



Implications of Digital Personal Data Protection (DPDP) Act on Telecom, Media & Technology Sector (TMT) and opportunities ahead

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The **Digital Personal Data Protection (DPDP) Act, 2023**, operationalised through the 2025 Rules, introduces a transformative framework for handling personal data in India. For **Telecom, Media, and Technology (TMT)** sector—key custodians of vast consumer data—the implications are significant:

Compliance mandates

Entities classified as **Data Fiduciaries** must implement robust consent management, age verification for minors, multilingual notices, and breach reporting within strict timelines. Telecom operators face challenges in harmonising DPDP with existing sectoral laws, while OTT and digital platforms must overhaul data collection and personalisation practices to ensure explicit consent and transparency

Operational overhaul

Traditional practices like bundled terms of service would no longer suffice. Companies must adopt modular, contextual consent flows and privacy notices in multiple languages, reflecting India's diversity.

Strategic advantages: Rather than viewing DPDP as a compliance burden, TMT players can leverage it to build **trust as a competitive differentiator**. By embedding privacy-by-design and transparent governance, businesses can:

1 Enhance consumer confidence



Strong data protection fosters loyalty and positions brands as responsible custodians of digital rights

2 Enable global alignment



DPDP will build a privacy aware culture, opening doors for cross-border partnerships and investments

3 Drive innovation



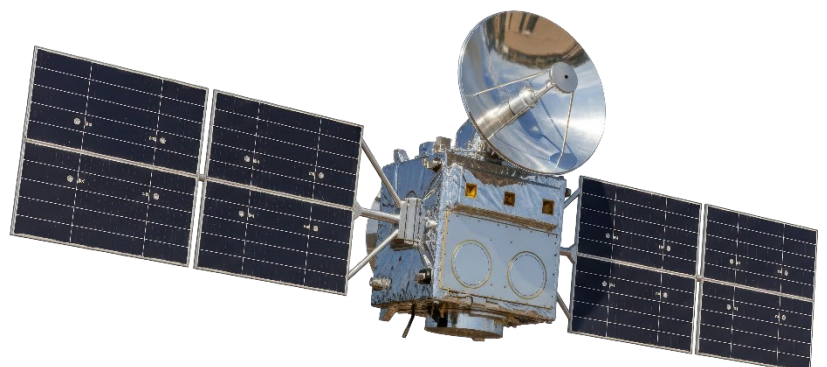
The rise of privacy-tech solutions—consent management platforms, secure data analytics—creates new revenue streams and operational efficiencies

4 AI and personalisation with ethics



Clear consent frameworks allow ethical deployment of AI-driven personalisation, strengthening user engagement without compromising privacy.

In essence, DPDP is not just a regulatory milestone—it's a strategic inflection point for TMT sector to **redefine trust, accelerate digital growth, and lead in a privacy-conscious economy.**



What next



TMT companies handle massive consumer datasets, making compliance complex. This should not be a bolt-on; it must be built into technology and processes. To capitalise on the opportunities and ensure compliance under the DPDP Act, TMT organisations should prioritise the following steps:

1. Understand the compliance mandates

- **Consent management:** Consent must be explicit, informed, and easily withdrawable. Pre-ticked boxes and bundled terms are no longer acceptable
- **Privacy notices:** Must be clear, concise, and available in multiple Indian languages
- **Age verification:** Mandatory parental consent for minors; prohibition on behavioural tracking of children
- **Breach reporting:** Notify the Data Protection Board and affected individuals within **72 hours** of a breach
- **Data retention and minimisation:** Collect only what is necessary and adhere to retention timelines
- **Cross-border transfers:** Restricted to countries approved by the Central Government
- **Significant Data Fiduciary (SDF) obligations:** Annual audits and **Data Protection Impact Assessments (DPIA)** every 12 months.

2. Operational overhaul for TMT

- **Redesign consent flows:** Move to modular, contextual consent mechanisms integrated into apps and platforms
- **Multilingual privacy notices:** Reflect India's linguistic diversity for OTT platforms, telecom services, and digital apps
- **Data mapping and inventory:** Maintain a dynamic inventory of personal data across systems, cloud, and third-party vendors
- **Vendor and partner contracts:** Update agreements to align with DPDP's fiduciary-processor accountability model.

3. Embed Privacy-by-Design

- **Secure architecture:** Implement encryption, masking, and strong access controls
- **Automated compliance:** Use AI and automation for consent management, breach alerts, and audit trails
- **Self-service portals:** Enable individuals to exercise rights (access, correction, erasure) easily.

4. Strategic advantages beyond compliance

Rather than viewing DPDP as a burden, TMT firms can leverage it for **competitive differentiation to build consumer trust, enable global alignment and leverage innovation opportunities.**


5. Immediate action plan

- **Appoint a Data Protection Officer (DPO)** for governance
- **Conduct a Current-State Assessment** and gap analysis
- **Develop a phased compliance roadmap** (18-month window)
- **Train employees** on privacy obligations and ethical data handling
- **Engage with industry bodies** for best practices and regulatory updates.


KPMG in India's key data privacy service offerings



Privacy management office




Privacy-by-Design implementation




Privacy platform automation




Designing consent management architecture



Data Principal Rights enablement



Privacy-driven customer experience enhancement



Personal data breach simulation programmes



Data Processing Agreement compliance reviews



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