

THE DPDP RULES 2025 & ITS IMPLEMENTATION

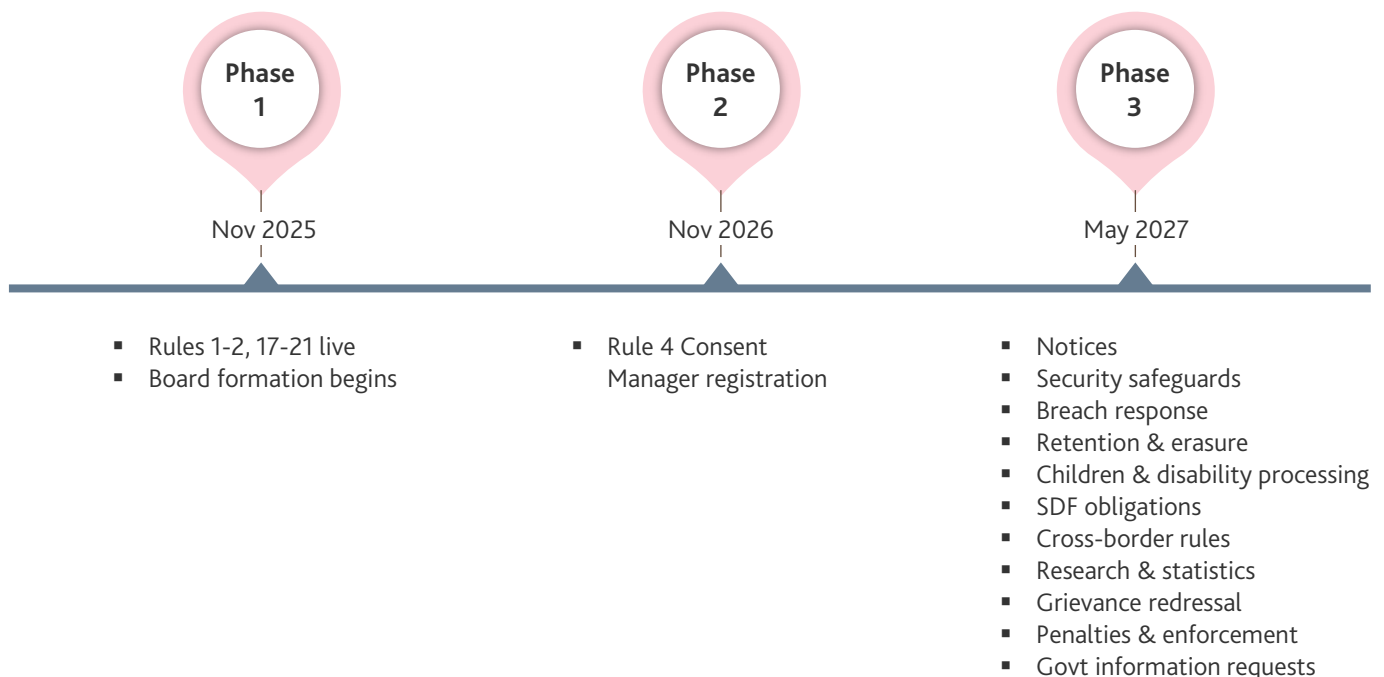
The Digital Personal Data Protection Rules 2025 operationalise the DPDP Act, 2023 and detail the practical, governance, technical and procedural controls that organisations undertake on their compliance journey to ensure the lawful processing of personal data in India.

The Rules detail multiple aspects, such as **notice, consent, state processing, data retention, security safeguards, breach management, children's data, disabilities, significant data fiduciaries (SDFs), research exemptions, cross-border transfer, and the Data Protection Board of India.**

APPLICABILITY & TIMELINES

The act applies to any processing of digital personal data carried out within the territory of India. This includes any data collected through online means as well as data gathered offline and subsequently digitised. The Rule has come up with specific implementation timelines, scattered over 18 months from November 2025.

On 13 November 2025, the DPDP Rules introduced a three-phased roll-out, depicted below:



FORCE IMMEDIATELY

Rule Numbers	Area Covered	What Organisations Must Do Now
Rules 1–2	Definitions & scope	Understand the terminology and applicability.
Rules 17–21	Data Protection Board governance (appointments, terms, meetings, salaries, procedures)	No direct industry obligation, but Board formation begins.





RULES THAT WILL COME INTO FORCE IN 12 MONTHS

Rule Number	Area Covered	What Organisations must start preparing for
Rules 4	Consent Manager Registration & Verification Standards	<ul style="list-style-type: none"> Consent Manager registration with the Board in compliance with First Schedule . Appropriate technical and organisational measures.

RULES THAT WILL COME INTO FORCE FROM 18 MONTHS

Rule Numbers	Area	What Organisations must start preparing for
Rule 3	Notices	Itemised notice, purpose clarity, withdrawal & grievance information.
Rule 5	State processing	Lawful basis, accuracy, necessity, retention control.
Rule 6	Security safeguards	Encryption, access control, monitoring, audit logs, resilience.
Rule 7	Breach reporting	Notify individuals immediately & Board within 72 hours; evidence logs.
Rule 8	Retention & erasure	Erase when purpose ends; 48-hr pre-erasure notice; 1-year logs.
Rule 9	Obligations of processors	Contractual controls, processing limitations.
Rule 10–11	Children's & disabilities-related processing	Parental verification, disability consent, expanded guardian rules.
Rule 12–13	Significant Data Fiduciaries	DPIA, annual audit, algorithmic risk reviews, restricted datasets.
Rule 14	Cross-border transfer	Allowed, except in restricted jurisdictions.
Rule 15	Research/statistics	De-identification & minimal harm requirements.
Rule 16	Grievance mechanism	Timely redressal, tracking & escalation.
Rule 22	Offences & penalties	Enforcement becomes active.
Rule 23	Government information requests	Must comply with lawful requests via designated officers.

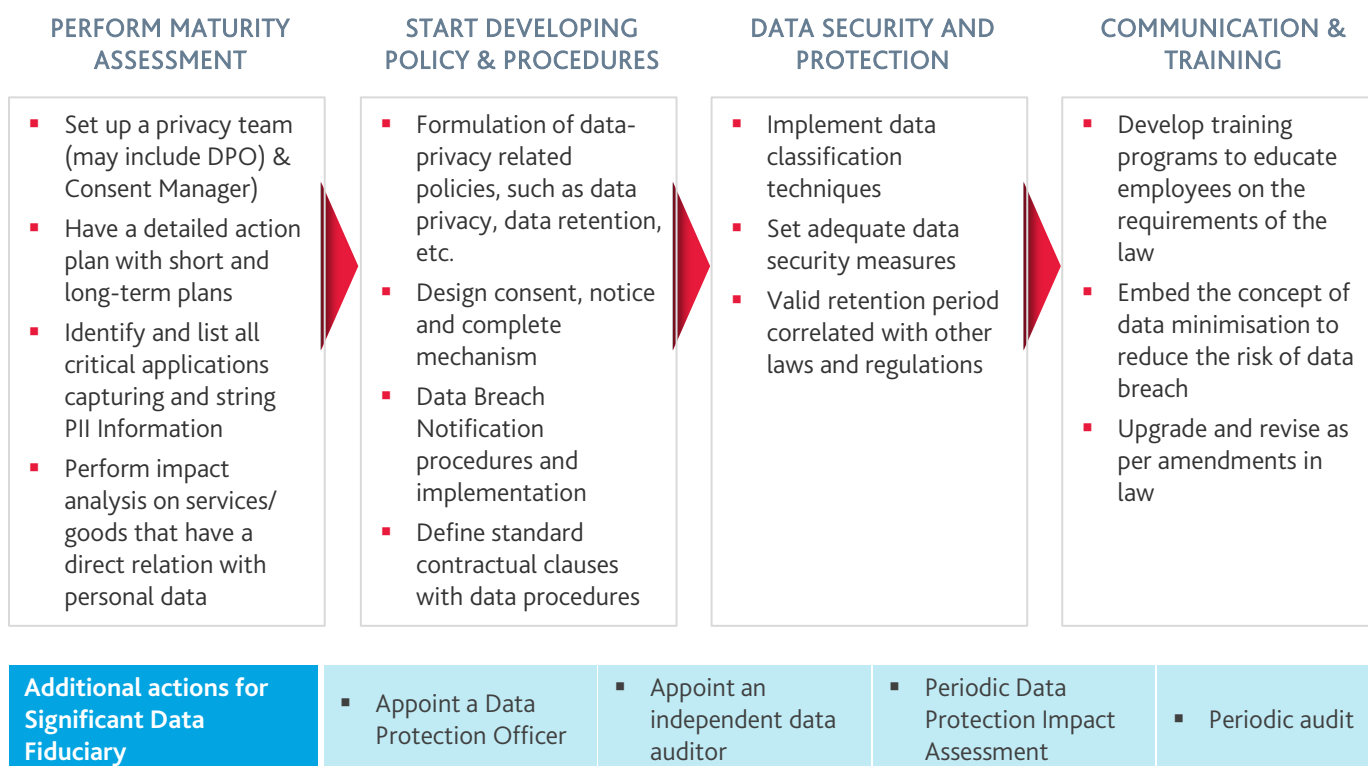
WHAT'S NEXT

 TECHNOLOGY	 OPERATIONS	 RISK	 PROCESS
<ul style="list-style-type: none"> Encryption, monitoring, access control Logging systems to support 1-year retention Breach management and reporting automation 	<ul style="list-style-type: none"> Consent withdrawal facilities Child & disability verification processes Automated deletion & archiving 	<ul style="list-style-type: none"> Processor contracts updated per Rule 6 & Rule 9 	<ul style="list-style-type: none"> Updated privacy policies, notices, retention schedules DPIA framework Records of processing Appointment of Data Protection Officer (if SDF)

PENALTIES

Effective	Penalty Applicable For	Max Penalty
12 May 2027	Security Safeguard Failures	INR 250 Crore
	Breach Notification Failures	INR 200 Crore
	Children's data violations	INR 200 Crore
	SDF violations	INR 150 Crore
	General Non-Compliance	INR 50 Crore

WAY FORWARD FOR ORGANISATIONS TO COMPLY WITH THE DPDP ACT 2023



HOW WE CAN HELP

Our full spectrum of services operates in a continual process of risk remediation and privacy posture improvement.

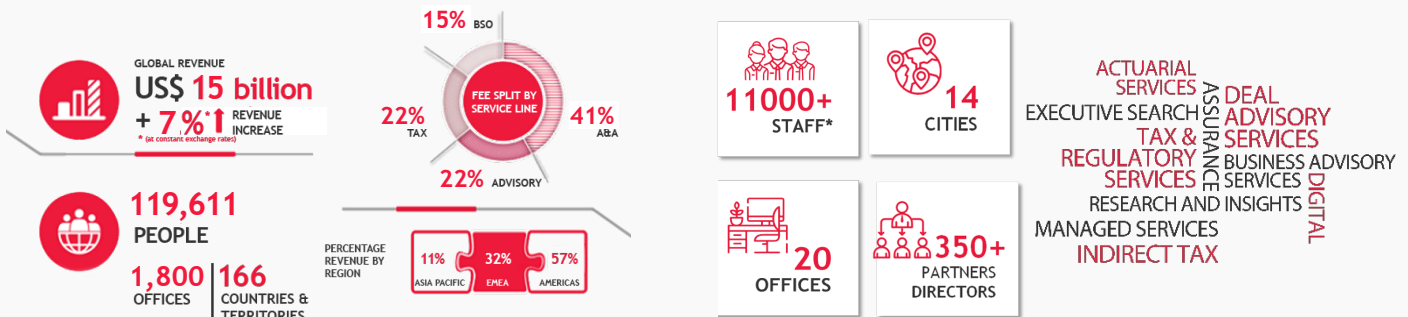
MANAGED SERVICES	LEGAL SUPPORT	TECHNOLOGY SUPPORT
<ul style="list-style-type: none"> Individual rights administration Records of processing Privacy by design operations Maturity assessments Policies & procedures Privacy watch Data protection academy External DPO or internal DPO support Representative as a service 	<ul style="list-style-type: none"> Ad hoc legal advice (e.g., Video surveillance, DSARs, data sharing) Advice on data subject requests and data breaches Advice on interpretation and applicability Advice on contractual arrangements with third parties Legal representation vis-à-vis data protection authorities International data transfers policies and development of registers 	<ul style="list-style-type: none"> Design and review of planned and existing architecture Data privacy impact assessments and technical measures implementation Data subject rights management Data privacy management tools: <ul style="list-style-type: none"> Tool/software selection Plan, design, implementation of tools Data masking & data encryption tool Security assessments: <ul style="list-style-type: none"> Vulnerability scanning Penetration testing Ethical hacking & social engineering
IMPLEMENTATION & REMEDIATION	DATA PRIVACY ASSESSMENT	
<ul style="list-style-type: none"> Data privacy strategy and implementation Privacy project management Development of privacy notices, policies, procedures Technical controls implementation Third-party processor remediation Data minimisation, retention, erasure and classification policies, and process development 	<ul style="list-style-type: none"> Data privacy readiness assessment Data privacy audit/due diligence Annual privacy health check Data mapping/data flow diagramming Records of processing register development Data protection assurance/ certification 	

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