

Item	Content
Document reference	CRA-DoC-001
Version	V1.0
Date of issue	3 September 2026
Prepared by	Jin Cancan
Reviewed by	Zhou Yang
Approved by (signatory)	Zhou Yang
Product covered	Nand Flash Tracer (NFT), software only, assessed baseline version Ver 2.26.8
Language	English version — Official Version for EU Market Surveillance Authorities

EU Declaration of Conformity

*Note: this document is a **legal document awaiting signature**. The English version is the official version for EU market surveillance authorities; the Chinese version (CRA-DoC-001 V1.0, Internal Working Version) is its counterpart and the two are identical in substance.*

Under Article 28(2), this declaration is to be provided in the language required by the Member State in which the product is placed or made available; the manufacturer issues it in both Chinese and English and provides the user information and instructions in a language easily understood by users and market surveillance authorities, as required by Article 13(18).

Important: this declaration takes effect only on signature. Under Article 13(12), it may be drawn up and signed only after the technical documentation has been drawn up, the conformity assessment procedure has been carried out and conformity has been demonstrated. Until every condition set out in CRA-CA-001, Section 7.2 has been met and the testing in CRA-TR-001 has been executed, **this declaration must not be signed and the CE marking must not be affixed.**

This declaration is drawn up in accordance with Article 28 of Regulation (EU) 2024/2847 and with Annex V, and is structured item by item in the order of Annex V, points 1 to 8.

Item 1 (Annex V, point 1): Name and type of the product and any additional information enabling its unique identification

Item	Content
Product name	Nand Flash Tracer (NFT)
Product type	Software; a product containing no hardware components
Version	Ver 2.26.8
Internal build identifier	NFT-2.26.8-20260826 (P04)
Release date	26 August 2026 (DoC-01)
Form of distribution	A locally installed package (Windows installer) downloaded from the manufacturer's official channels; no cloud services are provided with it
Intended platform	Windows 7 / 10 / 11 (local stand-alone)

	installation; no cloud services; no remote data processing)
Intended purpose	Parsing, virtual page reassembly and data reconstruction of raw dump images obtained by chip-off reading of NAND Flash, for use by professional data recovery laboratories, data recovery technicians and digital forensic bodies

*Note: under Article 13(15), the product is to bear a type, batch or serial number or other element allowing its identification. As this product is software only, the **version number together with the internal build identifier** serves as the identifying element and is shown in the "About" dialog of the software and in the user information and instructions accompanying the product (CRA-TD-001, Section 2.1 and Annex A.3).*

Item 2 (Annex V, point 2): Name and address of the manufacturer or of its authorised representative

Manufacturer:

Item	Content
Name (English)	Dalian ByteSmart Technology Co., Ltd.
Name (Chinese)	大连比特智序科技有限公司
Registered address (English)	No.32, 1st Floor, No.555 Huanghe Road, Shahekou District, Dalian City, Liaoning Province, China
Registered address (Chinese)	中国辽宁省大连市沙河口区黄河路 555 号 1 层 32 号
Telephone	+86 15524692190
Email	nandflashtacer@gmail.com
Website	https://www.flash-tracer.com/

Place of establishment of the manufacturer: Dalian, People's Republic of China (established outside the Union).

Authorised representative: None appointed.

*Note: under Article 18(1), the manufacturer "**may**" appoint an authorised representative by written mandate — under the CRA that appointment is an **option, not a mandatory obligation**. The manufacturer has appointed no authorised representative, and this declaration is therefore **issued by the manufacturer directly**; the words "or of its authorised representative" in Annex V, point 2 do not apply. If an authorised representative is appointed in future, its name and address are to be entered in this item, and the mandate is to specify at least the obligations in Article 18(3): keeping the EU declaration of conformity and the technical documentation at the disposal of market surveillance authorities for at least 10 years after the product has been placed on the market or for the support period, whichever is longer; providing all the information and documentation necessary to demonstrate conformity on a reasoned request from a market surveillance authority; and cooperating with market surveillance authorities, at their request, on action taken to eliminate risks. Row A-08 of Section 4.2 of the conformity assessment record (CRA-CA-001) is to be updated in step (CA-05).*

Importer: the product is supplied by download directly from the manufacturer to users, and the manufacturer does **not** place it on the market through an importer established in the Union. Should an importer be involved in future, that importer's identity and obligations are a matter for that importer under this Regulation and are not recorded in this declaration.

Reference: Regulation (EU) 2024/2847, Article 18(1) and (3); Annex V, point 2.

Item 3 (Annex V, point 3): Statement that the declaration is issued under the sole responsibility of the provider

This EU declaration of conformity is issued under the sole responsibility of the provider (the manufacturer).

Under Annex VIII, Part I, point 1, the manufacturer, **under its sole responsibility**, ensures and declares that the product to which this declaration refers satisfies all 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.

The manufacturer is aware that under Article 28(4) **drawing up this 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).

Item 4 (Annex V, point 4): Object of the declaration (identification of the product allowing traceability)

The object of this declaration is:

Item	Content
Product name	Nand Flash Tracer (NFT)
Version	Ver 2.26.8
Internal build identifier	NFT-2.26.8-20260826 (P04)
SHA-256 checksum of the installer	MD5 checksum recorded in the release record (integrity verification method: MD5, per supplier policy; see P03). (TR-01)
Release date	26 August 2026 (DoC-01)
Traceability records	The build identifier is written into the "About" dialog of the software and into the user information and instructions; release records (including the build artefact and its checksum)

	are kept with the technical documentation (CRA-TD-001)
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*Note: Annex V, point 4 permits the inclusion of a photograph "where appropriate". This product is **software only and has no physical form**, so no photograph exists; traceability is achieved through the **version number, the internal build identifier and the SHA-256 checksum of the installer**.*

*Note: **this declaration refers only to the version identified in the table above**. Under Article 13(12), every other version, whether earlier or later, must complete its own conformity assessment before a separate declaration is issued or this declaration is updated. Under Article 13(19) and Article 28(2), this declaration is to be updated where appropriate.*

Reference: Regulation (EU) 2024/2847, Annex V, point 4; Article 13(15) and (19); Article 28(2).

Item 5 (Annex V, point 5): Statement that the object described is in conformity with the relevant Union harmonisation legislation

The manufacturer declares that the object described above is in conformity with the following Union harmonisation legislation:

Regulation (EU) 2024/2847 of the European Parliament and of the Council of 23 October 2024 on horizontal cybersecurity requirements for products with digital elements and amending Regulations (EU) No 168/2013 and (EU) No 2019/1020 and Directive (EU) 2020/1828 (Cyber Resilience Act) (OJ L, 2024/2847, 20.11.2024).

and further declares that:

- 1. Conformity with the essential requirements in Annex I has been demonstrated.** It has been demonstrated that the product conforms to the essential cybersecurity 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 the cybersecurity risk assessment, CRA-RA-001, Section 6, under Article 13(4)); and it has been demonstrated that the manufacturer meets the essential requirements in Annex I, Part II, points (1) to (8).
- 2. Conformity assessment procedure applied. Module A (internal control / self-assessment) set out in Annex VIII, Part I.** The product is a default / standard category product and falls within none of the categories in Annex III (important products) or Annex IV (critical products), so Module A applies (Article 32; scope and classification record CRA-CLASS-001 V2.1).
- 3. No notified body involved.** Module A is an internal control procedure and **does not involve a notified body**. No conformity assessment of this product has been carried out by any notified body, and the manufacturer holds no certificate issued

by a notified body. Item 7 of this declaration (notified body information) is therefore not applicable, and no notified body identification number follows the CE marking (Article 30(4)).

4. **Identification of the harmonisation legislation.** As at the date of signature of this declaration, the product is **not subject to any other Union legal act requiring an EU declaration of conformity**; accordingly, under Article 28(3), this declaration is a single declaration identifying only the one legal act named above.

Reference: Regulation (EU) 2024/2847, Article 28(1) and (3); Article 32; Article 30(4); Annex I; Annex VIII, Part I; Annex V, point 5.

Item 6 (Annex V, point 6): References to the relevant harmonised standards or other common specifications or cybersecurity certification used

No harmonised standard, common specification or cybersecurity certification has been applied. The manufacturer declares truthfully as follows:

5. **Harmonised standards: none.** As at the date of signature of this declaration (and as at 3 September 2026, the date of preparation of the technical documentation CRA-TD-001), **no citation of a CRA harmonised standard has been published in the Official Journal of the European Union (OJEU)**, so no harmonised standard is available to be applied. The 41 standards (including the EN 40000 series) entrusted to CEN/CENELEC/ETSI under standardisation request M/606 are **still under development**.
6. **Common specifications under Article 27: none.** As at the date of signature, no CRA common specification applicable to this product has been adopted by the Commission.
7. **European cybersecurity certification: none.** The manufacturer has applied or obtained no certification under any European cybersecurity certification scheme adopted pursuant to Regulation (EU) 2019/881.
8. **No presumption of conformity is claimed.** As none of the above harmonised standards, common specifications or certification schemes exists, the manufacturer **does not claim** the presumption of conformity under Article 27. Conformity has been demonstrated **directly against the essential requirements in Annex I, Parts I and II**.
9. **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**; it is not cited in this declaration.

Other technical specifications and internal measures relied upon to demonstrate conformity with the essential requirements in Annex I (under Annex VII, point 5, where no harmonised standard, common specification or certification scheme has been applied, the solutions adopted are to be described and

the list of other relevant technical specifications applied is to be given). The following are **references to methods, formats and industry practice only, and constitute no certification and no formal statement of conformity**:

Area	Technical specification or internal measure applied	Technical specification / industry practice referred to	Certification or formal conformity claimed
Component inventory (SBOM)	Software bill of materials drawn up in a commonly used, machine-readable format covering at least the top-level dependencies	SPDX 2.3 (JSON); ISO/IEC 5962	No
Vulnerability severity rating	Common vulnerability scoring system used to rate severity and remediation priority	CVSS v3.1 (migration to v4.0 to be assessed)	No
Weakness awareness	Common weakness lists used as a checklist for coding and review (with particular attention to input validation, memory safety, path handling and deserialisation)	CWE Top 25 and SANS Top 25 weakness lists used as reference	No
Risk management method	Qualitative asset—threat—impact risk matrix covering the design, development, production, delivery and maintenance stages	General risk management method of ISO/IEC 27005 used as reference (method only; no claim of ISO/IEC 27001 certification)	No
Secure development process	Layered architecture review, code review, pre-release security gate, change review	General practice of secure software development frameworks (SSDF-type) used as reference	No
Protection in transit	HTTPS (TLS 1.2 or higher) used throughout for licence activation and update checking	CRA-TD-001, Sections 3.3 and 4.3	No
Integrity of distribution	Official channels only, SHA-256 checksums published, monotonic version number check to prevent downgrading	CRA-TD-001, Sections 4.3, 5.5 and 5.6	No
Data protection	Data processed locally, no telemetry, no collection of	CRA-TD-001, Section 3.4	No

	personal data, encryption at rest relying on the host operating system		
Internal documentation set	Technical documentation, risk assessment, test report, SBOM, vulnerability handling procedure, coordinated vulnerability disclosure policy, security update distribution procedure, incident and vulnerability reporting procedure, CE marking usage rules	CRA-TD-001, CRA-RA-001, CRA-TR-001, CRA-SBOM-001, CRA-VHP-001, CRA-CVD-001, CRA-SUP-001, CRA-IRP-001, CRA-CE-001	No

*Commitment to monitor: the manufacturer will continuously monitor the publication of citations of CRA harmonised standards in the Official Journal of the European Union. **Within 6 months of the publication in the OJEU of a citation of a relevant harmonised standard or common specification**, it will complete a gap assessment and update item 6 of this declaration and Section 7 of the technical documentation (CRA-TD-001) where appropriate (CRA-TD-001, Section 7.4, point 3).*

Reference: Regulation (EU) 2024/2847, Annex V, point 6; Annex VII, point 5; Article 27; Article 31(2).

Item 7 (Annex V, point 7): Name and number of the notified body, description of the conformity assessment procedure performed and identification of the certificate issued

This item is not applicable.

Reasons:

10. This product is assessed under **Module A (internal control) set out in Annex VIII, Part I**. That procedure is carried out by the manufacturer internally and **does not involve a notified body**;
11. There is accordingly no name and number of a notified body, no conformity assessment procedure performed by a notified body, and no certificate issued by a notified body that could be identified;
12. Accordingly, 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). **No notified body identification number is added after the CE marking for this product**, and no

such number may appear in any document, promotional material or product interface;

13. This item is marked as not applicable by virtue of the qualifier "where applicable" in Annex V, point 7, and the fact is expressly stated in this declaration so that the item is not simply omitted.

Note: Annex V, point 7 is itself qualified by the words "where applicable". The manufacturer states truthfully that it does not apply, rather than leaving the item blank or removing it, so that market surveillance authorities can check the structural completeness of the declaration.

Reference: Regulation (EU) 2024/2847, Annex V, point 7; Annex VIII, Part I; Article 30(4); Article 32.

Item 8 (Annex V, point 8): Additional information

8.1 Support period and how its end date is communicated

Item	Content
Support period	10 February 2024 to 10 February 2029 (5 years)
End date of the support period	February 2029 (year and month stated)
Basis for determining the support period	Storage chips are generally superseded in less than 5 years; the product is a one-off perpetual-licence commercial tool and users reasonably expect a service life of around 5 years (Article 13(8); see CRA-TD-001, Sections 6.1 and 6.2)
How the end date is communicated at the time of purchase	"Support period until February 2029" is clearly stated in an easily accessible manner on the purchase page and the order confirmation page, and in the user information and instructions accompanying the product (CRA-TD-001, Annex A.7)
Notification that the support period has ended	Where technically feasible, users are shown a notification in the software that the support period has ended; implementation: A prompt is shown upon software startup after the licence expires. (Implemented in the current release.) (P17)
Continued availability of security updates	Each security update provided during the support period remains available for at least 10 years or for the remaining support period, whichever is longer , after its release (Article 13(9))

Reference: Regulation (EU) 2024/2847, Article 13(8), (9) and (19); Annex II, point 7.

8.2 Single point of contact for reporting vulnerabilities

Item	Content
Single point of contact	A dedicated vulnerability reporting channel is published on the compliance page https://www.flash-tracer.com/about.html (first published with the compliance page; screenshot archived in the release record). A

	dedicated mailbox security@flash-tracer.com is recommended and to be confirmed. (DoC-02)
Current contact address	nandflashtacer@gmail.com
Means of communication available	Three channels in parallel: email, the contact form on the website, and a private message on the forum
Not limited to automated tools	Under Article 13(17), the single point of contact shall allow users to choose their preferred means of communication and shall not be limited to automated tools. The manufacturer imposes no mandatory web form or bot as the sole channel
Where it is published	In the user information and instructions accompanying the product (CRA-TD-001, Annex A.2); on the website at: https://www.flash-tracer.com/about.html (P01)
Acknowledgement of receipt	Reports concerning security vulnerabilities will be acknowledged within 3 working days
Coordinated vulnerability disclosure policy	Coordinated vulnerability disclosure policy CRA-CVD-001, obtainable through the single point of contact above and published on the website notice board and as a pinned post on the forum

Reference: Regulation (EU) 2024/2847, Article 13(17); Annex I, Part II, points (5) and (6); Annex II, point 2.

8.3 Internet address at which the full declaration is published

The full text of this EU declaration of conformity is published at:

<https://www.flash-tracer.com/about.html> (P11)

That address is the "internet address at which the EU declaration of conformity can be consulted" required by Annex II, point 6, and is recorded in the user information and instructions accompanying the product (CRA-TD-001, Annex A.6). Where provided online, the address is to remain accessible and user friendly and is to remain online for at least **10 years after the product has been placed on the market or for the support period, whichever is longer** (Article 13(18)).

8.4 Simplified declaration

Under Article 13(20), the manufacturer may provide a simplified declaration (following the model in Annex VI) accompanying the product, which **must contain the exact internet address at which the full declaration can be consulted:**

Exact internet address stated in the simplified declaration: <https://www.flash-tracer.com/about.html> (P11)

Form in which the simplified declaration accompanies the product: Provided as a separate file (CRA-DoC-001) in the installation directory and linked from the compliance page. (DoC-03)

*Note: the internet address in the simplified declaration must be **identical word for word** to the address in Section 8.3. If that address changes, the simplified declaration must be*

updated and redistributed in step, failing which the manufacturer would be in breach of Article 13(20).

Reference: Regulation (EU) 2024/2847, Article 13(20); Article 28(2); Annex VI.

8.5 Software bill of materials (SBOM)

The manufacturer has drawn up a software bill of materials (**CRA-SBOM-001**) under Annex I, Part II, point (1) and Annex VII, point 2(b), in SPDX 2.3 (JSON) format, covering at least the top-level dependencies of the product and updated before every external release.

The SBOM is not published by default. Under Annex VII, point 8, the manufacturer provides the SBOM **on a reasoned request from a market surveillance authority** (the request having to be necessary for the purpose of verifying conformity with the essential requirements in Annex I), in a format and language that can be understood. Business users and integrators may also request it through the single point of contact in Section 8.2, and the manufacturer will provide it after verifying the identity of the requester. The SBOM is kept together with the technical documentation for the period laid down in Article 13(13).

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>. (P12)

Reference: Regulation (EU) 2024/2847, Annex VII, points 2(b) and 8; Annex I, Part II, point (1); Article 13(5), (13) and (22).

8.6 Language

This EU declaration of conformity is issued in the Chinese and English languages, the two versions being counterparts. The English version is the official version for EU market surveillance authorities.

Under Article 28(2), this declaration is to be provided in the language required by the Member State in which the product is placed or made available. **Where a Member State requires another language for the market in which the product is placed, the manufacturer will provide a translation for that market.** Translations are kept with the English version and made available to national competent authorities under Annex VIII, Part I, point 4.2.

Targeted Union markets: to be confirmed at first EU placement (product distributed via the website); the simplified declaration is provided in English with additional Union-language versions to be added per target market. (DoC-04)

Note: under Article 13(18), the user information and instructions are to be provided in a language easily understood by users and market surveillance authorities; the manufacturer provides them in Chinese and English and will add local language versions as required by the target Member States.

Reference: Regulation (EU) 2024/2847, Article 28(2); Article 13(18); Annex VIII, Part I, point 4.2.

Signature

Signed for and on behalf of: Dalian ByteSmart Technology Co., Ltd. / 大连比特智序科技有限公司

Item	Content
Place of issue	Dalian, China
Date of issue	September 3, 2026 (CA-01)
Name	Zhou Yang (周洋)
Function	Legal Representative (法定代表人)
Signature	

*Note: the date of issue **may not be earlier than** the date on which every condition in CRA-CA-001, Section 7.2 has been met (that is, the date of completion of that assessment, CA-02), nor earlier than the date on which the testing in CRA-TR-001 has been executed and confirms that no unresolved High or Critical issue remains. **This declaration takes effect only on signature.** Any version before signature is a draft, has no legal effect and may not be relied on to affix the CE marking.*

Reference: Regulation (EU) 2024/2847, Annex V, point 8 (place and date of issue; name, function, signature); Article 13(12); Article 28(4).

Notes on use / 使用说明

- 14. Legal basis and model structure.** This declaration is drawn up under Article 28, follows the model structure in Annex V and contains the elements specified in Annex VIII, Part I, point 4.2. Under Article 28(1) it states that conformity with the applicable essential requirements in Annex I has been demonstrated, and under Article 28(4) drawing it up means that the manufacturer assumes responsibility for the compliance of the product.
- 15. Retention period.** This declaration is kept together with the technical documentation (CRA-TD-001) and is at the disposal of national competent authorities for **10 years after the product has been placed on the market or for the support period, whichever is longer** (Article 13(13); Annex VIII, Part I, point 4.2). For this product, the period is whichever is the longer of 10 years from 10 February 2024 (P13) and the support period ending on 10 February 2029.
- 16. Provision to authorities.** The manufacturer provides a copy of this declaration to market surveillance authorities on request, and, on a reasoned request, provides all the information and documentation necessary to demonstrate conformity in a language understandable to them (Annex VIII, Part I, point 4.2; Article 13(22)).
- 17. Updating where appropriate.** This declaration is to be updated where appropriate (Article 28(2)), and is to be reassessed and updated at least in the following cases: a substantial modification of the product (Article 3(30)); a change in the classification conclusion; the publication in the Official Journal of the European Union of a citation of a harmonised standard; a change in the manufacturer's name, registered address, single point of contact or support period; or the appointment of, or a change in, an authorised representative.

Following an update, the version number is to be re-issued and the declaration republished.

18. **Re-issue on substantial modification.** Where a substantially modified version of the product is placed on the market, the conformity assessment is to be carried out afresh for the modified version (Article 13(12)) and this declaration re-issued; this declaration may not be used to cover a version that has not been assessed. A natural or legal person other than the manufacturer that makes a substantial modification to a product and places it on the market is, under Article 22, considered a manufacturer of that product and must itself assume the obligations in Articles 13 and 14.
19. **Relationship with the CE marking.** The CE marking may be affixed under Article 30 only after this declaration has been signed; the location, graphic specification and preconditions for affixing are set out in the CE marking usage rules (CRA-CE-001). Module A involves no notified body, so no notified body identification number follows the CE marking (Article 30(4)).
20. **Provision with the product.** Under Article 13(20), a copy of this declaration, or a simplified declaration containing the exact internet address in Section 8.3, is provided with the product.
21. **Conditions for taking effect.** Until every condition in CRA-CA-001, Section 7.2 has been met, this document is a draft: it **must not be signed and may not be relied on to affix the CE marking**.

Reference: Regulation (EU) 2024/2847, Article 28; Article 13(12), (13), (19), (20) and (22); Article 22; Article 30(3) and (4); Article 3(30); Annex V; Annex VI; Annex VIII, Part I, point 4.2.

Items pending confirmation (consolidated list of placeholders)

No.	Placeholder	Where it occurs
P04	NFT-2.26.8-20260826	Items 1 and 4
P11	https://www.flash-tracer.com/about.html	Items 8.3 and 8.4; CRA-TD-001, Annex A.6
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 .	Item 8.5
P13	10 February 2024	Notes on use, point 2
P17	A prompt is shown upon software startup after the licence expires. (Implemented in the current release.)	Item 8.1
P01	https://www.flash-tracer.com/about.html	Item 8.2
TR-01	MD5 checksum recorded in	Item 4

	the release record (integrity verification method: MD5, per supplier policy; see P03).	
CA-01	September 3, 2026	Signature
CA-02	September 3, 2026	Signature
CA-05	No authorised representative is appointed at present; to be completed if one is appointed in future.	Item 2
DoC-01	26 August 2026	Items 1 and 4
DoC-02	A dedicated vulnerability reporting channel is published on the compliance page https://www.flash-tracer.com/about.html (first published with the compliance page; screenshot archived in the release record). A dedicated mailbox security@flash-tracer.com is recommended and to be confirmed.	Item 8.2
DoC-03	Provided as a separate file (CRA-DoC-001) in the installation directory and linked from the compliance page.	Item 8.4
DoC-04	Targeted Union markets: to be confirmed at first EU placement (product distributed via the website); the simplified declaration is provided in English with additional Union-language versions to be added per target market.	Item 8.6

Signature record

Role	Name	Signature	Date
Prepared by	Jin Cancan		3 September 2026
Reviewed by	Zhou Yang		3 September 2026
Approved by (signatory · legal representative)	Zhou Yang		September 3, 2026 (CA-01)