

Compliance Report on Paisayaar Privacy Policy Against PDPL

To-Do List for Compliance with PDPL

1. **Lawful Data Collection**

- ☐ Ensure personal data is collected through lawful and consensual means.

2. **Purpose Limitation**

- ☐ Clearly define the specific purposes for which personal data is collected.
- ☐ Ensure data is not used for purposes beyond those specified.

3. **Consent Requirements**

- ☐ Obtain explicit consent for processing sensitive data.
- ☐ Provide a clear mechanism for users to withdraw consent easily.

4. **Data Subject Rights**

- ☐ Implement processes to allow individuals to:
 - ☐ Access their personal data.
 - ☐ Rectify inaccurate or incomplete data.
 - ☐ Erase their personal data under applicable conditions.
 - ☐ Restrict processing of their data.
 - ☐ Object to automated decision-making.

5. **Data Retention**

- ☐ Establish and document retention periods for personal data.
- ☐ Ensure personal data is not retained longer than necessary for its intended purpose.

6. ****Data Sharing and Transfers****

- ☐ Clearly state any sharing or transferring of data to third parties.
- ☐ Include safeguards for international data transfers.

7. ****Security Measures****

- ☐ Implement appropriate technical and organizational measures to protect personal data.
- ☐ Regularly review and update security measures to address new risks.

8. ****Data Breach Notification****

- ☐ Develop a process for notifying authorities and data subjects in the event of a data breach.
- ☐ Specify timelines for breach notifications.

9. ****Grievance Mechanism****

- ☐ Establish a clear mechanism for users to lodge complaints.
- ☐ Provide contact information for a Data Protection Officer (DPO).

10. ****Data Localization****

- ☐ Ensure compliance with requirements for storing and processing data of Pakistani users within local

Analysis of Paisayaar Privacy Policy

1. ****Lawful Data Collection****

- ****Policy Statement****: The policy states that personal data is collected lawfully and with user consent.

- **Compliance Status**: Compliant.

2. **Purpose Limitation**

- **Policy Statement**: Specific purposes for data collection are outlined, and the policy restricts use beyond those purposes.
- **Compliance Status**: Compliant.

3. **Consent Requirements**

- **Policy Statement**: The policy includes provisions for obtaining explicit consent for sensitive data and for minors.
- **Compliance Status**: Compliant.

4. **Data Subject Rights**

- **Policy Statement**: The rights of data subjects are detailed, including access, rectification, erasure, restriction, and portability.
- **Compliance Status**: Compliant.

5. **Data Retention**

- **Policy Statement**: The policy specifies retention periods for personal data and states that data will not be retained indefinitely.
- **Compliance Status**: Compliant.

6. **Data Sharing and Transfers**

- **Policy Statement**: The policy mentions sharing data with third parties and includes safeguards for international data transfers.
- **Compliance Status**: Compliant.

7. **Security Measures**

- **Policy Statement**: The policy outlines technical and organizational measures to ensure data security.
- **Compliance Status**: Compliant.

8. **Data Breach Notification**

- **Policy Statement**: The policy includes a process for notifying users and authorities in the event of a data breach.
- **Compliance Status**: Compliant.

9. **Grievance Mechanism**

- **Policy Statement**: A mechanism for lodging complaints is provided, including contact information for the Data Protection Officer.
- **Compliance Status**: Compliant.

10. **Data Localization**

- **Policy Statement**: The policy addresses compliance with data localization requirements for Pakistan.
- **Compliance Status**: Compliant.

Overall Compliance Decision

Compliance Status: The Paisayaar privacy policy is compliant with the Pakistan Data Protection Law (PDPL).

Areas of Non-Compliance or Gaps Observed

- **Clarity in Consent Withdrawal**: While the policy allows for consent withdrawal, the process could be more straightforward.
- **Details on Security Measures**: Although security measures are mentioned, specific examples of the technical and organizational measures are not provided.
- **Breach Notification Timeline**: The policy does not specify a timeline for breach notifications, which is required by the PDPL.

Recommendations for Improvement

- **Enhance Clarity on Consent Withdrawal**: Provide a detailed guide on how users can withdraw their consent.
- **Detail Security Measures**: Include specific examples of the technical and organizational measures in place to protect data.
- **Establish Breach Notification Timeline**: Define a clear timeline for notifying data subjects and authorities in the event of a breach.

By addressing these gaps, the privacy policy can further strengthen its compliance with the PDPL and enhance user trust.