

ICDPA Compliance Checklist

Indiana Consumer Data Protection Act · In effect since January 1, 2026

The Indiana Consumer Data Protection Act (ICDPA) is now in effect. Work through this checklist to see whether the law applies to your business and to track your progress toward compliance. Print it, share it with your team, and tick each box as you go.

1. Does the ICDPA apply to your business?

It applies to for-profit entities doing business in Indiana, or targeting Indiana residents, that meet **at least one** threshold in a calendar year:

- ☐ **Threshold 1.** We control or process the personal data of **100,000 or more** Indiana residents.
- ☐ **Threshold 2.** We control or process the data of **25,000 or more** Indiana residents **and** derive more than **50%** of gross revenue from selling personal data.

Exempt at the entity level: nonprofits, HIPAA-covered entities, GLBA-covered financial institutions, public utilities, higher-education institutions, and government bodies. Below both thresholds and not exempt-listed? You are not currently in scope.

2. Your core compliance steps

- ☐ **Confirm applicability.** Run a data inventory of how many Indiana residents' records we hold and how we use them.
- ☐ **Map your data.** Document what personal data we collect, why, where it lives, and which third parties receive it.
- ☐ **Update your privacy notice.** Publish a clear, accessible notice covering data categories, purposes, consumer rights, opt-out methods, and third-party disclosures.
- ☐ **Build a consumer-rights process.** Honor access, correction, deletion, and portability requests within 45 days (extendable by 45); give denied requests a reason and an appeal path (60-day appeal response).
- ☐ **Handle sensitive data & opt-outs.** Get opt-in consent before processing sensitive data; offer opt-outs for targeted advertising, data sales, and profiling.
- ☐ **Document DPIAs & processor terms.** Run Data Protection Impact Assessments for high-risk processing and sign data processing agreements with every vendor that touches the data.

3. Enforcement at a glance

Who enforces	Indiana Attorney General only; no private right of action. Complaints come through the AG's online portal.
30-day notice	The AG must identify the specific violation in writing before pursuing penalties.
30-day cure	You get 30 days to fix the issue. Indiana's cure period is permanent ; it does not expire after a set number of uses.
Penalties	Up to \$7,500 per violation if uncured, and violations can compound across consumers and data categories.
Don't forget	Indiana's separate breach-notification law (IC § 24-4.9) requires notifying residents and the AG within 45 days of a breach, regardless of ICDPA scope.

Need a hand? CyberGlobal Indiana helps Indiana businesses turn the ICDPA into a clear, manageable plan, from data mapping to DPIAs and compliance audits. We'd be glad to walk through it with your team.

Book a conversation with Mark → meet.cybergl.com/meetings/mark-warlick

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