ITAD Compliance Checklist

DPDP · RBI · CPCB · NIST · DoD — Operational Readiness Map

How to Use This Checklist

REGULATORY READINESS

This checklist consolidates the operational controls required by India's IT asset disposal regulations, mapped against international data sanitization standards. Use it to assess your current ITAD posture or to brief internal audit and risk teams.

DPDP Act, 2023 — Erasure Obligation

Control	Required Evidence
Lawful basis for retention	Documented purpose limitation per dataset.
Erasure upon purpose completion	Per-device certified destruction certificate.
Significant Data Fiduciary controls	DPIA and audit trail of erasure events.
Consent withdrawal handling	Auditable erasure workflow tied to consent records.

RBI Cyber Security Framework

Control	Required Evidence
Secure disposal procedure	Board-approved IT asset disposal policy.
Outsourced vendor accountability	Signed SLA + vendor compliance documentation.
Inspection readiness	Per-device certificates, chain-of-custody logs.
Annual System Audit Report	Disposal section with metrics and certificates.

E-Waste Management Rules, 2022 (CPCB)

Control	Required Evidence
Registered downstream	CPCB registration of recycler partner.

Manifest tracking	EPR portal acknowledgements per pickup.
Storage limits	Documented storage duration and conditions.
Penalty exposure	Internal violation register and remediation log.

Data Sanitization Standards

Standard	When to Apply
NIST 800-88 Clear	Standard endpoints with non-sensitive data.
NIST 800-88 Purge	Endpoints with personal or financial data.
NIST 800-88 Destroy	Drives with classified or non-recoverable media.
DoD 5220.22-M	High-sensitivity BFSI and ATM/terminal media.

CYVRA Engagement Readiness

• Identify retiring device population (laptops, desktops, servers, ATMs, mobiles).

• Classify by data sensitivity (Public / Internal / Confidential / Regulated).

• Choose erasure standard per class (Clear / Purge / Destroy / DoD).

• Schedule pickup window and authorize CYVRA collection personnel.

• Receive per-device certificates and audit-ready compliance package.