

Implementation to the Digital Personal Data Protection Act and Rules

Road to May 13, 2027



Latest Developments

- › The Digital Personal Data Protection Act, 2023 was passed in August 2023

- › On November 13, 2025, it has been notified and the Digital Personal Data Protection Rules, 2025 have been published

- › Companies have 18 months to comply with the law. This period ends on **May 13, 2027**.

- › Provisions in relation to the organizations who will be Consent Manager must be complied within 12 months i.e. **November 13, 2026**

- › Data Protection Board of India (DPBI), number of members in the DPBI and provisions notified with immediate effect i.e. wef. **November 13, 2025**

- › DPBI will be in the National Capital Region of India, though the Functioning of the Board will be as a digital office.

- › 18 month time line provided for the compliance to the Rules.
- › Notice to be lawful and transparent and the methods enlisted
- › Clear terminologies provided as to what comprises Reasonable Security Safeguards
- › Breach to be reported immediately and without delay on becoming aware of the Breach to Data Principal and DPBI as also detailed notification to DPBI within 72 hours or a longer time on becoming aware.
- › 3 years timeline for E-commerce, Gaming and Social Media intermediaries to erase data if the Data Principal does not engage with the Data Fiduciary with a 48 hour prior notice of such deletion.
- › Business Information of Data Protection Officer or person who is able to correspond on behalf of Data Fiduciary needs to be displayed and prominently published in the website or app.
- › Verifiable Consent for processing personal data of a child or a person with disability defined and due diligence parameters set to verify individual being the parent/guardian/legal guardian.

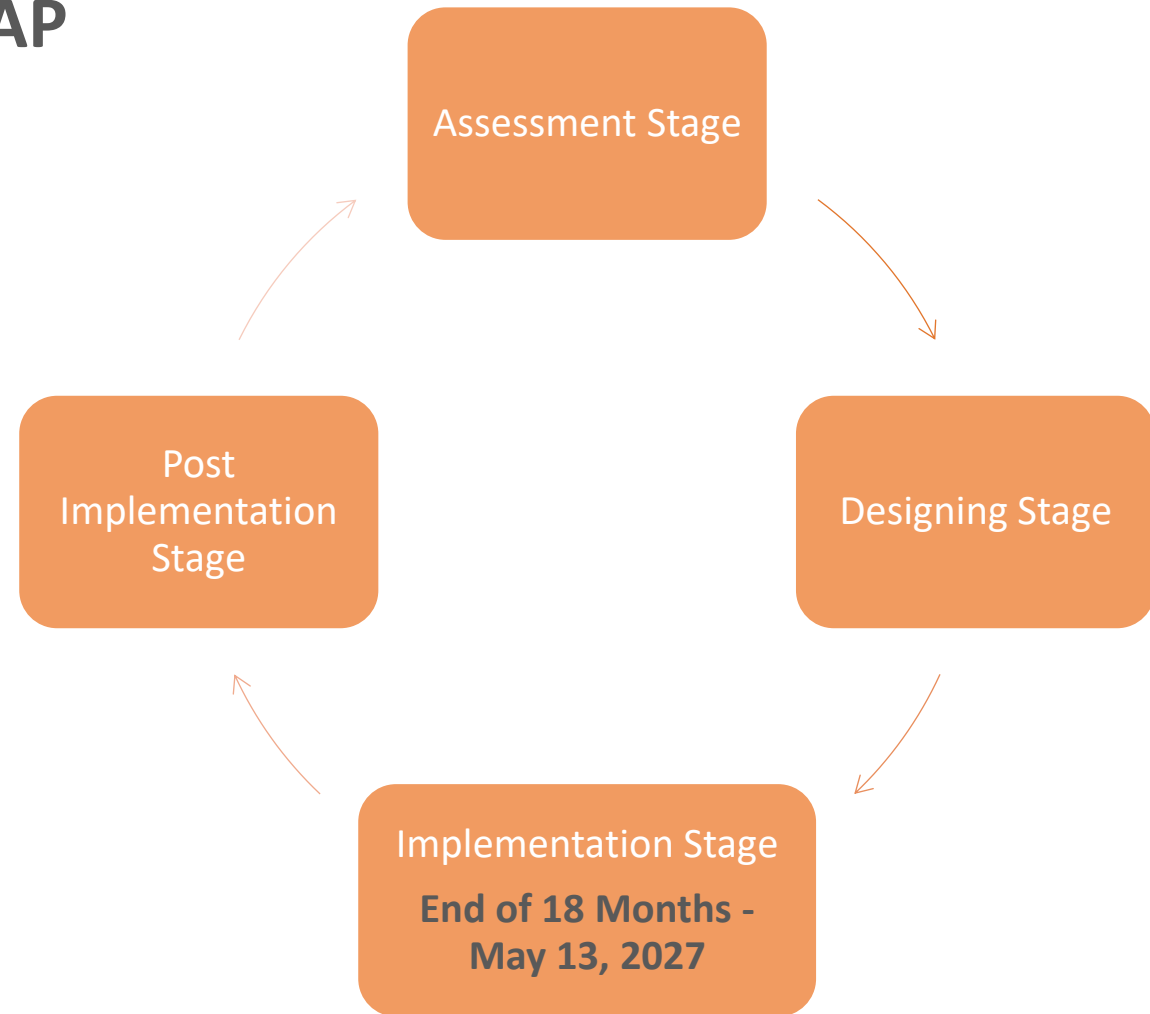
- › Healthcare professionals, educational institutions, and childcare providers are exempt from the provisions of sections relating to the processing of personal data of a child for defined purposes.
- › Significant Data Fiduciary to conduct a Data Protection Impact Assessment (DPIA) and Audit once every 12 months as also conduct due diligence to verify that the technical measures including the algorithmic software adopted by it is not likely to pose a risk to the rights of Data Principals.
- › A maximum timeline of 90 days to respond to grievance redressal of a Data Principal.
- › Processing of Personal Data Outside India will be subject to the restrictions set by the Central Government to transfer personal data to a foreign country.
- › Appellate Tribunal will be the Telecom Disputes Settlement and Appellate Tribunal (TDSAT) and its workings defined.
- › Stricter rules than the draft defined to allow for Calling for Information from a Data Fiduciary or Intermediary.

IMPLEMENTATION ROAD MAP

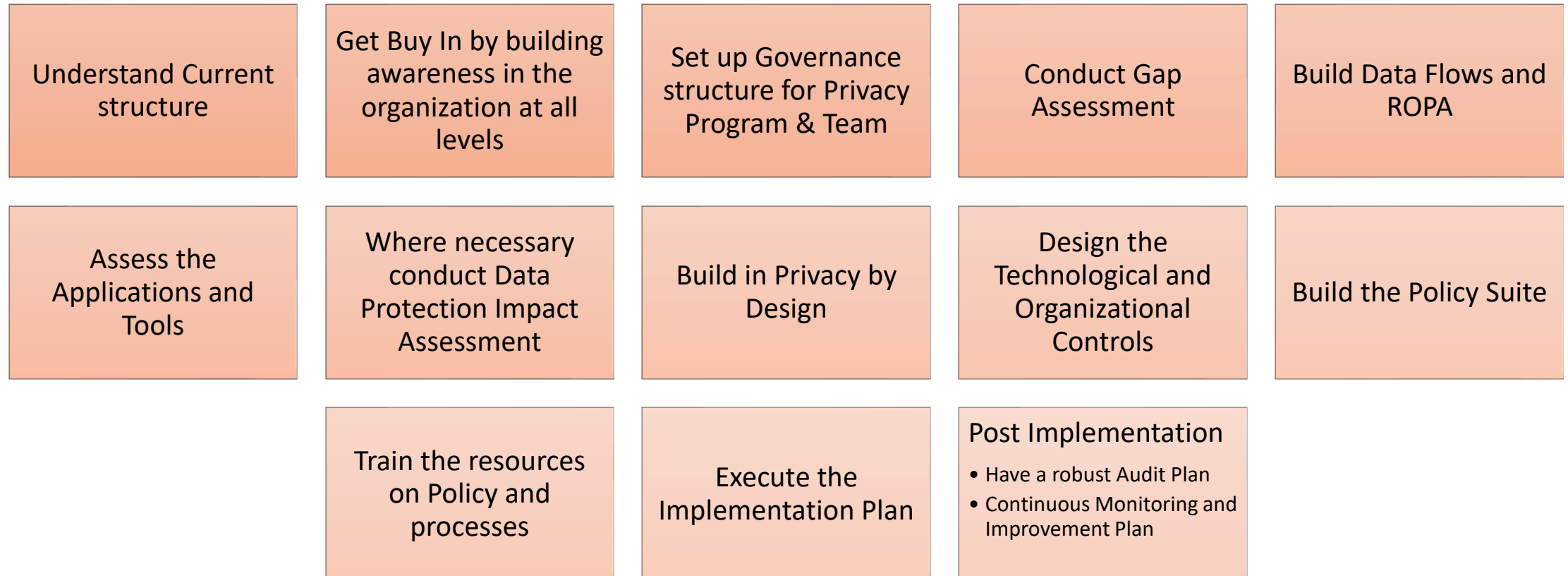
Less than 18 Months for Compliance

The Privacy Program is not a one-time exercise but is a continuous mandate.

Each year one has to keep revisiting this and assessing the maturity of the Program.



BUILDING BLOCKS FOR COMPLIANCE



We help and support clients at all stages of their privacy journey



Privacy Advisory and documentation



Training and Awareness



Building the Privacy Program and Framework



Contentious Practice