

SAMPLE DELIVERABLE · DPDP READINESS

Acme Learning Pvt Ltd: DPDP readiness assessment

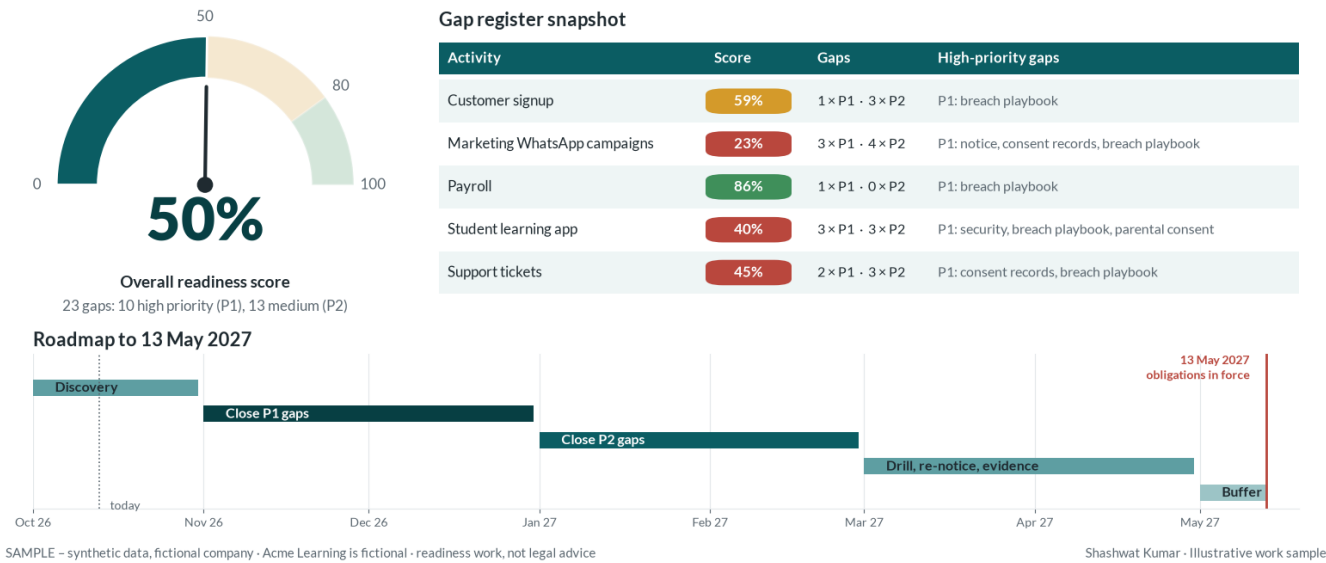
Fictional ed-tech company · assessment date 13 Oct 2026 · scored with the DPDP gap scorer on a synthetic inventory

SAMPLE · synthetic data · fictional company

DPDP ACT READINESS ASSESSMENT

Acme Learning: are we ready for 13 May 2027?

Fictional ed-tech company · 5 processing activities · 10 obligations under the DPDP Act 2023 and Rules 2025 · readiness work, not legal advice



Executive summary

Acme Learning is **50% ready** across its five main processing activities. Three activities are RED, one is AMBER and one is GREEN. We logged **23 gaps**: 10 high priority (P1) and 13 medium (P2). Core obligations take effect on **13 May 2027**, seven months from now. That is enough time if P1 work starts this quarter.

- **No breach playbook anywhere** (5 of 5 activities). The Rules expect prompt notice to the Data Protection Board and affected people, with a detailed report within 72 hours.
- **Children's data is the biggest legal exposure**. The student app processes data of minors without verifiable parental consent (s.9, Rule 10).
- **WhatsApp marketing has no valid notice or consent** and no contract with the messaging vendor. It is the lowest-scoring activity (23%).
- **Retention is undefined** for four of five activities, so data is kept indefinitely.

Readiness work, not legal advice. This assessment maps processing activities against core obligations of the Digital Personal Data Protection Act 2023 and the DPDP Rules 2025 to prioritise operational fixes. It is not a legal opinion; the organisation's counsel should review interpretations, especially on children's data and cross-border transfers.

SCOPE & DATA INVENTORY

What personal data Acme holds, and where

Over two weeks of interviews and system walkthroughs we listed every processing activity that touches personal data, then picked the five with the highest volume or risk. For each one we record who the data is about, what is collected, where it sits, which vendors process it and how long it is kept.

Activity	Data principals	Data categories	Est. records	System / location	Processor	Current retention	Child data
Customer signup	Learners, parents	name, email, phone	48,000	AWS Mumbai	None (in-house)	Indefinite	No
Marketing WhatsApp campaigns	Prospects, learners	phone, name	1,20,000	BSP vendor, India	WhatsApp BSP	Indefinite	No
Payroll	Employees	PAN, bank a/c, salary	85	HRMS SaaS, India	HRMS provider	8 yrs (statutory)	No
Student learning app	Students (approx. 60% under 18)	name, age, progress	31,000	AWS Mumbai + analytics SDK (US)	Analytics SDK	Not defined	Yes
Support tickets	Learners, parents	name, email, issue text	9,500 / yr	Helpdesk SaaS (EU)	Helpdesk provider	Not defined	No

Record counts and locations are synthetic illustrations.

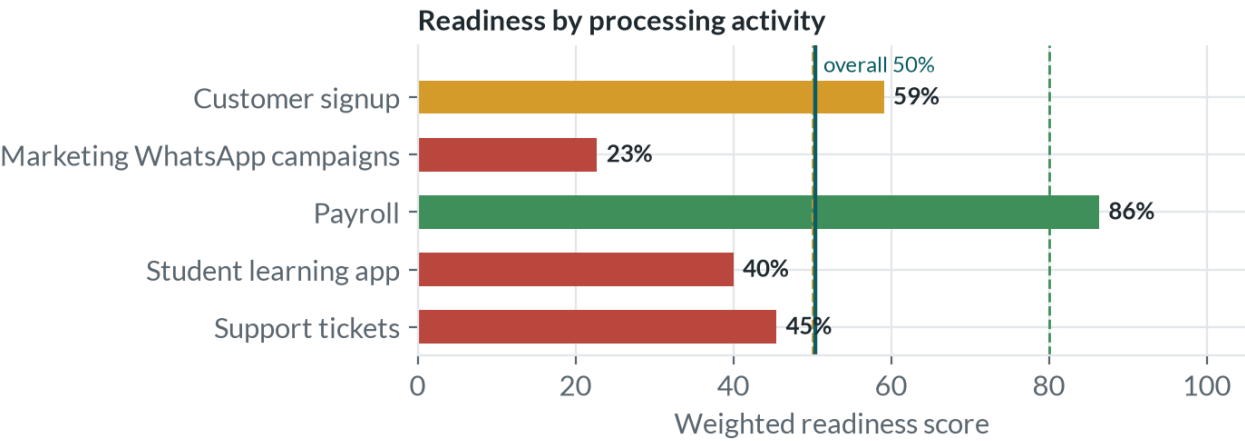
Method: ten weighted checks per activity

Each activity is tested against ten obligations. High-impact items (notice, consent, security, breach, children) carry weight 3 and the rest weight 2. The score is the weighted share of checks met. 'n/a' items, such as the children check where no child data is processed, are excluded. RAG bands: GREEN ≥ 80%, AMBER 50–79%, RED < 50%.

#	Obligation checked	Reference	Weight
1	Notice	s.5 / Rule 3: itemised notice in plain language	3
2	Consent	s.6: free, specific, unambiguous consent + record	3
3	Withdraw	s.6(4): withdrawal as easy as giving consent	2
4	Purpose	s.4/s.6: lawful, specified purpose	2
5	Retention	s.8(7) / Rule 8 + Third Schedule: erase when purpose ends	2
6	Processor DPA	s.8(2): processor engaged under a valid contract	2
7	Security	s.8(5) / Rule 6: reasonable security safeguards	3
8	Breach	s.8(6) / Rule 7: notify Board + principals, 72h report	3
9	Rights	s.11-13 / Rule 14: access, correction, erasure, grievance	2
10	Children	s.9 / Rule 10: verifiable parental consent if child data	3

READINESS SCORES

Where Acme stands today



Obligation-by-activity matrix

Activity	Notice	Consent	Withdraw	Purpose	Retention	Processor DPA	Security	Breach	Rights	Children	Score
Customer signup	Met	Met	Gap	Met	Gap	Met	Met	Gap	Gap	n/a	59%
Marketing WhatsApp campaigns	Gap	Gap	Gap	Met	Gap	Gap	Met	Gap	Gap	n/a	23%
Payroll	Met	Met	Met	Met	Met	Met	Met	Gap	Met	n/a	86%
Student learning app	Met	Met	Gap	Met	Gap	Met	Gap	Gap	Gap	Gap	40%
Support tickets	Met	Gap	Gap	Met	Gap	Gap	Met	Gap	Met	n/a	45%

Reading the matrix

- **Breach** is a gap in every column. That is a company-wide control, so one playbook, one incident log and one drill fix it everywhere.
- **Withdrawal** and **retention** fail almost everywhere. Consent can be given in one tap but cannot be withdrawn the same way, and nothing is ever deleted.
- **Purpose** is met everywhere, a good base for writing itemised notices quickly.
- **Payroll** is GREEN because employment processing rests on legitimate uses rather than consent, which the scorer marks as n/a.

GAP REGISTER

23 gaps, ranked by weight

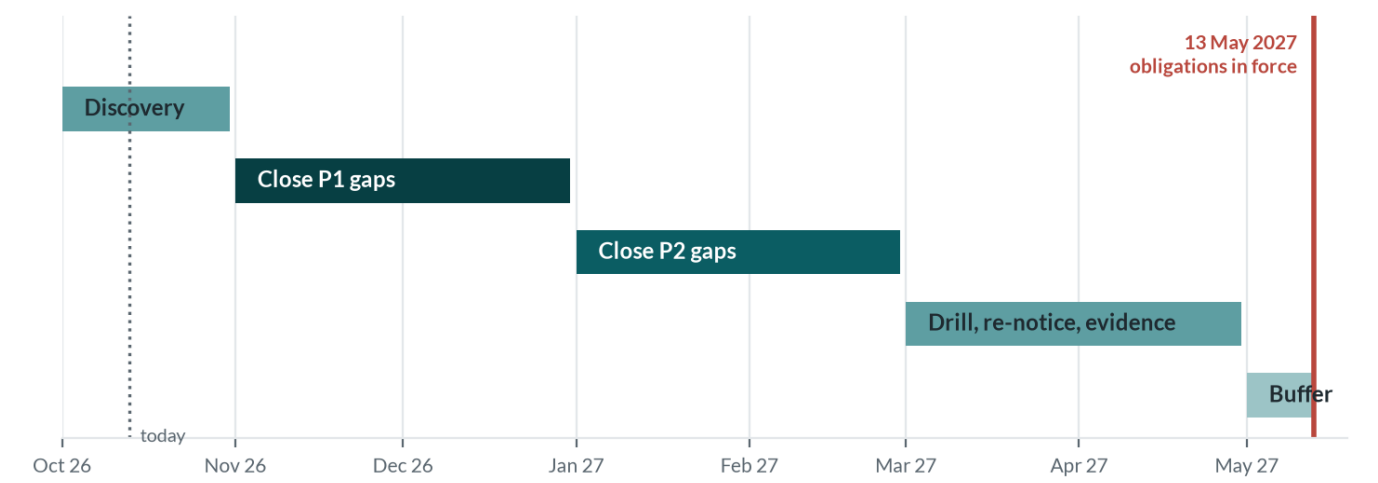
Generated by the DPDP gap scorer and reviewed by hand. P1 = weight-3 obligation (10 items, close by Dec 2026); P2 = weight-2 obligation (13 items, close by Feb 2027).

#	Pri.	Activity	Obligation	Remediation	Owner
1	P1	Customer signup	s.8(6) / Rule 7: notify Board + principals, 72h report	Write and rehearse a breach playbook	InfoSec + DPO
2	P1	Marketing WhatsApp campaigns	s.5 / Rule 3: itemised notice in plain language	Issue a standalone notice listing data, purpose, rights, and how to withdraw consent	Legal + Product
3	P1	Marketing WhatsApp campaigns	s.6: free, specific, unambiguous consent + record	Capture affirmative consent per purpose and store logs	Product + Eng
4	P1	Marketing WhatsApp campaigns	s.8(6) / Rule 7: notify Board + principals, 72h report	Write and rehearse a breach playbook	InfoSec + DPO
5	P1	Payroll	s.8(6) / Rule 7: notify Board + principals, 72h report	Write and rehearse a breach playbook	InfoSec + DPO
6	P1	Student learning app	s.8(5) / Rule 6: reasonable security safeguards	Encryption, access control, logs retained 1 yr, backups	CTO / InfoSec
7	P1	Student learning app	s.8(6) / Rule 7: notify Board + principals, 72h report	Write and rehearse a breach playbook	InfoSec + DPO
8	P1	Student learning app	s.9 / Rule 10: verifiable parental consent if child data	Age-gate and get verifiable parental consent, or confirm no child data	Product + Legal
9	P1	Support tickets	s.6: free, specific, unambiguous consent + record	Capture affirmative consent per purpose and store logs	Product + Eng
10	P1	Support tickets	s.8(6) / Rule 7: notify Board + principals, 72h report	Write and rehearse a breach playbook	InfoSec + DPO
11	P2	Customer signup	s.6(4): withdrawal as easy as giving consent	Add a one-step withdrawal path in the same channel	Product
12	P2	Customer signup	s.8(7) / Rule 8 + Third Schedule: erase when purpose ends	Set a retention period and an erasure job	Eng + Legal
13	P2	Customer signup	s.11-13 / Rule 14: access, correction, erasure, grievance	Publish a rights/grievance channel with an SLA	Support + DPO
14	P2	Marketing WhatsApp campaigns	s.6(4): withdrawal as easy as giving consent	Add a one-step withdrawal path in the same channel	Product
15	P2	Marketing WhatsApp campaigns	s.8(7) / Rule 8 + Third Schedule: erase when purpose ends	Set a retention period and an erasure job	Eng + Legal
16	P2	Marketing WhatsApp campaigns	s.8(2): processor engaged under a valid contract	Sign a DPA with the vendor that covers security and breach cooperation	Procurement
17	P2	Marketing WhatsApp campaigns	s.11-13 / Rule 14: access, correction, erasure, grievance	Publish a rights/grievance channel with an SLA	Support + DPO
18	P2	Student learning app	s.6(4): withdrawal as easy as giving consent	Add a one-step withdrawal path in the same channel	Product
19	P2	Student learning app	s.8(7) / Rule 8 + Third Schedule: erase when purpose ends	Set a retention period and an erasure job	Eng + Legal
20	P2	Student learning app	s.11-13 / Rule 14: access, correction, erasure, grievance	Publish a rights/grievance channel with an SLA	Support + DPO
21	P2	Support tickets	s.6(4): withdrawal as easy as giving consent	Add a one-step withdrawal path in the same channel	Product
22	P2	Support tickets	s.8(7) / Rule 8 + Third Schedule: erase when purpose ends	Set a retention period and an erasure job	Eng + Legal
23	P2	Support tickets	s.8(2): processor engaged under a valid contract	Sign a DPA with the vendor that covers security and breach cooperation	Procurement

ROADMAP

Seven months to 13 May 2027

The plan does the high-risk, high-weight work first. P1 gaps close before the end of December, so January to April is left for contracts, retention engineering and rehearsal. A two-week buffer protects the deadline.



Milestone	Target date	Evidence of completion
Inventory and RoPA signed off by leadership	31 Oct 2026	Signed record of processing; data-flow diagrams
Breach playbook live; incident log in place	30 Nov 2026	Playbook v1, 72-hour report template, on-call list
Itemised notices and consent capture with logs	15 Dec 2026	Notice text per activity; consent records in the database
Age-gating and verifiable parental consent in student app	31 Dec 2026	Release notes; consent artefacts; test evidence
Security baseline: encryption, access reviews, 1-year logs	31 Dec 2026	Configuration screenshots; access review sign-off
DPAs signed with WhatsApp vendor, helpdesk and analytics SDK	31 Jan 2027	Executed DPAs with breach-cooperation clauses
Retention schedule and automated erasure jobs	15 Feb 2027	Retention policy; job run logs
Rights and grievance channel with SLA; one-tap withdrawal	28 Feb 2027	Published page; ticket workflow; SLA dashboard
Tabletop breach drill; re-notice existing users	15 Apr 2027	Drill report; re-notice campaign metrics
Evidence pack and readiness re-score ≥ 85%	30 Apr 2027	Re-run of scorer; evidence index for counsel review

Expected outcome: closing every P1 and P2 gap takes the readiness score from 50% to 100% on the ten checks. A re-score of 85% or more by end-April is the go/no-go threshold.

GOVERNANCE & NEXT STEPS

Making it stick

Who does what

Workstream	Responsible	Accountable	Consulted
Notices, consent, withdrawal	Product + Engineering	CEO	Legal counsel
Children's data (age-gate, parental consent)	Product	CEO	Legal counsel, Customer Success
Security baseline and breach playbook	CTO / InfoSec	CTO	Cloud vendor, DPO
Vendor DPAs	Procurement	CFO	Legal counsel
Retention and erasure	Engineering	CTO	Finance (statutory records)
Rights and grievance channel	Support	DPO / Grievance Officer	Product

Next 30 days

- Appoint an accountable owner for DPDP readiness and a Grievance Officer contact.
- Freeze new WhatsApp campaigns to cold lists until the notice and consent flow is live.
- Start the breach playbook and the age-gating design in parallel; both are on the critical path.
- Send DPA templates to the three processors identified in the inventory.

Assumptions & limitations

- Scope covers the five highest-risk activities. HR recruitment, CCTV and website analytics should be inventoried next.
- Answers come from interviews and walkthroughs; technical controls were not penetration-tested.
- Cross-border transfer analysis (the analytics SDK in the US, helpdesk in the EU) is flagged for counsel and not scored.
- Whether Acme could be notified as a Significant Data Fiduciary is not assessed.

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About this sample: Acme Learning Pvt Ltd is a fictional company. The inventory is synthetic and was scored with an open DPDP gap-scorer prototype (dpdp_scorer.py). Prepared by Shashwat Kumar as an illustrative work sample.