COMMISSIONER OF COMMUNICATIONS | Digital Security Authority

Cyber Resilience Act - CRA Guide

Cyprus

A practical introduction for stakeholders

- **Stronger products for a safer digital Europe**
- **Responsibilities across the supply chain**
- **Cooperation for resilience and trust**
- **Aligned with European values and global best practices**

Prepared by the Digital Security Authority of Cyprus - NCCA as part of CURIUM's knowledge and capacity-building activitiesin collaboration with Working Group 4: EU and National Legislations of NCC-CY

NCCA NATIONAL CYBERSECURITY CERTIFICATION AUTHORITY | CURIUM | NCC ΕΘΝΙΚΟ ΚΕΝΤΡΟ ΣΥΝΤΟΝΙΣΜΟΥ ΚΥΒΕΡΝΟΑΣΦΑΛΕΙΑΣ ΚΥΠΡΟΥ

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Key Definitions

Some important terms used in CRA

Product with digital elements (PDE)

a software or hardware product and its remote data processing solutions, including software or hardware components being placed on the market separately

Conformity Assessment

the process of verifying whether the essential cybersecurity requirements set out in Annex I have been fulfilled

Logical Connection

a virtual representation of a data connection implemented through a software interface

Indirect Connection

a connection to a device or network, which does not take place directly but rather as part of a larger system that is directly connectable to such device or network

Intended Purpose

the use for which a PDE is intended by the manufacturer, including the specific context & conditions of use, as specified in the information supplied by the manufacturer in the instructions for use, promotional/sales materials and statements and in the technical documentation

Remote data processing solutions

data processing at a distance for which the software is designed and developed by the manufacturer, or under the responsibility of the manufacturer, and the absence of which would prevent the PDE from performing one of its functions

Cybersecurity Risk

the potential for loss or disruption caused by an incident and is to be expressed as a combination of the magnitude of such loss or disruption and the likelihood of occurrence of the incident

Significant Cybersecurity Risk

a cybersecurity risk which, based on its technical characteristics, can be assumed to have a high likelihood of an incident that could lead to a severe negative impact, including by causing considerable material or non-material loss or disruption

1. Introductory Note

Why this guide was prepared

The Cyber Resilience Act (CRA) introduces a new European framework for the cybersecurity of products with digital elements. It applies to a wide range of hardware and software products placed on the EU market and introduces obligations for different actors in the supply chain, including manufacturers, authorised representatives, importers and distributors.

This guide has been prepared to support stakeholders in Cyprus in understanding the main requirements of the CRA and what they may need to do in practice. It is intended as an awareness and preparedness tool, not as a substitute for the Regulation itself or for legal advice.

What this guide is for

- understand what the CRA is and why it matters
- identify whether a product falls within scope
- understand the stakeholders affected and their respective roles under the Regulation
- recognise the key milestones and obligations
- understand the role of the relevant Cyprus authority
- help affected stakeholders plan their next actions related to CRA compliance

This guide is not

- legal advice
- a substitute for the CRA
- a binding interpretation

2. What is the CRA?

A simple explanation

The CRA is an EU Regulation that sets cybersecurity requirements for products with digital elements. Its goal is to make hardware and software products placed on the EU market more secure throughout their lifecycle.

It introduces obligations for manufacturers and certain responsibilities for other actors in the supply chain, such as authorised representatives, importers and distributors.

Secure-by-design and by default

Security throughout the product lifecycle

Vulnerability handling and reporting

Responsibilities across the supply chain

CRA TIMELINE AT A GLANCE

10 Dec 2024
Entry into force

11 Jun 2026
Conformity Assessment Bodies can apply for notification

11 Sep 2026
Reporting obligations for vulnerabilities and cybersecurity incidents start

11 Dec 2027
Full application

3. Who this guide is for

A practical reference for stakeholders in Cyprus

Manufacturers
develop and place products on the market.

Software developers
develop software products or digital components.

Conformity assessment bodies
assess products where third-party assessment is required.

Importers
place products from third countries in the EU market.

Distributors
make products available further down the supply chain.

Authorised representatives
act on behalf of manufacturers where mandated.

Public bodies
procure or use digital products.

Consumers
buy or use products.

How to use this guide

1. Find your role
Identify the stakeholder group that best matches your organisation.

2. Check if your product is in scope
Use the guidance presented in Section 4 to understand whether the CRA applies.

3. Focus on the relevant obligations
Review the obligations that apply to your role and take action.

4. Does the CRA apply to my product?

A simple decision flow

1 Is it a hardware or software product with digital elements?
- No → Probably outside scope

2 Does it have a direct or indirect connection to a device or network?
- No → Probably outside scope

3 Is it placed in the EU market?
- No → Probably outside scope

4 Is it excluded by another specific EU Regulation?
- Yes → Probably outside scope
- No → CRA likely applies
- Unsure → Further assessment needed

CRA likely applies
You are likely within the scope of the CRA.

Further assessment needed
More analysis or expert input may be required.

Probably outside scope
The CRA likely does not apply.

Common examples

- **Router** — Connected network equipment.
- **Smart camera** — Internet-connected monitoring device.
- **App** — Mobile app with network access.
- **Firewall** — Network security device or software.
- **IAM** — System managing users and access.
- **Connected toy** — Internet-connected children's toy.

Remember

The CRA scope can depend on the product's intended purpose, connectivity and use.

A case-by-case assessment may still be needed.

5. What type of product do I have?

Default, important and critical products under the CRA

Once a product is within the scope of the CRA, the next step is to identify its category. In simple terms, products are grouped as default, important or critical. This matters because the product category can affect the level of scrutiny and the conformity assessment route.

Default products

Classification Clue

In-scope products that are not specifically listed as important or critical.

Important products

INCLUDES CLASS I & II PRODUCTS

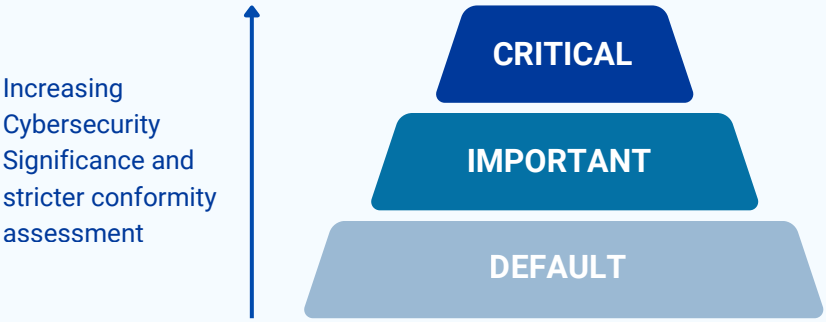
Classification Clue

Product with cybersecurity risk specifically listed in ANNEX III of CRA.

Critical products

Classification Clue

Products with significant cybersecurity risk listed in ANNEX IV of CRA.



The exact classification depends on the CRA and the product's functionality. If you are unsure, a more detailed assessment may be needed.

6. Responsibilities across the supply chain

Each economic operator has a role in ensuring that only CRA-compliant products enter and remain on the EU market

Manufacturer ····→ Authorised representative ····→ Importer ····→ Distributor

Manufacturer

Main Responsibilities

Designs, develops and documents the product securely; carries out the chosen conformity assessment procedures; ensures vulnerability handling.

If compliant

Product can be placed on the EU market.

If not compliant

Product may be stopped, withdrawn or recalled.

Authorised Representative

Main Responsibilities

Performs specific tasks on behalf of the manufacturer, where mandated keep EU declaration of conformity and technical documentation and cooperates with market surveillance authorities.

If compliant

Product can be placed on the EU market.

If not compliant

Mandate may fail; cooperation issues with authorities may arise.

Importer

Main responsibility

Checks that products meet CRA requirements and checks the required CE marking and technical documentation before placing them in the EU market.

**Considered as manufacturer when he places a product in the market under his name or trademark or the product carries out a substantial modification*

If compliant

Product can be placed on the EU supply chain.

If not compliant

Shall block the product from being placed in the EU market, witdraw or recall it.

Distributor

Main responsibility

Checks CE marking and required documentation before making the product available on the EU market.

**Considered as manufacturer when he places a product in the market under its name or trademark or the product carries out a substantial modification*

If compliant

Product can be made available on the EU market.

If not compliant

Shall not make the product available in the EU market.

Non-compliance may lead to corrective actions, withdrawal, recall, restrictions, penalties and reputational damage.

7. Role of the Notifying Authority and Market Surveillance Authority in Cyprus

In Cyprus, the Digital Security Authority (DSA) is the designated authority for these CRA functions

Notifying Authority

Main Role

- Designates and notifies conformity assessment bodies (CABs).
- Assesses whether notified bodies meet the required competence, impartiality and independence criteria.
- Monitors notified bodies and takes action where requirements are no longer met.

Why it matters

Helps ensure that bodies involved in conformity assessment are trustworthy and competent.

Market Surveillance Authority

Main Role

- Checks whether products with digital elements placed on the market comply with the CRA.
- Requests information and documentation from economic operators where needed.
- Takes corrective action when products are non-compliant or present cybersecurity risks.
- Cooperates with other authorities and relevant EU mechanisms.

Why it matters

Helps ensure that only compliant products enter and remain on the EU market.

The CRA relies both on preventive oversight (through notified bodies) and on enforcement after products enter the market.

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MORE INFORMATION

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