

DPDPA Legal Cross-Reference Index

Act section / Rule → the domain-controls that satisfy it — the auditor's view for proving coverage clause-by-clause. Companion to the 53-control DPDPA Readiness Checklist (the domain / implementation view). Control tags show the domain (A–G).

Part A · DPDP Act, 2023 — by section

S.4 Grounds for processing personal data		
B.1	B Establish a valid legal basis (consent or a listed legitimate use) for every processing activity	S.4, S.7
S.5 Notice		
B.2	B Provide a clear, itemised notice before/at the point of consent (data, purpose, rights, how to complain)	S.5, DPDP Rules 2025 (notice)
B.3	B Make notice available in English and the 22 Eighth-Schedule languages	S.5(3)
B.9	B Provide retrospective notice for personal data collected before the Act	S.5(2)
C.5	C Publish the contact/means for Data Principals to exercise their rights	S.5, DPDP Rules 2025
S.6 Consent		
B.4	B Obtain consent that is free, specific, informed, unconditional and unambiguous	S.6(1)
B.5	B Provide withdrawal of consent that is as easy as giving it	S.6(4)–(6)
B.6	B Maintain consent records/logs (versioned, timestamped, purpose-linked)	S.6, DPDP Rules 2025
B.7	B Integrate with a registered Consent Manager where applicable	S.6(7)–(9), DPDP Rules 2025
B.8	B Do not bundle or condition consent on unrelated services	S.6(1)
D.1	D Enforce purpose limitation — process only for the stated purpose	S.6, S.8(1)
D.2	D Apply data minimisation — collect only what is necessary	S.6(1)
S.7 Certain legitimate uses		
B.1	B Establish a valid legal basis (consent or a listed legitimate use) for every processing activity	S.4, S.7
S.8 General obligations of a Data Fiduciary		
A.1	A Assign accountability for data protection (grievance/contact officer; DPO if a Significant Data Fiduciary)	S.8(9)–(10), S.10
A.2	A Publish and operate a grievance-redressal mechanism with defined response timelines	S.8(10), S.13
A.5	A Maintain a documented data-protection / privacy policy (internal and published)	S.8 (accountability)
A.6	A Run staff training and awareness on DPDPA obligations	S.8 (accountability)
A.7	A Keep accountability records (roles, decisions, evidence of compliance)	S.8

D.1	☐ D Enforce purpose limitation — process only for the stated purpose	S.6, S.8(1)
D.3	☐ D Keep personal data accurate where used to make decisions or shared	S.8(3)–(4)
D.4	☐ D Enforce retention limits — erase when purpose is served or consent withdrawn (unless law requires)	S.8(7), DPDP Rules 2025 (retention)
D.5	☐ D Maintain a Record of Processing / data inventory (personal data, purposes, flows, processors)	S.8 (accountability)
D.6	☐ D Classify personal data and identify sensitive categories and children's data	S.8–9 (implementation)
D.7	☐ D Map data flows across processors and geographies	S.8, S.16 (implementation)
D.8	☐ D Automate / schedule deletion to enforce retention limits	S.8(7), DPDP Rules 2025
E.7	☐ E Bind Data Processors by contract to the same reasonable security safeguards	S.8(2), Rule 6
G.1	☐ G Put Data Processing Agreements in place binding vendors to DPDPA safeguards	S.8(2)
G.2	☐ G Conduct vendor due diligence / periodic security reviews	S.8(2), Rule 6
G.3	☐ G Flow down obligations to sub-processors	S.8(2)
S.9 Processing of children's personal data		
B.10	☐ B Obtain verifiable parental consent + age assurance for children (<18); no tracking or targeted ads	S.9, DPDP Rules 2025 (children)
D.6	☐ D Classify personal data and identify sensitive categories and children's data	S.8–9 (implementation)
S.10 Additional obligations of a Significant Data Fiduciary		
A.1	☐ A Assign accountability for data protection (grievance/contact officer; DPO if a Significant Data Fiduciary)	S.8(9)–(10), S.10
A.3	☐ A (SDF) Appoint an independent Data Auditor and undergo periodic data audits	S.10, DPDP Rules 2025 (SDF)
A.4	☐ A (SDF) Conduct periodic Data Protection Impact Assessments (DPIAs)	S.10, DPDP Rules 2025 (SDF)
A.8	☐ A (SDF) Implement any additional measures the government prescribes (e.g. due-diligence of processing)	S.10, DPDP Rules 2025 (SDF)
S.11 Right to access information		
C.1	☐ C Operate a Right to Access (summary of data processed and recipients)	S.11
C.7	☐ C Verify the identity of a requester before actioning a rights request	S.11–12 (implementation)
S.12 Right to correction and erasure		
C.2	☐ C Operate Rights to Correction, Completion, Updating and Erasure	S.12
C.7	☐ C Verify the identity of a requester before actioning a rights request	S.11–12 (implementation)
S.13 Right of grievance redressal		
A.2	☐ A Publish and operate a grievance-redressal mechanism with defined response timelines	S.8(10), S.13
C.3	☐ C Operate a Right to Grievance Redressal (before approaching the Board)	S.13

C.6	☐ C	Define and publish response timelines for rights requests	S.13, DPDP Rules 2025
S.14 Right to nominate			
C.4	☐ C	Support the Right to Nominate another person to exercise rights	S.14
S.16 Cross-border transfer restriction			
D.7	☐ D	Map data flows across processors and geographies	S.8, S.16 (implementation)
G.4	☐ G	Maintain a cross-border transfer register	S.16
G.5	☐ G	Screen transfers against government-restricted countries	S.16

Part B · DPDP Rules, 2025 — by rule

Rule 6 Reasonable security safeguards			
E.1	☐ E	Encrypt / mask / obfuscate / tokenise personal data (at rest and in transit)	Rule 6
E.2	☐ E	Enforce access controls to systems processing personal data (least privilege, MFA)	Rule 6
E.3	☐ E	Log, monitor and review access to personal data (detect, investigate, remediate)	Rule 6
E.4	☐ E	Retain access logs for at least one year	Rule 6
E.5	☐ E	Maintain backups and resilience for continued processing after compromise	Rule 6
E.6	☐ E	Implement breach-detection measures	Rule 6, Rule 7
E.7	☐ E	Bind Data Processors by contract to the same reasonable security safeguards	S.8(2), Rule 6
E.8	☐ E	Maintain confidentiality, integrity and availability of personal data (general safeguards)	Rule 6
E.9	☐ E	Run secure configuration, patching and vulnerability management	Rule 6 (reasonable safeguards)
F.1	☐ F	Detect and triage personal data breaches	Rule 6, Rule 7
F.6	☐ F	Carry out post-incident remediation to prevent recurrence	Rule 6–7
G.2	☐ G	Conduct vendor due diligence / periodic security reviews	S.8(2), Rule 6
Rule 7 Intimation of a personal data breach			
E.6	☐ E	Implement breach-detection measures	Rule 6, Rule 7
F.1	☐ F	Detect and triage personal data breaches	Rule 6, Rule 7
F.2	☐ F	Notify affected Data Principals without delay, in clear language	Rule 7
F.3	☐ F	Report a detailed breach account to the Data Protection Board within 72 hours	Rule 7
F.4	☐ F	Include the required content in breach notices (nature, consequences, mitigation, safety steps, contact)	Rule 7
F.5	☐ F	Maintain a breach register	Rule 7

Part C · DPDP Rules, 2025 — other provisions (by topic)

Specific Rule numbers not asserted; these map to the Rules governing each topic (notice, retention, children, SDF).

Rules SDF		
A.3	A (SDF) Appoint an independent Data Auditor and undergo periodic data audits	S.10, DPDP Rules 2025 (SDF)
A.4	A (SDF) Conduct periodic Data Protection Impact Assessments (DPIAs)	S.10, DPDP Rules 2025 (SDF)
A.8	A (SDF) Implement any additional measures the government prescribes (e.g. due-diligence of processing)	S.10, DPDP Rules 2025 (SDF)
Rules children		
B.10	B Obtain verifiable parental consent + age assurance for children (<18); no tracking or targeted ads	S.9, DPDP Rules 2025 (children)
Rules notice		
B.2	B Provide a clear, itemised notice before/at the point of consent (data, purpose, rights, how to complain)	S.5, DPDP Rules 2025 (notice)
Rules retention		
D.4	D Enforce retention limits — erase when purpose is served or consent withdrawn (unless law requires)	S.8(7), DPDP Rules 2025 (retention)
Rules unspecified		
B.6	B Maintain consent records/logs (versioned, timestamped, purpose-linked)	S.6, DPDP Rules 2025
B.7	B Integrate with a registered Consent Manager where applicable	S.6(7)–(9), DPDP Rules 2025
C.5	C Publish the contact/means for Data Principals to exercise their rights	S.5, DPDP Rules 2025
C.6	C Define and publish response timelines for rights requests	S.13, DPDP Rules 2025
D.8	D Automate / schedule deletion to enforce retention limits	S.8(7), DPDP Rules 2025