

Data Audit Checklist

A PRACTICAL DATA MAPPING & GOVERNANCE GUIDE

MUCHANGI PATRICK & ASSOCIATES ADVOCATES
Data Privacy • AI Governance • Digital Regulation

EXECUTIVE SUMMARY

Periodic data audits enable an organisation to maintain an accurate record of processing activities, identify unknown or unauthorised data flows, and demonstrate accountability in accordance with section 41 of the Data Protection Act, 2019.

This checklist has been prepared by Muchangi Patrick & Associates Advocates to guide organisations through a structured data mapping and audit exercise, from data inventory and classification to reporting and remediation.

This checklist is a diagnostic tool, not a substitute for legal advice. Organisations identifying material gaps should seek a full compliance audit before relying on the results for governance or regulatory reporting purposes.

HOW TO USE THIS CHECKLIST

For each of the twenty-six requirements below, the assessor should record one of the following four ratings, supported where necessary by a brief explanatory note:

YES — Fully compliant with the requirement.

PARTIAL — Some compliance, but improvements are required.

NO — Not compliant; the requirement is unmet.

N/A — Not applicable to the organisation's data holdings.

DATA AUDIT ASSESSMENT

N O.	AUDIT REQUIREMENT	YES	PARTIAL	NO	N/A	NOTES
01	All personal data holdings identified and catalogued	☐	☐	☐	☐	
02	Data inventory or map covering all departments completed	☐	☐	☐	☐	
03	Categories of data subjects identified	☐	☐	☐	☐	
04	Categories of personal data identified, including special categories	☐	☐	☐	☐	
05	Sources of personal data documented	☐	☐	☐	☐	
06	Purpose of collection recorded for each data category	☐	☐	☐	☐	
07	Lawful basis identified for each processing activity	☐	☐	☐	☐	
08	Data flows within the organisation	☐	☐	☐	☐	

N O.	AUDIT REQUIREMENT	YES	PARTIAL	NO	N/A	NOTES
8	mapped					
09	Data flows to external third parties mapped	☐	☐	☐	☐	
10	Cross-border data transfers identified and documented	☐	☐	☐	☐	
11	Data storage locations identified (on-premise, cloud or hybrid)	☐	☐	☐	☐	
12	Data retention periods defined for each data category	☐	☐	☐	☐	
13	Data disposal and secure deletion procedures verified	☐	☐	☐	☐	
14	Processor and sub-processor relationships identified	☐	☐	☐	☐	
15	Data processing agreements in place with all processors	☐	☐	☐	☐	
16	Access controls reviewed for each data repository	☐	☐	☐	☐	
17	Data quality and accuracy controls assessed	☐	☐	☐	☐	
18	Legacy or orphaned data systems identified	☐	☐	☐	☐	
19	Shadow IT and unauthorised data repositories investigated	☐	☐	☐	☐	
20	Records of Processing Activities (ROPA) updated	☐	☐	☐	☐	
21	Data protection risks identified during the audit	☐	☐	☐	☐	
22	Findings compared against the previous audit cycle	☐	☐	☐	☐	
23	Remedial actions assigned with owners and timelines	☐	☐	☐	☐	
24	Audit findings reported to senior management or the board	☐	☐	☐	☐	
25	Data audit methodology and scope documented	☐	☐	☐	☐	
26	Next audit cycle scheduled	☐	☐	☐	☐	

COMPLIANCE SCORE

Aggregate the ratings above to determine the organisation's overall compliance posture:

SCORE	RATING
23 - 26	Excellent
18 - 22	Good
11 - 17	Fair
0 - 10	Immediate Remediation Required

PRIORITY ACTIONS

Corrective actions identified during the assessment should be recorded and tracked to closure below:

PRIORITY	ACTION	RESPONSIBLE OFFICER	TARGET DATE
HIGH			
HIGH			
MEDIUM			
MEDIUM			
LOW			

OVERALL ASSESSMENT

Overall Data Audit Rating:

☐ EXCELLENT	☐ GOOD	☐ FAIR	☐ POOR
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AUDITOR'S NOTES

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NEED A FULL DATA AUDIT?

This checklist provides a high-level self-assessment only. For a comprehensive, documented data mapping exercise, Muchangi Patrick & Associates Advocates offers:

- ✦ Data Protection Compliance Audits
- ✦ Data Protection Impact Assessments (DPIAs)
- ✦ AI Governance Assessments
- ✦ Privacy Programme Development
- ✦ Data Breach Response Advisory
- ✦ Virtual Data Protection Officer (vDPO) Services
- ✦ Executive & Board Training

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