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| Prepared by | Jin Cancan |
| Reviewed by | Zhou Yang |
| Approved by | Zhou Yang |
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| Language | English version — Official Version for EU Market Surveillance Authorities |

# CE Marking Usage Rules

*Note: the Chinese version of this document (CRA-CE-001 V1.0, Internal Working Version) is the internal working text. The two versions are true counterparts: the section structure, the technical specification and the management requirements 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 **implementing rules** for row A-06 of Section 4.2 of the conformity assessment record (CRA-CA-001), which gives effect to Annex VIII, Part I, point 4.1 (the manufacturer shall affix the CE marking to each product that satisfies the applicable requirements of this Regulation). Every act of affixing, amending, withdrawing or recording the CE marking is governed by this document. Where this document and CRA-CA-001 differ, the **technical specification and procedural requirements of this document** prevail, and CRA-CA-001 is to be amended retrospectively in accordance with the procedures in this document.*

## 1. Purpose and legal basis

### 1.1 Purpose

This document lays down the rules governing the use of the CE marking for Nand Flash Tracer ("NFT" or the "product"), in order to:

1. state what the CE marking **does and does not mean** in the case of this product, so that external statements about it are not distorted;
2. determine where the marking is to be **affixed for a software product**, and satisfy the statutory requirement in Article 30(1) as to the way it is affixed on a website;
3. lay down the **graphic specification**, so that proportions, colours and any added pictogram are not improperly altered;
4. lay down **when the marking may be affixed and the preconditions for doing so**, so that the statutory sequence in Article 13(12) is respected;
5. lay down the **prohibitions**, the relationship with other Union harmonisation legislation, and the requirements on records and verification.

### 1.2 Legal basis

| Reference | Substance | Where it is implemented in this document |
|---|---|---|
| Article 29 | The CE marking is subject to the general principles set out in Article 30 of Regulation (EC) No 765/2008 | Sections 1.2, 3, 5 and 7 |
| Article 30(1) | The CE marking shall be affixed **visibly, legibly and indelibly** to the product; where that is not possible or not warranted on account of the nature of the product, it shall be affixed to the packaging and to the accompanying EU declaration of conformity. **For products in the form of software, the CE marking shall be affixed to the EU declaration of conformity or to the website accompanying the software product; in the latter case, the relevant section of the website shall be easily and directly accessible to consumers** | Section 4 |
| Article 30(2) | On account of the nature of the product, the CE marking may be less than 5 mm in height, provided that it remains visible and legible | Section 5.2 |
| Article 30(3) | The CE marking shall be affixed before the product is placed on the market | Section 6 |
| Article 30(4) | Where a notified body is involved in the conformity assessment based on full quality assurance (Module H), the identification number of the notified body shall follow the CE marking | Sections 3.2, 5.5 and 7.3 |
| Article 30(5) | Where the product is also subject to other Union harmonisation legislation requiring the CE marking, the marking shall also indicate that it fulfils the requirements of that legislation | Section 8 |
| Article 30 of Regulation (EC) No 765/2008 | General principles governing the CE marking (affixing, prohibition of misleading markings, no addition of other markings likely to confuse third parties as to meaning or form) | Sections 3 and 7 |

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| Annex VIII, Part I, point 4.1 | The manufacturer shall affix the CE marking to each product that satisfies the applicable requirements of this Regulation | Section 6 |
| Article 13(12) | Once conformity has been demonstrated, draw up the EU declaration of conformity and affix the CE marking in accordance with Article 30 | Section 6 |
| Article 3 (definition of CE marking) | The CE marking is a marking by which the manufacturer indicates that the product and the processes it has put in place are in conformity with the essential requirements in Annex I and with other Union harmonisation legislation providing for its affixing | Section 3 |

Reference: Regulation (EU) 2024/2847, Article 29; Article 30(1), (2), (3), (4) and (5); Article 13(12); Article 3 (definition of the CE marking); Annex VIII, Part I, point 4.1; Regulation (EC) No 765/2008, Article 30.

### 1.3 Relationship with other documents

| Reference | Document | Relationship with this document |
|---|---|---|
| CRA-CA-001 | Conformity assessment record (Module A) | This document is the implementing rules for its row A-06; the conditions in its Section 7.2 are a core item of the preconditions in Section 6 of this document |
| CRA-DoC-001 | EU declaration of conformity | Section 4.1 of this document provides for the marking to be affixed on the first page of that declaration; until the declaration is signed the marking may not be affixed |
| CRA-TD-001 | Technical documentation | The technical documentation item in the preconditions is governed by it; the evidence of affixing is kept with it |
| CRA-TR-001 | Test report | The testing item in the preconditions requires that its testing has been executed |
| CRA-RET-001 | Documentation retention and access | Storage of the evidence of affixing, the responsible person and the backup strategy |

# 2. Form of the product and the preliminary determination on how to affix

### 2.1 Form of the product

NFT is a **software-only product**, distributed as a locally installed package, with no hardware components, no physical packaging and no nameplate or label on which a physical marking could be affixed.

### 2.2 Preliminary determination

Under Article 30(1), first sentence, the CE marking is to be affixed to the product; where that is **not possible or not warranted** on account of the nature of the product, it is to be affixed to the packaging and to the accompanying EU declaration of conformity. For this product:

6. affixing the marking to the "product itself" is technically possible (for example by rendering it in the software interface), but doing so **alone does not satisfy** the third sentence of Article 30(1), which lays down a specific rule for products in the form of software;
7. the product has **no physical packaging**, so affixing to the packaging does not apply;
8. the third sentence of Article 30(1) therefore applies: **for products in the form of software, the CE marking shall be affixed to the EU declaration of conformity or to the website accompanying the software product**.

Reference: Regulation (EU) 2024/2847, Article 30(1).

## 3. What the CE marking means and what it does not mean

### 3.1 What it means

Under the definition in Article 3, **the CE marking is a marking by which the manufacturer indicates that the product and the processes it has put in place are in conformity with the essential requirements in Annex I and with other Union harmonisation legislation providing for its affixing**. As applied to this product, affixing the CE marking indicates specifically that:

9. the manufacturer has completed the conformity assessment under Module A (internal control) set out in Annex VIII, Part I;
10. the manufacturer has drawn up and signed the EU declaration of conformity (CRA-DoC-001) under Article 28;
11. the manufacturer declares, under its sole responsibility, that the product satisfies the essential requirements in Annex I, Part I that apply to it and that the manufacturer meets the essential requirements in Annex I, Part II (Annex VIII, Part I, point 1).

### 3.2 What it does not mean

The manufacturer observes the following discipline in all external communications (website, forum, product interface, promotional materials, tender documents and replies to customers). **The CE marking does not indicate:**

12. **a quality mark** — it does not indicate the strength of functionality, performance, the success rate of recovery or the quality of the user experience;

13. **a guarantee of security** — it does not indicate that the product is free of vulnerabilities or cannot be compromised, and it is not a commitment by the manufacturer to "zero vulnerabilities";
14. **a mark of origin** — it does not indicate that the product was designed, developed or manufactured within the Union. This product is developed by a manufacturer established in Dalian, China, and that fact may not be obscured by the CE marking in any context;
15. **third-party verification** — this product is assessed under Module A with **no notified body involved**, so the marking does not indicate that any third party has tested or certified the product;
16. **conformity with other legislation** — it indicates conformity only with the essential requirements in Annex I to Regulation (EU) 2024/2847, and not conformity with the GDPR, NIS2, the Radio Equipment Directive or any other law (Section 8);
17. **an unconditional state of compliance** — the product has been assessed at a specific version; a version that has not been assessed may not continue to use the same marking (Section 7.4).

### 3.3 No markings likely to confuse may be added

Under the general principles in Article 30 of Regulation (EC) No 765/2008, as referred to by Article 29, no marking, sign or wording **likely to confuse third parties as to the meaning or the form of the CE marking** may be added to the product, its packaging or the accompanying documents.

The manufacturer's specific rules are:

18. on the compliance page of the website and on the first page of the declaration, no other certification badge, security icon or rating mark may be placed within the minimum clear space not less than half the height of the CE marking around the CE marking;
19. no self-devised sign resembling the CE marking may be used (for example a combination of letters shaped like "CE");
20. no wording implying third-party verification or official approval, such as "certified", "approved by" or "EU verified", may be placed next to the CE marking;
21. content that may coexist but must be clearly distinguished: the manufacturer's trade mark, the product name, the version number, the declaration reference and the date of publication. Those items are placed outside the marking as text and must not be capable of being read as part of it.

Reference: Regulation (EU) 2024/2847, Article 29; Article 3 (definition of the CE marking); Annex VIII, Part I, point 1; Regulation (EC) No 765/2008, Article 30.

## 4. Where the marking is affixed (software-only product)

### 4.1 Statutory requirement (substance of Article 30(1))

> *"The CE marking shall be affixed **visibly, legibly and indelibly** to the product. Where that is not possible or not warranted on account of the nature of the product, it shall be affixed to the packaging and to the accompanying EU declaration of conformity. **For products in the form of software, the CE marking shall be affixed to the EU declaration of conformity or to the website accompanying the software product. In the latter case, the relevant section of the website shall be easily and directly accessible to consumers.**"*

## 4.2 Locations decided for this product

The manufacturer uses **both of the following locations**, so that conformity can be verified both by market surveillance authorities and by users:

**(a) On the first page of the EU declaration of conformity (CRA-DoC-001)**

22. Location: the first page of CRA-DoC-001, after the document information table and before the title of the body of the text;
23. Specification: vector artwork, not less than 5 mm in height (Section 5.2);
24. The full declaration is published at https://www.flash-tracer.com/about.html (P11) and is provided with the product in the form of a simplified declaration (Article 13(20));
25. Under the third sentence of Article 30(1) (the specific rule for products in the form of software), that declaration is the "accompanying EU declaration of conformity", so affixing the marking to it is the **primary means of affixing** for this product.

**(b) On the website accompanying the software product — a dedicated compliance page**

26. Location: https://www.flash-tracer.com/about.html (CE-01);
27. **Accessibility requirement (statutory):** under Article 30(1), third sentence, the relevant section of the website **shall be easily and directly accessible to consumers**. The page must therefore:
28. be reachable from the home page of the website in **at most one click** (a permanent "Compliance" link in the footer);
29. be viewable without logging in, without completing a form, and without any interaction beyond dismissing the cookie banner;
30. state in text near the CE marking: "The CE marking indicates that this product is in conformity with the essential requirements set out in Annex I to Regulation (EU) 2024/2847 (Cyber Resilience Act)";
31. also provide a link to, or an embedded copy of, the full EU declaration of conformity;
32. remain online for **at least 10 years after the product has been placed on the market or for the support period, whichever is longer** (the requirement in Article 13(18) for information provided online).
33. The page must be printable and savable in the ordinary way, so that market surveillance authorities can retain a copy.

**(c) Supplementary reproduction in the "About" dialog of the software (optional)**

34. Location: within "Help — About Nand Flash Tracer", on the same screen as the version number, the internal build identifier and the manufacturer's name and address;

35. Nature: a **supplementary, non-independent** reproduction that is clearly legible, and which **does not replace** either (a) or (b);
36. Size: because the dialog constrains the layout, the derogation in Article 30(2) may be relied on (height of less than 5 mm), but the marking **must remain visible and legible** (Section 5.2);
37. Implementation status: The CE marking is affixed on the compliance page and in the About dialog of the software; implemented in the current release. (CE-05)

    *Note: Article 30(1), third sentence, offers a choice ("or") for products in the form of software. The manufacturer uses both locations because the first page of the declaration serves authorities verifying documentation, while the website page serves the direct accessibility required for consumers and users. Using both does not breach that provision and better satisfies the requirement that the marking be easily and directly accessible to consumers.*

Reference: Regulation (EU) 2024/2847, Article 30(1); Article 13(18) and (20).

# 5. Graphic specification

## 5.1 Form of the marking

38. The CE marking consists of the letters **C** and **E** in the form established by the general Union legislation. Its construction is:
39. **the letter C**: built from two **concentric** circles — the stroke of the C is formed by the annular part between the outer and the inner circle, the two circles sharing the same centre;
40. **the letter E**: formed of one vertical line and three horizontal lines, the top and bottom of the vertical line being aligned with the top and bottom of the C;
41. the **various components of the marking must have substantially the same vertical dimension**;
42. the overall proportions of the marking (height-to-width ratio, stroke weight and spacing) must follow the official artwork exactly; the proportions must not be altered when it is enlarged or reduced.
43. The authoritative artwork of the marking is contained in the CE marking artwork file established by the general Union legislation. The authoritative CE marking artwork follows the Union specification (Regulation (EU) 2024/2847, Annex VIII); the controlled artwork file (CE_Marking.svg, v1.0) is stored on the local data-backup server. (CE-02)
44. It is **prohibited** to draw the marking by hand, to substitute an approximating typeface, or to modify the official artwork in any way (including altering the stroke proportions, altering the letter spacing, or adding an outline, a shadow, a gradient or a three-dimensional effect).

## 5.2 Size

| Item | Specification | Reference |
|---|---|---|
| General minimum height | **5 mm** | General rule (general principles governing the CE marking) |
| Derogation | On account of the nature of the product, the CE marking | Article 30(2) |

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|---|---|---|
| | **may be less than 5 mm in height**, provided that **it remains visible and legible** | |
| As applied to this product | (a) first page of the declaration: not less than 5 mm; (b) compliance page of the website: not less than 5 mm, with an equivalent display of not less than 5 mm on mobile devices in the responsive layout; (c) "About" dialog: may be less than 5 mm, but must remain visible and legible | Article 30(1) and (2) |
| Enlargement | Permitted, provided the proportions are not altered | Section 5.1 |

*Note: the derogation in Article 30(2) is conditioned on "the nature of the product" and is continuously constrained by the requirement that the marking remain "visible and legible". The "About" dialog of software is constrained by its layout and is a typical case for that derogation;* ***but even where the derogation applies, the marking may not be so small as to be unrecognisable****.*

## 5.3 Colour and contrast

45. The marking is to be reproduced in a **single colour**, normally black on a white background, or the reverse (white on a black background);
46. Another single colour may be used, provided that it affords **sufficient contrast** with the background; multi-colour, gradient and semi-transparent treatments are not permitted;
47. Low-contrast combinations (for example a light grey marking on a white background) are not permitted;
48. Where the marking appears in a dark website footer, the reversed-out version is to be used, with no reduction in contrast.

## 5.4 Prohibitions (graphic level)

49. The proportions must not be altered (stretched, squashed, skewed or rotated);
50. The colour rules must not be altered (multi-colour, gradient, shadow, glow or three-dimensional treatment);
51. **No additional pictogram or sign may be attached**, unless Union law provides for it (Section 5.5);
52. The marking may not be used as part of a trade mark or logo, or embedded in the manufacturer's own trade mark device;
53. A low-resolution bitmap may not be stretched to size; even for screen display a vector file or a bitmap of sufficient resolution is to be used (Section 5.6).

## 5.5 Additional pictograms

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**).

**This product is assessed under Module A, with no notified body involved, and therefore:**

54. **no notified body identification number is added after the CE marking**;
55. apart from that identification number, Union law provides for no other pictogram or sign to be attached to the CE marking for this product, so the CE marking for this product is **used on its own, with nothing attached to it**.

Reference: Regulation (EU) 2024/2847, Article 30(4).

### 5.6 Minimum clear space

56. A **minimum clear space** is to be kept around the marking, in which no text, graphic, border or background pattern may appear;
57. Size of the minimum clear space: not less than half the height of the CE marking (CE-03)
58. No other marking likely to confuse third parties as to the meaning of the CE marking may appear within that clear space either (Section 3.3).

### 5.7 File storage and version control

| Item | Requirement |
|---|---|
| Format | Vector (SVG) is the authoritative version; PNG (transparent background, shorter side not less than 300 px) also stored for the website and the dialog |
| Naming | `ce-marking-cecra-v1.svg`, `ce-marking-cecra-v1.png` (no variant identifier other than the version number in the file name) |
| Storage location | Local data server; Zhou Yang (CE-04) |
| Version control | The artwork files are brought under change management; any replacement requires the approval of the reviewer (Zhou Yang) and the date of, and reason for, the replacement is recorded |
| Prohibited | Artwork arbitrarily downloaded from internet search results may not be used; screenshots or re-compressed artwork may not be used |
| Backup | Backed up together with the technical documentation for the period laid down in Article 13(13) |

Reference: Regulation (EU) 2024/2847, Article 30(1), (2) and (4); Article 29; Regulation (EC) No 765/2008, Article 30.

## 6. When the marking may be affixed and the preconditions

### 6.1 Statutory timing (Article 30(3))

**The CE marking shall be affixed before the product is placed on the market.** Read with the statutory sequence in Article 13(12) (draw up the technical documentation; carry out the conformity assessment procedure; draw up the EU

declaration of conformity once conformity has been demonstrated; affix the CE marking in accordance with Article 30), affixing must occur:

59. **after** the conformity assessment has been completed and conformity has been demonstrated; and
60. **after** the EU declaration of conformity (CRA-DoC-001) has been signed; and
61. **before** the product is placed on the EU market.

***Important: as at 3 September 2026 the CE marking has not yet been affixed to this product. The test cases in the test report (CRA-TR-001) were executed on 27 August 2026 with the result "Passed"; it remains to be confirmed whether all remaining conditions in CRA-CA-001, Section 7.2 have been met, in particular closure of the outstanding placeholders and signature of CRA-DoC-001. Until that confirmation is recorded, the CE marking must not be used on the website, in a draft declaration, in promotional materials or in the product interface.***

## 6.2 Pre-condition checklist

Before affixing, each item is to be checked and the check recorded. The marking may be affixed only where the answer to **every** item is yes:

| No. | Precondition | Reference | Evidence for the check | Status |
|---|---|---|---|---|
| 1 | The technical documentation has been drawn up and is complete (Annex VII, points 1 to 8) | Article 13(12); Article 31 | CRA-TD-001, together with CRA-RA-001, CRA-TR-001 and CRA-SBOM-001, which it references | 3 September 2026; Zhou Yang |
| 2 | The cybersecurity risk assessment has been completed and included in the technical documentation | Article 13(2), (3) and (4) | CRA-RA-001 | 3 September 2026; Zhou Yang |
| 3 | The testing has been executed and passed (including the exercise of the vulnerability handling process) | Annex VII, point 6; Annex I, Part II, point (3) | CRA-TR-001, Sections 5, 6, 7 and 8 | 3 September 2026; Zhou Yang (P09, TR-21, TR-22, TR-23) |
| 4 | No residual risk or finding rated "critical" or "high" remains unresolved | CRA-RA-001, Section 8.3; CRA-CA-001, Section 5.2 | CRA-TR-001, Section 7; CRA-CA-001, Section 5 | 3 September 2026; Zhou Yang |
| 5 | The EU declaration of conformity (CRA-DoC-001) | Article 28; Annex VIII, Part I, point 4.2 | The signed CRA-DoC-001 (showing the date of | 3 September 2026; Zhou Yang (CA-01) |

| | | | | |
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| | has been signed | | signature) | |
| 6 | The user information and instructions (Annex II, points 1 to 9) accompany the product and have been published | Article 13(18); Annex II | CRA-TD-001, Annexes A.1 to A.9; the means of accompanying the product and the website page | 3 September 2026; Zhou Yang |
| 7 | The single point of contact has been published (and is not limited to automated tools) | Article 13(17); Annex II, point 2 | URL of the page on the website on which it is published, and the screenshot as evidence | 3 September 2026; Zhou Yang (P01) |
| 8 | The end date of the support period (February 2029) is stated in an easily accessible manner at the time of purchase | Article 13(19); Annex II, point 7 | Screenshots of the purchase page and the order confirmation page as evidence | 3 September 2026; Zhou Yang (P18) |
| 9 | The SBOM has been drawn up and retained and can be provided on a reasoned request | Annex VII, points 2(b) and 8; Annex I, Part II, point (1) | CRA-SBOM-001 | 3 September 2026; Zhou Yang (P12) |
| 10 | The locations for affixing are ready (the layout of the first page of the declaration; the URL of the compliance page on the website is live and reachable) | Article 30(1) | The URL and the record verifying accessibility | 3 September 2026; Zhou Yang (CE-01) |
| 11 | The CE marking artwork file is the controlled version referred to in Section 5.7 | Section 5 | The version of the artwork file and its storage record | 3 September 2026; Zhou Yang (CE-02, CE-04) |
| 12 | It has been confirmed that no notified body identification number is added | Article 30(4) | Section 5.5 of this document; item 7 of CRA-DoC-001 | 3 September 2026; Zhou Yang |

## 6.3 Execution of affixing and records

62. The pre-condition checklist is checked item by item, with the date of the check entered, by the compliance and documentation lead (Jin Cancan); the reviewer (Zhou Yang) reviews it and approves affixing;
63. Once affixing is complete, a **verification record** is retained for each of the two locations: a full-page screenshot (showing the address bar and the date), a PDF copy of the first page of the signed declaration, and (where Section 4.2(c) is used) a screenshot of the "About" dialog of the software;
64. The verification record is stored at Local data server (CA-06) and kept with the technical documentation (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);
65. The date of affixing may not be earlier than the date of signature of CRA-DoC-001, and may not be later than the date on which the product is placed on the EU market.

Reference: Regulation (EU) 2024/2847, Article 30(3); Article 13(12), (17), (18) and (19); Annex VIII, Part I, points 4.1 and 4.2.

# 7. What must not be done

## 7.1 The marking must not be affixed before the assessment is complete and the declaration signed

Until every item in the pre-condition checklist in Section 6.2 is met, the CE marking **must not be used on the website, in a draft declaration, in the installation package, in the product interface, in promotional materials, in tender documents, on business cards or on any other external medium**, and no wording such as "CE marking imminent" or "CE marking applied for" may be used to imply that conformity has been established.

## 7.2 The marking must not be affixed to pre-release, test, beta, alpha or prototype versions

66. **Pre-release, beta, alpha and release-candidate versions, internal test builds, prototypes and demonstration versions may not bear the CE marking**, and it may not be used in the declaration accompanying them or on the website pages for them;
67. Where such versions are distributed to users, the download page and the software itself must clearly identify them as pre-release versions;
68. **On unfinished software (recital 37):** under recital 37, a manufacturer may make unfinished software available for testing purposes; such making available is to be limited to the **time necessary for testing**, is to be accompanied by a risk assessment, and the unfinished software is to comply with the applicable requirements of this Regulation to the extent possible. The manufacturer accordingly provides that:
69. pre-release versions provided to testers are to be subject to a defined testing period, notified to them in writing;

70. before they are provided, the risk to the user's environment is to be assessed (the methodology in CRA-RA-001 may be used, supplemented by an assessment of the differences);
71. to the extent possible, the pre-release version is to meet the applicable requirements in Annex I, and must at least not introduce any known high-severity defect;
72. pre-release versions are **not** accompanied by an EU declaration of conformity, and the CE marking must not appear on their download page or in the software.

## 7.3 No notified body number may be added

This product is assessed under Module A, with no notified body involved. Under Article 30(4), **no notified body identification number is added after the CE marking**. Any practice of placing a four-digit number after the CE marking would, for this product, be a **misrepresentation** and would breach Article 30(4).

## 7.4 The marking must not be affixed to a version that has not been assessed

73. Affixing is done in respect of a **specific version** (item 4 of CRA-DoC-001 identifies Ver 2.26.8 only);
74. Earlier and later versions must **each complete their own conformity assessment** before the marking may be affixed or continue to be used;
75. Use of the CE marking is to cease, and the relevant page content withdrawn, until the re-assessment is complete, where:
76. the product undergoes a substantial modification (Article 3(30); the four cases listed in CRA-CA-001, Section 8.1);
77. the classification changes and Module A ceases to be available;
78. an unresolved non-conformity rated "critical" or "high" emerges;
79. circumstances arise in which corrective measures or withdrawal or recall are required under Article 13(21).

## 7.5 No implication of conformity with legislation that does not apply

The CE marking indicates conformity only with the essential requirements in Annex I to Regulation (EU) 2024/2847 (Section 3.2, point 5). Wording such as "GDPR compliant", "NIS2 certified", "compliant with the Radio Equipment Directive" or "compliant with the medical devices legislation" **must not** be placed near the CE marking, unless that legislation actually applies and its own conformity procedures have been completed separately (Section 8).

## 7.6 No distortion

Under the general principles in Article 30 of Regulation (EC) No 765/2008 and Section 5.4: the marking may not be stretched, squashed, skewed, rotated, recoloured, given a shadow or gradient, stretched from a low-resolution bitmap, embedded in a trade mark, or treated in any way that alters its form.

## 7.7 No confusing wording

The CE marking for this product must not be described using wording such as "CE certification", "CE certificate", "EU approved" or "officially certified". The correct wording is: "This product bears the CE marking, by which the manufacturer indicates that it is in conformity with the essential requirements set out in Annex I to Regulation (EU) 2024/2847 (Cyber Resilience Act)."

Reference: Regulation (EU) 2024/2847, Article 30(1), (3) and (4); Article 13(12) and (21); Article 3(30); recital 37; Regulation (EC) No 765/2008, Article 30.

# 8. Relationship with other Union harmonisation legislation (Article 30(5))

## 8.1 Assessment

Under Article 30(5), where the product is also subject to other Union harmonisation legislation requiring the CE marking, the marking is also to indicate that it fulfils the requirements of that legislation. The manufacturer's assessment for this product is as follows:

| Legislation | Applicable | Reasons for the assessment |
|---|---|---|
| Radio Equipment Directive (RED, Directive 2014/53/EU) | **No** | The product is software only, contains no radio equipment and does not use the radio spectrum to communicate |
| Electromagnetic Compatibility Directive (EMC, Directive 2014/30/EU) | **No** | The product is software only and is not an apparatus or a fixed installation; it neither generates nor is susceptible to electromagnetic disturbance as such |
| Low Voltage Directive (LVD, Directive 2014/35/EU) | **No** | The product is software only and involves no electrical equipment |
| Machinery Regulation (Regulation (EU) 2023/1230) | **No** | The product is not machinery or a partly completed machine |
| RoHS Directive (Directive 2011/65/EU) | **No** | The product is software only and contains no electrical or electronic parts or homogeneous materials |
| Medical Device Regulation (Regulation (EU) 2017/745) | **No** | The product is not a medical device and is not intended for the diagnosis, treatment, monitoring or alleviation of disease |
| Artificial Intelligence Act (Regulation (EU) 2024/1689) | **No** | The product is a rule-based, deterministic parsing and reconstruction tool and does not constitute an AI system under that Regulation; it has no high-risk AI system characteristics |

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| General Data Protection Regulation (GDPR, Regulation (EU) 2016/679) | **Not legislation providing for the CE marking** | The GDPR provides for no CE marking; its obligations fall on the user as data controller and on the manufacturer in its own role. The product collects no personal data (CRA-TD-001, Section 3.4) |
| NIS2 Directive (Directive (EU) 2022/2555) | **Not legislation providing for the CE marking** | NIS2 imposes obligations on entities and sectors and provides for no product CE marking |

**Conclusion: as at the date of this document (3 September 2026), NFT is not subject to any other Union harmonisation legislation requiring the CE marking.** The CE marking for this product therefore indicates conformity with Regulation (EU) 2024/2847 only, and, under Article 28(3), a single EU declaration of conformity (namely CRA-DoC-001) is required.

### 8.2 Rule where this changes

If that assessment changes — for example, if the product is later placed on the market bundled with dedicated hardware reading equipment, or acquires radio communication capability and thereby falls within the scope of the RED and the EMC Directive:

80. under Article 30(5), **the CE marking is also to indicate that the product fulfils the requirements of that legislation**;
81. under Article 28(3), a **single** EU declaration of conformity is to be drawn up, identifying every legal act concerned (including its publication reference); the legislation concerned may not be covered by separate declarations;
82. the conformity assessment of the product is to be repeated, and CRA-CA-001, CRA-DoC-001 and this document updated;
83. where a re-assessment is triggered, CRA-CA-001, Section 8 applies.

Reference: Regulation (EU) 2024/2847, Article 30(5); Article 28(3).

## 9. Records and verification

### 9.1 Evidence retained

The following evidence is kept with the technical documentation (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):

84. this document (CRA-CE-001) and each of its successive versions;
85. the record of the check of the pre-condition checklist in Section 6.2 (including the date of the check and the signature of the person checking);
86. the verification record of affixing referred to in Section 6.3 (screenshots and PDF copies for the two locations);
87. successive content snapshots of the compliance page on the website and the record of any change of URL;

88. the controlled version of the CE marking artwork file and the record of replacements;
89. the records of the annual self-check in Section 9.2;
90. the records of any action taken under the corrective procedure for improper use in Section 9.3.

## 9.2 Annual self-check

91. **Frequency:** at least once every 12 months, in step with the cycles in CRA-RA-001, Section 10, CRA-TR-001, Section 1.3 and CRA-CA-001, Section 8.2;
92. **Responsibility:** carried out by the compliance and documentation lead (Jin Cancan) and reviewed by the head of development (Zhou Yang);
93. **Content:**
94. whether the marking is still present at both locations, is legible and is undistorted;
95. whether the URL of the compliance page on the website is unchanged and is still reachable in at most one click;
96. whether the declaration bearing the marking is the current valid version (version and date of signature of CRA-DoC-001);
97. whether there is any unauthorised use (third-party download sites, reseller pages, promotional materials);
98. whether any of the prohibitions in Section 7 has occurred;
99. whether the assessment of the applicability of legislation in Section 8.1 still holds;
100. **Records:** the outcome is entered in the self-check record and retained; any problem found is dealt with under Section 9.3.
101. First annual self-check: 3 September 2027; record stored on the local data-backup server. (CE-06)

## 9.3 Corrective procedure for improper use

Where improper use of the CE marking is found (including, but not limited to, affixing before the assessment is complete, affixing to a pre-release version, adding a notified body number, distortion of the marking, use after expiry of the assessed version, or unauthorised use by a third party), the following procedure applies:

| Step | Action | Owner | Time limit |
|---|---|---|---|
| 1 | Record the finding (date, person finding it, location of use, type of impropriety, screenshot evidence) | Jin Cancan | On the day it is found |
| 2 | **Stop the use immediately** (take down the page, withdraw the file, remove the material) | Jin Cancan | Within 24 hours of discovery |
| 3 | Assess the impact: whether it has caused misapprehension on the part of a market surveillance authority | Zhou Yang | Within 3 working days of discovery |

| | | | |
|---|---|---|---|
| | or of users; whether it constitutes a non-conformity under Article 13(21) | | |
| 4 | Take corrective action: correct the marking, correct the wording, notify known affected parties; where non-conformity is involved, take the corrective measures, or withdraw or recall the product, under Article 13(21) | Zhou Yang | Determined by the outcome of the assessment; Corrective-action time limits: unsafe/critical use — immediate (within 24 h); other improper use — within 30 days or the next release, whichever is earlier. |
| 5 | Trace the cause and update this document or the relevant process to prevent recurrence | Jin Cancan | Within 10 working days of correction |
| 6 | Retain all records of the action taken | Jin Cancan | Kept together with Section 9.1 |

*Note: the manufacturer is a micro/small enterprise and cannot monitor third-party websites across the board. Discovery is limited to the annual self-check, routine inspection of the website and the forum, reports received through the single point of contact, and notifications from market surveillance authorities. The manufacturer makes no commitment to monitor third-party download sites in real time, but* ***once it becomes aware of unauthorised use of the CE marking by a third party, it will take reasonable steps to require that party to remove it****.*

Reference: Regulation (EU) 2024/2847, Article 13(13) and (21); Article 30(1), (3), (4) and (5); Annex VIII, Part I, point 4.1.

# 10. Items pending confirmation (consolidated list of placeholders)

| No. | Placeholder | Where it occurs |
|---|---|---|
| CE-01 | https://www.flash-tracer.com/about.html | 4.2(b); 6.2, item 10 |
| CE-02 | The authoritative CE marking artwork follows the Union specification (Regulation (EU) 2024/2847, Annex VIII); the controlled artwork file (CE_Marking.svg, v1.0) is stored on the local data-backup server. | 5.1, 5.7; 6.2, item 11 |
| CE-03 | not less than half the height of the CE marking | 3.3, 5.6 |
| CE-04 | Local data server; Zhou Yang | 5.7; 6.2, item 11 |
| CE-05 | The CE marking is affixed on the compliance page and in the About dialog of the software; implemented in the | 4.2(c) |

| | | |
|---|---|---|
| | current release. | |
| CE-06 | First annual self-check: 3 September 2027; record stored on the local data-backup server. | 9.2 |
| CE-07 | Corrective-action time limits: unsafe/critical use — immediate (within 24 h); other improper use — within 30 days or the next release, whichever is earlier. | 9.3 |
| CA-06 | Local data server | 6.3, 9.1 |
| P01 | https://www.flash-tracer.com/about.html; September 3, 2026 | 6.2, item 7 |
| P04 | NFT-2.26.8-20260826 | 4.2(c) (shown on the same screen as the version number) |
| P09 | Test completion date: 24 August 2026; scope: all applicable cases in CRA-TR-001 Sections 5–7; overall conclusion: Passed. | 6.2, item 3 |
| P11 | https://www.flash-tracer.com/about.html | 4.2(a) and (b) |
| P12 | File name: CRA-SBOM-001.spdx.json; format: SPDX 2.3 (JSON); generated with an SCA tool (Syft/CycloneDX); published at https://www.flash-tracer.com/about.html. | 6.2, item 9 |
| P18 | Local data server | 6.2, item 8 |
| TR-21 | The tabletop exercise was completed; all steps executed within the defined deadlines; no critical gaps identified; improvements registered in CRA-TR-001 Section 6.4. | 6.2, item 3 |
| TR-22 | Pass; August 27, 2026; Jin Cancan | 6.2, item 3 |
| TR-23 | All applicable essential requirements of Annex I, Parts I and II were verified; the product passed all test cases; no unresolved critical or high findings remain. Conclusion: the object under test conforms to the applicable requirements. | 6.2, item 3 |

# Signature record

| Role | Name | Signature | Date |
|---|---|---|---|
| Prepared by | Jin Cancan | | 3 September 2026 |

| | | | |
|---|---|---|---|
| (compliance and documentation lead) | | | |
| Reviewed by (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 rules in Sections 4, 5, 6, 7 and 8 have been reviewed and are in force.* ***Affixing the CE marking in practice remains subject to every item in the pre-condition checklist in Section 6.2 being met and to the reviewer approving affixing.***