the market	Open
NC -09	The storage path, file name, and name and version of the generation tool of CRA-SBOM-001 are not confirmed	Annex VII, points 2(b) and 8; Annex I, Part II, point (1)	Generate and archive the SBOM and record the tool and the storage location	Zhou Yang	Before placing on the market	Open
NC -10	The internal build identifier for Ver 2.26.8 has not been determined	Article 13(15); Annex V, points 1 and 4	Determine the build identifier and enter it in the "About" dialog, the user information and instructions, CRA-DoC-001 and CRA-CE-001	Zhou Yang	Before placing on the market	Open
NC -11	The date of signature and the published internet address of CRA-DoC-001 are not determined; the form in which the simplified declaration accompanies the product is not determined	Article 13(20); Article 28; Annex II, point 6	Determine the compliance page address on the website and publish the full declaration there; determine the form in which the simplified declaration accompanies the product	Jin Cancan	Before placing on the market	Open
NC -12	The manufacturer has no	Article 14(7)	Work through sub-points (a) to (d) of Article	Jin Cancan	Before 11 September 2026 (the	Open

	principal place of business in the Union, has appointed no authorised representative and has no importer, so the route for determining the coordinator CSIRT under Article 14(7) is not finally confirmed		14(7) in order and determine the Member State; record the determination and its basis in CRA-IRP-001		date Article 14 applies)	
NC -13	The storage location of the documentation and records, the person responsible for retrieving them and the backup strategy are not confirmed	Article 13(13) and (22); Annex VIII, Part I, point 4.2	Determine the storage arrangements and the responsible person; draw up CRA-RET-001	Jin Cancan	Before placing on the market	Open
NC -14	There is no verification record for affixing the CE marking (screenshot and date), because it has not yet been affixed	Article 30(1) and (3); Annex VIII, Part I, point 4.1	After CRA-DoC-001 is signed, affix the marking in accordance with CRA-CE-001 and retain the verification record	Jin Cancan	After affixing	To be carried out
NC -15	The tabletop exercise of the vulnerability handling process (EX-01) was executed on 27 August 2026 and a conclusion was recorded (CRA-TR-001, Section 7).	Annex I, Part II, point (3); Annex VII, point 6	Execute the exercise in accordance with CRA-TR-001, Section 6 and record the conclusion, the time actually taken, any item not meeting the criteria and the improvements	Jin Cancan	August 27, 2026 (TR-21)	Closed - subject to verification of the exercise record

5.2 Closure rules

27. No declaration may be signed while an open finding affects compliance.

Where an open finding affects an applicable requirement in Annex I, Part I or Part II, **the EU declaration of conformity (CRA-DoC-001) must not be drawn up or signed and the CE marking must not be affixed.** NC-01 to NC-11 and NC-13

above are all of that kind, each affecting the conclusion on the corresponding row in Section 4.

28. **Proof of closure.** A finding is closed by **evidence being entered**, not by oral confirmation: the relevant placeholder is replaced with the actual content, the related documents (CRA-TD-001, CRA-RA-001, CRA-TR-001, CRA-DoC-001) are updated in step, and the reviewer checks and signs.
29. **Review and approval.** Once every finding affecting compliance has been closed, the reviewer (Zhou Yang) reviews the matrix in Section 4, changes the affected rows from "conform with observation" to "conform", and the approver signs the conclusion in Section 7 and the signature record at the end of this document.
30. **Consequences of placing on the market with findings open.** The manufacturer is aware and accepts that signing the declaration and affixing the CE marking while the above findings remain open would constitute a breach of Article 13(12) and Article 28(4) and would trigger the corrective and withdrawal obligations under Article 13(21).
31. **Retention of records.** This table, together with the evidence of closure for each finding, is kept with CRA-TD-001 for the period laid down in Article 13(13) (10 years after placing on the market or the support period, whichever is longer).

Reference: Regulation (EU) 2024/2847, Article 13(7), (12), (13) and (21); Article 28(4); Annex VIII, Part I, points 4.1 and 4.2.

6. Statement on harmonised standards

6.1 Current status

Item	Status as at 3 September 2026
CRA harmonised standards	No CRA harmonised standard has a citation published in the Official Journal of the European Union (OJEU)
Standardisation request	Standardisation request M/606 entrusts CEN/CENELEC/ETSI with the preparation of 41 standards (including the EN 40000 series); these are still under development
Harmonised standards applied	None
Common specifications under Article 27	None
European cybersecurity certification schemes adopted under Regulation (EU) 2019/881	None

6.2 No presumption of conformity is claimed

Since **no citation of a CRA harmonised standard has been published in the Official Journal of the European Union** as at the date of this document, the manufacturer **does not claim** the presumption of conformity under Article 27. Conformity is demonstrated **directly against the essential requirements in Annex I, Parts I and II**; the evidence chain is set out in the compliance matrix in Section 4.

6.3 The EN 18031 series

The EN 18031 series is a harmonised standard supporting the Radio Equipment Directive (RED, Directive 2014/53/EU) and has no connection with

the CRA. This assessment does not cite that series and relies on no part of it as evidence of conformity. Where external materials or customer questionnaires measure this product's CRA conformity against EN 18031, the manufacturer should correct that.

6.4 Commitment to monitor and re-assess

32. The manufacturer will continuously monitor the publication of citations of CRA harmonised standards in the Official Journal of the European Union, with particular attention to standardisation request M/606 and the EN 40000 series.
33. **Within 6 months of the publication in the OJEU of a citation of a relevant harmonised standard or common specification**, the manufacturer will complete a gap assessment and, on that basis, update the matrix in Section 4 of this document, Section 7 and Appendix B of CRA-TD-001 and, where necessary, CRA-RA-001 and CRA-DoC-001 (that 6-month period carries forward the commitment in CRA-TD-001, Section 7.4, point 3).
34. The manufacturer will also monitor the formal adoption and the publication of the language versions of Commission CRA guidance C(2026) 5252 final.
35. The person responsible for that monitoring is the compliance and documentation lead (Jin Cancan), and it forms part of the annual review referred to in Section 8.

Note: the manufacturer is a micro/small enterprise and is not able to establish a 24/7 security operations centre, obtain ISMS certification or operate a bug bounty programme. The commitments above are set at a scale that can actually be delivered.

Reference: Regulation (EU) 2024/2847, Article 27; Annex VII, point 5; Annex VIII, Part I, point 1; Article 31(2).

7. Conclusion of the assessment

7.1 Conclusion

On the basis of the row-by-row verification in the compliance matrix in Section 4, and taking account of the findings recorded in Section 5 and their state of closure, the manufacturer, **under its sole responsibility**, reaches the following conclusions:

36. **As regards the product.** At the assessed baseline version Ver 2.26.8, NFT **satisfies the essential requirements in Annex I, Part I** that apply to it (point (1) applies in its entirety; of sub-points (a) to (m) of point (2), six — (a), (b), (f), (g), (i) and (j) — apply in full and seven — (c), (d), (e), (h), (k), (l) and (m) — apply in part, the parts that do not apply being expressly justified in CRA-RA-001, Section 6 under Article 13(4)).
37. **As regards the manufacturer.** The manufacturer **meets the essential requirements in Annex I, Part II, points (1) to (8)**; its vulnerability handling processes, coordinated vulnerability disclosure policy and security update distribution mechanism are established and carried by dedicated documents.
38. **As regards the procedure.** This conformity assessment has been carried out under Module A (internal control) set out in Annex VIII, Part I, **with no notified body involved**, as required by Article 32 for default / standard category products.

39. **As regards harmonised standards.** No presumption of conformity under Article 27 is claimed; conformity is demonstrated directly against Annex I (Section 6).

40. **As regards the next steps.** Once conformity has been demonstrated, the manufacturer may draw up the EU declaration of conformity (CRA-DoC-001) under Article 28 and affix the CE marking under Article 30.

Reference: Regulation (EU) 2024/2847, Annex VIII, Part I, point 1; Article 13(12); Article 28; Article 30.

7.2 Conditions for the conclusion to take effect

Important: the conclusion in Section 7.1 is conditional until every condition below is met, and may not be relied on to sign CRA-DoC-001 or to affix the CE marking. This paragraph must not be deleted or watered down.

- 41. **CRA-TR-001 has been executed:** every planned case has been run and its result recorded, the findings in Section 7 have been disposed of under the closure rules, and the conclusion in Section 8 has been completed (NC-01, P09, TR-22, TR-23);
- 42. **The tabletop exercise of the vulnerability handling process (EX-01) has been executed** and a conclusion recorded (NC-15, TR-21);
- 43. **Every finding affecting compliance — NC-02 to NC-11 and NC-13 — has been closed**, the evidence having been entered and checked by the reviewer;
- 44. The corresponding placeholders in CRA-TD-001 and CRA-RA-001 have been closed in step, and the conclusions of those two documents are consistent with this document;
- 45. **No unresolved residual risk rated "high" or "critical" remains** (CRA-RA-001, Section 8.3, point 3: if a high or critical risk cannot be reduced to 6 or below before release, the manufacturer will postpone placing that version on the market);
- 46. The affected rows in Section 4 of this document have been changed from "conform with observation" to "conform", and the reviewer and the approver have signed the signature record at the end of this document.

The date on which all of the above conditions are met is the **date of completion** of this assessment (September 3, 2026 (CA-02)), and that date **may not be later than** the date of signature of CRA-DoC-001 or the date on which the product is placed on the EU market.

7.3 Authorisation to draw up the declaration and affix the marking

Once every condition in Section 7.2 is met:

- 47. the legal representative (Zhou Yang) signs CRA-DoC-001 in the name of the manufacturer, the declaration being structured item by item under Annex V, points 1 to 8 (see CRA-DoC-001);
- 48. the pre-condition checklist in CRA-CE-001, Section 6 is worked through before affixing; only once it has been verified may the CE marking be affixed on the first page of CRA-DoC-001 and on the compliance page of the website;

49. the verification record is retained once affixing and publication are complete (NC-14).

Reference: Regulation (EU) 2024/2847, Article 28(1), (2) and (4); Article 30(1) and (3); Article 13(12).

8. Triggers for re-assessment

The manufacturer shall repeat this conformity assessment — in whole, or in respect of the part affected — and update CRA-DoC-001 and the use of the CE marking as necessary, on the occurrence of any of the following.

8.1 Substantial modification (Article 3(30) and Article 22)

Under Article 3(30), a "substantial modification" means a change to the product after it has been placed on the market which affects its compliance with the essential requirements in Annex I, Part I, or which results in a change to the intended purpose for which the product was assessed. For this product, **the following changes will constitute a substantial modification** and therefore trigger a re-assessment:

- 50. **Adding cloud or online services** — for example offering online parsing of dump images, cloud storage, cloud collaboration, a remote technical support channel, or parsing capability delivered as a service. Such a change would introduce inbound interfaces, a multi-user account model and remote data processing, and would alter the applicability determinations for sub-points (d), (e), (h) and (l) altogether;
- 51. **Adding an identity, authentication or VPN capability** — for example introducing a user account system, log-in passwords, an online licence verification portal, or a built-in proxy or VPN / tunnelling function. Such a change would make "authentication, identity or access management systems" applicable where they are currently not, and would materially widen the obligations under sub-points (d) and (e);
- 52. **Changing the intended purpose** — for example extending the positioning of the product from a professional data recovery and forensic tool to a general-purpose data management platform, a data processing service, or a consumer-facing tool;
- 53. **A material change to the security risk profile** — for example adding script or plug-in execution capability, adding a network-accessible interface, taking on a large number of third-party dependencies, changing the distribution or update infrastructure, or the emergence of exploitation of a critical vulnerability in the product.

*On Article 22: a natural or legal person other than the manufacturer that makes a substantial modification to a product and places it on the market **is considered a manufacturer** under this Regulation and assumes the obligations in Articles 13 and 14 in respect of the parts affected by the modification, or in respect of the whole product where the modification affects the cybersecurity of the product as a whole. The manufacturer draws this to the attention of integrators in the user information and instructions (CRA-TD-001, Annex A.8(f), point 4).*

8.2 Other triggers

54. **Publication of harmonised standards.** On the publication in the Official Journal of the European Union of a citation of any CRA harmonised standard, a gap assessment shall be completed within 6 months and the assessment repeated, as provided in Section 6.4;
55. **A change in the circumstances referred to in Article 13(14).** That is, a change in the procedures or their operating environment on which continued conformity of series production depends: a change of build toolchain or build machine, a change in the checks carried out at the pre-release security gate, a change in the distribution channel or download infrastructure, or a change in the generation, storage or rotation arrangements for code signing keys or the activation server keys;
56. **A change in the classification.** If the product falls within a category in Annex III or Annex IV, Module A ceases to be available and a conformity assessment procedure must be selected afresh under Article 32 (in which case a notified body will be involved);
57. **The annual review.** This assessment shall be reviewed at least every 12 months, in step with the cycles in CRA-RA-001, Section 10 and CRA-TR-001, Section 1.3;
58. **A change in basic information.** Any change in the manufacturer's name, registered address, single point of contact, support period or the appointment of an authorised representative requires this document and CRA-DoC-001 to be updated in step.

First annual review: 3 September 2027; responsible person: Zhou Yang; review record stored on the local data-backup server. (CA-03)

Reference: Regulation (EU) 2024/2847, Article 3(30); Article 13(14); Article 22; Article 32; Article 28(2) (the declaration shall be updated where appropriate).

9. Items pending confirmation (consolidated list of placeholders)

*Note: each placeholder below is replaced with the actual content once the corresponding matter is confirmed. **Until the placeholders affecting compliance are closed, the conclusion in Section 7.1 is conditional and may not be relied on to sign CRA-DoC-001 or to affix the CE marking.** Placeholders carried forward from CRA-TD-001, CRA-RA-001 and CRA-TR-001 keep their numbering so that they can be tracked across documents.*

No.	Placeholder	Where it occurs	Owner and note
P01	https://www.flash-tracer.com/about.html	4.5 (A-27, A-28), 4.6 (A-33); Section 5, NC-07	The "evidence that the contact address for reporting vulnerabilities has been provided" required by Annex VII, point 2(b)
P02	Official download page and update distribution server: ftp://www.flash-tracer.com . (Distribution is via	4.5 (A-29)	Describes the distribution channel for security updates and the protection of data in transit

	FTP; integrity is ensured by MD5 checksum, see P03.)		
P03	Authenticode code signing is not used. Integrity is verified by providing an MD5 checksum; the MD5 value is published on the compliance page (https://www.flash-tracer.com/about.html).	4.4 (A-15), 4.5 (A-29); Section 5, NC-03	Affects the conclusions on sub-points (f) and (k) and on Part II, point (7)
P04	NFT-2.26.8-20260826	2.1, 4.6 (A-31); Section 5, NC-10	Element allowing identification of the product under Article 13(15); Annex V, points 1 and 4
P06	Microsoft Visual Studio 2022 (VS2022); build performed on an offline Windows 11 build machine; compiler hardening enabled: ASLR, DEP/NX, Control Flow Guard (CFG) and /GS stack protection.	4.4 (A-20), 4.6 (A-44); Section 5, NC-02	Affects the conclusion on sub-point (k)
P07	Domain: https://www.flash-tracer.com/ ; the activation form transmits only the activation code (no other user data).	4.4 (A-16)	Basis for the data minimisation determination
P08	Release packages are stored on a local data-backup server not connected to the network; each version is backed up and the server performs monthly backups; responsible person: Zhou Yang.	4.6 (A-37, A-44)	Evidence of continued conformity under Article 13(14)
P09	August 27, 2026; Passed	4.2 (A-02), 4.3 (A-09), 4.4 (A-10), 4.5 (A-25); Section 5, NC-01	Annex VII, point 6; the core precondition for the conclusion of this assessment to take effect
P11	https://www.flash-tracer.com/about.html	4.2 (A-07), 4.6 (A-34, A-36); Section 5, NC-11	Annex II, point 6; Article 13(20)
P12	File name: CRA-SBOM-001.spdx.json; format: SPDX 2.3 (JSON); generated	4.5 (A-23), 4.6 (A-34); Section 5, NC-09	Annex VII, points 2(b) and 8

	with an SCA tool (Syft/CycloneDX); published at https://www.flash-tracer.com/about.html .		
P13	10 February 2024	4.6 (A-43)	Determines the start of the 10-year retention period under Article 13(13)
P14	Local data server; Zhou Yang; Regular monthly backup to the data machine	4.6 (A-37, A-45); Section 5, NC-13	Ability to make documentation available under Article 13(13) and (22)
P15	No separate uninstaller is provided; uninstallation only requires deleting the program folder. No user files exist in other locations. There is no separate "clear user data" function; deleting the program folder removes all user data.	4.4 (A-22), 4.6 (A-34); Section 5, NC-04	Affects the conclusion on sub-point (m)
P16	No automatic update function is configured; there is no automatic-install switch (manual update only).	4.4 (A-12), 4.6 (A-34, A-35); Section 5, NC-05	Required by Annex II, points 8(c) and 8(e)
P17	A prompt is shown upon software startup after the licence expires. (Implemented in the current release.)	4.4 (A-12), 4.6 (A-35); Section 5, NC-06	Article 13(19), second sentence
P18	The support end date (February 2029) is stated in the contract and on the purchase/order confirmation page; the screenshot is archived in the contract/release record.	4.6 (A-35); Section 5, NC-08	Article 13(19), first sentence
RA-07	Temporary files and cached images are stored within the program folder, cleared on exit, with user-only file permissions.	4.4 (A-22)	Numbering carried forward from CRA-RA-001
RA-08	The product does not currently offer local session locking or password protection for project files; this is	4.4 (A-13)	Numbering carried forward from CRA-RA-001

	documented as a known limitation.		
RA-10	Critical 1 day, High 1 day, Medium 3 days, Low 1 week	4.5 (A-24)	Numbering carried forward from CRA-RA-001
CA-01	September 3, 2026	4.2 (A-07), 4.6 (A-36), 7.3	May not be earlier than the date of completion of this assessment (CA-02)
CA-02	September 3, 2026	7.2	Determines whether the declaration may be signed and the marking affixed
CA-03	First annual review: 3 September 2027; responsible person: Zhou Yang; review record stored on the local data-backup server.	8.2	Maintenance arrangement keeping this assessment current
CA-04	Local data-backup server (with the findings record).	5.2	Closure is evidenced by the evidence being entered
CA-05	No authorised representative is appointed at present; to be completed if one is appointed in future.	4.2 (A-08)	Article 18 is an optional obligation; item 2 of CRA-DoC-001 must be amended in step if an appointment is made
CA-06	Local data-backup server (screenshot and date recorded at affixing).	4.2 (A-06); Section 5, NC-14	To be entered once affixing is complete
CA-07	To be confirmed with the Reporting Owner before first submission: the Member State in which the largest number of NFT users in the Union is established (determination basis: Article 14(7)); the Coordinated CSIRT entry-point URL is recorded once determined.	4.6 (A-46); Section 5, NC-12	To be confirmed in CRA-IRP-001; Article 14 applies from 11 September 2026

Signature record

Role	Name	Signature	Date
Prepared by (assessor · compliance and documentation lead)	Jin Cancan		3 September 2026

Reviewed by (assessor · head of development)	Zhou Yang		3 September 2026
Approved by (legal representative)	Zhou Yang		3 September 2026

*Note: signature of this document records only that the outcome of the verification in the compliance matrix in Section 4 has been reviewed. **The conclusion in Section 7.1 becomes unconditional only once every condition in Section 7.2 has been met**; at that point this document is to be signed again, and the approver is to sign CRA-DoC-001 separately.*