

COMPLIANCE TESTING CHECKLIST

Pre-Launch AI System Compliance Verification

BlackIndian AI Professional Framework Version 1.0 | December 2025 Read Time: 8 minutes



TABLE OF CONTENTS

01	02	03
How to Use This Checklist	GDPR Compliance (EU)	HIPAA Compliance (US Healthcare)
04	05	06
EU AI Act Compliance	Fair Lending Compliance (US Financial)	Employment AI Compliance (US/NYC)
07	08	09
General Data Protection	Documentation Requirements	Sign-Off & Certification

1. HOW TO USE THIS CHECKLIST

Purpose

This checklist ensures your AI system meets regulatory requirements before launch. Use it as:

- **Pre-launch verification** (complete before production deployment)
- **Audit preparation** (demonstrate compliance to regulators)
- **Gap analysis** (identify missing compliance elements)

Instructions

For Each Item:

-  **Compliant** - Requirement met, evidence documented
-  **Partial** - Requirement partially met, gaps exist
-  **Non-Compliant** - Requirement not met
-  **N/A** - Not applicable to this system

Required for Launch:

- All applicable items must be  or 
- No  items allowed
-  items require documented remediation plan with timeline

2. GDPR COMPLIANCE (EU DATA PROTECTION)

Applies If: Processing personal data of EU residents

Article 5: Principles of Processing

#	Requirement	Status	Evidence	Notes
2.1	Lawfulness, Fairness, Transparency Legal basis for processing identified (consent, contract, legitimate interest, etc.)	✓ ⚠ ✗ ⊗	Reference: _____	Legal basis: _____
2.2	Purpose Limitation Data used only for specified, explicit purposes	✓ ⚠ ✗ ⊗	Reference: _____	Purpose documented: Yes No
2.3	Data Minimization Only necessary data collected and processed	✓ ⚠ ✗ ⊗	Reference: _____	Data minimization review completed: Yes No
2.4	Accuracy Mechanisms to ensure data accuracy and enable corrections	✓ ⚠ ✗ ⊗	Reference: _____	Correction process: Implemented
2.5	Storage Limitation Retention periods defined and enforced	✓ ⚠ ✗ ⊗	Reference: _____	Retention period: _____ days/years
2.6	Integrity & Confidentiality Appropriate security measures implemented	✓ ⚠ ✗ ⊗	Reference: _____	Security testing completed: Yes No

Article 13-14: Transparency & Information

#	Requirement	Status	Evidence	Notes
2.7	Privacy Notice Clear privacy policy provided to users	✓ ! ✗ ⊗	URL: _____	Last updated: _____
2.8	AI Disclosure Users informed that AI is processing their data	✓ ! ✗ ⊗	Location: _____	Clear and prominent: ☐ Yes ☐ No
2.9	Purpose Disclosure Specific purposes of AI processing explained	✓ ! ✗ ⊗	Reference: _____	Understandable to layperson: ☐ Yes ☐ No
2.10	Contact Information Data controller contact info provided	✓ ! ✗ ⊗	Email: _____	DPO appointed: ☐ Yes ☐ No ☐ N/A

Article 15-22: Data Subject Rights

#	Requirement	Status	Evidence	Notes
2.11	Right of Access (Article 15) Users can request their data	✓ ✗ ⚠	Process: _____	Response time: _____ days
2.12	Right to Rectification (Article 16) Users can correct inaccurate data	✓ ✗ ⚠	Process: _____	Correction mechanism: ☐ Automated ☐ Manual
2.13	Right to Erasure (Article 17) Users can request data deletion	✓ ✗ ⚠	Process: _____	Deletion verified: ☐ Yes ☐ No
2.14	Right to Data Portability (Article 20) Users can export their data	✓ ✗ ⚠	Export format: _____	Tested: ☐ Yes ☐ No
2.15	Right to Object (Article 21) Users can object to processing	✓ ✗ ⚠	Process: _____	Objection honored: ☐ Yes ☐ No
2.16	Right to Human Review (Article 22) Users can request human review of automated decisions	✓ ✗ ⚠	Process: _____	Human-in-the-loop: ☐ Yes ☐ No

Article 32: Security of Processing

#	Requirement	Status	Evidence	Notes
2.17	Encryption at Rest Personal data encrypted when stored	✔ ⚠ ✖ ⊗	Algorithm: _____	Tested: ☐ Yes ☐ No
2.18	Encryption in Transit Personal data encrypted during transmission	✔ ⚠ ✖ ⊗	Protocol: _____	TLS 1.2+: ☐ Yes ☐ No
2.19	Access Controls Role-based access to personal data	✔ ⚠ ✖ ⊗	System: _____	Least privilege: ☐ Yes ☐ No
2.20	Audit Logging All personal data access logged	✔ ⚠ ✖ ⊗	Retention: _____ days	Log review: ☐ Regular

Article 35: Data Protection Impact Assessment (DPIA)

#	Requirement	Status	Evidence	Notes
2.21	DPIA Required? High-risk processing (profiling, sensitive data, large-scale)	☐ Yes (DPIA required) ☐ No	Assessment: _____	Risk level: ☐ Low ☐ Medium ☐ High
2.22	DPIA Completed If required, DPIA conducted and documented	☐  ☐  ☐ ☒  ☐ 	Document: _____	Date: _____ _____
2.23	DPIA Consultation DPO consulted during DPIA	☐  ☐  ☐ ☒  ☐ 	Consulted: _____	Date: _____ _____

Article 33-34: Data Breach

#	Requirement	Status	Evidence	Notes
2.24	Breach Notification Plan Documented process to notify within 72 hours	✓ ⚠ ✗ ⊗	Plan: _____	Tested: ☐ Yes ☐ No
2.25	Breach Detection Monitoring to detect breaches	✓ ⚠ ✗ ⊗	Tools: _____	Alert threshold: _____

GDPR COMPLIANCE STATUS

☑ COMPLIANT

All applicable items 

☑ PARTIAL COMPLIANCE

Some  items, remediation plan documented

☑ NON-COMPLIANT

One or more  items, cannot launch



Penalty if Non-Compliant: Up to €20M or 4% of global annual revenue, whichever is higher

Assessor: _____ Date: _____

3. HIPAA COMPLIANCE (US HEALTHCARE)

Applies If: Processing Protected Health Information (PHI) of US patients

HIPAA Security Rule – Administrative Safeguards

#	Requirement	Status	Evidence	Notes
3.1	Security Management Process Risk analysis conducted	✓ ✗ ⚠	Document: _____	Date: _____ —
3.2	Risk Management Mitigation strategies implemented	✓ ✗ ⚠	Plan: _____	All risks addressed: ☐ Yes ☐ No
3.3	Workforce Security Access authorization procedures	✓ ✗ ⚠	Policy: _____	Role-based access: ☐ Yes ☐ No
3.4	Training Workforce trained on HIPAA	✓ ✗ ⚠	Records: _____	All employees: ☐ Yes ☐ No
3.5	Business Associate Agreements (BAAs) BAAs with all vendors handling PHI	✓ ✗ ⚠	Signed BAAs: _____	All vendors: ☐ Yes ☐ No

HIPAA Security Rule – Physical Safeguards

#	Requirement	Status	Evidence	Notes
3.6	Facility Access Controls Physical access to servers restricted	✔ ⚠ ✖ ⊗	Controls: _____	Cloud: ☐ AWS ☐ Azure ☐ GCP ☐ Other
3.7	Workstation Security Workstations secured	✔ ⚠ ✖ ⊗	Policy: _____	Auto-lock: ☐ Yes ☐ No
3.8	Device & Media Controls Secure disposal of devices/media	✔ ⚠ ✖ ⊗	Process: _____	Data wiping: ☐ Yes ☐ No

HIPAA Security Rule - Technical Safeguards

#	Requirement	Status	Evidence	Notes
3.9	Access Controls Unique user IDs, authentication	✓ ✗ ⊗ ⚠	System: _____	MFA enabled: Yes No
3.10	Audit Logs All PHI access logged and retained	✓ ✗ ⊗ ⚠	Retention: _____ years	Minimum 6 years: Yes No
3.11	Encryption PHI encrypted at rest and in transit	✓ ✗ ⊗ ⚠	At rest: _____ In transit: _____	
3.12	Transmission Security TLS 1.2+ for PHI transmission	✓ ✗ ⊗ ⚠	Protocol: _____	Verified: Yes No

HIPAA Privacy Rule

#	Requirement	Status	Evidence	Notes
3.13	Minimum Necessary Only minimum PHI accessed	✓ ! ✗	Review: _____	Enforced: ☐ Yes ☐ No
3.14	Privacy Notice Notice of Privacy Practices provided	✓ ! ✗	URL: _____	HIPAA-compliant: ☐ Yes ☐ No
3.15	Patient Rights Access, amendment, accounting of disclosures	✓ ! ✗	Process: _____	Documented: ☐ ☐ Yes ☐ No

HIPAA Breach Notification Rule

#	Requirement	Status	Evidence	Notes
3.16	Breach Notification Plan Process to notify within 60 days	✓ ✗ ⊗ ⚠	Plan: _____	Tested: ☐ Yes ☐ No
3.17	Breach Risk Assessment Process to assess if incident is reportable breach	✓ ✗ ⊗ ⚠	Process: _____	Four-factor test: ☐ Documented

HIPAA COMPLIANCE STATUS

☑ COMPLIANT

All applicable items 

☑ PARTIAL COMPLIANCE

Some  items, remediation plan documented

☑ NON-COMPLIANT

One or more  items, cannot launch



Penalty if Non-Compliant: \$100 - \$50,000 per violation, up to \$1.5M per year per violation category

Assessor: _____ Date: _____

4. EU AI ACT COMPLIANCE

Applies If: Deploying AI in EU or affecting EU residents

Risk Classification

#	Requirement	Status	Evidence	Notes
4.1	Risk Level Determined System classified as: Minimal, Limited, High, or Unacceptable	✓ ✗ ⊗	Classification: _____	Assessment date: _____
4.2	Unacceptable Risk Check System does NOT fall under prohibited uses (social scoring, manipulation, real-time biometric in public)	✓ ✗ ⊗	Verified: _____	If prohibited, CANNOT DEPLOY

High-Risk AI Requirements (if applicable)

#	Requirement	Status	Evidence	Notes
4.3	Risk Management System (Article 9) Documented risk management throughout lifecycle	✓ ⚠ ✗ ⊗	Document: _____	Continuous: ☐ Yes ☐ No
4.4	Data Governance (Article 10) Training data quality, relevance, representativeness	✓ ⚠ ✗ ⊗	Report: _____	Bias mitigated: ☐ Yes ☐ No
4.5	Technical Documentation (Article 11) Comprehensive technical documentation	✓ ⚠ ✗ ⊗	Document: _____	Complete: ☐ Yes ☐ No
4.6	Record-Keeping (Article 12) Automatic logging of events	✓ ⚠ ✗ ⊗	System: _____	Tamper-proof: ☐ Yes ☐ No
4.7	Transparency (Article 13) Users informed of AI use, how it works, human oversight	✓ ⚠ ✗ ⊗	Disclosure: _____	Clear: ☐ Yes ☐ No
4.8	Human Oversight (Article 14) Humans can understand, monitor, intervene	✓ ⚠ ✗ ⊗	Oversight plan: _____	Override capability: ☐ Yes ☐ No
4.9	Accuracy, Robustness, Cybersecurity (Article 15) System tested for accuracy, resilience, security	✓ ⚠ ✗ ⊗	Test report: _____	BlackIndian AI test: ☐ Complete
4.10	Conformity Assessment (Article 43) Third-party assessment by notified body	✓ ⚠ ✗ ⊗	Assessment: _____ Notified body: _____	
4.11	CE Marking CE mark affixed to high-risk AI	✓ ⚠ ✗ ⊗	Applied: _____	Date: _____
4.12	Registration System registered in EU database	✓ ⚠ ✗ ⊗	Registration #: _____	Date: _____

Limited Risk AI (Transparency Obligations)

#	Requirement	Status	Evidence	Notes
4.13	AI-Generated Content Disclosure Users informed content is AI-generated	✓ ! ✗ ⊗	Disclosure: _____	Prominent: ☐ Yes ☐ No
4.14	Deepfake Disclosure Manipulated images/audio/video labeled	✓ ! ✗ ⊗	Watermark: _____	Machine-readable: ☐ Yes ☐ No

EU AI ACT COMPLIANCE STATUS

☑ COMPLIANT

All applicable items 

☑ PARTIAL COMPLIANCE

Some  items, remediation plan documented

☑ NON-COMPLIANT

One or more  items, cannot launch in EU



Penalty if Non-Compliant: Up to €35M or 7% of global annual revenue (for prohibited AI), €15M or 3% (for non-compliance with obligations)

Assessor: _____ Date: _____

5. FAIR LENDING COMPLIANCE (US FINANCIAL SERVICES)

Applies If: AI used for credit decisions, lending, insurance

Equal Credit Opportunity Act (ECOA)

#	Requirement	Status	Evidence	Notes
5.1	Prohibited Bases System does NOT discriminate based on race, color, religion, national origin, sex, marital status, age, receipt of public assistance	✓ ⚠ ✗ ⊗	Test report: _____	Disparate impact test: ☐ Pass
5.2	Adverse Action Notices Applicants notified if denied with reasons	✓ ⚠ ✗ ⊗	Notice template: _____	Specific reasons: ☐ Yes ☐ No
5.3	Record Retention Applications retained 25 months	✓ ⚠ ✗ ⊗	Retention policy: _____	Automated: ☐ Yes ☐ No

Fair Credit Reporting Act (FCRA)

#	Requirement	Status	Evidence	Notes
5.4	Adverse Action Notice (FCRA) If credit report used, specific notice required	☒ ☒ ☒ ☒ ☒ ☒ ☒ ☒	Notice: _____	CRA info included: ☒ Yes ☒ No
5.5	Accuracy Requirements Reasonable procedures to ensure accuracy	☒ ☒ ☒ ☒ ☒ ☒ ☒ ☒	Procedures: _____	Tested: ☒ Yes ☒ No

Fair Lending Examination (Disparate Impact Testing)

#	Requirement	Status	Evidence	Notes
5.6	Comparative Analysis Approval rates compared across protected classes	✔ ⚠ ✖ ⊗	Test date: _____ Report: _____	
5.7	Four-Fifths Rule Protected group approval rate >= 80% of highest group	✔ ⚠ ✖ ⊗	Ratio: _____	Pass: ☐ Yes ☐ No
5.8	Interest Rate Analysis No systematic differences in pricing	✔ ⚠ ✖ ⊗	Analysis: _____	Fair: ☐ Yes ☐ No

FAIR LENDING COMPLIANCE STATUS

☒ COMPLIANT

All applicable items 

☒ PARTIAL COMPLIANCE

Some  items, remediation plan documented

☒ NON-COMPLIANT

One or more  items, cannot launch



Penalty if Non-Compliant: \$5,000 per violation (ECOA), up to \$5,000 per violation (FCRA), potential class action lawsuits

Assessor: _____ **Date:** _____

6. EMPLOYMENT AI COMPLIANCE (US/NYC)

Applies If: AI used for hiring, promotion, termination decisions

EEOC Guidelines

#	Requirement	Status	Evidence	Notes
6.1	Uniform Guidelines on Employee Selection Selection process doesn't have adverse impact	❌ ✅ ❌ ⚠️ ❌	Analysis: _____	Four-fifths rule: ❌ Pass
6.2	Protected Classes Tested Impact analyzed for race, color, religion, sex, national origin, age (40+), disability	❌ ✅ ❌ ⚠️ ❌	Test report: _____	All classes: ❌ Yes ❌ No
6.3	Business Necessity If adverse impact, job-relatedness demonstrated	❌ ✅ ❌ ⚠️ ❌	Justification: _____	Validated: ❌ Yes ❌ No

NYC Local Law 144 (AI Hiring Tools)

Applies If: Using AI for hiring in NYC

#	Requirement	Status	Evidence	Notes
6.4	Annual Bias Audit Independent bias audit conducted within past year	✓ ✗ ⚠	Audit date: _____ Auditor: _____	
6.5	Audit Summary Published Summary posted on website	✓ ✗ ⚠	URL: _____ Date published: _____	
6.6	Candidate Notification Candidates notified AI tool used (at least 10 days before)	✓ ✗ ⚠	Notice: _____ Timing: _____	
6.7	Alternative Process Candidates can request alternative selection process	✓ ✗ ⚠	Process: _____	Documented: Yes No
6.8	Data Retention Audit results retained 3 years	✓ ✗ ⚠	Location: _____	Accessible: Yes No

EMPLOYMENT AI COMPLIANCE STATUS

☑ COMPLIANT

All applicable items 

☑ PARTIAL COMPLIANCE

Some  items, remediation plan documented

☑ NON-COMPLIANT

One or more  items, cannot launch



Penalty if Non-Compliant (NYC): \$500 for first violation, \$500-\$1,500 for each subsequent violation (per day)

Assessor: _____ Date: _____

7. GENERAL DATA PROTECTION

Applies to: All AI systems processing user data

Basic Security Requirements

#	Requirement	Status	Evidence	Notes
7.1	Authentication Strong authentication for system access	✓ ✗ ⚠ ⊗	Method: _____	MFA: ☐ Enabled
7.2	Authorization Role-based access controls	✓ ✗ ⚠ ⊗	System: _____	Least privilege: ☐ Yes
7.3	Data Encryption (At Rest) Sensitive data encrypted when stored	✓ ✗ ⚠ ⊗	Algorithm: _____ Key mgmt: _____	
7.4	Data Encryption (In Transit) TLS 1.2+ for data transmission	✓ ✗ ⚠ ⊗	Protocol: _____	Cert valid: ☐ Yes
7.5	Secure Development Security integrated into SDLC	✓ ✗ ⚠ ⊗	Process: _____	Testing: ☐ Regular
7.6	Vulnerability Management Regular security testing	✓ ✗ ⚠ ⊗	Last test: _____	BlackIndian AI: ☐ Yes
7.7	Incident Response Plan Documented breach response procedures	✓ ✗ ⚠ ⊗	Plan: _____	Tested: ☐ Yes ☐ No
7.8	Logging & Monitoring Security events logged and monitored	✓ ✗ ⚠ ⊗	System: _____ Alert threshold: _____	
7.9	Backup & Recovery Regular backups, tested recovery	✓ ✗ ⚠ ⊗	Frequency: _____ Last test: _____	
7.10	Patch Management Systems kept up-to-date	✓ ✗ ⚠ ⊗	Process: _____	Automated: ☐ Yes ☐ No

8. DOCUMENTATION REQUIREMENTS

Required Documentation

#	Document	Status	Location	Last Updated
8.1	System Architecture Diagram	Complete Partial Missing		
8.2	Data Flow Diagram	Complete Partial Missing		
8.3	Privacy Policy	Complete Partial Missing		
8.4	Terms of Service	Complete Partial Missing		
8.5	AI Disclosure / Transparency Notice	Complete Partial Missing		
8.6	Risk Assessment Report	Complete Partial Missing		
8.7	Security Testing Report	Complete Partial Missing		
8.8	Bias Testing Report	Complete Partial Missing		
8.9	Incident Response Plan	Complete Partial Missing		
8.10	Data Retention Policy	Complete Partial Missing		
8.11	Training Records (Staff HIPAA/GDPR/etc.)	Complete Partial Missing		
8.12	Vendor Agreements (BAAs, DPAs)	Complete Partial Missing		
8.13	Model Card / AI Documentation	Complete Partial Missing		

9. SIGN-OFF & CERTIFICATION

Pre-Launch Checklist Sign-Off

I certify that:

- ☐ All applicable compliance requirements have been reviewed
- ☐ All  items are complete with documented evidence
- ☐ All  items have documented remediation plans with timelines
- ☐ No  items remain (or documented executive approval for launch with risk)
- ☐ All required documentation is complete and accessible
- ☐ The AI system is ready for production deployment from a compliance perspective

Completed by:

Name: _____

Title: _____

Signature: _____ Date: _____



Reviewed by (Legal/Compliance):

Name: _____

Title: _____

Signature: _____ Date: _____

Approved for Launch:

Name: _____

Title: _____

Signature: _____ **Date:** _____

BlackIndian AI Certification

If BlackIndian AI conducted testing:

📄 **ⓧ CERTIFIED SECURE** - System passed comprehensive security testing across all 7 vulnerability categories with all critical and high-severity issues remediated.

Certification Valid Through: _____ (typically 6-12 months)

BlackIndian AI Assessor: _____

Signature: _____ **Date:** _____

APPENDIX A: REMEDIATION PLAN TEMPLATE

For any ⚠️ or ❌ items:

Item #	Issue Description	Priority	Assigned To	Due Date	Status	Notes
_____	_____	P0/P1/ P2	_____	_____	☐ Open ☐ In Progress ☐ Complete	_____
_____	_____	P0/P1/ P2	_____	_____	☐ Open ☐ In Progress ☐ Complete	_____
_____	_____	P0/P1/ P2	_____	_____	☐ Open ☐ In Progress ☐ Complete	_____

Priority Definitions:

- **P0 (Critical):** Must fix before launch, blocks deployment
- **P1 (High):** Fix within 30 days post-launch
- **P2 (Medium):** Fix within 90 days post-launch

APPENDIX B: AUDIT PREPARATION

For Regulatory Audits:

1. **Gather All Documents** (from Section 8)
2. **Prepare Evidence** (test reports, logs, screenshots)
3. **Create Executive Summary** (compliance status overview)
4. **Assign Point of Contact** (who will interface with auditors)
5. **Schedule Mock Audit** (practice run with internal team)

Common Auditor Requests:

- Privacy policy and disclosures
- Security testing reports
- Bias/fairness testing results
- Access control configurations
- Incident logs (if any)
- Training records
- Vendor agreements

Have ready: Document links, login credentials (read-only), sample data (anonymized)

Document Information

Author: BlackIndian AI Compliance Team

Company: BlackIndian AI

Version: 1.0

Last Updated: December 2025

Next Review: Quarterly

For compliance consulting or full assessment:

security@blackindianai.com

blackindianai.com

END OF DOCUMENT

