

Statement of Compliance

UK Product Security and Telecommunications Infrastructure (PSTI) Act

Date: 01-05-2026

Place: Utrecht, The Netherlands

1. Manufacturer

We, Bold Security Technology BV, declare that this Statement of Compliance is prepared on behalf of and under the responsibility of the manufacturer.

- Registered Address:
 - Leidseveer 2, 3511 SB Utrecht, The Netherlands
- Authorised Representative:
 - Hiske Braaksma (COO)
hbraaksma@boldsmartlock.com

2. Product Identification

- Product Name: **Bold Smart Lock**
- Product Type: Bluetooth-enabled smart cylinder lock for keyless access control
- Models / Batch: SX and DX variants (Euro profile cylinders)
(firmware and batch details maintained in internal technical documentation based on mass production runs)

The product is a keyless smart locking system communicating via Bluetooth and secured through encrypted protocols and authentication mechanisms.

3. Declaration of Compliance (PSTI Act)

We declare that, in our opinion as the manufacturer, the product identified above complies with the applicable security requirements set out in Schedule 1 of the UK PSTI Act.

3.1 Compliance with Schedule 1 Core Security Requirements

The manufacturer confirms compliance with the following mandatory requirements:

1. No Universal Default Passwords

All devices are supplied without universal default passwords. Each device is uniquely provisioned or requires the user to define secure authentication credentials during initial setup.

2. Vulnerability Disclosure Process

The manufacturer maintains a publicly accessible vulnerability disclosure process.

Security issues can be reported via: privacy@boldsmartlock.com. Reported vulnerabilities are handled in accordance with responsible disclosure practices and addressed through security updates where applicable.

3. Transparency on security updates (support period)

The manufacturer clearly communicates the period during which the product receives security updates. Bold Security Technology BV provides:

- A minimum of 2 years of warranty and security support from the date of manufacture; and
- Already ongoing 10+ years active support to existing customers, including security updates and vulnerability management where applicable.

4. Security measures implemented

As a manufacturer, we have implemented the following measures:

- Unique credential provisioning and secure onboarding
- Security-by-design principles throughout the product lifecycle
- Secure communication using encryption mechanisms
- Vulnerability monitoring and patch management processes
- Secure boot and system integrity protections
- Password complexity enforcement and authentication controls
- Multi-factor authentication at account level
- Transparent user communication regarding updates and lifecycle

The product incorporates encrypted communication and authentication mechanisms, including secure pairing processes and protected communication between the gateway device, cloud infrastructure, and connected smart locks.

5. Standards and References

Conformity of the product is supported by the manufacturer's UKCA Declaration of Conformity and associated technical documentation. The following harmonised standards have been applied to demonstrate compliance with applicable regulatory requirements:

- BS EN 62479:2010 – Safety
- BS EN 60950-1:2006 + A2:2013 – Safety
- EN 301 489-1 V2.2.0 (2017-03) – Electromagnetic Compatibility
- EN 301 489-17 V3.2.0 (2017-03) – Electromagnetic Compatibility
- EN 300 328 V2.1.1 (2016-11) – Radio spectrum / wireless performance

These standards support compliance with the Radio Equipment Regulations 2017 (UK) and related CE/UKCA frameworks. Technical documentation demonstrating compliance can be made available to relevant authorities upon request.

Additional Information

For further details about certification, compliance, and product assurance, please refer to:

- SKG-IKOB (independent Dutch certification body for security hardware)
- <https://www.skgikob.nl/certificaten/29397/686.393.01>

The Bold Smart Lock is certified to SKG* (three-star) classification, representing the highest level of burglary resistance for cylinder-based security systems. This certification confirms resistance against physical attacks such as drilling and pulling.

Relationship to European Standards

The SKG*** certification is based on recognised European and national standards for physical security, including:

- EN 1303 – Mechanical cylinder durability and attack resistance
- EN 1627 / EN 1630 – Burglar resistance testing of building hardware
- NEN 5089 / NEN 5096 – Dutch classification schemes for burglary resistance

These standards address resistance to physical attack methods such as drilling, pulling, and manipulation.

Combined security approach

The Bold Smart Lock operates as a standalone secure device and within a broader ecosystem that integrates:

- Cybersecurity controls (secure authentication, encryption, update processes)
- Regulatory compliance (CE / UKCA frameworks and harmonised standards)
- Physical security certification (SKG*** classification aligned with EN standards)

This combined approach ensures both digital and physical resilience, consistent with modern product security expectations under the PSTI Act.

Declaration

We confirm our ongoing commitment to maintaining compliance with applicable legislation and to continuously improving the security of our products and services. For further information, please contact: privacy@boldsmartlock.com

Signed for and on behalf of the manufacturer

Name: H. van Nikkelen Kuijper

Function: CEO

Signature:

