Federal Office
for Information Security

Assurance Continuity Maintenance Report

BSI-DSZ-CC-1198-2022-MA-01

STARCOS 3.7 COS GKV C3

from

Giesecke+Devrient ePayments GmbH

SOGIS
Recognition Agreement

The IT product identified in this report was assessed according to the procedures on Assurance Continuity [1] and the developer's Impact Analysis Report (IAR). The baseline for this assessment was the Certification Report, the Security Target and the Evaluation Technical Report of the product certified by the Federal Office for Information Security (BSI) under BSI-DSZ-CC-1198-2022.

The certified product itself did not change. The changes are related to an update of life cycle security aspects, precisely concerning the incorporation of further certified production sites into the scope of the certificate and the renewal of some (site) certificates for development and production sites.

Considering the nature of the changes leads to the conclusion that these are classified as a minor change and that certificate maintenance is the correct path to continuity of assurance.

The resistance to attacks has not been re-assessed in the course of this maintenance process. Therefore, the assurance statement as outlined in the Certification Report BSI-DSZ-CC-1198-2022 dated 2 September 2022 is of relevance and has to be considered when using the product. Details can be found on the following pages.

This report is an addendum to the Certification Report BSI-DSZ-CC-1198-2022.

Common Criteria
Recognition Arrangement
recognition for components
up to EAL 2 only

Bonn, 23 February 2026

The Federal Office for Information Security

DAkkS
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Assessment

The IT product identified in this report was assessed according to the procedures on Assurance Continuity [1] and the Impact Analysis Report (IAR) [2]. The baseline for this assessment was the Certification Report of the certified product (Target of Evaluation, TOE) [3], its Security Target and the Evaluation Technical Report as outlined in [3].

The vendor for the STARCOS 3.7 COS GKV C3, Giesecke+Devrient ePayments GmbH, submitted an IAR [2] to the BSI for approval. The IAR is intended to satisfy the requirements according to the procedures on Assurance Continuity [1]. In accordance with those requirements, the IAR describes (i) the changes made to the certified TOE, (ii) the evidence updated as a result of the changes and (iii) the security impact of the changes.

The certified product STARCOS 3.7 COS GKV C3 itself did not change.

The changes performed in the present maintenance process are related to an update of life cycle security aspects, more precisely concerning the incorporation of further certified production sites into the scope of the TOE's life cycle model and the renewal of some (site) certificates for development and production sites. The partial ALC re-evaluation was performed by the ITSEF SRC Security Research & Consulting GmbH. The procedure led to an updated version of the Evaluation Technical Report (ETR) [6].

The list of the development and production sites in Annex B of the Certification Report BSI-DSZ-CC-1198-2022 including their related site certificates is replaced as follows:

a) Giesecke+Devrient Development Center Germany (DCG) for Development and Testing. Refer to the Certification Report BSI-DSZ-CC-S-0260-2023 [7].

b) Giesecke+Devrient Development Center Spain (DCS) for Development. Refer to the Certification Report CCN-CC/2024-24/INF-4575 [8].

c) Linxens Singapore Changi Site for Module Production. Refer to the Certification Report CCN-CC/2025-19/INF-4714 [9].

d) Linxens Tianjin Site for Module Production. Refer to the Certification Report CCN-CC/2023-35/INF-4423 [10].

e) INESA Shanghai, INESA Intelligent Electronics Co. Ltd. for Module Production. Refer to the Certification Report SiteCC-2500140-01-CR [11].

f) PT UTAC Manufacturing Services Indonesia for Module Production. Refer to the Certification Report ANSSI-CC-SITE-2025/05 [12].

g) Giesecke+Devrient (China) Technologies Co. Ltd., Huangshi Branch (GDCHINA HS) for Production (in particular Inlay Embedding) and Initialisation. Refer to the Certification Report ANSSI-CC-SITE-2025/03 [13].

h) Giesecke+Devrient ePayments Iberia S.A. (GDIMS) for Production (in particular Inlay Embedding) and Initialisation. Refer to the Certification Report CCN-CC/2024-08/INF-4392 [14].

i) For development and production sites regarding the underlying IC platform please refer to the Certification Report EUCC-3090-2025-11-08 (ST31P450 A08) [15].

Hereby, the renewal of site certificates is covered in a), b), c), d), e) and g), and the integration of the further module production site PT UTAC Manufacturing Services Indonesia and of the further production and initialisation site GDIMS is addressed in f) and h) respectively. Please note related to i) that since the TOE's certification BSI-DSZ-CC-1198-2022 the underlying hardware was re-certified under EUCC-3090-2025-11-08 (ST31P450 A08). In the course of the present partial ALC re-evaluation the new certificate [15] is taken into account as proof of continuity for development and production security for the hardware part of the TOE.

In their combination, above listed sites fulfil Common Criteria assurance requirements ALC – Life cycle support as claimed in the Security Target [4].

Please note, that meanwhile the developer's company name changed from Giesecke+Devrient Mobile Security GmbH to Giesecke+Devrient ePayments GmbH (Prinzregentenstraße 161, 81677 München).

Conclusion

The maintained changes are at the level of an update of life cycle security aspects addressing the incorporation of further certified production sites into the TOE's life cycle model and the renewal of some (site) certificates for development and production sites relevant for the life cycle considered herein. These changes have no effect on product assurance.

Considering the nature of the changes performed in the present maintenance process leads to the conclusion that these are classified as a minor change and that certificate maintenance is the correct path to continuity of assurance.

The resistance to attacks has not been re-assessed in the course of this maintenance process. The update of the vulnerability assessment of the underlying hardware as provided in EUCC-3090-2025-11-08 (ST31P450 A08) was not considered in this maintenance process. Therefore, the assurance statement as outlined in the Certification Report BSI-DSZ-CC-1198-2022 dated 2 September 2022 is of relevance and has to be considered when using the product.

Obligations and notes for the usage of the product

All aspects of assumptions, threats and policies as outlined in the Security Target [4] not covered by the TOE itself need to be fulfilled by the operational environment of the TOE.

The customer or user of the product shall consider the results of the certification within his system risk management process. In order for the evolution of attack methods and techniques to be covered, he should define the period of time until a re-assessment for the TOE is required and thus requested from the sponsor of the certificate.

Additional Note: The strength of the cryptographic algorithms was not rated in the course of the product certification and this maintenance procedure (see BSIG[1] Section 52, Para. 4, Clause 2).

This report is an addendum to the Certification Report [3].

1 Act on the Federal Office for Information Security (BSI-Gesetz - BSIG) of 2 December 2025, BGBl. 2025, no. 301, p. 2

References

[1] Common Criteria document “Assurance Continuity: CCRA Requirements”, Version 3.1, 29 February 2024

Common Criteria document “Assurance Continuity: SOG-IS Requirements”, Version 1.2, March 2024

[2] Impact Analysis Report, STARCOS 3.7 COS GKV C3, Version 1.1, 11 November 2025, Giesecke+Devrient ePayments GmbH (confidential document)

[3] Certification Report BSI-DSZ-CC-1198-2022 for STARCOS 3.7 COS GKV C3 from Giesecke+Devrient Mobile Security GmbH, Version 1.0, 2 September 2022, Bundesamt für Sicherheit in der Informationstechnik (BSI)

[4] Security Target BSI-DSZ-CC-1198-2022, Security Target STARCOS 3.7 COS GKV C3, Version 1.4, 5 August 2022, Giesecke+Devrient Mobile Security GmbH (confidential document)

Security Target Lite BSI-DSZ-CC-1198-2022, Security Target Lite STARCOS 3.7 COS GKV C3, Version 1.1, 5 August 2022, Giesecke+Devrient Mobile Security GmbH (sanitised public document)

[5] Configuration List STARCOS 3.7 COS GKV C3 for BSI-DSZ-CC-1198-2022-MA-01, Version 1.0, 10 February 2026, Giesecke+Devrient ePayments GmbH (confidential document)

[6] Evaluation Technical Report for STARCOS 3.7 COS GKV C3, BSI-DSZ-CC-1198-2022-MA-01, Version 1.2, 10 February 2026, SRC Security Research & Consulting GmbH (confidential document)

[7] Certification Report for Giesecke+Devrient Development Center Germany (DCG) of Giesecke+Devrient ePayments GmbH, BSI-DSZ-CC-S-0260-2023, 20 December 2023, Bundesamt für Sicherheit in der Informationstechnik (BSI)

[8] Certification Report CCN-CC/2024-24/INF-4575 for Giesecke+Devrient Development Center Spain (DCS), related to CCN-CC-21/2025, 22 May 2025 (Certificate date), National Cryptologic Centre (CCN)

[9] Certification Report CCN-CC/2025-19/INF-4714 for Linxens Singapore Changi Site, related to CCN-CC-50/2025, 22 December 2025 (Certificate date), National Cryptologic Centre (CCN)

[10] Certification Report CCN-CC/2023-35/INF-4423 for Linxens Tianjin Site, related to CCN-CC-24/2024, 21 October 2024 (Certificate date), National Cryptologic Centre (CCN)

[11] Certification Report SiteCC-2500140-01-CR for INESA Shanghai, INESA Intelligent Electronics Co. Ltd., related to SiteCC-2500140-01, 13 January 2026, TrustCB B.V.

[12] Certification Report ANSSI-CC-SITE-2025/05 for PT UTAC Manufacturing Services Indonesia, 12 August 2025, ANSSI

[13] Certification Report ANSSI-CC-SITE-2025/03 for Giesecke+Devrient (China) Technologies Co. Ltd., Huangshi Branch (GDCHINA HS), 27 May 2025, ANSSI

[14] Certification Report CCN-CC/2024-08/INF-4392 for Giesecke+Devrient ePayments Iberia S.A. (GDIMS), related to CCN-CC-18/2024, 6 September 2024 (Certificate date), National Cryptologic Centre (CCN)

[15] Rapport de certification EUCC-3090-2025-11-08 for ST31P450 A08, 10 December 2025, ANSSI

Note: End of report