



DPDP for SaaS Companies

Two hats: Data Fiduciary for your own users, Data Processor for client data. Each hat has its own duties.

■ Fiduciary Hat (Your Users)

- Notice + consent for signups (S.5–6)
- Product vs marketing = separate consents
- Requests answered on published timelines (R.14)
- Delete closed accounts (S.8(7))

■ Processor Hat (Client Data)

- Valid contract required (S.8(2))
- Process on client instructions only
- No mining client data for yourself
- Cross-client reuse is never OK

■ Your DPA Must Cover

- Security safeguards (R.6 set)
- Breach flow-down: tell the client without delay
- Help with erasure requests
- Sub-processors + deletion at exit

■ Why It Pays

- Every buyer now asks "is this vendor DPDP-safe?"
- A ready DPA wins the security review
- Exportable audit evidence closes deals
- Core obligations from 13 May 2027



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www.easydp.in/blog/saas-dpdp-compliance-guide/