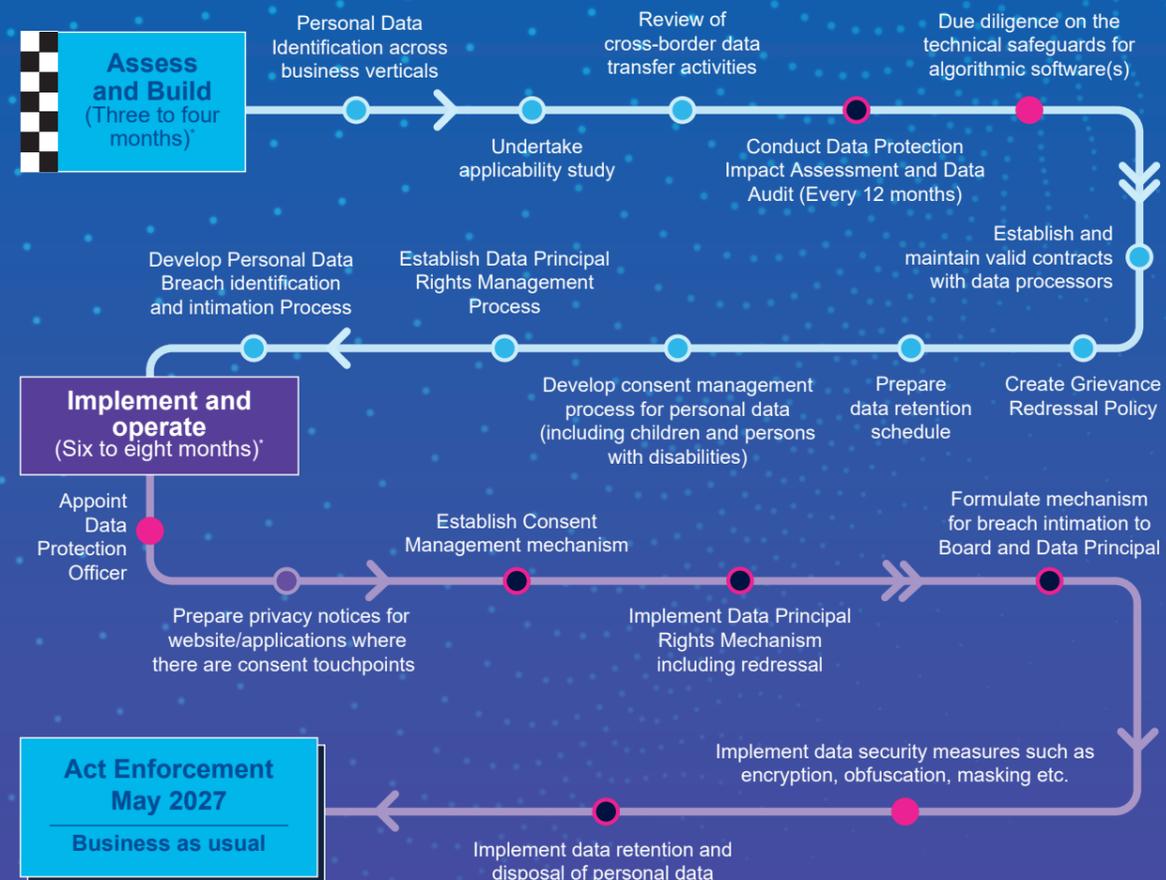




DPDP Act and Rules compliance roadmap



● Applicable to only Significant Data Fiduciary only ● Potential areas for automation

*Note: These are indicative timelines proposed for your consideration and may vary based on your current data privacy compliance readiness/ posture. Some of the activities mentioned above can run in parallel and may not necessarily be sequential in nature.



Highlights of the Digital Personal Data Protection Act

Territorial and Material Scope

- Applies to processing of personal data within India
- Applies to personal data collected in digitised form or digitised subsequently
- Processing outside India in connection with any activity related to offering goods and services within India.

Data Principal Rights

Data Principals shall have the following rights;

- Right to access information
- Right to correction and erasure
- Right to nominate someone to act on their behalf in case of death/incapacity
- Right to grievance redressal.

Grounds of Processing

Below are the two grounds of processing:

- Consent: Consent should be freely given, specific, informed, unambiguous and unconditional
- No separate consent is required for "certain legitimate uses" recognised under the Act.

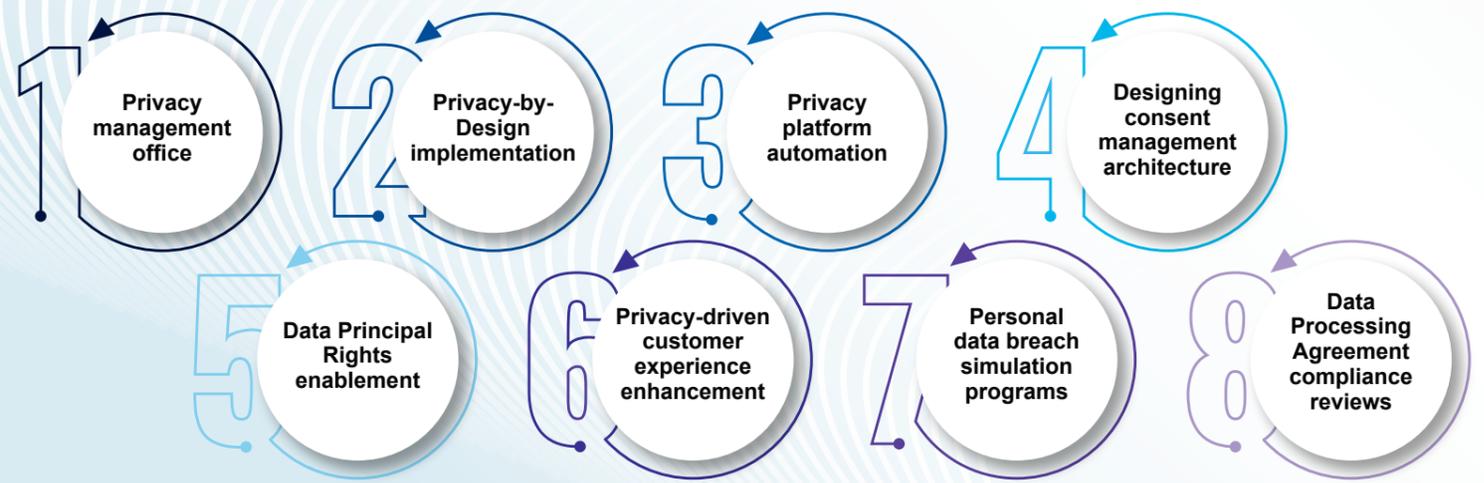
Key Penalties

- Up to INR250 crore for personal data breach
- Up to INR200 crore for breach in obligations relating to processing of personal data of children
- Up to INR150 crore for breach of SDF obligations.

Key Timelines under DPDP Rules

DPDP Rule	Obligation	Timeline(s)
7(1) and 7(2)	Breach intimation to the Data Protection Board (DPB) and Data Principal	First Intimation to DPD and Data Principal: Without delay Second Intimation to DPB with detailed information of breach: Within 72 hours
8(2) and Third Schedule	Personal data erasure and intimation of such erasure by E-commerce/social media/gaming entities	Retention Period: Three years Intimation: 48 hours prior to deletion
First Schedule – Part B - 4(c)	Maintenance of consent records by consent manager	Seven years
6(1)(e)	Retention of personal data, associated logs and data traffic	One year
14(3)	Response to the grievances of Data Principals	Within 90 days

KPMG in India's Key Data Privacy Service offerings



kpmg.com/in

KPMG in India Contacts

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