

Document Retention Policy

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Reviewed by	Zhou Yang
Approved by	Zhou Yang
Product	Nand Flash Tracer (NFT)
Language	English (Official Version for EU Market Surveillance Authorities)

1 Purpose and legal basis

This policy sets out the collection, retention, access and custody responsibilities for CRA compliance documents, so as to satisfy the market-surveillance authority's requirement of accessibility and to reduce compliance risk arising from missing documentation.

Reference: Regulation (EU) 2024/2847, Article 13(13) (retention of technical documentation and declaration), Article 13(18) (retention of user information and instructions), Article 13(22) (cooperation with market surveillance authorities), Article 28(2), Article 31(2) (continuous updating of technical documentation), and Annex VIII Part I, point 4.2.

2 Scope

This policy applies to all CRA compliance documents established for the NFT software (assessed baseline version Ver 2.26.8), including the technical documentation, risk assessment, test report, conformity assessment, declaration of conformity, CE marking usage record, vulnerability handling process, CVD policy, security update policy, SBOM, vulnerability and incident reporting records, and the user information and instructions.

3 Retention period

- Technical documentation and EU declaration of conformity: **at least 10 years after the product is placed on the market or the support period, whichever is longer** (Article 13(13) and Annex VIII Part I, point 4.2).
- User information and instructions: in a language easily understood by users and market surveillance authorities, **at least 10 years after the product is placed on the market or the support period, whichever is longer**; where provided online, it shall be accessible, user-friendly and kept online for the same period (Article 13(18)).
- Support period: 10 February 2024 to 10 February 2029. The minimum retention is therefore calculated as 10 years from the date the last unit is placed on the market, or the remaining support period after 10 February 2029, whichever is longer.

> Note: This policy applies a uniform floor of "10 years after placement on the market" to ensure coverage of the support-period case.

4 Document inventory and responsibility

Document No.	Title	Form of custody
CRA-CLASS-001	Product Scope and Classification Record (Step 1)	Electronic + paper copy
CRA-TD-001	Technical Documentation	Electronic
CRA-RA-001	Cybersecurity Risk Assessment	Electronic

CRA-TR-001	Test Report	Electronic
CRA-SBOM-001	Software Bill of Materials (SPDX 2.3 JSON, machine-readable)	Electronic
CRA-VHP-001	Vulnerability Handling Process	Electronic
CRA-CVD-001	Coordinated Vulnerability Disclosure Policy	Electronic + online
CRA-SUP-001	Security Update Policy	Electronic
CRA-CA-001	Module A Self-Assessment	Electronic
CRA-DoC-001	EU Declaration of Conformity	Electronic + signed paper
CRA-CE-001	CE Marking Usage Rules	Electronic
CRA-IRP-001	Vulnerability and Incident Reporting Procedure	Electronic
CRA-RET-001	This policy	Electronic
—	User information and instructions (TD Annex A / website)	Electronic + online
—	Vulnerability and incident reporting records	Electronic

5 Storage and backup

- The master copy is stored on the manufacturer's internal file server / controlled directory; an offline backup is provided to prevent single-point loss.

Storage path: Local data server; access-rights custodian: Zhou Yang; backup: Regular monthly backup to the data machine.

- The signed paper original of the EU Declaration of Conformity (CRA-DoC-001) is retained together with its electronic copy.
- Online-published content (CVD policy, user information and instructions, compliance page) is kept available by the web administrator for the period in Section 3.

6 Access by market surveillance authorities

- Upon a reasonable request by a market surveillance authority, provide all information and documents necessary to demonstrate conformity in a language they can understand (Article 13(22)).
- The SBOM is provided only upon a reasoned request by a market surveillance authority for the purpose of verifying conformity with Annex I essential requirements (Annex VII, point 8); it is not published by default.
- Cooperate with measures taken by market surveillance authorities to eliminate risks.

7 Updating and version management

- The technical documentation is kept continuously and appropriately updated during the support period (Article 31(2)); each update records version, date and a change summary.
- After a document is revised, the previous version is retained under this policy for the same period and is not overwritten or destroyed.

8 Cessation of operations

- Before ceasing operations, the manufacturer shall notify the relevant market surveillance authorities and, by all available means, notify users as far as possible (Article 13(23)).
- After cessation, documents must still be retained until the period in Section 3 expires; if key personnel change, a custodian must be designated in advance.

9 Items pending confirmation

1. Exact storage path, access-rights custodian and backup strategy (Section 5).
2. URLs and maintenance custodian for online-published content (CVD policy, user information and instructions, compliance page) (Section 5).
3. Rules for designating the custodian in the event of cessation of operations (Section 8).

Signature record

Role	Name	Signature	Date
Prepared by	Jin Cancan		2026-09-03
Reviewed by	Zhou Yang		2026-09-03
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