

DIGITAL PERSONAL DATA PROTECTION ACT, 2023



Presented by:

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26th June 2026



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Case File

The Mystery of Advait's Weekend



THE CHALLENGE

I have never met Advait.

I don't know where he lives.

I have never met Advait.

I don't know where he works.

I don't know his phone number.

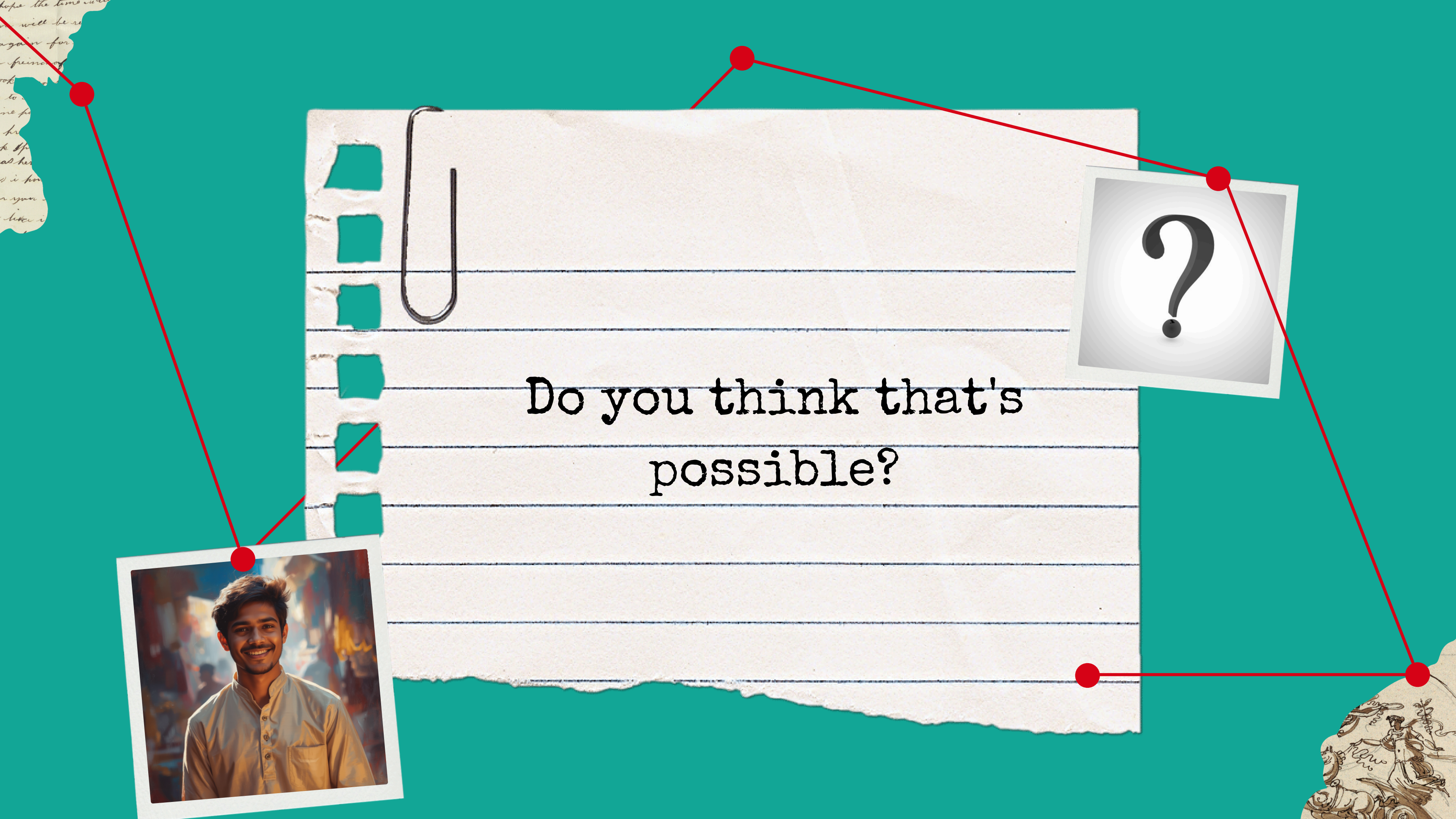


Guess what:

By the end of the
next 2 minutes, I
can tell you a
surprising amount
about his life.



Do you think that's
possible?



CLUE 1



Friday, 7:42 PM

Advait orders a
Pepperoni Pizza
through an app

CLUE 2



Friday, 10:15 PM

Advait books a cab
home.

CLUE 3



Saturday, 8:00 AM

Advait checks into a gym using a fitness app.

CLUE 4



Saturday, 11:30 AM

Advait buys trekking shoes online.

CLUE 5



Saturday, 3:00 PM

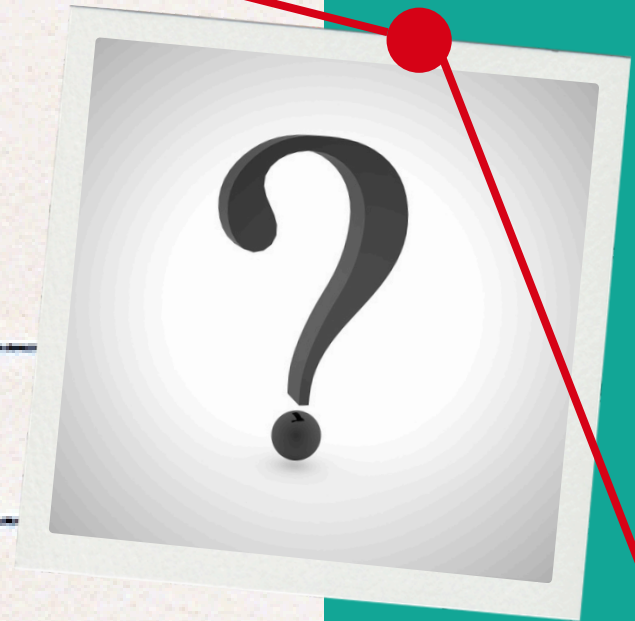
Advait uploads photos
from a trek.

How many
organizations
know something
about Advait?



In just 24 hours:

- We know what Advait eats.
- How he travels.
- His fitness habits.
- His hobbies.
- His spending patterns.
- Places he visits.



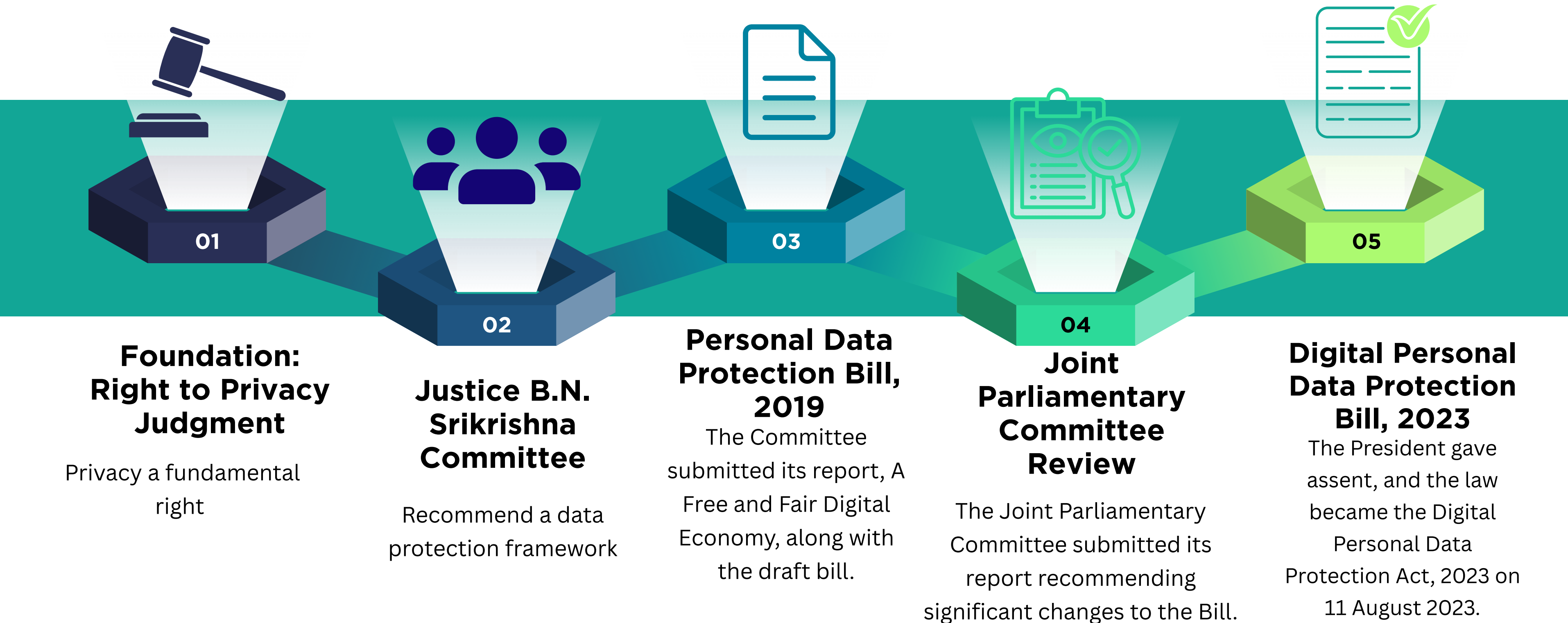
SO, HERE IS MY QUESTION

**WHO DOES ALL THIS DATA ACTUALLY
BELONG TO?**

WHO DECIDES HOW IT IS USED?

**AND WHO IS RESPONSIBLE FOR
PROTECTING IT?**

HISTORY



APPLICABILITY



Processing of
digital personal
data in India



Processing outside India
+
Goods or Services offered
to people in India

IMPORTANT DEFINITIONS





DATA



PERSONAL DATA



DATA



PERSONAL DATA

Any information represented in a form that can be communicated, interpreted, or processed.

Any data that can identify an individual, directly or indirectly.



DATA



PERSONAL DATA



DATA



PERSONAL DATA





DATA



PERSONAL DATA





DATA



PERSONAL DATA

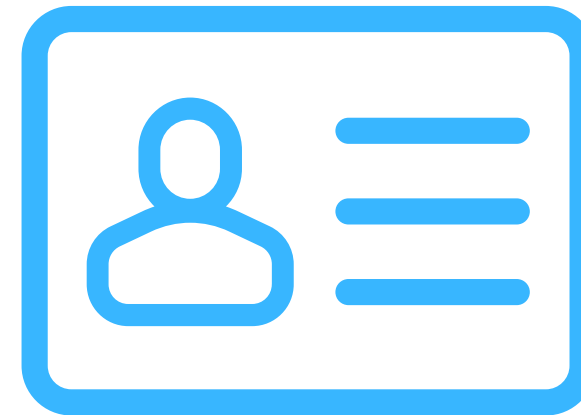




DATA



PERSONAL DATA

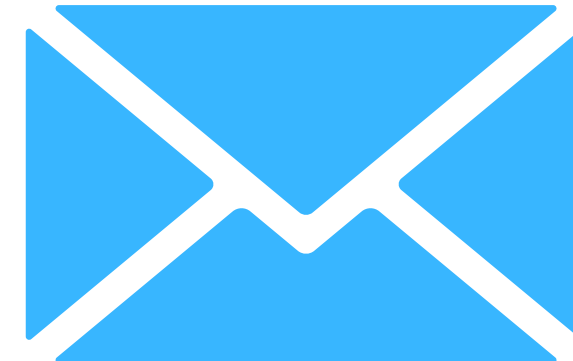
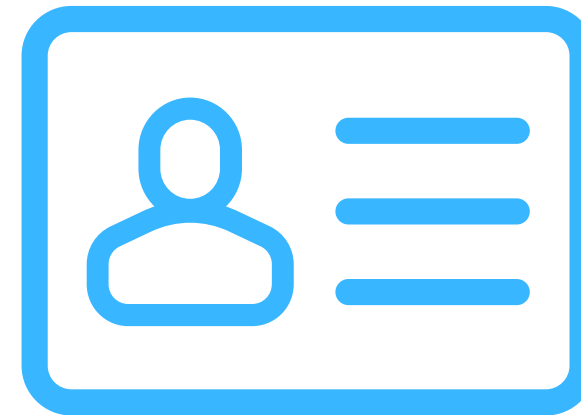




DATA



PERSONAL DATA

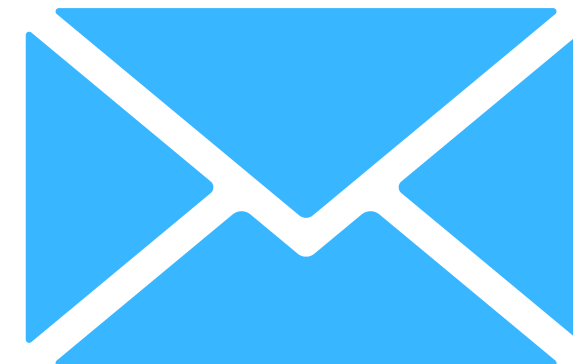
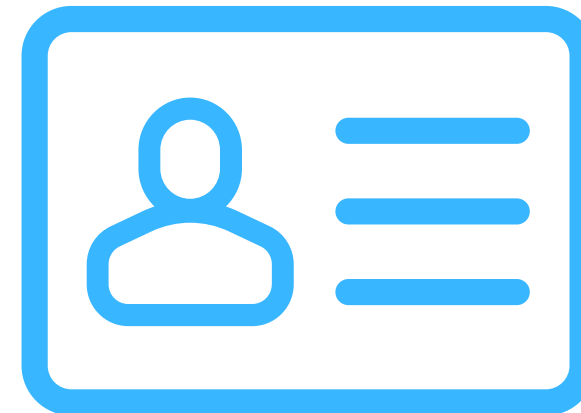




DATA



PERSONAL DATA





DATA PRINCIPAL



DATA PRINCIPAL

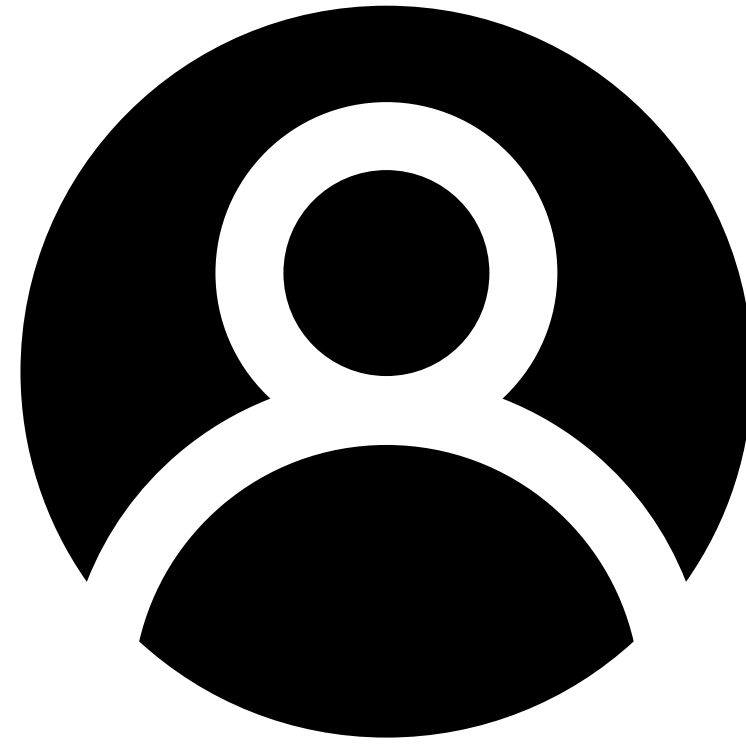
The individual to whom the personal data relates.

If the individual is a **child**, the parent or lawful guardian acts on behalf of the child.

If the individual has a **disability**, their lawful guardian may act on their behalf.

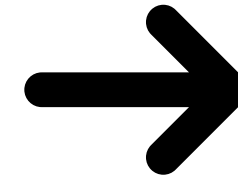
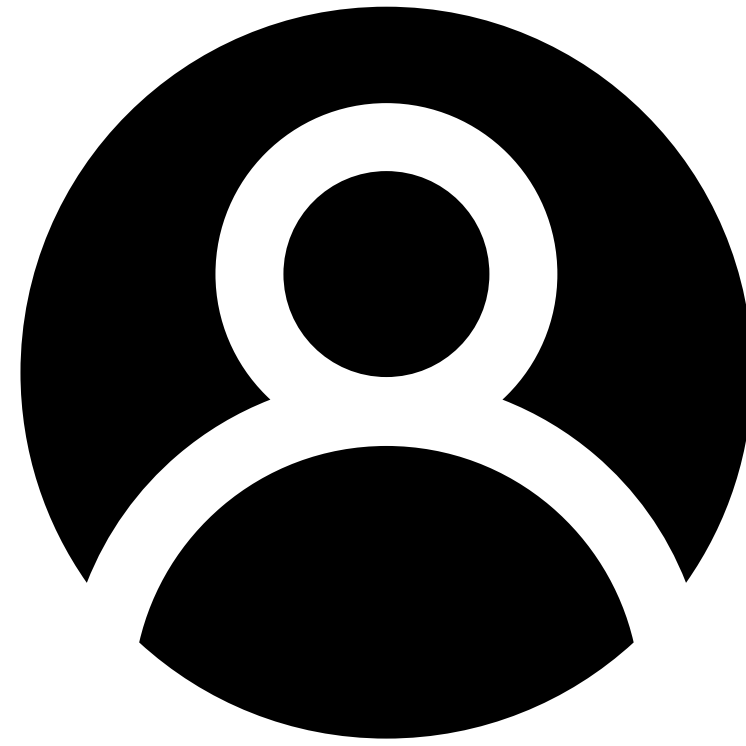


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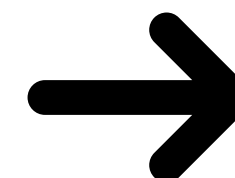
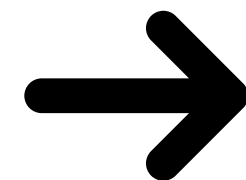
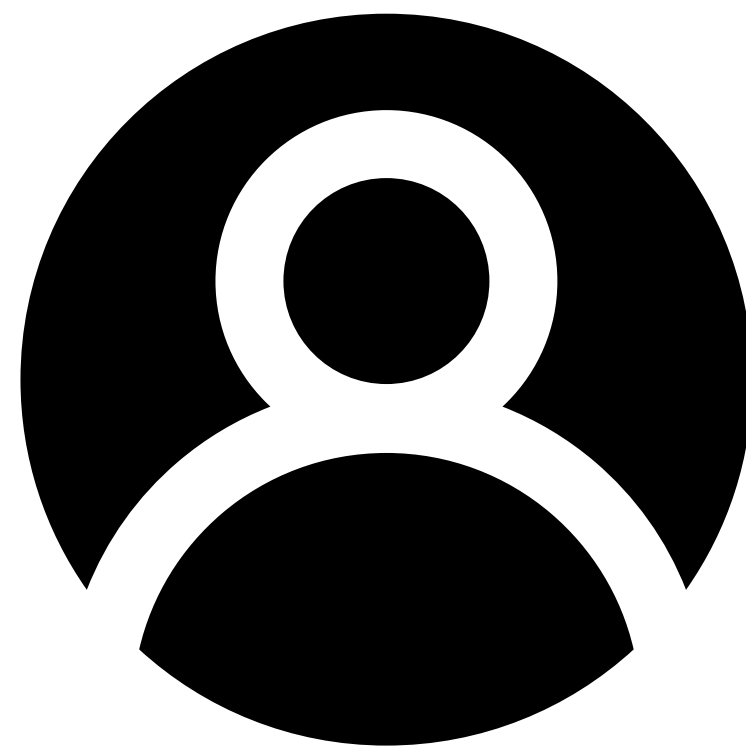


DATA PRINCIPAL



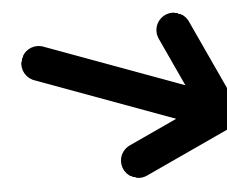
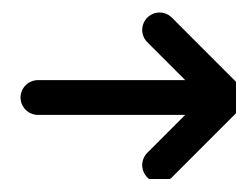
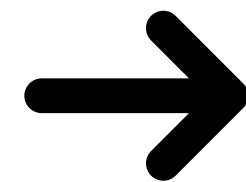
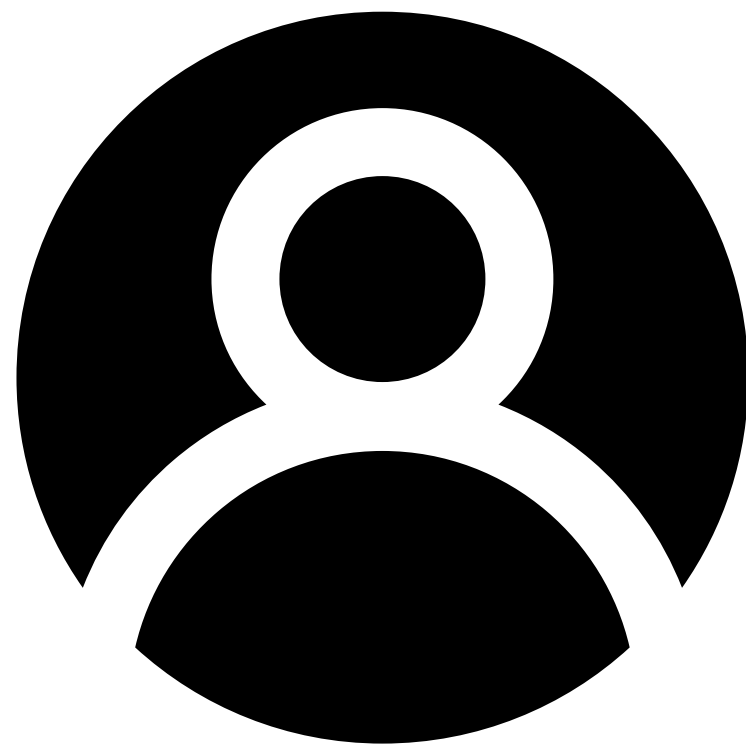


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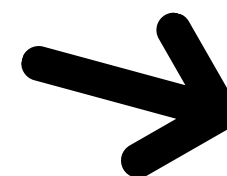
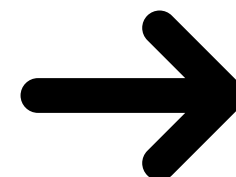
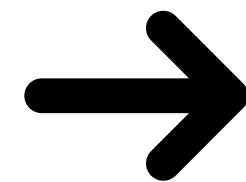
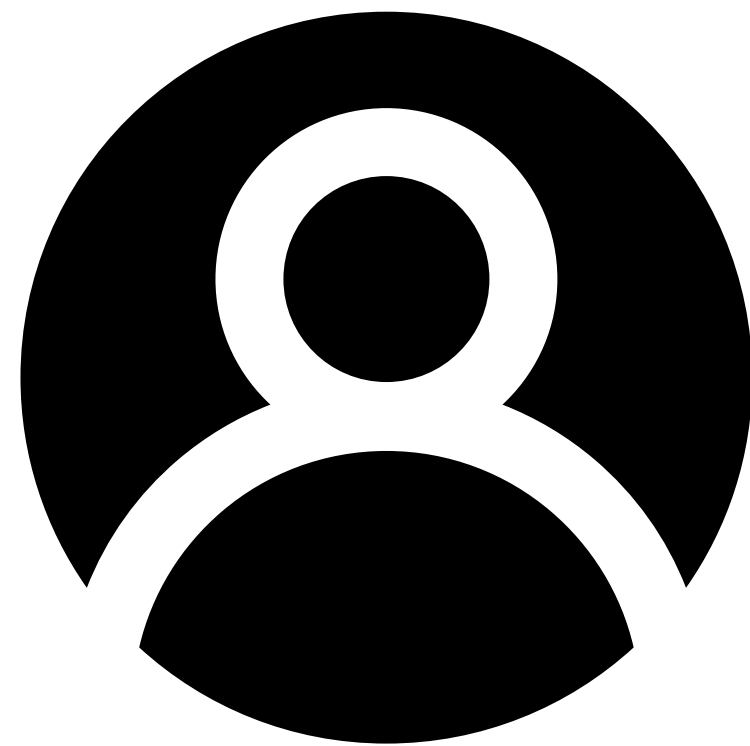


DATA PRINCIPAL



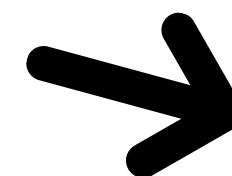
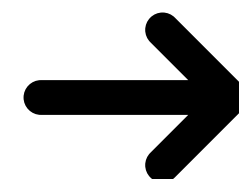
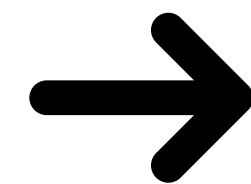


DATA PRINCIPAL





CUSTOMER





DATA FIDUCIARY

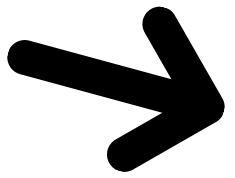
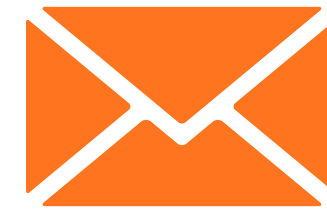
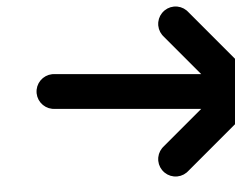
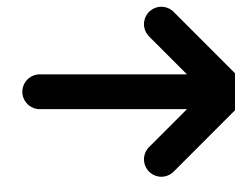
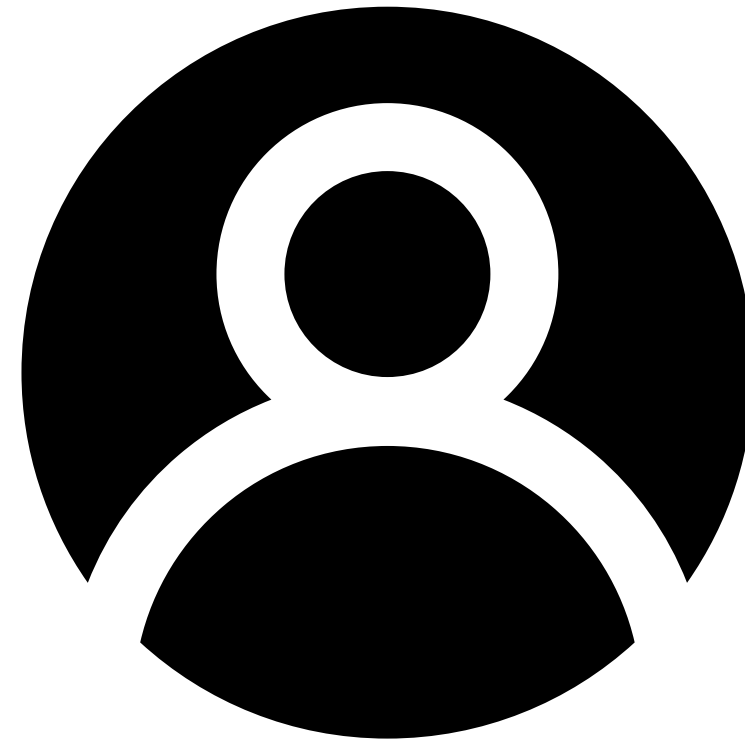


DATA FIDUCIARY

Any person, company, organization, or government entity that determines the **purpose and means** of processing personal data.



DATA FIDUCIARY





FLIPKART



DATA PROCESSOR

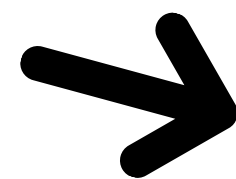
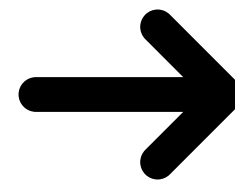
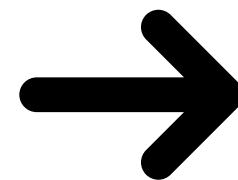
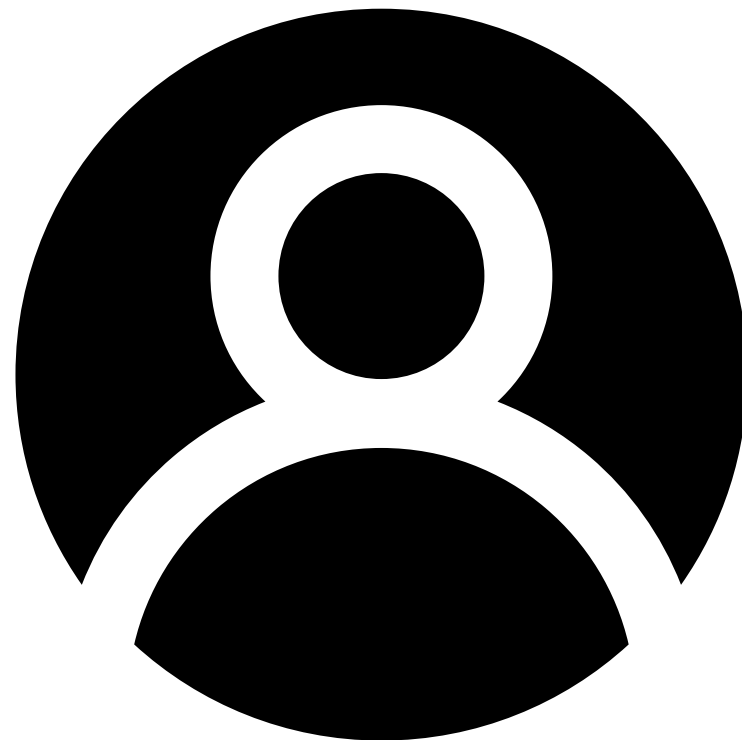


DATA PROCESSOR

A person or entity that
processes personal data on
behalf of a Data Fiduciary.

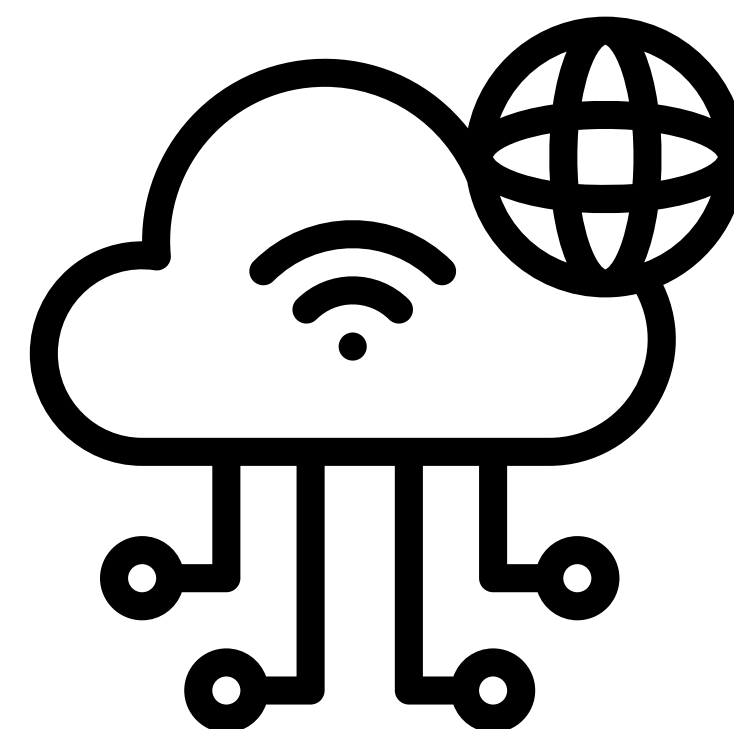
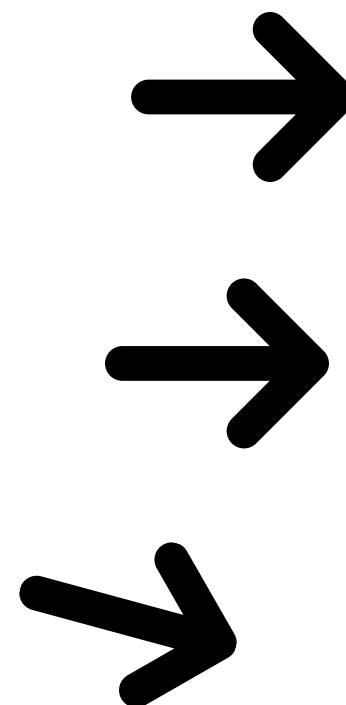
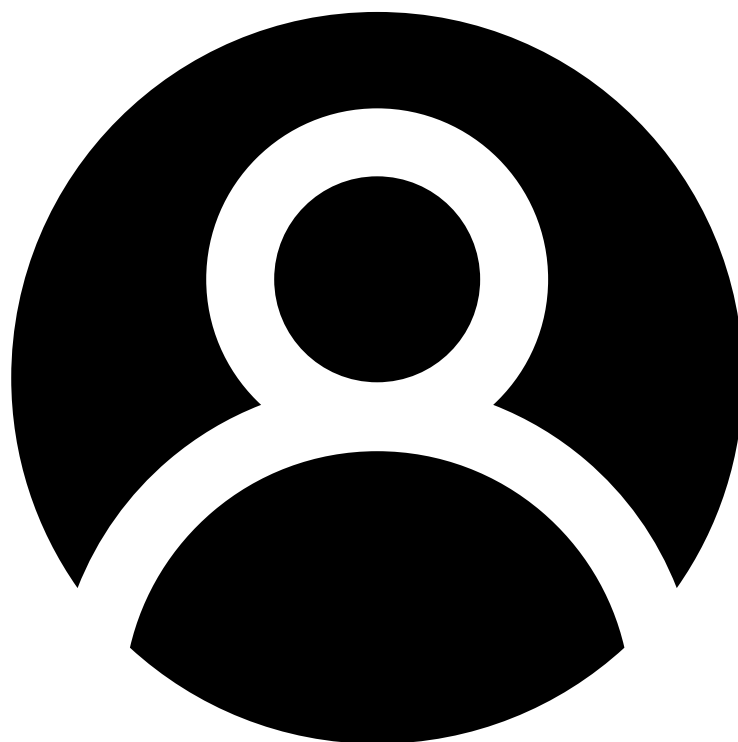


DATA PROCESSOR





DATA PROCESSOR





**CLOUD
SERVICE PROVIDER**



**CONSENT
MANAGER**



**CONSENT
MANAGER**

Person registered with the Data Protection Board who acts as a single point of contact to enable a Data Principal to give, manage, review, and withdraw consent.

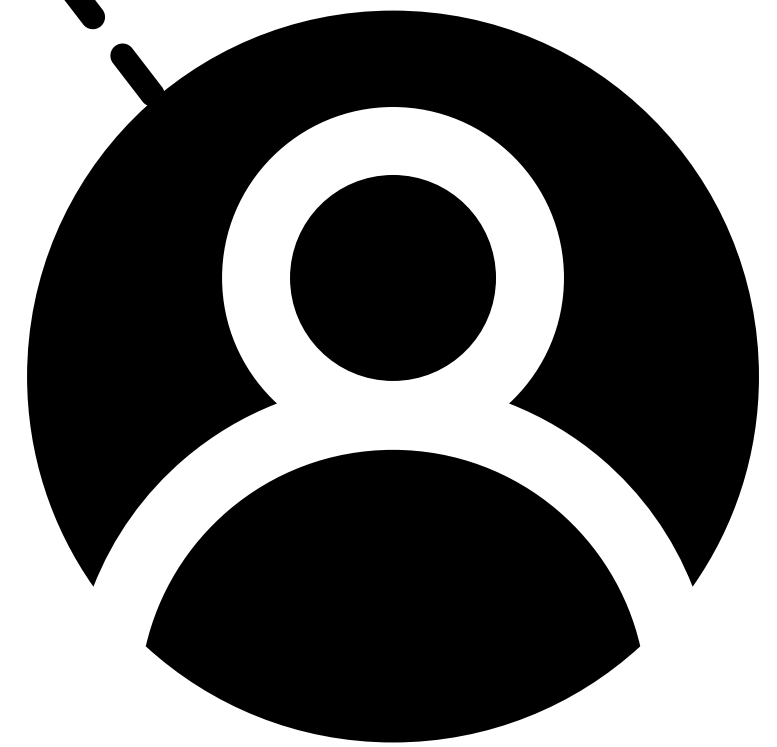
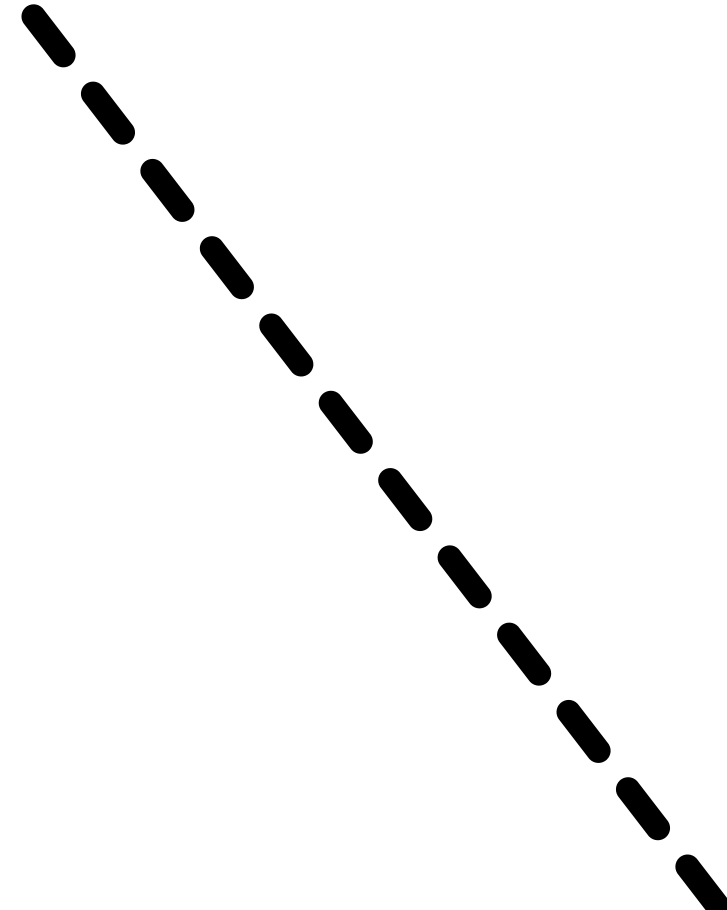


**CONSENT
MANAGER**

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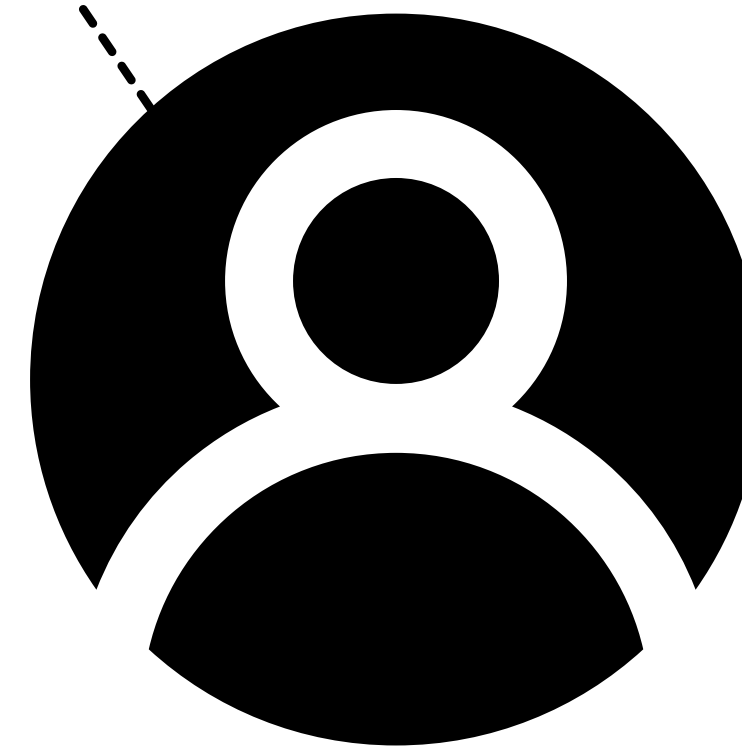
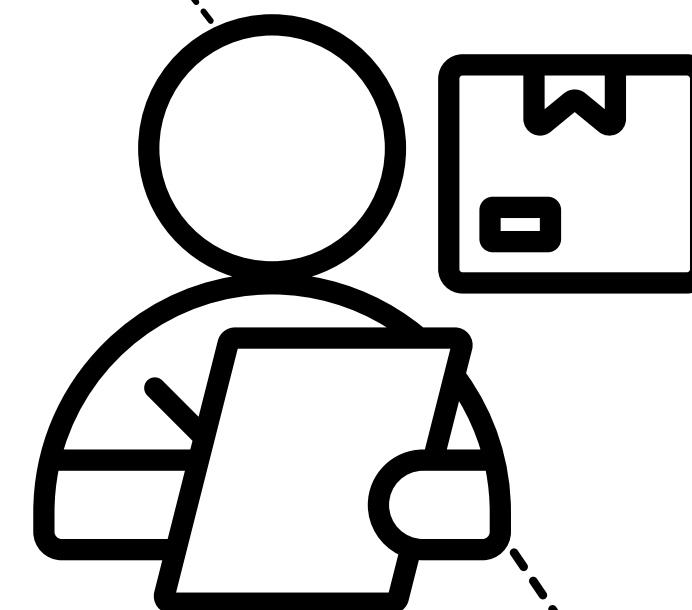


**CONSENT
MANAGER**





**CONSENT
MANAGER**



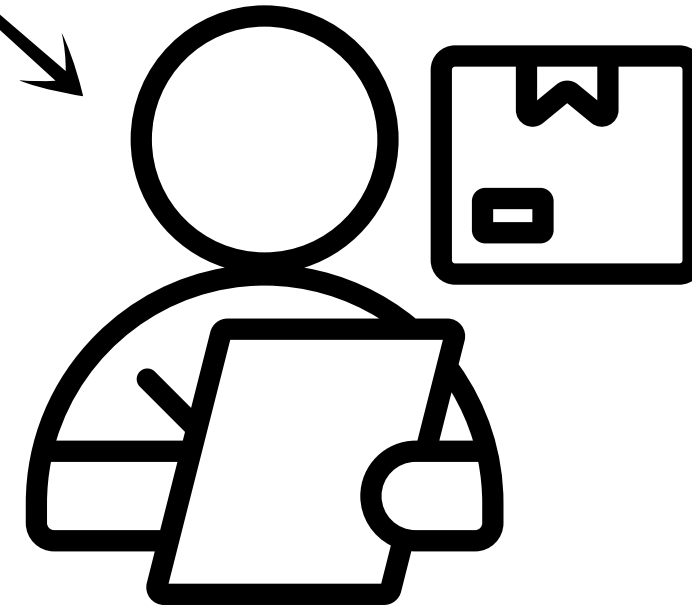
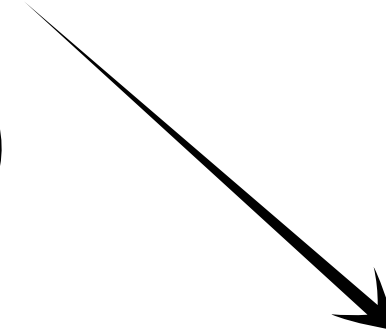


**CONSENT
MANAGER**



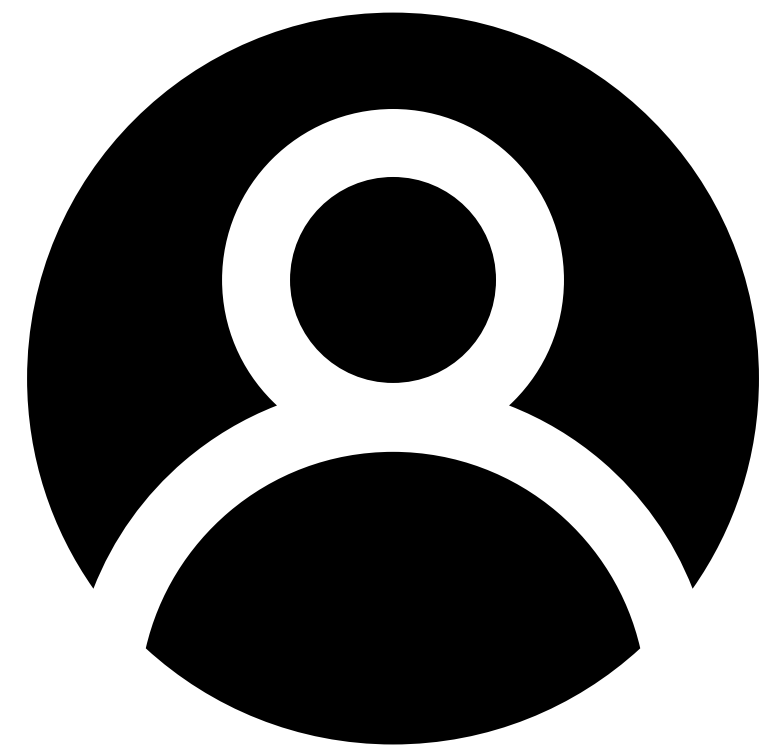
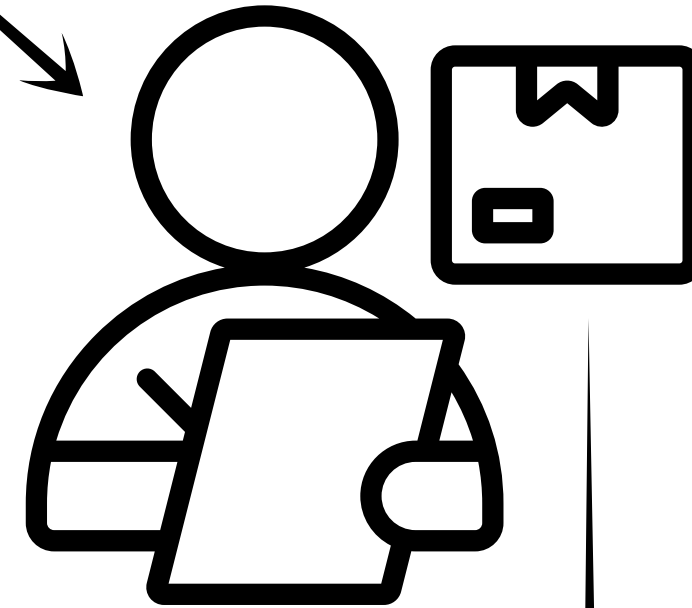
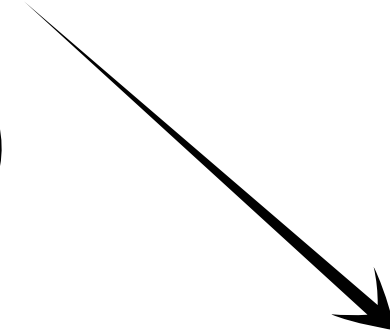


**CONSENT
MANAGER**



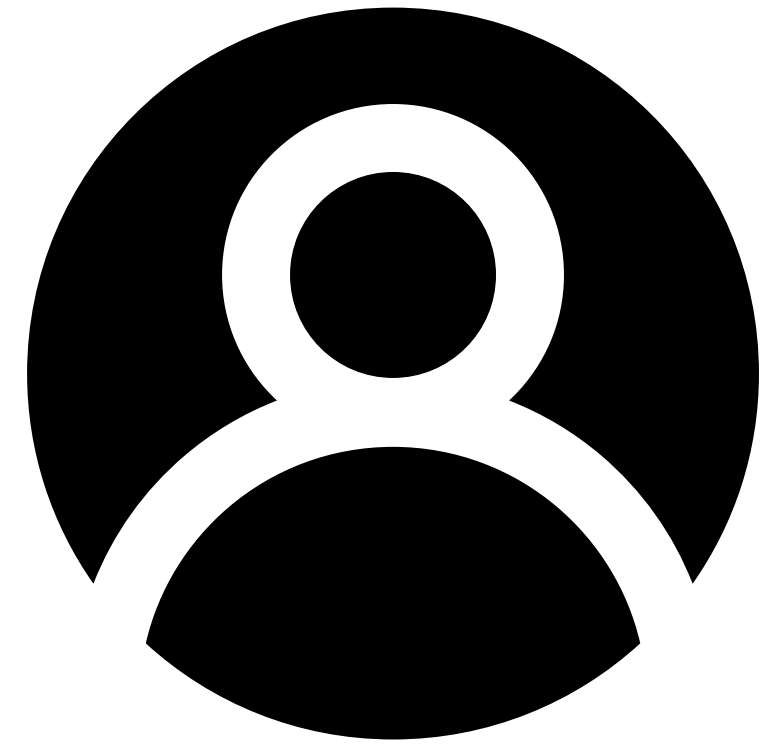
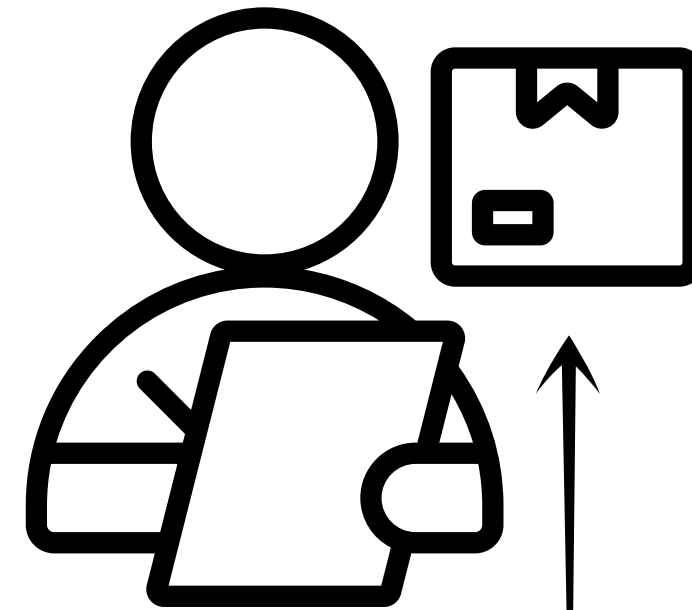


**CONSENT
MANAGER**



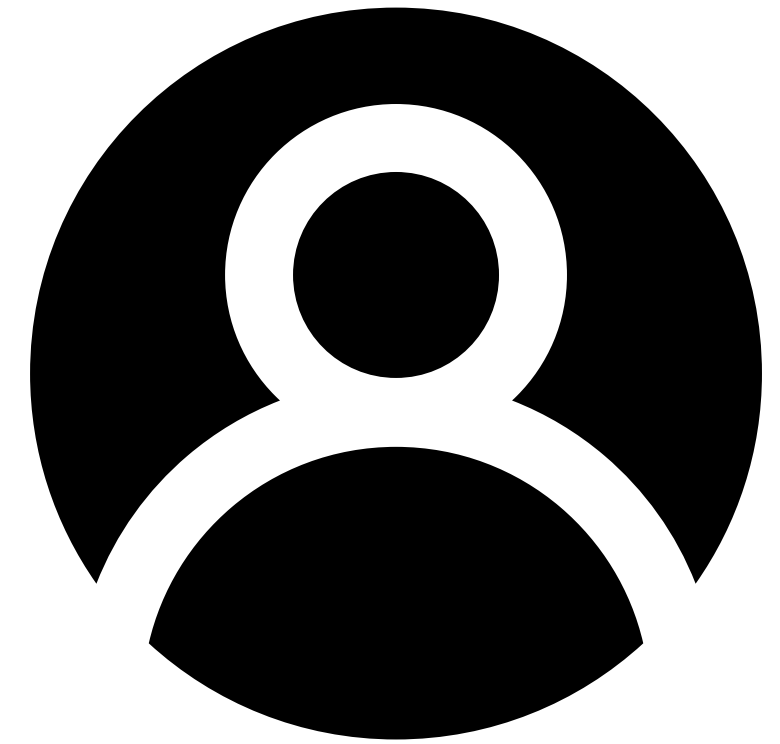
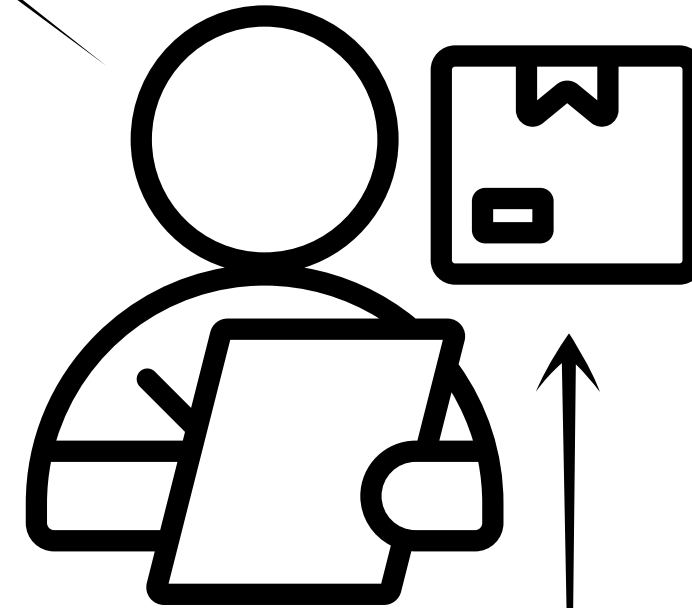


**CONSENT
MANAGER**



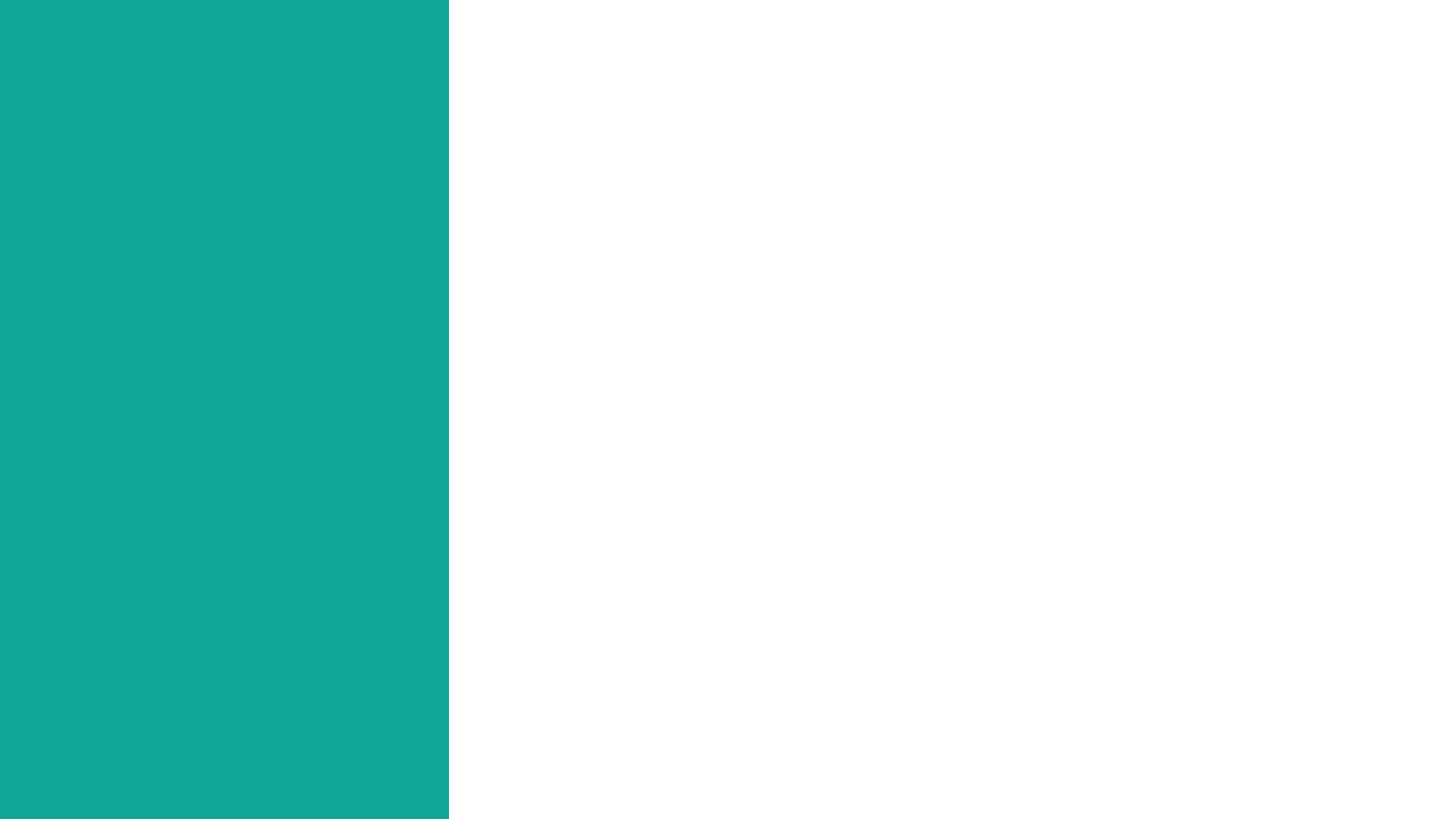


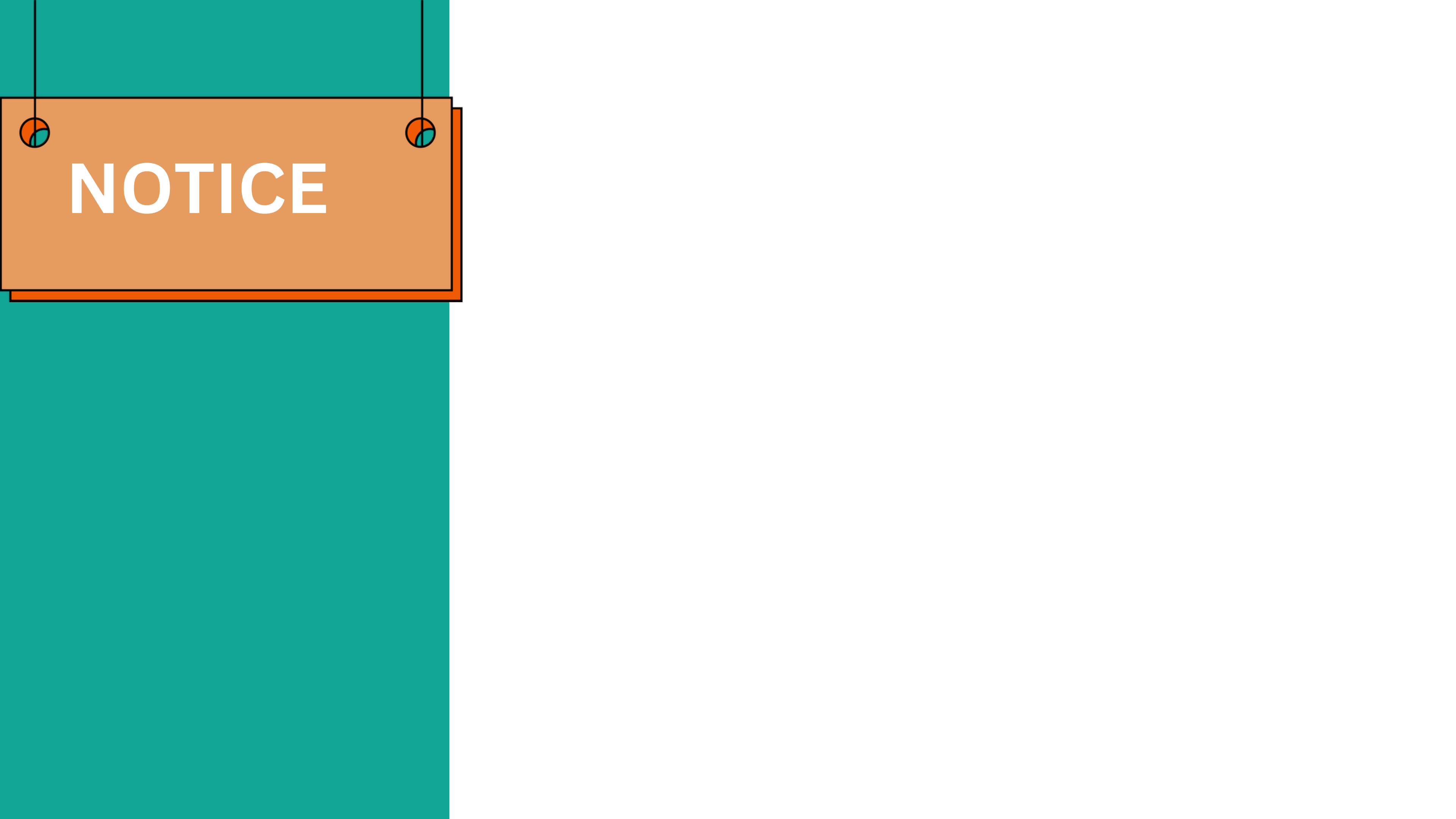
**CONSENT
MANAGER**





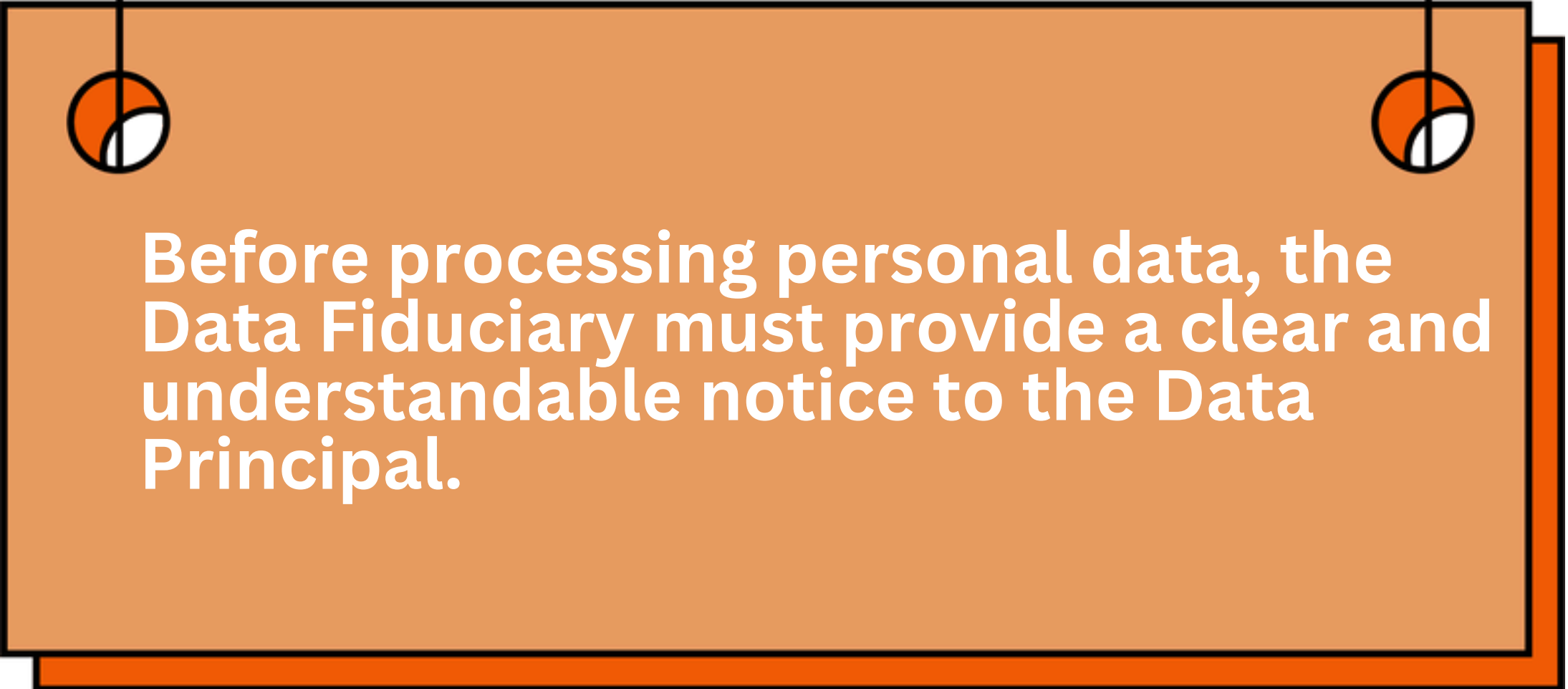
**CONSENT
MANAGER**



The image features a solid teal background. In the upper-left corner, there is a brown rectangular sign with a thin black border. The sign is suspended by two thin black vertical lines, each ending in a small circular fastener with a teal and orange design. The word "NOTICE" is written in large, white, bold, sans-serif capital letters on the sign. A second, slightly offset brown rectangle is visible behind the first one, creating a layered effect.

NOTICE

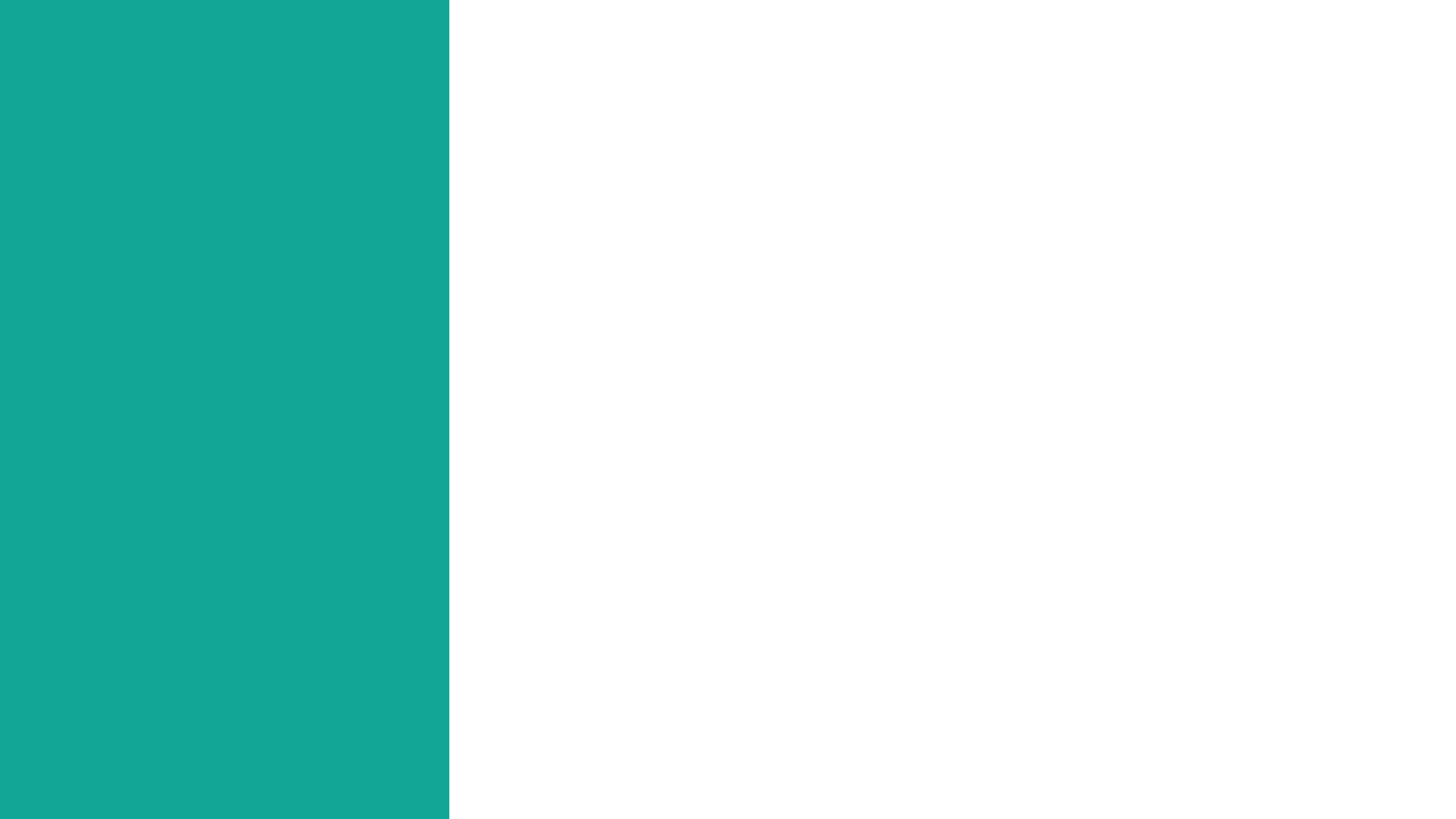
NOTICE



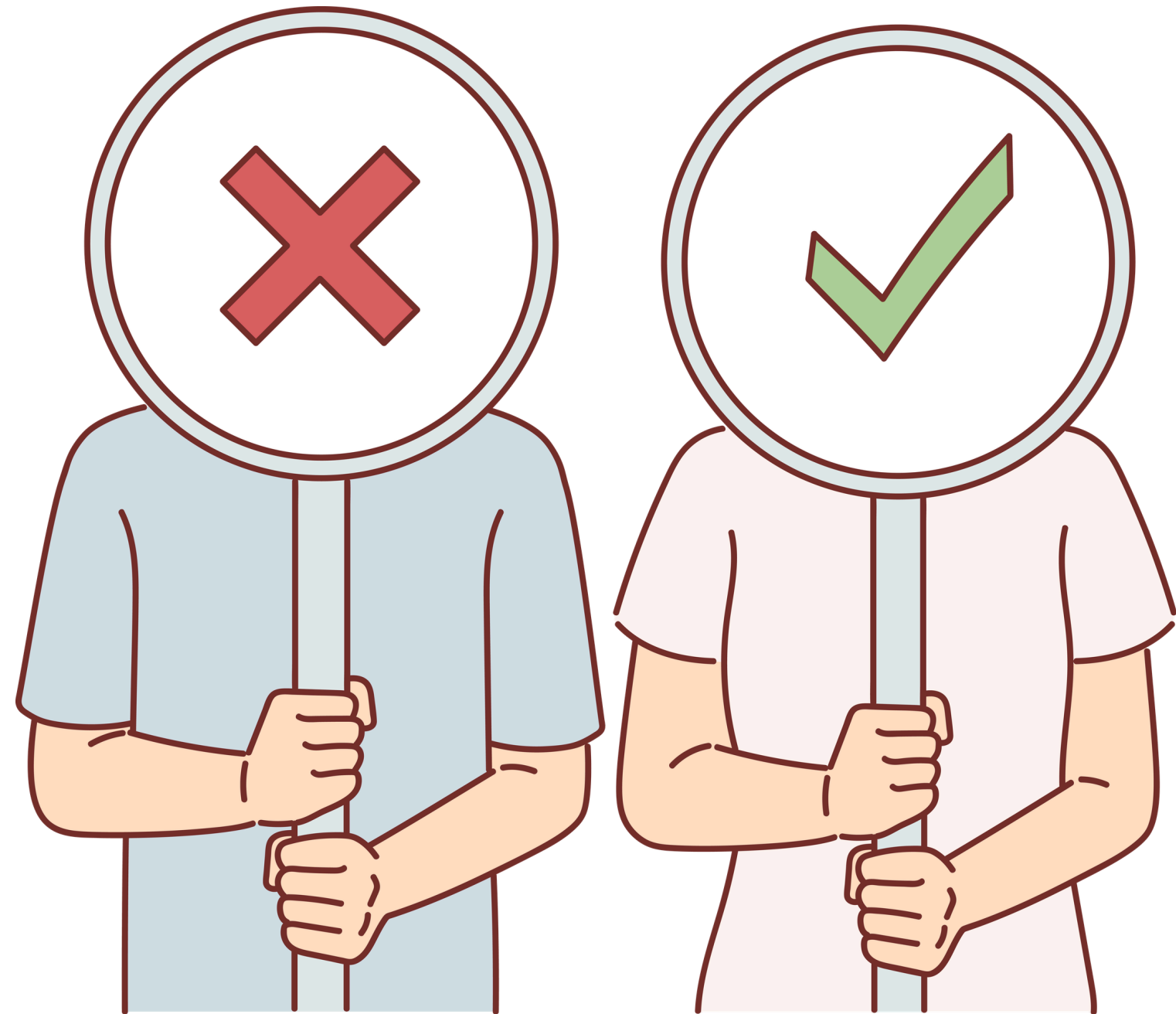
Before processing personal data, the Data Fiduciary must provide a clear and understandable notice to the Data Principal.

NOTICE





CONSENT



CONSENT

After providing notice, the Data Fiduciary must obtain cosent which shall be :



CONSENT

After providing notice, the Data Fiduciary must obtain cosent which shall be :



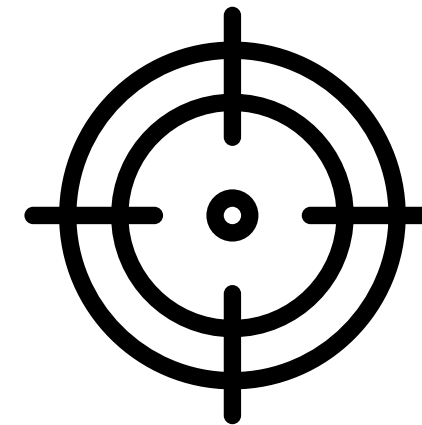
FREE

CONSENT

After providing notice, the Data Fiduciary must obtain cosent which shall be :



FREE



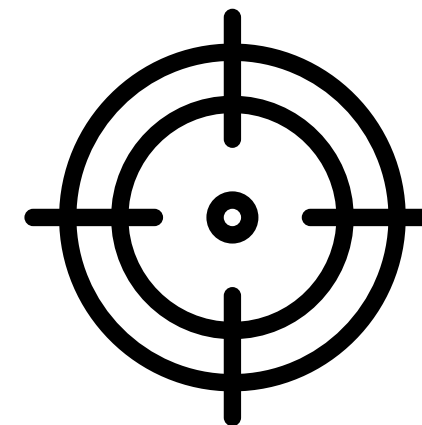
SPECIFIC

CONSENT

After providing notice, the Data Fiduciary must obtain cosent which shall be :



FREE



SPECIFIC



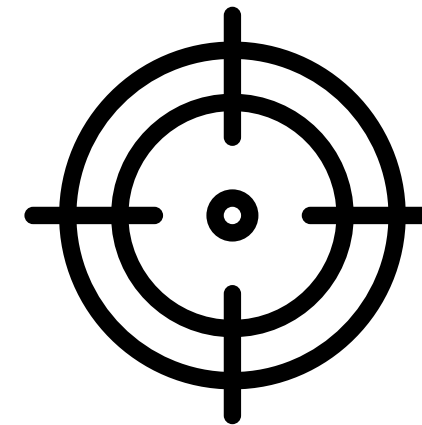
INFORMED

CONSENT

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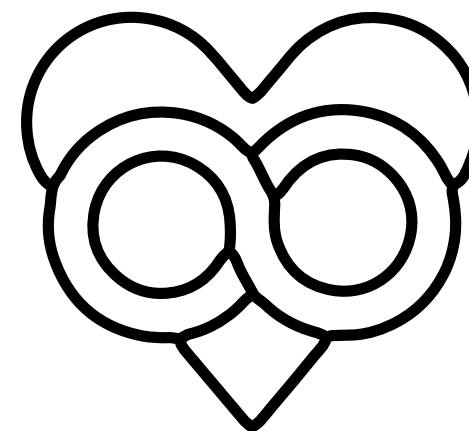
FREE



SPECIFIC



INFORMED



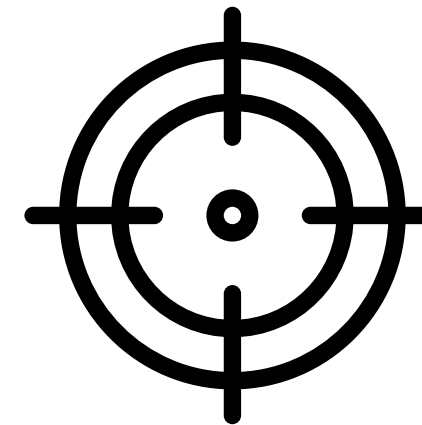
UNCONDITIONAL

CONSENT

After providing notice, the Data Fiduciary must obtain cosent which shall be :



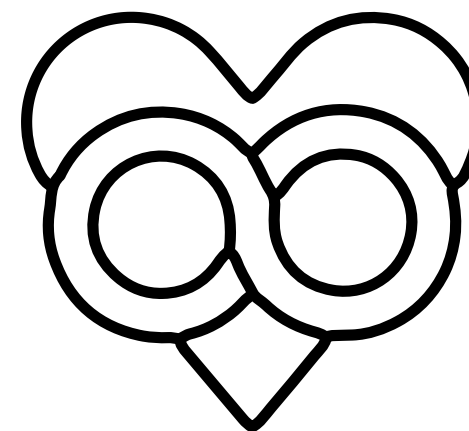
FREE



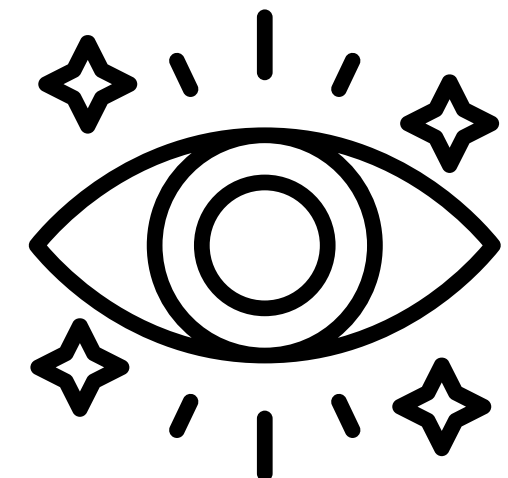
SPECIFIC



INFORMED



UNCONDITIONAL



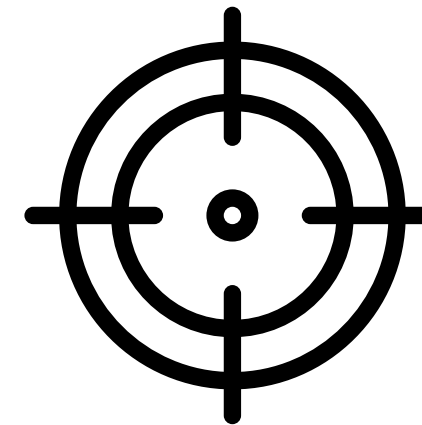
UNAMBIGUOUS

CONSENT

After providing notice, the Data Fiduciary must obtain cosent which shall be :



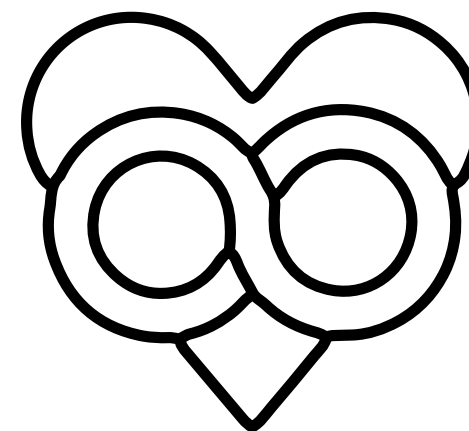
FREE



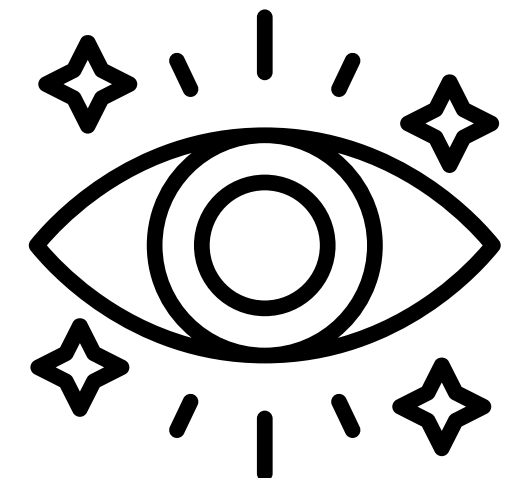
SPECIFIC



INFORMED

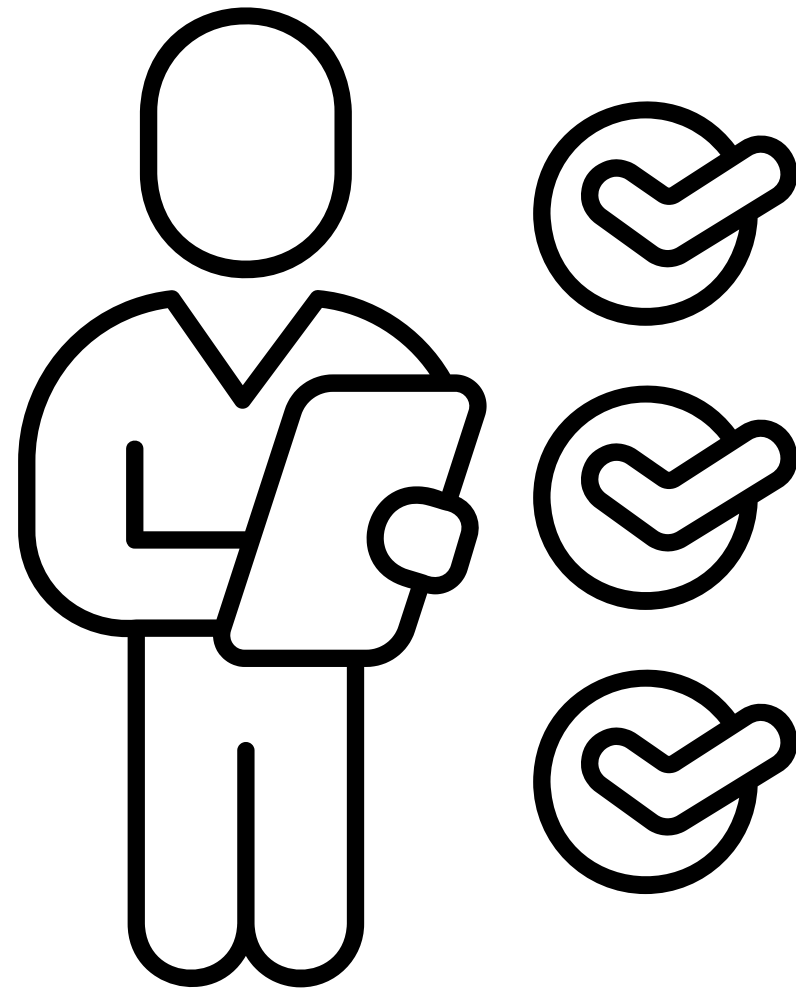


UNCONDITIONAL



UNAMBIGUOUS

General obligations of Data Fiduciary



General obligations of Data Fiduciary



Process Data
Only for a
Lawful
Purpose

General obligations of Data Fiduciary



Process Data
Only for a
Lawful
Purpose



Provide
Notice and
Obtain
Consent

General obligations of Data Fiduciary



Process Data
Only for a
Lawful
Purpose



Provide
Notice and
Obtain
Consent



Ensure Accuracy
of Data

General obligations of Data Fiduciary



Process Data
Only for a
Lawful
Purpose



Provide
Notice and
Obtain
Consent



Ensure Accuracy
of Data



Implement
Reasonable Security
Safeguards

General obligations of Data Fiduciary



Report
Personal Data
Breaches

General obligations of Data Fiduciary



Report
Personal Data
Breaches



Delete Data
When No
Longer
Required

General obligations of Data Fiduciary



Report
Personal Data
Breaches



Delete Data
When No
Longer
Required



Ensure Data
Processors
Comply

General obligations of Data Fiduciary



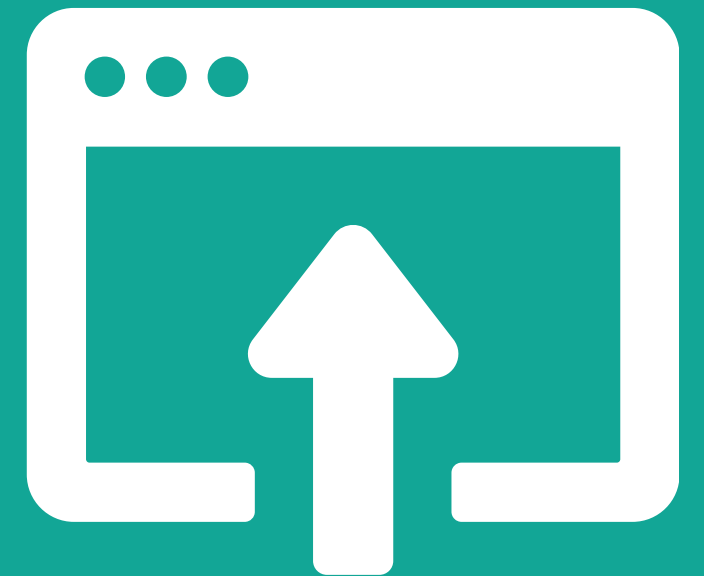
Report
Personal Data
Breaches



Delete Data
When No
Longer
Required



Ensure Data
Processors
Comply



Publish Contact
Details for Grievance
Redressal

Rights of Data Principal

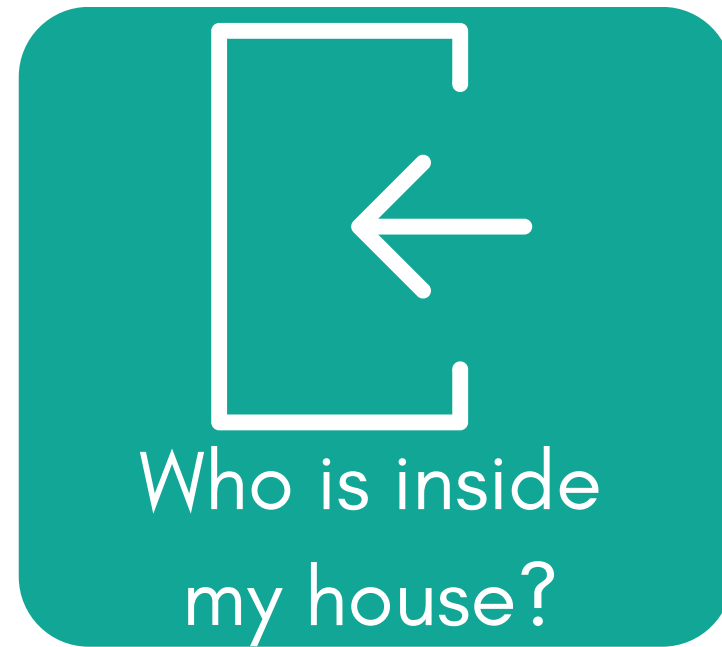
Imagine your personal data is a house.

Rights of Data Principal

Imagine your personal data is a house.



Rights of Data Principal



Rights of Data Principal



Rights of Data Principal



Rights of Data Principal



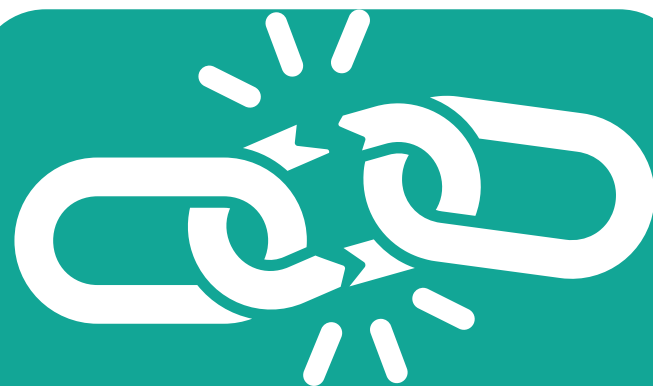
Rights of Data Principal



Who is inside
my house?



Call for help when
something goes
wrong



Fix what's
broken

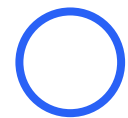


Give a trusted
person a spare key.

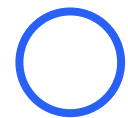


Remove what
shouldn't be there

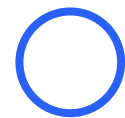
Rights of Data Principal



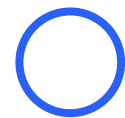
Rights of Data Principal



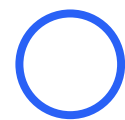
Rights of Data Principal



Rights of Data Principal



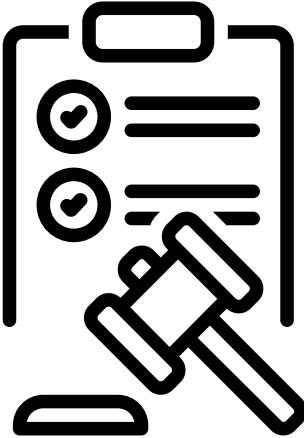
Rights of Data Principal





PROCESSING WITHOUT EXPLICIT CONSENT



Voluntary data sharing	• Personal data provided voluntarily by the Data Principal • Data shared for a specific purpose • No objection expressed at the time of sharing	
Compliance with Law or Court Orders	• Comply with any legal obligation • Follow court or tribunal orders	
Employment-related purposes	• For recruitment, employment, or termination • Limited to what is necessary and reasonable	



Medical Emergency	• To protect life or health of the Data Principal • Applies where consent cannot be obtained immediately	
Disaster management	• Processing allowed during: -natural or man-made disasters -breakdown of public order • For rescue, relief, and safety operations	
State Benefits & Public Services	• Processing by the State for: provision of subsidies, benefits, services -licences, permits, or certificates • Subject to lawful and authorised purpose	

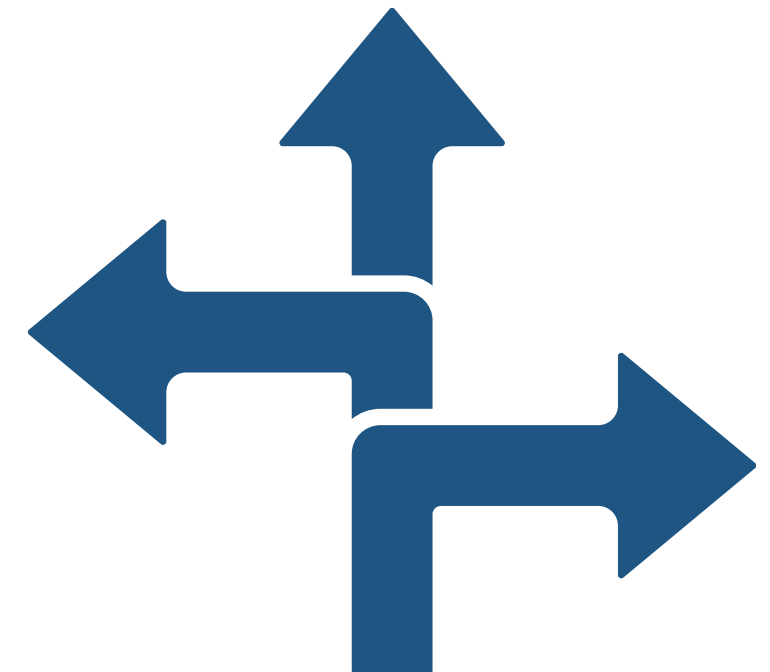
GOVERNING BODY UNDER THE DPDP ACT, 2023

DATA PROTECTION BOARD OF INDIA





DATA PROTECTION BOARD OF INDIA

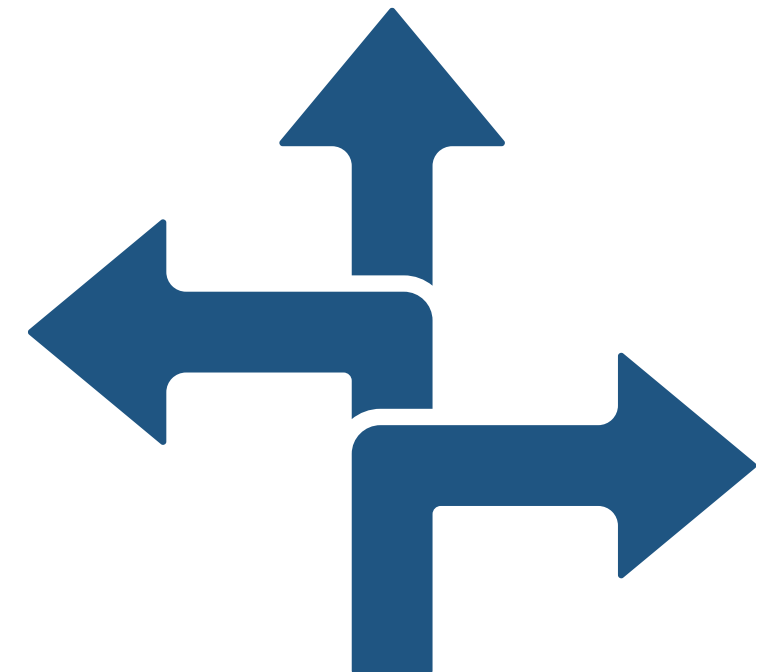




**Investigates Data
Breaches**



DATA PROTECTION BOARD OF INDIA





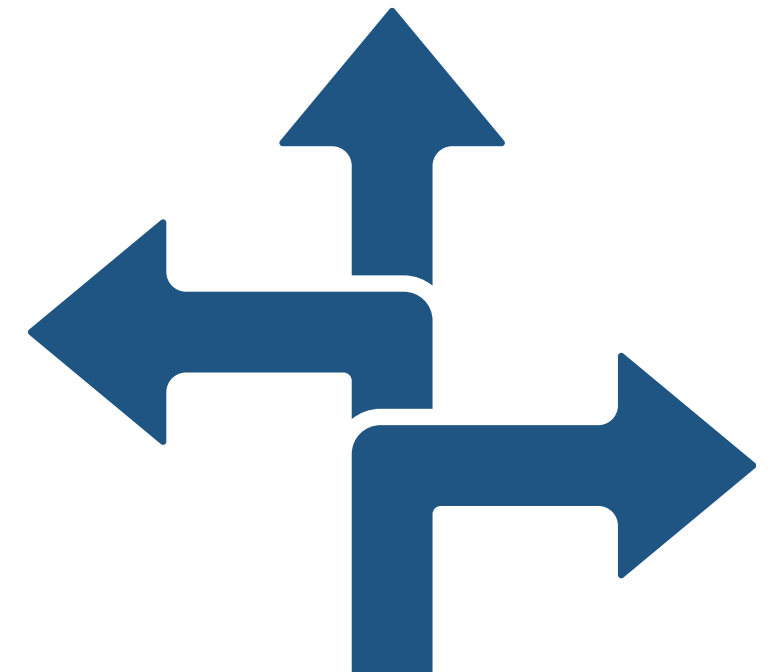
**Investigates Data
Breaches**



DATA PROTECTION BOARD OF INDIA



**Adjudicates
Complaints**





**Investigates Data
Breaches**

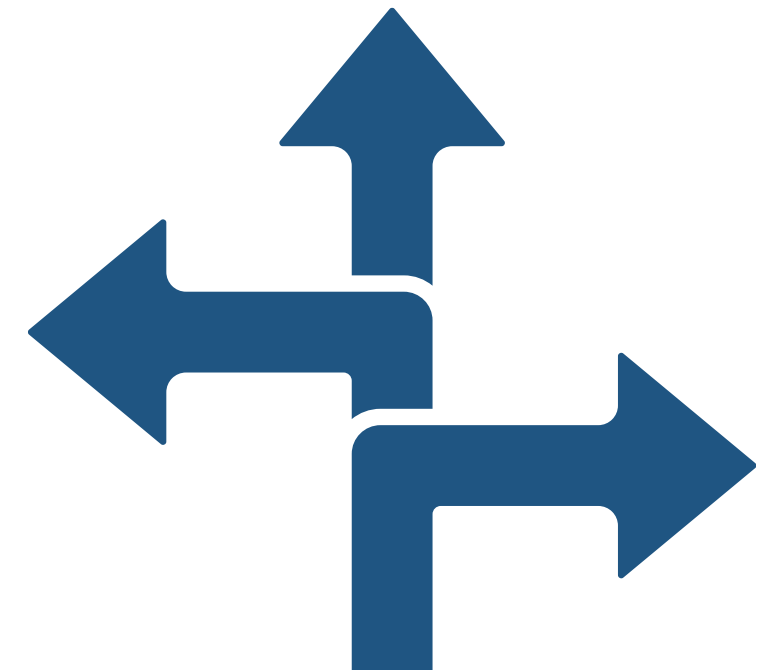
Imposes Penalties



DATA PROTECTION BOARD OF INDIA



**Adjudicates
Complaints**





**Investigates Data
Breaches**

Imposes Penalties

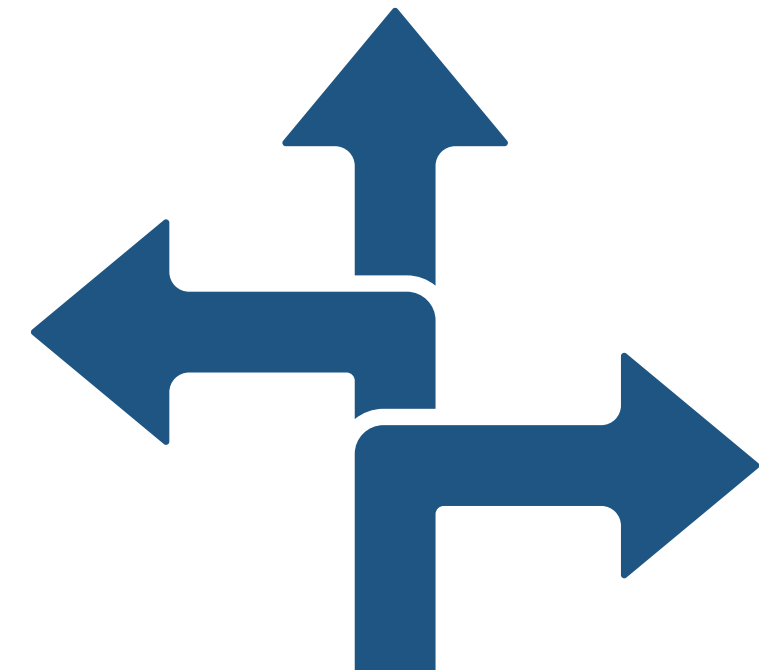


DATA PROTECTION BOARD OF INDIA

Issues Directions



**Adjudicates
Complaints**





**Investigates Data
Breaches**

Imposes Penalties



DATA PROTECTION BOARD OF INDIA

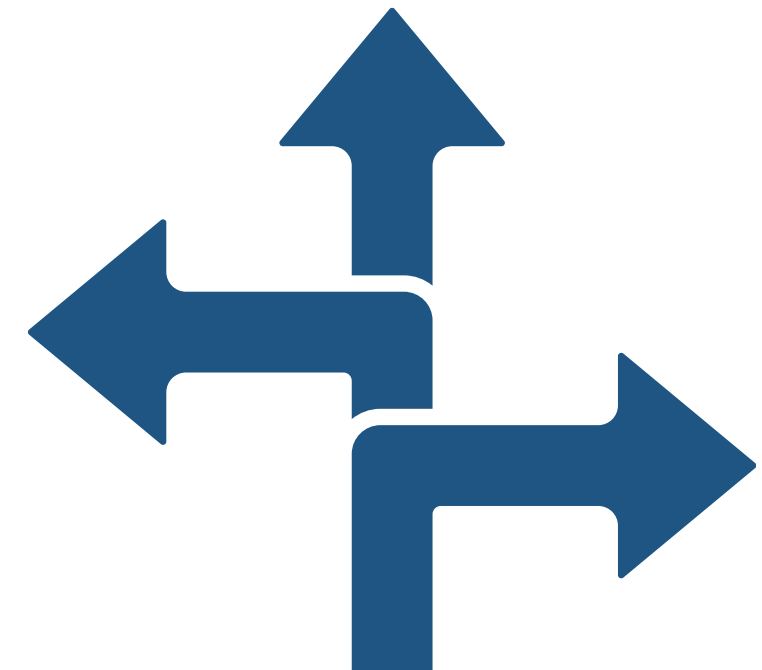
Issues Directions



**Adjudicates
Complaints**



**Provides Digital
Hearings**



PENALTY



PENALTY

Fail to Protect Personal Data?

250 Cr.

Fail to Protect Children's Data?

200 Cr.



Fail to Report a Data Breach?

200 Cr.

Fail to Fulfil Duties Relating to
Notice, Rights, or Other Obligations?

50 Cr.

RETROSPECTIVE VS PROSPECTIVE

Scenario	DPDP Applies?
Data collected before commencement, still being processed after commencement	

Scenario	DPDP Applies?
Data collected before commencement, still being processed after commencement	

Scenario	DPDP Applies?
Data collected before commencement, still being processed after commencement	
Data collected and completely processed before commencement	

Scenario	DPDP Applies?
Data collected before commencement, still being processed after commencement	
Data collected and completely processed before commencement	

Scenario	DPDP Applies?
Data collected before commencement, still being processed after commencement	
Data collected and completely processed before commencement	
Data breach occurred before commencement but discovered after commencement	

Scenario	DPDP Applies?
Data collected before commencement, still being processed after commencement	
Data collected and completely processed before commencement	
Data breach occurred before commencement but discovered after commencement	Depends

Scenario	DPDP Applies?
Data collected before commencement, still being processed after commencement	
Data collected and completely processed before commencement	
Data breach occurred before commencement but discovered after commencement	Depends
Consent obtained before commencement but does not meet DPDP standards	

Scenario	DPDP Applies?
Data collected before commencement, still being processed after commencement	
Data collected and completely processed before commencement	
Data breach occurred before commencement but discovered after commencement	Depends
Consent obtained before commencement but does not meet DPDP standards	Fresh compliance may be required

PRATICAL ASPECTS



WHAT IS THE MOST VALUABLE ASSET IN A CS FIRM?

WHAT IS THE MOST VALUABLE ASSET IN A CS FIRM?

WHAT IS THE MOST VALUABLE ASSET IN A CS FIRM?

DATA



PAN CARD

DATA



PAN CARD



FINANCIALS

DATA



PAN CARD



FINANCIALS

DATA



KYC DOCUMENTS



PAN CARD



FINANCIALS



KYC DOCUMENTS

DATA



EMPLOYEE DATA



PAN CARD



FINANCIALS



KYC DOCUMENTS

DATA



EMPLOYEE DATA



SHAREHOLDER INFORMATION



PAN CARD



FINANCIALS



KYC DOCUMENTS

DATA



DIRECTOR INFORMATION



EMPLOYEE DATA



SHAREHOLDER INFORMATION

ARE WE JUST A CS FIRM?

WE ARE NOT JUST A CS FIRM.

WE ARE ALSO:



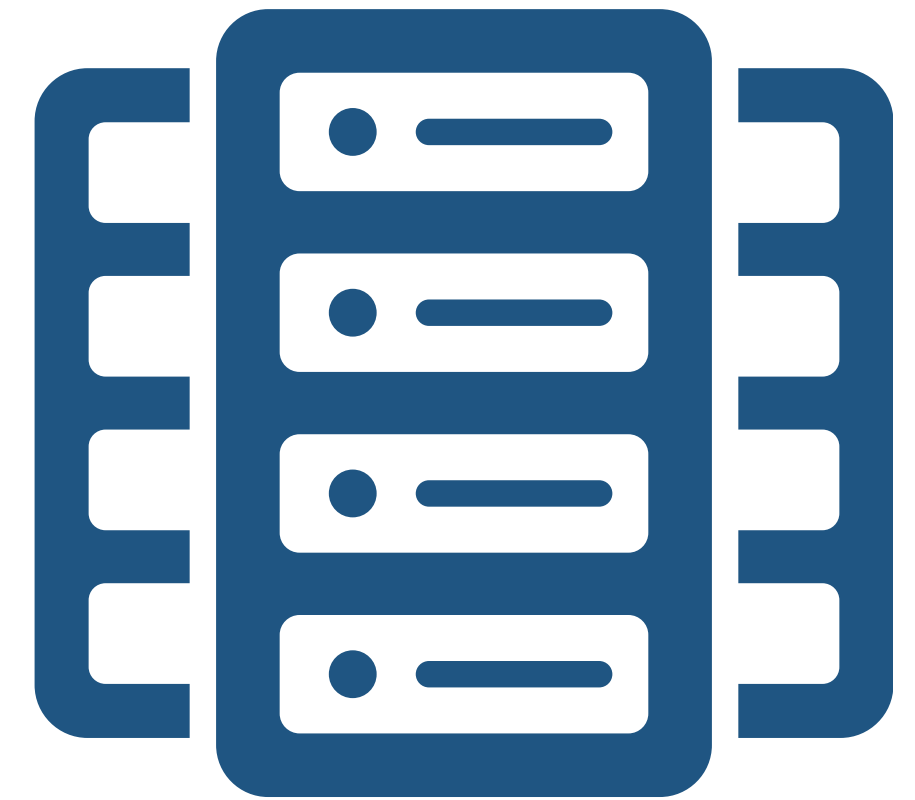
DATA FIDUCIARY

WE ARE NOT JUST A CS FIRM.

WE ARE ALSO:



DATA FIDUCIARY



DATA PROCESSOR

SAFEGUARD MEASURES



PROTECT IT

**Store client data in secure systems with passwords,
encryption, and access controls**



EXPLAIN IT

Tell clients why their data is being collected and how it will be used



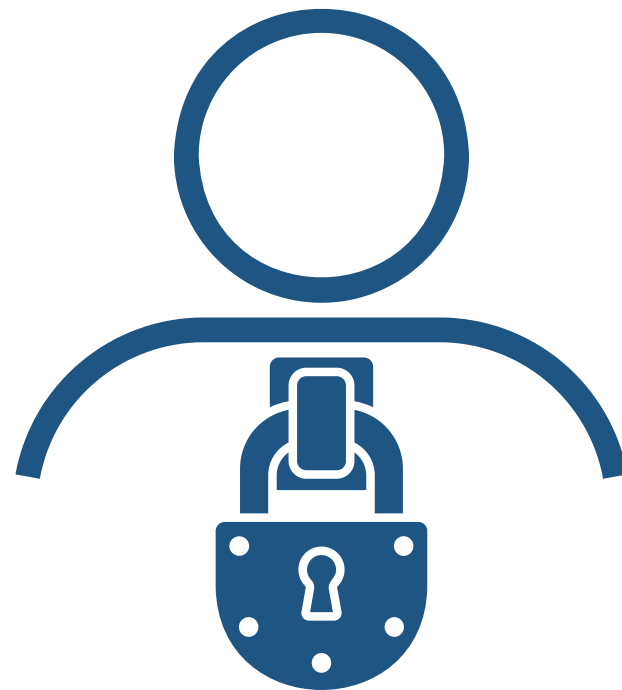
OBTAIN CONSENT

Take express consent from the Client



RESTRICT IT

Give access only to employees who need the information for their work



COLLECT LESS

Collect only the data necessary for the assignment



DELETE IT

**Retain personal data only for as long as required by law or
business necessity**



FORMULATE POLICY

Formulate data protection/privacy policy and internal SOPs



AUDIT TRAIL

Maintain detailed audit trails of data access, processing, sharing, and modifications to ensure accountability and support compliance verification



PREPARE FOR BREACHES

Have a plan for data leaks, hacked emails, lost laptops, or unauthorized disclosures



TRAIN PEOPLE

Regularly train employees, articles, interns, and staff on confidentiality and data handling



RESPECT RIGHTS

**Be prepared to respond to requests for information, correction,
or erasure of personal data**





**People do not give organizations their
data**

They lend them their trust





Thank you