EL

EXAMPLE LEGAL

Example Legal Associates

B. Example, Advocate | Mumbai

SAMPLE REPORT - FICTIONAL COMPANY, ILLUSTRATIVE ANSWERS

DPDP Act Compliance Gap Assessment Report

Digital Personal Data Protection Act, 2023

DPDP Rules, 2025

Prepared For

Demo Manufacturing Pvt Ltd

Maharashtra | Manufacturing

Employees: 26-50

Prepared By

Example Legal Associates

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Assessment Date: 22 November 2026

Content last reviewed: 22 November 2026

57%

Overall Compliance Score

SAMPLE - Not a real assessment. Take the assessment for your own report.

Executive Summary

57%

Overall Compliance Score

Risk Level

High Risk

Penalty Exposure

Up to Rs. 250 Cr

Category-wise Compliance

Category	Your score	Peer avg	Requirements met
Consent Management	47%	-	4/9
Security Safeguards	65%	-	5/9
Data Principal Rights	71%	-	3/6
Breach Response	33%	-	1/5
Governance & Retention	76%	-	2/4

Key Findings

* Total Compliance Score: 57%
* Risk Level: High Risk
* Areas Requiring Attention: 3 High Priority Items
* Compliant Areas: 15 areas meet requirements

Your Action Plan

18 actions, in the order to tackle them. Step-by-step instructions, deadlines and penalties for each follow on the next pages.

IMMEDIATE (0-30 days) - 3 actions High priority - highest penalty risk

1. Affected Party Notification

Breach Response | DPDP Act 2023 - Section 8(6) | DPDP Rules 2025 - Rule 7
Link: https://www.meity.gov.in/data-protection-framework

2. Security Incident Documentation

Breach Response | DPDP Act 2023 - Section 8 | CERT-In Guidelines
Link: https://www.cert-in.org.in

3. Post-Incident Review and Remediation

Breach Response | DPDP Act 2023 - Section 8(4) | Best Practice
Link: https://www.meity.gov.in/data-protection-framework

SHORT TERM (31-90 days) - 9 actions Medium priority

4. Purpose Limitation Compliance

Consent Management | DPDP Act 2023 - Section 6(1) | DPDP Rules 2025 - Rule 3
Link: https://www.meity.gov.in/data-protection-framework

5. Consent Record Keeping

Consent Management | DPDP Act 2023 - Section 6 | DPDP Rules 2025 - Rule 3
Link: https://www.meity.gov.in/data-protection-framework

6. Re-consent for Policy Changes

Consent Management | DPDP Act 2023 - Section 5, 6 | DPDP Rules 2025
Link: https://www.meity.gov.in/data-protection-framework

7. Third-Party Data Sharing Consent

Consent Management | DPDP Act 2023 - Section 6(1), 8(2) | DPDP Rules 2025 - Rule 9
Link: https://www.meity.gov.in/data-protection-framework

8. Consent Version History Tracking

Consent Management | DPDP Act 2023 - Section 6 | Best Practice
Link: https://www.meity.gov.in/data-protection-framework

9. Audit Logging and Retention

Security Safeguards | DPDP Rules 2025 - Rule 6(2) | Rule 12
Link: https://www.meity.gov.in/data-protection-framework

10. Backup and Recovery Testing

Security Safeguards | DPDP Act 2023 - Section 8(4) | Best Practice
Link: https://www.meity.gov.in/data-protection-framework

11. Secure Software Development (SSDLC)

Security Safeguards | DPDP Act 2023 - Section 8(4) | OWASP Best Practice
Link: https://www.meity.gov.in/data-protection-framework

12. 72-Hour Breach Notification to DPB

Breach Response | DPDP Act 2023 - Section 8(6) | DPDP Rules 2025 - Rule 7
Link: https://www.meity.gov.in/data-protection-framework

ONGOING (90+ days) - 6 actions Low priority - improvements and housekeeping

13. Vulnerability Assessment

Security Safeguards | DPDP Act 2023 - Section 8(4) | CERT-In Guidelines
Link: https://www.cert-in.org.in

14. Right to Erasure (Right to be Forgotten)

Data Principal Rights | DPDP Act 2023 - Section 12(2) | DPDP Rules 2025 - Rule 5
Link: https://www.meity.gov.in/data-protection-framework

15. Timely Response to Rights Requests

Data Principal Rights | DPDP Act 2023 - Section 11, 12 | DPDP Rules 2025 - Rule 5
Link: https://www.meity.gov.in/data-protection-framework

16. Nomination of Representative

Data Principal Rights | DPDP Act 2023 - Section 14 | DPDP Rules 2025 - Rule 5
Link: https://www.meity.gov.in/data-protection-framework

17. Data Retention Policy

Governance & Retention | DPDP Act 2023 - Section 8(5)
Link: https://www.meity.gov.in/data-protection-framework

18. Employee Data Protection Training

Governance & Retention | DPDP Act 2023 - Section 8 | Best Practice
Link: https://www.meity.gov.in/data-protection-framework

HIGH Priority Action Items

Address immediately to mitigate compliance risks.

HIGH Breach Response

Affected Party Notification

"DPDP Act 2023 - Section 8(6) | DPDP Rules 2025 - Rule 7"

Steps to Address:

1. Create notification templates covering: breach nature, data involved, consequences
2. Include recommended protective actions for users
3. Establish communication channels: email, SMS, in-app, public notice
4. Provide helpline/FAQ for affected individuals
5. Document notification evidence (delivery receipts)

Deadline: 13 May 2027

Penalty: Up to Rs. 200 Cr for failing to notify affected individuals

Ref: DPDP Act 2023 - Section 8(6) | DPDP Rules 2025 - Rule 7
Link: https://www.meity.gov.in/data-protection-framework

HIGH Breach Response

Security Incident Documentation

"DPDP Act 2023 - Section 8 | CERT-In Guidelines"

Steps to Address:

1. Maintain comprehensive incident register with all security events
2. Document: incident timeline, impact assessment, containment actions
3. Record root cause analysis findings for each incident
4. Track remediation actions to completion
5. Generate incident reports for management and regulators

Deadline: 13 May 2027

Penalty: Up to Rs. 200 Cr for inadequate incident management

Ref: DPDP Act 2023 - Section 8 | CERT-In Guidelines
Link: https://www.cert-in.org.in

HIGH Breach Response

Post-Incident Review and Remediation

"DPDP Act 2023 - Section 8(4) | Best Practice"

Steps to Address:

1. Conduct post-incident review within 2 weeks of incident closure
2. Document lessons learned and improvement recommendations
3. Track remediation actions with assigned owners and deadlines
4. Update security controls and procedures based on findings
5. Report incident patterns to senior management quarterly

Deadline: 13 May 2027

Penalty: Up to Rs. 200 Cr for repeat incidents from same cause

Ref: DPDP Act 2023 - Section 8(4) | Best Practice
Link: https://www.meity.gov.in/data-protection-framework

MEDIUM Priority Action Items

Address within 30-60 days.

MEDIUM Consent Management

Purpose Limitation Compliance

"DPDP Act 2023 - Section 6(1) | DPDP Rules 2025 - Rule 3"

Steps to Address:

1. Document all data processing activities against their original consent purposes
2. Implement technical controls preventing use beyond consented scope
3. Create workflow requiring fresh consent for new processing purposes
4. Audit data usage quarterly for purpose creep
5. Train staff on purpose limitation requirements

Deadline: 13 May 2027

Penalty: Up to Rs. 50 Cr for processing beyond consented purposes

Ref: DPDP Act 2023 - Section 6(1) | DPDP Rules 2025 - Rule 3
Link: https://www.meity.gov.in/data-protection-framework

MEDIUM Consent Management

Consent Record Keeping

"DPDP Act 2023 - Section 6 | DPDP Rules 2025 - Rule 3"

Steps to Address:

1. Implement consent logging with: timestamp, IP address, user agent, consent version
2. Store consent records for minimum 7 years (recommended)
3. Enable audit trail retrieval by user ID or date range
4. Include proof of what user was shown at time of consent
5. Implement tamper-proof consent storage

Deadline: 13 May 2027

Penalty: Unable to demonstrate lawful processing - Up to Rs. 250 Cr

Ref: DPDP Act 2023 - Section 6 | DPDP Rules 2025 - Rule 3
Link: https://www.meity.gov.in/data-protection-framework

MEDIUM Consent Management

Re-consent for Policy Changes

"DPDP Act 2023 - Section 5, 6 | DPDP Rules 2025"

Steps to Address:

1. Implement notice version control with change tracking
2. Notify users of material changes via email and in-app notification
3. Re-obtain consent when adding new processing purposes
4. Maintain archive of all previous notice versions with dates
5. Give users 30-day notice period before changes take effect

Deadline: 13 May 2027

Penalty: Processing without valid consent - Up to Rs. 50 Cr

Ref: DPDP Act 2023 - Section 5, 6 | DPDP Rules 2025
Link: https://www.meity.gov.in/data-protection-framework

MEDIUM Consent Management

Third-Party Data Sharing Consent

"DPDP Act 2023 - Section 6(1), 8(2) | DPDP Rules 2025 - Rule 9"

Steps to Address:

1. Obtain separate, explicit consent before sharing data with any third party
2. Clearly identify each third party and their purpose in consent flow
3. Implement data processing agreements with all third parties
4. Provide users visibility into which third parties have their data
5. Enable users to revoke third-party sharing consent independently

Deadline: 13 May 2027

Penalty: Up to Rs. 50 Cr for unauthorized third-party sharing

Ref: DPDP Act 2023 - Section 6(1), 8(2) | DPDP Rules 2025 - Rule 9
Link: https://www.meity.gov.in/data-protection-framework

MEDIUM Consent Management

Consent Version History Tracking

"DPDP Act 2023 - Section 6 | Best Practice"

Steps to Address:

1. Implement version control for all consent forms and privacy notices
2. Track which consent version each user agreed to
3. Store historical versions with effective date ranges
4. Enable retrieval of consent state at any point in time
5. Create dashboard for consent version analytics

Deadline: 13 May 2027

Penalty: Inability to demonstrate compliance - Up to Rs. 50 Cr

Ref: DPDP Act 2023 - Section 6 | Best Practice
Link: https://www.meity.gov.in/data-protection-framework

MEDIUM Security Safeguards

Audit Logging and Retention

"DPDP Rules 2025 - Rule 6(2) | Rule 12"

Steps to Address:

1. Log all access to personal data with: user ID, timestamp, action, record accessed
2. Retain logs for minimum 1 year as per DPDP Rules
3. Implement log integrity protection (write-once storage, digital signatures)
4. Set up real-time alerting for suspicious access patterns
5. Enable log export for regulatory requests

Deadline: 13 May 2027

Penalty: Up to Rs. 250 Cr for inadequate security measures

Ref: DPDP Rules 2025 - Rule 6(2) | Rule 12
Link: https://www.meity.gov.in/data-protection-framework

MEDIUM Security Safeguards

Backup and Recovery Testing

"DPDP Act 2023 - Section 8(4) | Best Practice"

Steps to Address:

1. Implement automated backup for all personal data repositories
2. Store backups encrypted and in geographically separate location
3. Test backup restoration quarterly with documented results
4. Define and test RTO/RPO targets for critical systems
5. Document disaster recovery procedures and train responsible staff

Deadline: 13 May 2027

Penalty: Up to Rs. 250 Cr for inability to recover from incidents

Ref: DPDP Act 2023 - Section 8(4) | Best Practice
Link: https://www.meity.gov.in/data-protection-framework

MEDIUM Security Safeguards

Secure Software Development (SSDLC)

"DPDP Act 2023 - Section 8(4) | OWASP Best Practice"

Steps to Address:

1. Implement security requirements in all development projects
2. Conduct threat modeling during design phase
3. Enable static code analysis (SAST) in CI/CD pipeline
4. Perform security testing before production deployment
5. Train developers on secure coding practices annually

Deadline: 13 May 2027

Penalty: Up to Rs. 250 Cr for security-by-design failures

Ref: DPDP Act 2023 - Section 8(4) | OWASP Best Practice
Link: https://www.meity.gov.in/data-protection-framework

MEDIUM Breach Response

72-Hour Breach Notification to DPB

"Partially in place - complete the remaining steps below. DPDP Act 2023 - Section 8(6) | DPDP Rules 2025 - Rule 7"

Steps to Address:

1. 72-hour clock starts from DETECTION, not confirmation
2. Pre-draft notification templates with placeholders
3. Establish 24/7 escalation path to authorized reporters
4. Create Data Protection Board contact database
5. Implement breach severity classification matrix

Deadline: 13 May 2027

Penalty: Up to Rs. 200 Cr for late or missed notification

Ref: DPDP Act 2023 - Section 8(6) | DPDP Rules 2025 - Rule 7
Link: https://www.meity.gov.in/data-protection-framework

LOW Priority Action Items

Address as resources permit.

LOW Security Safeguards

Vulnerability Assessment

"Partially in place - complete the remaining steps below. DPDP Act 2023 - Section 8(4) | CERT-In Guidelines"

Steps to Address:

1. Implement continuous vulnerability scanning for all public-facing assets
2. Conduct quarterly penetration testing by certified third parties
3. Establish vulnerability remediation SLAs (critical: 72hrs, high: 7 days)
4. Subscribe to security advisories for all software components
5. Document and track all vulnerabilities to closure

Deadline: 13 May 2027

Penalty: Up to Rs. 250 Cr for security negligence

Ref: DPDP Act 2023 - Section 8(4) | CERT-In Guidelines
Link: https://www.cert-in.org.in

LOW Data Principal Rights

Right to Erasure (Right to be Forgotten)

"Partially in place - complete the remaining steps below. DPDP Act 2023 - Section 12(2) | DPDP Rules 2025 - Rule 5"

Steps to Address:

1. Build erasure request processing workflow
2. Implement automated deletion across all systems and backups
3. Document legitimate exceptions: legal compliance, ongoing disputes, tax records
4. Provide erasure confirmation within 30 days
5. Notify third parties to erase shared data

Deadline: 13 May 2027

Penalty: Up to Rs. 50 Cr for failing to erase data

Ref: DPDP Act 2023 - Section 12(2) | DPDP Rules 2025 - Rule 5
Link: https://www.meity.gov.in/data-protection-framework

LOW Data Principal Rights

Timely Response to Rights Requests

"Partially in place - complete the remaining steps below. DPDP Act 2023 - Section 11, 12 | DPDP Rules 2025 - Rule 5"

Steps to Address:

1. Define and publish response timelines for each request type
2. Implement request tracking with automated reminders
3. Create escalation process for requests approaching deadline
4. Acknowledge receipt of all requests within 48 hours
5. Provide regular status updates for complex requests

Deadline: 13 May 2027

Penalty: Up to Rs. 50 Cr for unreasonable delays

Ref: DPDP Act 2023 - Section 11, 12 | DPDP Rules 2025 - Rule 5
Link: https://www.meity.gov.in/data-protection-framework

LOW Data Principal Rights

Nomination of Representative

"DPDP Act 2023 - Section 14 | DPDP Rules 2025 - Rule 5"

Steps to Address:

1. Create mechanism for users to nominate representative for rights exercise
2. Verify nominee identity before processing requests
3. Enable users to update or revoke nominations easily
4. Process requests from nominated representatives with same priority
5. Document nomination records with audit trail

Deadline: 13 May 2027

Penalty: Up to Rs. 50 Cr for not honoring nomination rights

Ref: DPDP Act 2023 - Section 14 | DPDP Rules 2025 - Rule 5
Link: https://www.meity.gov.in/data-protection-framework

LOW Governance & Retention

Data Retention Policy

"Partially in place - complete the remaining steps below. DPDP Act 2023 - Section 8(5)"

Steps to Address:

1. Define retention periods for each data category aligned with legal requirements
2. Consider: consent validity, contract duration, statutory obligations (7 years for financial)
3. Implement automated deletion triggers when retention period expires
4. Create exception process for legal holds and dispute resolution
5. Document retention justification for each category

Deadline: 13 May 2027

Penalty: Up to Rs. 50 Cr for retaining data beyond necessary period

Ref: DPDP Act 2023 - Section 8(5)
Link: https://www.meity.gov.in/data-protection-framework

LOW Governance & Retention

Employee Data Protection Training

"Partially in place - complete the remaining steps below. DPDP Act 2023 - Section 8 | Best Practice"

Steps to Address:

1. Implement mandatory annual data protection training for all employees
2. Specialized training for employees handling personal data
3. Include DPDP Act requirements, breach response, data principal rights
4. Track training completion and maintain attendance records
5. Update training content when regulations change

Deadline: 13 May 2027

Penalty: Up to Rs. 150 Cr for employee-caused violations

Ref: DPDP Act 2023 - Section 8 | Best Practice
Link: https://www.meity.gov.in/data-protection-framework

Compliant Areas (15)

These areas meet Digital Personal Data Protection Act, 2023 requirements based on your responses

Consent Management

[Y] Granular and Purpose-Specific Consent
[Y] Easy Consent Withdrawal (Withdrawal Parity)
[Y] Multilingual Privacy Notices
[Y] Cookie and Tracking Consent

Security Safeguards

[Y] Encryption at Rest
[Y] Encryption in Transit
[Y] Tokenization and Data Masking
[Y] Role-Based Access Controls
[Y] Intrusion Detection Systems

Data Principal Rights

[Y] Right to Access (Data Subject Access Request)
[Y] Right to Correction
[Y] Grievance Redressal Mechanism

Breach Response

[Y] Incident Response Plan

Governance & Retention

[Y] Data Protection Officer (DPO) Designation
[Y] Records of Processing Activities (ROPA)

Next Steps & Resources

Work through Your Action Plan in order, starting with the Immediate items. Re-assess every 6-12 months, or after any change in headcount, premises or state of operation.

Government Resources

MeitY Data Protection Framework
https://www.meity.gov.in/data-protection-framework

Data Protection Board of India
https://www.dataprotection.gov.in

DPDP Act Full Text
https://www.meity.gov.in/writereaddata/files/Digital%20Personal%20Data%20Protection%20Act%202023.pdf

CERT-In (Breach Reporting)
https://www.cert-in.org.in

Applicable Legislation

* Digital Personal Data Protection Act, 2023
* DPDP Rules, 2025
* Information Technology Act, 2000
* IT (Reasonable Security Practices) Rules, 2011
* CERT-In Directions (April 2022)

Key Compliance Deadlines

* DPDP Rules notified; Data Protection Board constituted: 13 Nov 2025
* Consent Manager registration (only for would-be Consent Managers): Open since 13 Nov 2026
* DPDP Act Full Compliance (all businesses): 13 May 2027
* Data Breach Notification to Board: Within 72 hours of discovery
* Data Breach Notification to Principal: Without undue delay
* Response to Data Erasure Request: Without unreasonable delay
* Grievance Redressal Response: As prescribed by Rules

WARNING
DPDP Act compliance deadline: 13 May 2027. All Data Fiduciaries must be fully compliant by this date. Penalties up to Rs. 250 Crore for non-compliance.

Contact Example Legal Associates
For help implementing this action plan, or to schedule your next review in 6-12 months, contact B. Example, Advocate: +91 90000 00001 | counsel@example.com | www.example.com.

Disclaimer: This report is generated based on your responses and should not be construed as legal advice. Please consult with a legal professional for specific compliance guidance. Preparer details on this report were self-declared by the preparer and have not been verified by ComplianceCheck. The preparer is responsible for any advice given to their client on the basis of this report.

Report Generated: 22 November 2026
Assessment ID: SAMPLE
Content last reviewed: 22 November 2026

Appendix: Legal References

The provisions behind each gap in this report - useful when briefing your CA or lawyer.

Breach Response

* DPDP Act 2023 - Section 8(6) | DPDP Rules 2025 - Rule 7
* DPDP Act 2023 - Section 8 | CERT-In Guidelines
* DPDP Act 2023 - Section 8(4) | Best Practice

Consent Management

* DPDP Act 2023 - Section 6(1) | DPDP Rules 2025 - Rule 3
* DPDP Act 2023 - Section 6 | DPDP Rules 2025 - Rule 3
* DPDP Act 2023 - Section 5, 6 | DPDP Rules 2025
* DPDP Act 2023 - Section 6(1), 8(2) | DPDP Rules 2025 - Rule 9
* DPDP Act 2023 - Section 6 | Best Practice

Security Safeguards

* DPDP Rules 2025 - Rule 6(2) | Rule 12
* DPDP Act 2023 - Section 8(4) | Best Practice
* DPDP Act 2023 - Section 8(4) | OWASP Best Practice
* DPDP Act 2023 - Section 8(4) | CERT-In Guidelines

Data Principal Rights

* DPDP Act 2023 - Section 12(2) | DPDP Rules 2025 - Rule 5
* DPDP Act 2023 - Section 11, 12 | DPDP Rules 2025 - Rule 5
* DPDP Act 2023 - Section 14 | DPDP Rules 2025 - Rule 5

Governance & Retention

* DPDP Act 2023 - Section 8(5)
* DPDP Act 2023 - Section 8 | Best Practice