

SAMPLE REPORT

About this sample XYZ Learning is a fictional Pune edtech whose test-prep app is used by school students across India, with data hosted partly overseas. They ran the DPDP Readiness Check after an enterprise school-group customer asked for their data-protection position. We've used them to show what a completed report looks like — its format, depth and tone. The wording below is illustrative; your own report will reflect your answers and cover every area in full. Nothing here is legal advice.

Dear XYZ Learning team,

Thank you for completing the DPDP Readiness Check. Here is your personalised summary. The Digital Personal Data Protection Rules, 2025 were notified on 13 November 2025 and commence in phases: the Data Protection Board and its administrative framework were established immediately; the Consent Manager regime follows on 13 November 2026; and the substantive obligations tested here — notice, breach reporting, children's data, retention, cross-border and the rest — take effect on 13 May 2027. That is the date to plan to. Proposals to compress the timeline have been discussed but no amending notification has been issued, so the dates above remain the binding ones.

Throughout this report, references to what the Rules require are to the position from 13 May 2027, when the relevant provisions commence.

Prepared for: XYZ Learning

Volume: 50,000-5,00,000 individuals · Processes children's data · Data processed outside India

Reference: DPDP-2026-0912 · Issued: 26 July 2026 · Law stated as at: 25 July 2026

Overall readiness: Moderate — several areas to strengthen.

Act-now items: 2.

Priority actions flagged: 2.

▲ Act now — the items we would deal with first

Security safeguards: Your current measures fall short of the Rule 6 baseline — which looks for encryption or masking, access controls, monitoring and logging, backups, and keeping logs for at least a year. Because breach failures carry the Act's steepest penalties, a Rule 6-aligned security uplift belongs near the top of the list.

Breach readiness: There's no breach-response plan in place. Rule 7 expects you to tell affected individuals promptly and file a full report with the Data Protection Board inside 72 hours — a window that's almost impossible to hit if you start from scratch on the day. Draft the plan well ahead of May 2027.

Your position, area by area:

Notice & consent

■ **Address this year:** You provide some privacy information, but it doesn't yet meet Rule 3, which calls for a separate, itemised notice setting out what data you collect, why, how consent can be withdrawn, what rights individuals have, and how to reach the Data Protection Board. Worth reworking your existing wording into a compliant notice.

✓ **On track:** How you obtain consent lines up with the Act — freely given, specific, informed, and by a clear opt-in. Keep records so you can always show each consent was given.

● **Strengthen when you can:** Consent withdrawal already functions. To go further, make it fully self-service and confirm that what follows — halting processing and starting the deletion clock — kicks in on its own.

Security & breach readiness

▲ **Act now:** Security safeguards — covered in full under Act now at the top of this report.

▲ **Act now:** Breach readiness — covered in full under Act now at the top of this report.

Children's data

■ **Address this year:** You do collect parental consent, but not in a way that confirms the parent's identity and age the way Rule 10 requires — a tickbox on its own probably won't pass. Move to one of the recognised Rule 10 verification methods.

✓ **On track:** You don't track, profile or target advertising at children, which is what Section 9(3) requires. Re-check this each time a new advertising or analytics tool goes into the stack.

Your full report continues in the same format across five more areas:

Individual rights & grievance, Retention & erasure, Vendors & processors, Governance & accountability, and Cross-border transfers. Each is assessed and explained exactly like the sections above.

If it would help to talk any of this through, reply to this email with a couple of time slots that suit you, and we will arrange a short call. There is no charge and no obligation. If we do not hear from you, we will not follow up.

You are welcome to share this report within your organisation.

With regards,

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About this report

This is a preliminary awareness assessment prepared only from the answers you gave in the DPDP Readiness Check. We have not reviewed your documents, filings, systems or contracts, and we have not verified any of your responses.

It is not legal advice, it does not create a lawyer–client relationship, and no solicitation or advertisement is intended. It is not an audit, a certification or a compliance opinion, and no person other than the addressee should rely on it — including any investor, customer, insurer or counterparty to whom you may show it.

The law is stated as at the date shown at the top of this report and changes frequently. Please take specific legal advice — from us or from any other adviser — before acting, or declining to act, on anything in it.

As on the date of this report, we are not aware of any Significant Data Fiduciary notifications having been issued under Section 10.

As on the date of this report, we are not aware of any cross-border transfer restrictions notified by the Central Government under Section 16.

Your data

Your responses were used to prepare this report, in line with the privacy notice you accepted before starting. They were collected through Google Workspace, which processes them on our instructions under a written contract and may store them on servers outside India. Where you gave us a phone number, we use it only to clarify an answer before finalising the report. We keep your responses for 36 months from the date of this report and then delete or anonymise them — sooner if you ask. You may request a copy, correct or erase your data, or withdraw your consent at any time: write to privacy@brb-legal.com.