

DIGITAL PERSONAL DATA PROTECTION ACT TIMELINES

What your organization
must do by 2027

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DPDP RULES, 2025, ARE HERE.

With the **Digital Personal Data Protection Rules, 2025** now in force, India's data protection regime is fully operational — and the 18-month countdown to full compliance by **May 2027** has begun.



START EARLY.

DON'T RACE THE MAY 2027 DEADLINE.

Build Phase: Nov 2025 – Nov 2026

Establish foundations — policies, inventories, governance, and core privacy processes.

Implement Phase: Nov 2026 – May 2027

Deploy, integrate, and test operational controls across the organization.

Operational Phase: From May 2027

Run, monitor, and continually mature your end-to-end DPDP compliance programme.

*Those who wait will be racing against penalties. **Privacy done early is privacy done right.***

WHY THIS MATTERS

Why DPDPA Compliance Can't Wait

- ✔ Applies to most organizations handling digital personal data in India.
- ✔ Full compliance + penalties kick in from **13 May 2027**.
- ✔ Security failures alone can attract penalties up to **INR 250 crore**.

ACTIONS TO BE TAKEN FROM NOW

Phase 1: Regulatory Setup

Foundations Are Being Laid

The Data Protection Board of India is notified and set up.

Definitions, rule-making powers, and appeal mechanisms come into force.

Action for you: Start gap assessment and readiness planning now.



Immediate Implementation Checklist (For All Organizations)

Non-Negotiables for All Data Fiduciaries

- ✔ Gap assessment
- ✔ Updated privacy notices & policies
- ✔ Data inventory + purpose & retention mapping
- ✔ Incident & breach workflows
- ✔ Grievance redressal with SLAs
- ✔ Rights-handling processes
- ✔ DPAs & vendor alignment
- ✔ Awareness & role-based training

Note : These obligations take effect immediately and become fully enforceable as of 13 May 2027.

ACTIONS TO BE TAKEN FROM NOV 2026 TO MAY 2027

Phase 2: Consent Manager Ecosystem (From Nov 2026)

Assess if a
Consent
Manager suits
your business

01

Evaluate
service
providers

02

Plan technical
& process
integration

03

Example: An e-commerce platform integrates a Consent Manager to centralize marketing opt-ins and withdrawals across website, app, and CRM systems.

ACTIONS BEYOND MAY 2027

Phase 3: Full Obligations (From May 2027)

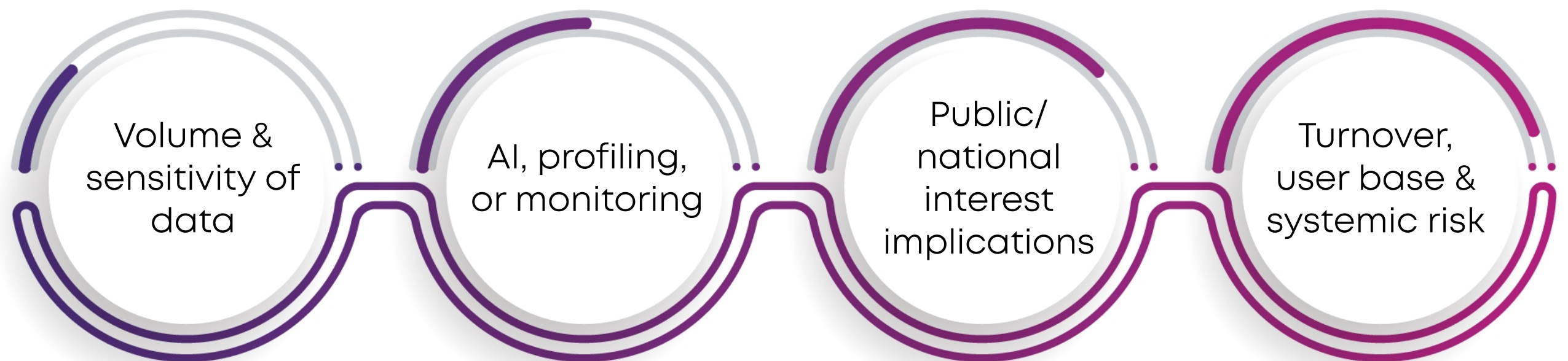
Full DPDPA Compliance Becomes Mandatory

- ✔ Valid legal basis (consent/legitimate use)
- ✔ Clear, accessible privacy notices
- ✔ Full Data Principal rights enablement
- ✔ Strong security, retention & deletion controls
- ✔ Children's data safeguards
- ✔ Vendor/processor oversight
- ✔ Follow notified cross-border transfer rule

Action for you: Ensure that all controls designed in earlier phases are fully operational, thoroughly tested, and closely monitored.

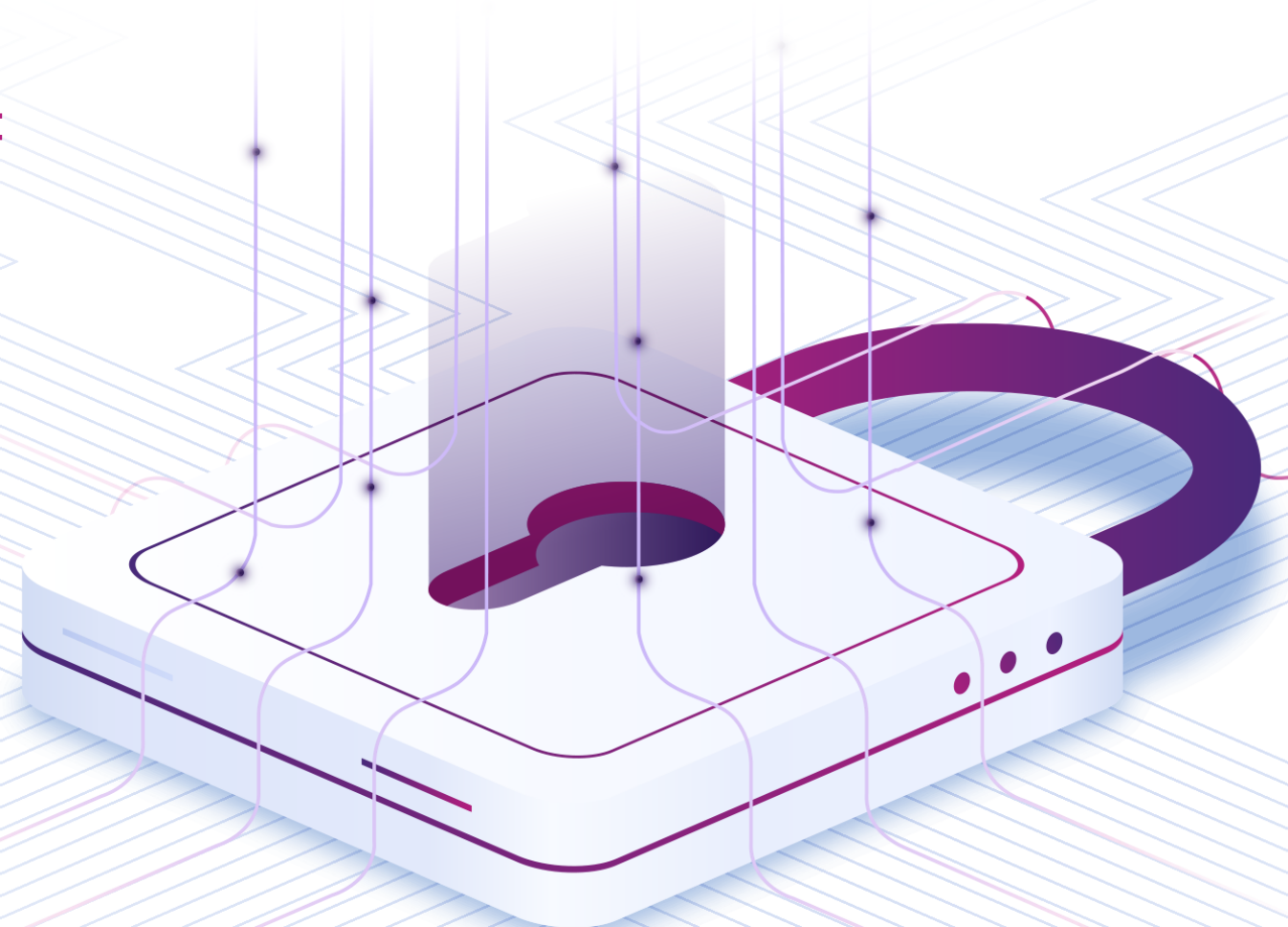
IF YOU'RE A SIGNIFICANT DATA FIDUCIARY(SDF)

SDFs are high-impact data fiduciaries designated based on:



Additional Duties (Before May 2027):

- ✓ India-based DPO
- ✓ Independent data auditor
- ✓ DPIAs for high-risk processing
- ✓ Board-level governance
- ✓ Structured oversight & reporting



OTHER MANDATORY REQUIREMENTS

72-Hour Breach Rule

- ✓ Notify DPB without undue delay
- ✓ Submit detailed report within 72 hours
- ✓ Inform affected users when risk of harm exists
- ✓ Maintain evidence & justification for each breach response

Consent Manager Requirements

- ✓ India-incorporated; net worth $\geq$ ₹2 crore
- ✓ Board-certified interoperable platform
- ✓ Plays the role of Fiduciary toward Data Principals
- ✓ Maintain consent/notice records for 7 years

PENALTIES YOU SHOULD BE AWARE OF

Up to

INR 250 crore

Failure to implement reasonable security safeguards.

Up to

INR 200 crore

Failure to notify personal data breaches

Up to

INR 200 crore

Violations in children's data processing.

Up to

INR 150 crore

Non-compliance by SDFs.

Up to

INR 50 crore

Other violations

Note : Data Protection Board will assess penalties based on the severity and duration of the violation, the type and volume of data involved, the impact on individuals, organisational intent and cooperation, remediation efforts, and any unfair gain or repeat non-compliance.



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