

PDPL Data Privacy Compliance

Audit Scorecard

A 15-point compliance assessment for personal data collection, consent, privacy notices, data sharing, retention, and PDPL controller obligations

Dealer / Center Name	
Dealer Code	
Region / Zone	
Auditor Name	
Audit Date	
Cycle / Period	

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How to Use This Scorecard

This scorecard evaluates PDPL Data Privacy Compliance compliance across 15 criteria grouped into 4 categories. For each criterion, circle a score from 1 (not in place) to 5 (fully embedded and sustained). Do not rate where you aspire to be — rate what you observe on the day.

Score Scale

Score	Level	What it means
1	**Not in place**	Standard does not exist or has never been implemented at this dealership.
2	**Attempted**	Some effort made but inconsistent — visible gaps remain in most areas.
3	**Defined**	Standard is documented and partially followed. Some areas compliant, others not.
4	**Managed**	Standard is followed consistently. Minor exceptions occur.
5	**Fully Sustained**	Fully embedded. Evidence of ongoing compliance between audits without prompting.

RAG Status Guide

Status	Overall Score	Action
Green	60–75 (80–100%)	Compliant. Maintain current standards.
Amber	38–59 (50–79%)	Improvement required. Structured action plan within 30 days.
Red	0–37 (0–49%)	Non-compliant. Priority intervention. Escalate to regional management.

AutoSmart Tip: Saudi PDPL (Personal Data Protection Law) enforcement is overseen by SDAIA and carries financial penalties for non-compliance. Customer data collected through the DMS, CRM, service history, and marketing systems all falls within PDPL scope. Pay particular attention to marketing consent — using customer data for promotional communications without documented consent is one of the most common compliance gaps in dealership environments.

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Scorecard

Circle a score 1–5 for each criterion. Record observations in the Notes column.

No.	Criterion / Question	1	2	3	4	5	Notes
PERSONAL DATA COLLECTION & CONSENT							
1	Is personal data collected from customers only for specified, explicit, and legitimate purposes as required under Saudi PDPL (issued by Royal Decree M/19)?	○	○	○	○	○	
2	Is customer consent obtained before collecting personal data used for non-essential purposes (e.g., marketing communications, data sharing with third parties)?	○	○	○	○	○	
3	Is the basis for processing each category of personal data documented (consent, contract performance, legal obligation, legitimate interest), consistent with PDPL requirements?	○	○	○	○	○	
4	Is sensitive personal data (as defined by PDPL) identified and subject to heightened protection measures, collected only with explicit consent or specific legal basis?	○	○	○	○	○	
PRIVACY NOTICES & DATA SHARING							
5	Is a privacy notice provided to customers at or before the point of data collection, covering the purposes of processing, data categories collected, and individual rights?	○	○	○	○	○	
6	Is the privacy notice written in plain Arabic (or dual Arabic/English), accessible to the customer, and current?	○	○	○	○	○	
7	Where personal data is shared with third parties (finance partners, insurers, OEM/distributor, marketing agencies), is the basis for sharing documented and compliant with PDPL?	○	○	○	○	○	
8	Are data processing agreements in place with third-party processors who handle personal data on behalf of the dealership?	○	○	○	○	○	
DATA RETENTION & CUSTOMER RIGHTS							
9	Is a data retention policy in place, defining how long different categories of personal data are kept and the basis for that retention period?	○	○	○	○	○	
10	Are personal data deleted or anonymised when the retention period expires, rather than retained indefinitely?	○	○	○	○	○	
11	Is a process in place to respond to customer requests to access, correct, or delete their personal data, within the timeframe required by PDPL?	○	○	○	○	○	
BREACH HANDLING & CONTROLLER OBLIGATIONS							
12	Is a documented personal data breach	○	○	○	○	○	

	response process in place, covering detection, containment, assessment, notification, and remediation?						
13	Is the PDPL obligation to notify SDAIA (Saudi Data and AI Authority) of qualifying data breaches within the required timeframe understood and documented?	○	○	○	○	○	
14	Is a data protection awareness programme in place for staff who handle personal data, covering PDPL obligations relevant to their role?	○	○	○	○	○	
15	Is there a named Data Protection Officer or equivalent responsible person designated at the dealership or group level, accountable for PDPL compliance?	○	○	○	○	○	
OVERALL SCORE → / 75 = %							

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Category Summary & RAG Status

Transfer category totals from the scorecard. Assign RAG status and record the priority action for each category.

Category	Score	%	RAG	Priority Action
Personal Data Collection & Consent	/20			
Privacy Notices & Data Sharing	/20			
Data Retention & Customer Rights	/15			
Breach Handling & Controller Obligations	/20			
OVERALL SCORE	**/75**			

Sign-Off

Auditor Name	
Auditor Signature	
Date	
Data Protection Officer Name	
Data Protection Officer Signature	
Next Audit Date	

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Action Plan Tracker

PDPL Data Privacy Compliance — Gap Closure Framework

A structured four-stage workflow to assign, track, verify, and close PDPL Data Privacy Compliance non-compliances

Dealer / Center Name	
Dealer Code	
Region / Zone	
Audit Cycle / Period	
Tracker Owner (ASM / ZSM)	
Date Opened	
Target Close Date	

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How to Use This Tracker

This tracker is designed to be completed immediately following a PDPL Data Privacy Compliance audit. Every non-compliance recorded must be logged here as an action item and progressed through all four stages before it is considered resolved.

Four-Stage Workflow

1. PENDING	2. IN PROGRESS	3. COMPLETED	4. APPROVED
Finding assigned. Owner & date set.	Work underway. Evidence being gathered.	Dealer submits evidence for review.	Auditor verifies and closes the item.

Stage Rules

Stage	Actioned by	Required action	Evidence required
PENDING	ASM / Auditor	Assign a named responsible party. Set a close date. Log the non-compliance description.	No evidence required at this stage.
IN PROGRESS	PDPL Data Privacy Compliance / Dealer Team	Begin remediation. Update status. Upload progress evidence as work is completed.	In-progress photos, supporting documents, records.
COMPLETED	Data Protection Officer	Mark item complete and submit for review. Evidence must be attached before submission.	Photo of rectified item, signed procedure, supporting evidence.
APPROVED	ASM / ZSM / Auditor	Review evidence. Verify compliance on next site visit if required. Approve and close.	Auditor sign-off. Date of verification recorded.

Tracker Summary

Fill in after completing each audit cycle.

Stage	Description	Count	Notes
PENDING	Not yet started		
IN PROGRESS	Work underway		
COMPLETED	Awaiting approval		
APPROVED	Verified & closed		

AutoSmart Tip: With AutoSmart Audit, every non-compliance is automatically converted into an action item at the point of audit — with owner assignment, close dates, evidence upload, and a four-stage approval workflow built in. No spreadsheets. No manual follow-up.

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Action Plan Tracker

Log every non-compliance from the audit below. Progress each item through all four stages before closure.

STAGE — PENDING						
Ref	**Non-Compliance / Gap Description**	**Category**	**Responsible Party**	**Target Date**	**Status**	**Evidence / Notes**
P-01						
P-02						
P-03						
P-04						
P-05						
P-06						
P-07						
P-08						
P-09						
P-10						

STAGE — IN PROGRESS						
Ref	**Non-Compliance / Gap Description**	**Category**	**Responsible Party**	**Target Date**	**Status**	**Evidence / Notes**
I-01						
I-02						
I-03						
I-04						
I-05						
I-06						
I-07						
I-08						

STAGE — COMPLETED						
Ref	**Non-Compliance / Gap Description**	**Category**	**Responsible Party**	**Target Date**	**Status**	**Evidence / Notes**
C-01						

C-02						
C-03						
C-04						
C-05						
C-06						

STAGE — APPROVED						
Ref	**Non-Compliance / Gap Description**	**Category**	**Responsible Party**	**Target Date**	**Status**	**Evidence / Notes**
A-01						
A-02						
A-03						
A-04						
A-05						
A-06						

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Cycle Sign-Off

To be completed once all action items in this cycle are Approved. Both the Data Protection Officer and the Regional Auditor must sign.

Dealer Principal Name	
Dealer Principal Signature	
Regional Auditor / ASM Name	
Auditor Signature	
Date of Review	
Next Review Date	

Cycle Notes

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