⚠ Illustrative sample. The business, numbers and findings are fictional, to show the format and depth of our reports. It is not legal advice. A real report is based on your business and reviewed by a qualified lawyer on our team.

Voliature · DPDP compliance report

Sample Business Pvt Ltd

A fictional 40-person Indian business that sells to customers online and in person.

READINESS SCORE

28/100

2	3
Critical	High
2	1
Medium	Low

SUMMARY

Sample Business collects personal data in seven places and shares it with five vendors. Most of the basics are partly in place, but there is no breach plan, customer data is open to every employee, and consent isn't recorded anywhere.

FIX FIRST

1. Write a breach response plan and name who runs it (F-01).
2. Lock the customer spreadsheet down to the four people who need it (F-02).
3. Replace the pre-ticked form box with real, recorded consent (F-03).

01

Methodology

We assess each area of the DPDP Act and Rules the same way: what the law asks, what the business does today, and what evidence exists. Each area gets a score from 0 to 4; the readiness score is the total, scaled to 100.

How each area is scored

0	**Not started.** Nothing in place.
1	**Ad hoc.** Done sometimes, by some people, with no written process.
2	**Partly in place.** A process exists but has gaps.
3	**In place.** Done consistently, with a written process.
4	**In place and evidenced.** Done consistently, with records you could show the Board.

How findings are rated

CRITICAL	A core obligation is missing, or many people's data is exposed. Fix within 2 weeks.
HIGH	An obligation under the Act isn't met. Fix within 30 days.
MEDIUM	Partly met, or met with no evidence. Fix within 60 days.
LOW	Good practice that lowers risk. Fix within 90 days.

02

Gap assessment

Each area of the Act, what Sample Business does today, and its score out of 4.

Area	Law	What happens today	Score
Privacy notice	`Section 5, Rule 3`	A template privacy policy that mentions foreign law. No itemised notice at the point of collection.	● ○ ○ ○ 1/4
Consent	`Section 6`	A pre-ticked “I agree to all terms” box. No record of who agreed, or to what.	● ○ ○ ○ 1/4
Security safeguards	`Section 8(5), Rule 6`	Antivirus and passwords in place. No access control on shared files, no access logs.	● ● ○ ○ 2/4
Breach readiness	`Section 8(6), Rule 7`	No plan, no named owner, no way to tell the Board or affected people.	○ ○ ○ ○ 0/4
Retention and erasure	`Section 8(7), Rule 8`	Data kept forever by default. Deleted only when someone remembers.	● ○ ○ ○ 1/4
Vendors (processors)	`Section 8(2)`	Two of five vendors have data protection terms in their contract.	● ● ○ ○ 2/4
Contact and grievances	`Section 8(9), 8(10)`	No published contact for privacy questions or complaints.	● ○ ○ ○ 1/4
Data Principal rights	`Sections 11 to 13, Rule 14`	Requests arrive on WhatsApp or by phone, with no log and no reply process.	● ○ ○ ○ 1/4
Children’s data	`Section 9, Rule 10`	Not applicable: Sample Business doesn’t knowingly collect data of anyone under 18. Re-check if that changes.	n/a

03

Data inventory

Every kind of personal data Sample Business collects, whose it is, and where it comes from.

Data	Whose	Includes	Collected from	Records
Customer contact details	Customers	Name, phone, email, address	Website form, billing counter	`≈ 12,000`

Data	Whose	Includes	Collected from	Records
Purchase and billing history	Customers	Orders, invoices, payment status	Billing software	≈ 12,000
Enquiries and leads	Prospects	Name, phone, what they asked about	Website form, WhatsApp	≈ 3,500
Marketing list	Customers, prospects	Phone, email, offer history	Copied from billing and enquiries	≈ 9,000
Employee records	Staff	ID and PAN numbers, bank details, salary, address	HR files, payroll	40
Job applicants	Applicants	CVs, phone, email	Email, job portals	≈ 600
CCTV footage	Visitors, staff	Video of the shop floor and entrance	On-site cameras	30 days rolling

04

Data mapping

Where that data is stored, who inside the business can see it, and who outside receives it. Flagged rows feed the risk register.

Where it's kept	What's there	Who can see it	Shared with	Status
Shared spreadsheet (customer list)	Contact and purchase details	All 40 staff	No one outside	Flagged
WhatsApp Business (3 staff phones)	Enquiries, customer chats, sent offers	3 sales staff	WhatsApp service provider	Flagged
Cloud email	Enquiries, CVs, invoices	All staff, one shared inbox	Email provider	—
Billing software	Customers, orders, payments	Accounts team (4)	Billing software vendor, payment gateway	—
Email marketing tool	Marketing list	Owner, 1 marketer	Email marketing vendor	Flagged
Payroll provider	Employee records	Owner, HR (1)	Payroll provider	—
CCTV recorder (on site)	Footage	Owner, store manager	No one outside	—

05

Consent assessment

Every place Sample Business asks for, or assumes, permission — and what it needs to look like.

Website enquiry form	TODAY Pre-ticked “I agree to all terms and conditions”; marketing bundled in.	NEEDED A short notice, an unticked optional box for offers, and a saved record of each yes.
WhatsApp offers	TODAY Billing numbers added to the offers list without asking.	NEEDED Send offers only to people who opted in; an easy way to stop.
Billing counter	TODAY Phone number asked for “for the bill”, then used for marketing.	NEEDED Say what the number is for; ask separately for offers.
Email newsletter	TODAY Unsubscribe link works, but no record of when people joined.	NEEDED Record the date, source and wording of each sign-up.
Job applications	TODAY CVs kept in email with no notice to applicants.	NEEDED A short notice in the job post, and a deletion date.

06

Vendor assessment

Every outside company that processes personal data for Sample Business (its Data Processors), and whether the contract protects it.

Vendor	Data they handle	Data protection terms	Deletes at end	Risk
Cloud email provider	Enquiries, CVs, invoices	Yes	Yes	LOW
Billing software vendor	Customer and order data	Yes	Not stated	MEDIUM
WhatsApp service provider	Customer phone numbers, chats	No	No	HIGH
Email marketing vendor	Marketing list	No	No	HIGH

Vendor	Data they handle	Data protection terms	Deletes at end	Risk
Payroll provider	Employee ID, bank and salary data	No	No	HIGH

07

Risk register

Every finding, rated, with the law it touches, the fix, and the evidence that proves it's done.

F-01 CRITICAL Breach readiness

No plan for a data breach.

If customer data leaked today, no one is named to decide what to do, and there is no way to tell the Data Protection Board or the people affected.

RECOMMENDED FIX

Write a breach response plan with named roles, a 72-hour checklist, and ready-to-send notices for the Board and affected people. Run one practice drill.

EVIDENCE REQUIRED

Signed-off plan, drill record, contact list.

LAW

`Section 8(6), Rule 7`

FIXED BY

Voliature: technical fix, in your systems

OWNER

Owner + IT lead

DUE

Week 2

F-02 CRITICAL Security safeguards

Every employee can open the full customer list.

About 12,000 customer records sit in one shared spreadsheet that all 40 staff can open, download and forward, with no log of who did.

RECOMMENDED FIX

Limit access to the four people who need it, turn on two-factor login, and keep access logs for at least a year.

EVIDENCE REQUIRED

Access list, sample access log, two-factor settings.

LAW

`Section 8(5), Rule 6`

FIXED BY

Voliature: technical fix, in your systems

OWNER

IT lead

DUE

Week 2

F-03 HIGH Consent

Consent is pre-ticked and never recorded.

The website form ticks “I agree to all terms” for the visitor and bundles marketing into it. Nothing records who agreed, when, or to what wording.

RECOMMENDED FIX

An unticked, optional box for offers, separate from the enquiry. Save each consent with the time and the notice version shown.

EVIDENCE REQUIRED

New form screenshot, sample consent record.

LAW

`Section 6`

FIXED BY

Voliature: technical fix, in your systems

OWNER

Marketing

DUE

Day 30

F-04 HIGH Privacy notice

No real privacy notice.

The website has a template privacy policy that refers to foreign law. Nothing tells people what is collected and why at the moment they share it.

RECOMMENDED FIX

A plain-language, itemised notice: what is collected, why, how to withdraw consent, how to use their rights, and how to complain to the Board. In the languages customers read.

EVIDENCE REQUIRED

Published notice, version history.

LAW

`Section 5, Rule 3`

FIXED BY

Voliature, with your sign-off

OWNER

Owner

DUE

Day 30

F-05 HIGH Vendors

Three vendors handle data with no data protection terms.

The WhatsApp service provider, email marketing vendor and payroll provider have no contract terms on security, breaches or deletion.

RECOMMENDED FIX

Sign data processing terms: process only on instructions, keep it secure, report breaches without delay, delete at the end.

EVIDENCE REQUIRED

Signed terms, updated vendor register.

LAW

`Section 8(2), 8(5), 8(7)`

FIXED BY

Voliature, with your vendors

OWNER

Owner

DUE

Day 30

F-06 MEDIUM Retention and erasure

Old enquiries and CVs are kept forever.

Enquiries from years ago and every CV ever received are still stored, long after they were needed.

RECOMMENDED FIX

A retention schedule for each kind of data, a quarterly clean-up, and a log of what was deleted.

EVIDENCE REQUIRED

Approved schedule, deletion log.

LAW

`Section 8(7), Rule 8`

FIXED BY

Voliature: technical fix, in your systems

OWNER

Office manager

DUE

Day 60

F-07 MEDIUM Rights and grievances

Requests and complaints have nowhere to go.

There is no published contact for privacy questions. Requests to see or delete data come in on WhatsApp and get lost.

RECOMMENDED FIX

Publish a privacy contact, keep a request register, and use reply templates for access, correction and deletion.

EVIDENCE REQUIRED

Published contact, request register.

LAW

`Section 8(9), 8(10), Sections 11 to 13`

FIXED BY

Voliature: technical fix, in your systems

OWNER

Office manager

DUE

Day 60

F-08 LOW Staff awareness

Staff share customer details on personal WhatsApp.

No one has had privacy training, and customer details are forwarded between personal phones to get work done.

RECOMMENDED FIX

A 45-minute training session and a one-page dos-and-don'ts sheet. Move work chats to the business account.

EVIDENCE REQUIRED

Attendance sheet, signed dos-and-don'ts.

LAW

Section 8(5)

FIXED BY

Voliature, with your sign-off

OWNER

Owner

DUE

Day 90

08

Action plan

What gets fixed, in what order, and by when. Our team makes these changes; you approve them.

Phase 1

Weeks 1–2

Close the critical gaps

F-01 Breach plan and drill

F-02 Lock down the customer list

Phase 2

By day 30

Fix notice, consent and vendors

F-03 Real, recorded consent

F-04 Privacy notice

F-05 Vendor data terms

Phase 3

By day 60

Set up the routines

F-06 Retention schedule

F-07 Request register and contact

Phase 4

By day 90

Train and re-score

F-08 Staff training

Re-assess and update the readiness score