

Significant Data Fiduciary (SDF) Assessment

**Assess Your Readiness. Understand Your Obligations.
Strengthen Privacy Governance.**

**Determine Whether Your Organization Meets the Requirements of a
Significant Data Fiduciary**

The **Digital Personal Data Protection (DPDP) Act, 2023** introduces the concept of a **Significant Data Fiduciary (SDF)**, recognizing that organizations processing personal data at scale or in ways that present higher risks may be subject to additional governance and compliance obligations.

Our **Significant Data Fiduciary (SDF) Assessment** helps organizations evaluate their current data processing activities, governance maturity, and operational practices to determine potential SDF applicability and prepare for enhanced compliance requirements.

What is a Significant Data Fiduciary?

Under the DPDP Act, the Central Government may designate certain Data Fiduciaries as **Significant Data Fiduciaries** based on factors such as:

- Volume and sensitivity of personal data processed
- Risk to the rights of Data Principals
- Potential impact on the sovereignty and integrity of India
- Risk to electoral democracy
- Public order considerations
- Use of emerging technologies
- Other prescribed factors

Organizations designated as SDFs may be required to implement additional governance, accountability, and risk management measures.

Why Conduct an SDF Assessment?

An SDF Assessment enables organizations to:

- Understand potential SDF applicability
- Evaluate current governance maturity
- Identify compliance gaps

- Strengthen privacy controls
 - Improve accountability
 - Reduce regulatory risk
 - Prepare for future regulatory expectations
 - Build customer and stakeholder confidence
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Our Assessment Covers

Organizational Profile

Review:

- Business operations
 - Industry sector
 - Geographic presence
 - Business model
 - Digital ecosystem
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Personal Data Processing

Assessment of:

- Categories of personal data
 - Volume of data processed
 - Sensitive personal information
 - Processing activities
 - Data lifecycle management
 - Cross-border data transfers
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Privacy Governance

Evaluate:

- Privacy governance framework
 - Executive oversight
 - Accountability mechanisms
 - Privacy policies
 - Roles and responsibilities
 - Privacy program maturity
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Privacy Risk Assessment

Review:

- High-risk processing activities
 - Large-scale processing
 - Automated decision-making
 - Emerging technologies
 - Artificial Intelligence (AI) use cases
 - Third-party processing arrangements
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Technical & Security Controls

Assessment of:

- Identity and Access Management (IAM)
 - Encryption
 - Network Security
 - Endpoint Security
 - Security Monitoring
 - Backup & Recovery
 - Incident Response
 - Data Loss Prevention (DLP)
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Third-Party Risk Management

Evaluate:

- Vendor due diligence
 - Data Processing Agreements (DPAs)
 - Outsourcing arrangements
 - Cloud service providers
 - Ongoing vendor oversight
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Accountability & Compliance

Review:

- Privacy documentation
- Records of processing
- Consent management
- Data retention practices

- Data Principal rights management
 - Audit readiness
 - Internal reporting mechanisms
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Our Assessment Methodology

Phase 1

Discovery & Business Understanding

Understand your organization's business model, digital ecosystem, and personal data processing activities.



Phase 2

Current State Assessment

Review governance, security controls, privacy practices, and compliance documentation.



Phase 3

Risk & Applicability Assessment

Evaluate organizational characteristics and processing activities against SDF designation factors.



Phase 4

Gap Analysis

Identify governance, operational, and technical gaps requiring improvement.



Phase 5

Recommendations

Develop practical recommendations to strengthen governance and operational readiness.



Phase 6

Executive Report

Deliver a detailed assessment report, risk summary, and prioritized roadmap.

Key Deliverables

- ✓ Executive Assessment Report
 - ✓ SDF Readiness Assessment
 - ✓ Governance Maturity Assessment
 - ✓ Privacy Gap Analysis
 - ✓ Risk Assessment Report
 - ✓ Compliance Roadmap
 - ✓ Priority Action Plan
 - ✓ Privacy Governance Recommendations
 - ✓ Executive Management Presentation
 - ✓ Continuous Improvement Recommendations
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Business Benefits

Our SDF Assessment helps organizations:

- Understand their privacy governance maturity
- Prepare for evolving regulatory expectations
- Improve operational transparency
- Strengthen executive oversight
- Enhance risk management
- Support business growth with confidence
- Improve customer and stakeholder trust
- Demonstrate accountability and responsible data management

Alignment with Privacy Frameworks

Our assessment aligns with leading privacy and governance frameworks, including:

- **Digital Personal Data Protection (DPDP) Act, 2023 – India**
- **ISO/IEC 27701 – Privacy Information Management**
- **ISO/IEC 27001 – Information Security Management**
- **NIST Privacy Framework**
- **OECD Privacy Guidelines**
- Privacy by Design principles

Industries We Serve

- Manufacturing
- Information Technology & SaaS
- Banking & Financial Services
- Insurance
- Healthcare & Life Sciences
- Retail & E-commerce
- Telecommunications
- Education
- Logistics & Supply Chain
- Professional Services
- Government & Public Sector
- Digital Platforms & Startups

Why Choose Us?

Regulatory & Technical Expertise

Our consultants combine deep knowledge of privacy regulations, cybersecurity, governance, and risk management to deliver practical, business-focused assessments.

Risk-Based Approach

We prioritize the areas that present the greatest privacy and operational risks, helping organizations focus resources where they matter most.

Actionable Recommendations

Our reports provide clear, prioritized guidance that supports both compliance objectives and operational efficiency.

End-to-End Support

From initial assessment through implementation and continuous improvement, we partner with organizations to build sustainable privacy programs.

Our Engagement Process

Initial Consultation → Discovery Workshop → Current State Assessment → Risk & Applicability Assessment → Gap Analysis → Executive Report → Implementation Roadmap → Ongoing Advisory Support

Prepare for Enhanced Privacy Responsibilities

As privacy regulations continue to evolve, organizations that process significant volumes of personal data must be ready to demonstrate strong governance, accountability, and responsible data management.

Our **Significant Data Fiduciary (SDF) Assessment** provides the insights, recommendations, and roadmap needed to evaluate your readiness, strengthen your privacy program, and prepare for enhanced regulatory expectations.

Contact us today to assess your organization's SDF readiness and build a resilient, future-ready privacy governance framework.