



## GOVERNANCE

- Board has approved a Data Protection Policy aligned to DPDP Act 2023
- Data Protection Officer (DPO) appointed with documented mandate and reporting line
- Privacy governance committee established with cross-functional representation
- Data protection obligations included in employee onboarding and annual training
- Third-party processor agreements include DPDP-compliant data protection clauses

## ROPA

- All processing activities documented in a Register of Processing Activities
- Retention periods defined and enforced for each processing category
- Cross-border data transfers identified with appropriate safeguards documented
- ROPA reviewed and updated within the last 12 months

## CONSENT & NOTICE

- Privacy notice meets DPDP Act requirements for content and accessibility
- Consent records maintained with timestamp, purpose, and withdrawal mechanism
- Consent withdrawal mechanism operational and tested end-to-end

## RISK ASSESSMENT PIA/DPIA

- Privacy Impact Assessments completed for all high-risk processing activities
- Data Protection Impact Assessments completed for SDF-designated processing
- DPIA programme schedule documented with annual review cadence

## DATA PRINCIPAL RIGHTS

- Access request procedure documented with SLA and escalation path
- Correction and erasure mechanism operational with audit trail
- Grievance officer appointed and contact details published

**SECURITY & BREACH**

- Breach response procedure documented with DPA notification within 72 hours
- Security safeguards reviewed and aligned to DPDP Act Section 8 requirements

**SCORING GUIDE**

**18-20**  
Audit-ready

**14-17**  
Functional gaps

**10-13**  
Material remediation

**<10**  
Escalate to board

Automate this checklist >> [dpdp-assessment.creativecyber.in](https://dpdp-assessment.creativecyber.in)