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# From mandate to momentum

Digital Personal Data Protection Act (DPDPA) 2023 and final rules as notified on 13 November 2025

# We welcome Meity's final DPDP Rules notification, setting enforcement schedule for the 2023 Act.

### **Key gazette notifications**

G.S.R. 843(E) - Sets phased timelines for DPDP Act sections: immediate, within one year, and 18 months

G.S.R. 844(E) - Establishes Data Protection Board of India (DPBI), empowers statutory functions

G.S.R. 845(E) - Constitutes the DPBI with four members, commencing the regulatory infrastructure

G.S.R. 846(E) - Publishes final DPDP Rules, establishing regulatory framework for personal data processing

### What these notifications mean?

#### Foundational phase

Defines terms, establishes DPBI, outlines governance, appointments, powers, protections, and related Act amendments.

#### Infrastructure phase

# 12-month window Consent Manager

registration opens; conditions apply; Board oversees breaches, penalties, and interoperable consent platform.

# Full regime enforcement

### 18-month window

Defines territorial scope, consent rules, rights, fiduciary duties, crossborder limits, penalties, and Act amendments.

### Rules set clarity

Rules provide detailed operational requirements (notice content; security measures; breach reporting; data retention schedules).

## Enforcements and penalties (Effective 13 May 2027)

Noncompliance by data fiduciary Children's data violations

Breach notification failures SDF obligations unmet Miscellaneous noncompliance

Data principal duties breach

up to INR 250 crore up to INR 200 crore up to INR 150 crore up to INR 150 crore

up to INR 50 crore

INR 10,000

### **Next steps for organisations**

- Conduct a gap analysis immediately: Map current data-processing, consent flows, vendor relationships, logs/audit capabilities against the forthcoming obligations.
- Establish governance and appoint roles: With regulatory architecture live, ensure you have oversight, board reporting, internal accountability (e.g., Data protection officer (DPO) appointment if applicable).
- Develop or deploy consent-management infrastructure: Build or select a system for obtaining, managing, tracking consent and withdrawals, and integrate vendor/processor workflows.
- Review and update policies/contracts: Privacy notices, vendor/data-processor contracts, cross-border transfer clauses, data-retention schedules must be updated in line with the Rules.
- Build technical/security controls: Logging, monitoring, backup, incident response, breach-notification workflows, data-mapping and inventory.
- Communications and awareness campaigns: Educate business units, legal, IT, vendors on upcoming obligations, rights of data principals, internal escalation.
   Monitor the timelines: Because obligations will phase-in alian your budget and resourcing with the activation.
- Monitor the timelines: Because obligations will phase-in, align your budget and resourcing with the activation phases—not all obligations apply today, but readiness must start now.
- **DPB notifications and advisory:** Organisations should keep a close watch on upcoming notifications and advisories that shall be released from time-to-time.
- Prepare for enforcement: With the DPBI in place, ensure documentation, audit trails, vendor oversight and internal compliance logs are maintained so you are enforcement-ready.

## For more details on what the DPDP Act means for your business. Please contact:



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