



Association of  
Independent Data Auditors  
of India  
[www.aidai.org.in](http://www.aidai.org.in)  
A Division of Foundation of Data Protection Professionals in India



## Association of Independent Data Auditors (AIDAI): Empanelment & Fee Report

### 1. Introduction: The Evolution of Data Auditing in India

The regulatory landscape for data protection in India has transitioned from the preliminary provisions of the Information Technology (IT) Act 2000 to the comprehensive mandates of the Digital Personal Data Protection Act (DPDPA) 2023.

This shift necessitates a specialized cadre of professionals capable of navigating a "Compliance by Default" framework.

The Association of Independent Data Auditors (AIDAI) has been established as the dedicated division of the Foundation of Data Protection Professionals in India (FDPI)—a Section 8 company—to serve as the unified platform for this new profession.

AIDAI integrates expertise from technical, legal, and financial sectors (Chartered Accountancy, ISO auditing, and Cost Accounting) to ensure that Indian organizations meet global standards of data accountability. This report details the formal empanelment structure and regulatory standards established during the recent virtual townhall.

### 2. The Regulatory Mandate for Independent Data Auditors

Under Section 10 of the DPDPA 2023, the role of the Independent Data Auditor (IDA) is established as a statutory requirement for Significant Data Fiduciaries (SDFs). AIDAI operates on the philosophy of **Compliance by Default**, recognizing that while "Privacy" remains undefined in the Act, rigorous compliance automatically secures data principles.

#### Statutory Elevation and Responsibility

The IDA role is elevated to a level of authority and responsibility equivalent to **Statutory Auditors reporting to Fraud Investigation Committees** or **Company Secretaries reporting to SEBI**. Auditors are granted the mandate to:

- **Report Non-Compliance Directly:** If significant non-compliance is observed, IDAs shall report directly to the Data Protection Board (DPB).
- **Perform Algorithmic Analysis:** Conduct technical evaluations of AI-driven processing to ensure safety and transparency.



- **Mandate Self-Evaluation:** Organizations must perform a self-evaluation of data volume, sensitivity, and risk (especially regarding biometrics and AI) to determine SDF status, rather than waiting for government notification.
- **Ensure Data Valuation:** Oversee the fair valuation of data as a corporate and PSU asset, a requirement recently emphasized by the Comptroller and Auditor General (CAG).

### 3. Empanelment Categories and Eligibility Criteria

AIDAI has structured three tiers of empanelment to accommodate different levels of expertise and to provide a career pivot for professionals affected by AI-driven job displacement.

#### Probationary Independent Data Auditor

- **Target Audience:** Freshers and professionals from technical, management, finance, or legal backgrounds with zero prior privacy experience.
- **Objective:** To develop a secondary level of professionals who can support experienced Data Protection Officers (DPOs) in large-scale organizations.

#### Accredited Independent Data Auditor

- **Target Audience:** Mid-career professionals with up to five years of experience or existing external credentials.
- **Eligibility:** Recognition is extended to those holding certifications from the, ISO (27001, 9000, 42001), DSCI, or professional qualifications as Advocates, Chartered Accountants, Cost Accountants or Company Secretaries

#### Certified Independent Data Auditor

- **Target Audience:** Senior professionals seeking the highest level of validation within the Indian regulatory context.
- **Requirement:** Successful completion of the AIDAI/FDPPI examination. .

### 4. AIDAI Empanelment Fee Schedule

The following fee structure is designed to be inclusive while maintaining the operational integrity of the association.



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Empanelment Category	Annual Fee (INR) +GST@18%	Key Eligibility / Requirement
<b>Probationary Independent Data Auditor</b>	₹3,000	Freshers or those transitioning careers due to AI.
<b>Accredited Independent Data Auditor</b>	₹6,000	Holds external certs (ISO, DSCI, BIS) or CA/Cost Accountant status.
<b>Certified Independent Data Auditor</b>	₹10,000	Must pass the formal FDPI/AIDAI CIDA Examination.

**Annual Target:** The CEO has mandated an empanelment target of **400 professionals per year**, distributed at a rate of 100 per quarter, to meet the impending demand from thousands of anticipated Significant Data Fiduciaries.

## 5. Competency Development and Training Pathways

To standardize the quality of audits, AIDAI shall deploy four primary training pillars:

- 1. Certified Data Protection Professionals (India Track):** Focused on the specific nuances of the DPDPA 2023.
- 2. Elite Data Protection Officer (Implementation Track):** Practical training for internal compliance management.
- 3. Certified Independent Data Auditor Track:** Advanced training for the external audit function, including algorithmic analysis.
- 4. Global Track (GDPR):** Exposure to international standards including GDPR, Singapore, and Dubai data laws.

An **Induction Programme** is scheduled for June to reorient all empanelled members on the DGPSI standards and the operational ethics of the association.

## 6. The Data Exchange and Professional Ecosystem

AIDAI shall launch a **Data Exchange Platform** by December. Operating on a Software-as-a-Service (SAS) model, this platform will allow organizations to seek and spot audit opportunities while facilitating the complete compliance life cycle.



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*The Independent Data Auditor functions as an **Advanced DPDPA Assistant System (ADAS)**. Much like safety systems in modern vehicles, the auditor serves as an external regulator ensuring the data fiduciary stays within the "legal lanes" of compliance, providing warnings before the organization drifts into non-compliance or regulatory penalties.*

The ecosystem also incorporates **Data Valuation Standards of India**, engaging Cost Accountants to ensure data is treated as a measurable financial asset, particularly for Public Sector Undertakings (PSUs).

## 7. Governance and Advisory Oversight

AIDAI is governed by a distinguished committee of industry veterans to ensure independence and credibility:

- **Leadership:** Mr. Naavi (Chairperson) and Mr. Vijayendra Shenoy (CEO).
- **Advisory Board:**
  - **Mr. Kamlesh Bajaj:** Founder CEO of DSCI.
  - **Mr. Rakesh Maheshwari:** Former Senior Official, Ministry of Electronics and Information Technology (MeitY).
  - **Mr. Sudarshan Mandyam:** International authority on ISO standards.
  - **Mr. K.S. Madhu Murthy:** Representative for the Chartered Accountant community.

## 8. Conclusion and Next Steps

The empanelment of Independent Data Auditors is a vital step in moving India from a culture of privacy guardianship to one of data accountability. AIDAI follows the "**Banyan Tree**" model, where members grow their own independent roots of practice while remaining connected to the central support of the association.

**Call to Action:** Eligible professionals shall visit [aidai.org.in](http://aidai.org.in) to initiate the empanelment process. Mandatory induction sessions in June will serve as the gateway for participation in the Data Exchange Platform.

**Important Note: Oath of Ethical Conduct** All empanelled auditors are required to subscribe to a formal **Oath of Ethical Conduct**. As statutory-level reporters to the Data Protection Board, auditors must maintain absolute integrity and independence, prioritizing national data security and principle rights above fiduciary interests.