

### Digital Personal Data Protection Act 2025

The DPDP act rules were notified on 13th Nov. DPDP Act governs how organizations collect, use, store, and process personal data of individuals ("Data Principals") in India.

#### DPDPA Implementation Timeline

Quick Reference Guide

| Effective: November 13, 2025 (Notification Date)   |
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| Effective: November 13, 2025 (Notification Date)   |
| <ul style="list-style-type: none"> <li>Data Protection Board of India established</li> <li>Board composition, qualifications &amp; governance framework</li> <li>Rule-making powers activated</li> <li>No compliance obligations for organizations yet</li> </ul>  |
| PHASE 2: Consent Manager Ecosystem   |
| Effective: November 13, 2026 (1 Year)  |
| <ul style="list-style-type: none"> <li>Consent Manager registration operational</li> <li>Technical &amp; operational framework for consent management</li> <li>Optional for Data Fiduciaries</li> <li>Single point of contact for consent lifecycle</li> </ul>   |
| PHASE 3: Full Compliance & Enforcement   |
| Effective: May 13, 2027 (18 Months) – MANDATORY  |
| <ul style="list-style-type: none"> <li>All consent &amp; notice requirements enforceable</li> <li>Security safeguards &amp; breach notification mandatory</li> <li>Children's data protection requirements active</li> <li>Significant Data Fiduciary obligations active</li> <li>Grievance redressal requirements active</li> <li>Data Principal rights enforceable (access, correction, erasure)</li> <li>Cross-border transfer restrictions enforced</li> </ul> |



Want to know more, drop an email to with subject line "DPDP Awareness" and we will be pleased to host an awareness session for you with your management / stakeholders.

#### In terms of timelines for most of the provisions Govt gave 18 months lead time:

- (1) provisions relating to Data Protection Board will be in effect from November 13, 2025
- (2) provisions on Consent Manager will come into effect from Nov 13, 2026 (one year lead time)
- (3) All other provisions will come into effect from May 13, 2027 (18 months lead time)

#### Penalties (per instance)

| Violation  | Penalty |
|--|---------|
| Failure to take reasonable security safeguard to protect | 250 Cr  |
| Failure to give notice upon breach of personal data      | 200 Cr  |
| Breach in obligations owed to children                   | 200 Cr  |
| Breach of obligations of Significant Data Fiduciaries    | 150 Cr  |
| Breach of consent obligations                            | 50 Cr   |
| Breach of any other provision                            | 50 Cr   |

## DATA PRIVACY

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### PHASE 3: Full Compliance & Enforcement

- All consent & notice requirements enforceable
- Security safeguards & breach notification mandatory
- Children’s data protection requirements active
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# Related Practice Areas

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Data Protection and Privacy