DPDP Compliance Checklist for Indian Businesses

This DPDP compliance checklist covers what the DPDP Act, 2023 and the DPDP Rules, 2025 ask of a business. Work through the 11 checks below. Then open the checklist for your industry.

If your business decides why and how personal data is used, you are a **Data Fiduciary**. Your obligations apply from 13 May 2027.

The 11 core checks

Tick each box as you finish the check.

1 Notice

Section 5, Rule 3

- Give a clear notice with every consent request. It must make sense on its own.
- List each item of personal data and the purpose. Explain how people can withdraw consent, use their rights and complain to the Data Protection Board.

2 Consent

Section 6

- Consent must be free, specific, informed, unconditional and unambiguous. It must come from a clear affirmative action.
- Let people withdraw consent as easily as they gave it.
- After a withdrawal, you and your processors stop within a reasonable time, unless a law requires or allows the processing.

3 Purpose limits

Sections 4, 6(1) and 7

- Ask only for the personal data your stated purpose needs.
- Use it for that purpose, or for a legitimate use listed in Section 7 of the Act.

4 Security safeguards

Section 8(5), Rule 6

- Protect personal data with reasonable safeguards. Rule 6 names encryption or masking, access controls, logs and monitoring, and backups.
- Keep those logs and the related personal data for one year, unless another law says otherwise.
- Add security terms to your contracts with processors.

5 Breach notice

Section 8(6), Rule 7

- Once you become aware of a breach, tell each affected person and the Board without delay.
- Within 72 hours of becoming aware, send the Board a detailed report. The Board can allow more time if you ask in writing.

6 Data principal rights

Sections 11, 12 and 14, Rule 14

- These access, correction and erasure rights cover personal data whose processing the person previously consented to. This includes the use under Section 7(a).
- On request, give a summary of their data, your processing, and who you shared it with. Sharing with a body authorised by law can stay off that list. That applies when it asked in writing about offences or cyber incidents.
- Correct, complete or update their data on request. Erase it too, unless the purpose or a law still needs it.
- Let people nominate someone to act for them on death or incapacity. Publish how to make each request.

7 Grievance redressal

Sections 8(9), 8(10) and 13, Rules 9 and 14(3)

- Set up an effective way to handle complaints. Publish your response time and keep to it. It can be 90 days at most.
- Publish contact details for your Data Protection Officer, if you have one. Otherwise name a person who answers processing questions.

8 Retention and erasure

Section 8(7), Rule 8

- Erase personal data when consent is withdrawn or the purpose is served, unless a law requires you to keep it.
- Make your processors erase the personal data you gave them, on the same terms.
- Before erasing, keep the data and its processing logs for at least one year from the processing.

9 Children's data

Section 9, Rules 10 to 12

- Get verifiable consent from a parent before you process a child's data. A child is anyone under 18.
- Do not track or monitor children's behaviour, or target ads at them. Avoid any processing likely to harm a child's well-being.
- The Rules exempt some uses from the parent consent and tracking duties. Examples include some health, education and child safety uses.
- For a person with a disability who has a lawful guardian, get the guardian's verifiable consent.

10 Processors and vendors

Sections 8(1) and 8(2)

- Use a Data Processor to handle personal data on your behalf only under a valid contract.
- You stay responsible under the Act for all processing a processor does on your behalf.

11 **Significant Data Fiduciary extras**

Section 10, Rule 13

- If the government notifies you as a **Significant Data Fiduciary**, appoint a Data Protection Officer based in India.
- Appoint an independent data auditor. Every 12 months, run a Data Protection Impact Assessment and an audit.
- Have the assessor send the Board a report of the significant findings.

Key dates

13 NOVEMBER 2026

Consent Manager registration opens.

13 MAY 2027

Data Fiduciary obligations apply.

Checklists for each industry, team and business moment are on the web page. dpdpaudit.co.in/dpdp-compliance-checklist

Each check comes from the Act or the Rules. Your legal team can confirm which ones apply to you. Read the DPDP Act.

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Built by Meridian Bridge Strategy. Not legal advice.