

DATA PROTECTION REGIME, INDIA PHASE-WISE COMPLIANCE PLAYBOOK (Effective 13.11.2025)

(Based on GSR 843(E), 844(E), 845(E))

DPDP Act – Enforcement | DPB members | DPB establishment

MASTER TIMELINE VIEW

Phase	Date	Compliance Areas
Phase 1	13 Nov 2025	Definitions, DPB establishment, rights redressal, breach readiness
Phase 2	13 Nov 2026	Consent Managers registration & operationalisation; Sec 27(1)(d) compliance
Phase 3	13 May 2027	Full compliance regime: notices, consent, breach, rights, children, SDF, DPIA, cross-border, exemptions

PHASE WISE IMPLEMENTATION

<p>PHASE 1 — IMMEDIATE (Effective 13 November 2025)</p> <p>Sections in force: Sec 1(2), 2, 18–26, 35, 38–44(1),(3)</p> <p>A. Legal & Governance Setup</p> <ul style="list-style-type: none">Review applicability of Act to business (Sec 2).Identify entity role: Data Fiduciary / Data Processor.Map all digital personal data inflows/outflows.Update internal Grievance Redressal workflows (Sec 13).Prepare for Data Principal rights: Access, Correction, Erasure, Nomination (Secs 11–14). <p>B. Readiness for the DATA PROTECTION BOARD (DPB)</p> <ul style="list-style-type: none">Note DPB established (GSR 844(E)).Maintain breach-ready documentation (for DPB directions).Align internal escalation matrix for DPB notices. <p>C. Consent Manager & Registration-Ready Framework</p> <ul style="list-style-type: none">Prepare to integrate with DPB-registered Consent Managers (Sec 6(7),(10)).Implement internal consent logs for later verification.	<p>PHASE 2 — BY 13 NOVEMBER 2026 (1 YEAR DEADLINE)</p> <p>Sections coming into force: Sec 6(9) + Sec 27(1)(d)</p> <p>DPDP Act - Enforcement</p> <p>A. Consent Manager Registration Compliance</p> <ul style="list-style-type: none">Ensure all Consent Managers used by the entity are DPB-registered.Update all consent flows to ensure verifiable traceability. <p>B. Data Principal’s RIGHT TO WITHDRAW VIA CONSENT MANAGER</p> <ul style="list-style-type: none">Deploy seamless consent withdrawal workflow.Automate “cease processing upon withdrawal” triggers. <p>C. Blacklisting Obligations (Sec 27(1)(d))</p> <ul style="list-style-type: none">(When DPB notifies blocking of a Data Fiduciary for repeated breaches.)Set up system to detect/deny data sharing with “blocked” fiduciaries.Build a vendor-risk list integrating DPB notifications.
<p>PHASE 3 — BY 13 MAY 2027 (18 MONTH DEADLINE)</p> <p>Largest enforcement block:</p> <p>Secs 3–5, 6(1–8),(10), 7–10, 11–17, 27(except 1(d)), 28–34, 36–37, 44(2)</p> <p>DPDP Act - Enforcement</p> <p>A. FULL CONSENT, NOTICE & LAWFUL PROCESSING OBLIGATIONS</p> <ul style="list-style-type: none">Issue all notices under Sec 5 in English + 8th Schedule languages.Verify “free, specific, informed, unconditional” consent (Sec 6).Deploy consent-withdrawal parity (ease = ease of giving). <p>B. SECURITY, BREACH & DPIA FRAMEWORK (Core Compliance)</p> <ul style="list-style-type: none">Implement robust technical + organisational security (Sec 8(4),(5)).Deploy breach-notification SOP for DPB + affected Data Principals (Sec 8(6)).Establish data-retention + erasure timelines (Sec 8(7),(8)).Create a Data Lifecycle Register (collection, processing, deletion). <p>C. CHILD DATA PROCESSING COMPLIANCE (Sec 9)</p> <ul style="list-style-type: none">Implement parental verifiable consent.Disable behavioural monitoring/tracking/ads for children.Classify products/services impacting children.	<p>PHASE 3.1 — BY 13 MAY 2027 (18 MONTH DEADLINE)</p> <p>D. SIGNIFICANT DATA FIDUCIARY (SDF) PREPAREDNESS (Sec 10) (Only if notified by Govt later)</p> <ul style="list-style-type: none">Appoint a Data Protection Officer (India-based).Appoint independent Data Auditor.Conduct periodic DPIA.Maintain audit trail of processing activities. <p>E. DATA PRINCIPAL RIGHTS SYSTEM (Sec 11–14)</p> <ul style="list-style-type: none">Create a unified rights-management portal to support:AccessCorrection/ErasureGrievance resolution within prescribed timelinesPost-death nominee mechanism <p>F. DATA TRANSFER RULES COMPLIANCE (Sec 16)</p> <ul style="list-style-type: none">Verify if Central Government has notified restricted geographies.Update cross-border contracts & SCCs accordingly. <p>G. EXEMPTIONS MANAGEMENT (Sec 17)</p> <ul style="list-style-type: none">Identify lawful exemptions applicable to business lines.Maintain logs for legal claims, law-enforcement exceptions.

DELIVERABLES

<p>External</p> <ul style="list-style-type: none">Clean statutory timelineObligations summaryIndustry-specific compliance roadmapBreach response flowchartConsent + Notice templates	<p>Internal</p> <ul style="list-style-type: none">Detailed Sec-wise compliance trackerClause bank for contracts (SaaS, DP agreements, processors)DPIA templatesGrievance redressal timeline triggersEnforcement impact trackerSDF readiness checklist
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