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DATA PROTECTION AND PRIVACY IN INDIA: THE EMERGING PICTURE

IMA India: The 24th Annual CFO Roundtable

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100 YEARS OF VALUES

Character, Competence & Commitment

Structure

- Introduction to key concepts in the Personal Data Protection Bill, 2019 ("**PDP Bill**")
  a) Existing laws on data privacy and information technology;
  b) Constitutional Right to Privacy;
  c) PDP Bill; and
  d) Comparing with the GDPR.
- Sectoral regulations and recent developments
- Impact of the PDP Bill on business and industry
  a) Impact of the PDP Bill on business and industry; and
  b) Compliance Chart.

Existing Laws

Information Technology Act, 2000 ("IT Act")	
Section 43A and Section 72A of the IT Act	Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Data or Information) Rules, 2011

A Constitutional Right to Privacy	
Justice K S Puttaswamy (Retd.) & Anr. v. Union of India & Ors., Constitutional Bench, 9 judges (August 2017)	• Unanimously upheld the right to privacy as a fundamental right. • Informational privacy is a facet of the right to privacy. • Data Protection Principles *viz.* Purpose Limitation, Data Minimization and Storage Limitation. • Triple Test as laid down in Puttaswamy including: (a) existence of law; (b) legitimate aim; and (c) restriction should be proportional to object

PDP Bill: Timeline & Applicability

Committee of Experts July, 2017

To study and identify key data protection issues and recommend methods to address them.

July, 2018

Committee of Experts submitted draft Personal Data Protection Bill, 2018 and its corresponding report to the government.

PDP Bill

In December 2019, PDP Bill was introduced into the Lok Sabha and sent to a Joint Parliamentary Committee.

Current Status

The JPC has sought views and suggestions on the PDP Bill within a period of three weeks starting February 4, 2020.

Applicability of the PDP Bill

The PDP Bill will govern all processing (defined to be inclusive of collection, storage, organization, structuring, adaptation, transmission, disclosure, or even erasure) of personal data: (a) within India; (b) by Indian entities, authorities or persons; and (c) outside India, if such processing is in connection with: (i) business in India or offering goods/services to Data Principals in India; or (ii) profiling of Data Principals in India.

PDP Bill: Definitions

Parties

- **Data Fiduciary**
- **Data Principal**

Significant Data Fiduciary - Criteria

- Volume of personal data processed;
- Sensitivity of data;
- Turnover of Data Fiduciary;
- Risk of harm by processing;
- Use of new technologies for processing; and
- Other factors causing harm from such processing.

Data

Personal Data	Data about or relating to a natural person which can directly or indirectly identify the person on its own or in combination with any other data, available online or offline, including inference drawn from such data for the purpose of profiling.
Sensitive Personal Data	broad and inclusive definition – primarily comprising of financial data, health data, biometric data, genetic data, sex life or orientation including transgender and intersex status, religious/political belief, caste/tribe and any other data that may be categorized by Data Protection Authority ("**DPA**").
Critical Personal Data	not defined in the PDP Bill. The DPA may notify any category of personal data to be critical personal data.

Obligations of Data Fiduciary #1

Fair & Reasonable Processing	• Fair and reasonable processing for the purpose consented by the Data Principal • Data Fiduciaries to maintain transparency surrounding general practices related to processing • Privacy by design policy
Purpose & Storage Limitation	• Lawful purpose for processing • Collection must be limited to the extent necessary for the purposes of processing of such personal data (Section 6) • Data must be processed only for the purpose collected or for other reasonable purposes (Section 14) • Whether retention will override purpose is unclear • Period of retention of collected data • Stored for as long as necessary to satisfy for purposes of processing, period required under applicable law or for longer period where explicit consent obtained
Data Accuracy and Integrity	Data Fiduciary to take steps to ensure data must be complete, accurate and updated subject to conditions specified under Section 8 including: (a) such data is likely to be used to make a decision; (b) likely to be disclosed to other individuals; or (c) kept in a form that distinguishes personal data based on facts from personal data based on opinions.

Obligations of Data Fiduciary #2

Consent Notice (Section 7)	Every Data Fiduciary must give Data Principal notice at the time of collection, or as reasonably as possible, containing: (a) purpose of collection; (b) nature/categories of data; (c) identity and contact details of Data Fiduciary or data protection officer ("**DPO**"); (d) right of consent withdrawal; (e) legal basis for processing; (f) data sharing disclosures including cross-border transfer, if any; (g) right to file complaints and the procedure for redressal, ratings for data trust scores; and (h) other relevant information.
Breach Notification (Section 25)	Every Data Fiduciary is required to, by notice, inform the DPA about breach of any personal data processed by Data Fiduciary where such breach is likely to cause harm to any Data Principal as soon as possible as specified by regulations providing details of: (a) nature of personal data subject to breach; (b) number of Data Principals affected by breach; (c) possible consequences of breach; and (d) action being taken to remedy.
Security Safeguards (Section 24)	Every Data Fiduciary, having regard to the nature, scope and processing of data and risk, is required to implement security safeguards including: (a) de-identification and encryption; (b) protecting personal data integrity; and (c) prevent misuse, unauthorized access, modification, disclosure or destruction. Every Data Fiduciary/processor must undertake periodic review of security safeguards as may be specified by regulations.

Additional Obligations for specified categories

Significant Data Fiduciaries (Section 26)	Every Significant Data Fiduciary would be obligated, in addition to the obligations applicable in generality to Data Fiduciaries, to: • undertake data protection impact assessments ("**DPIA**"); • maintain accurate and updated records of important data life-cycle operations, security safeguards, DPIAs etc.; • annual independent data audits; • appoint data protection officer, as may be prescribed; and • have in place procedure and effective mechanism for grievance redressal.
Guardian Data Fiduciaries (Section 16)	Guardian Data Fiduciaries are barred from: (a) profiling, tracking or behaviorally monitoring of children's personal data; (b) targeted advertising directed at children; or (c) undertaking any other processing that may cause significant harm to the child. Exemptions are provided or application is modified specifically for Data Fiduciaries which offer counselling or child protection services.
Social Media Intermediary (Section 26)	Specific class of social media intermediaries which have more than a specified number of users, and whose actions are likely to impact electoral democracy, security of the state, public order, sovereignty or integrity of India will also be classified as Significant Data Fiduciaries. Social media intermediaries, which are classified as Significant Data Fiduciaries, are required to enable users to voluntarily verify their accounts visible to all users of the service.

Grounds for Processing – with Consent

CONSENT
Personal Data to be processed for a purpose and must be consented to by the Data Principal

Purpose	Consent
• Purpose of processing may be incidental or connected with purpose for which consent has been provided • Purpose must be clear and well-defined	• Clear, concise and easily comprehensible consent notice satisfying criteria (Section 8) • Consent must be free, informed, specific, clear and capable of being withdrawn • Explicit and granular consent in case of processing sensitive personal data

Grounds for Processing – without Consent

State related functions or emergency	• Function of State for: (a) provision of service/benefit to Data Principal from State; or (b) issuance of certification, license or permit for action/activity of Data Principal; • Processing necessary under law of Parliament; • Compliance of order/judgment of court;	• Respond to medical emergency; and • For the safety of or provide assistance to individual during disaster or breakdown of public order.

Employment	**Other Reasonable Purposes**	**Research, Archiving and Statistical Purposes**
• Recruitment or termination by Data Fiduciary; • Provision of services or benefit sought by employees (Data Principals); • Verifying attendance of employees (Data Principals); and • Other activities related to assessment of performance of employees (Data Principals).	• Prevention/detection of unlawful activity e.g. fraud; • Whistleblowing; • Mergers & acquisitions; • Network and information security; • Credit scoring; • Recovery of debt; • Processing of publicly available information; and • Operation of search engines.	Exemption from procuring consent if: • Compliance results in disproportionate diversion of resources; • Anonymization does not achieve purpose and data is de-identified; • No decision specific to or action directed at Data Principal as a result of processing; and • No risk of significant harm to Data Principal.

Processing of Personal Data and Sensitive Personal Data of Children

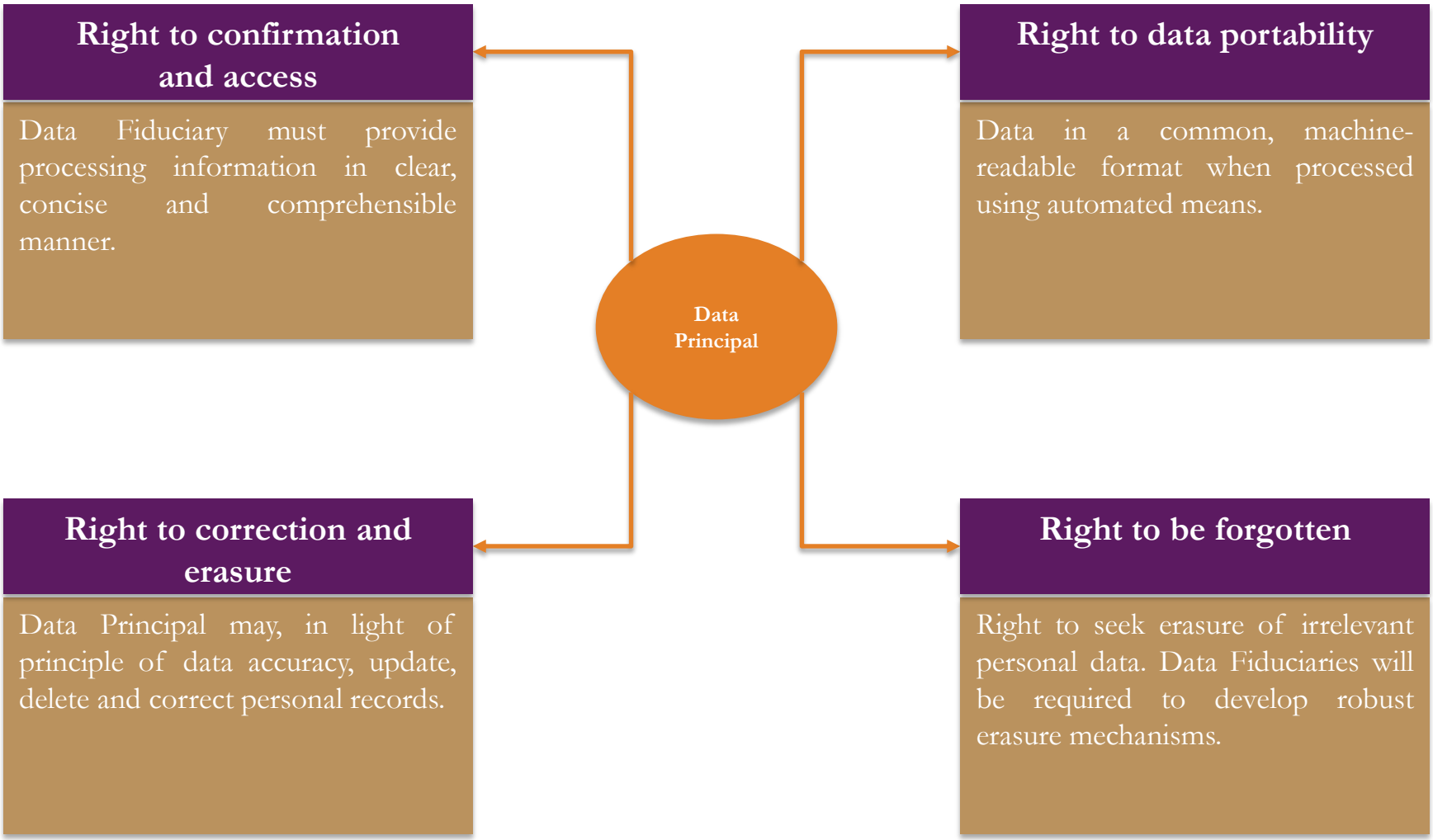
Obligations

- Age verification and consent procurement from guardians prior to processing
- Manner of verification to be prescribed by regulations taking into consideration:
  - volume of personal data processed
  - Proportion of such data being of children
  - Possibility of harm
  - Other factors as may be prescribed
- DPA may classify any Data Fiduciary as Guardian Data Fiduciary

Guardian Data Fiduciary

- Guardian Data Fiduciaries barred from profiling, tracking or behaviorally monitoring or conducting targeted advertising at children
- Exclusive counselling or child protection services exempt from consent requirements.
- Guardian Data Fiduciaries- Classification Criteria
  - Operate website or services targeted at children
  - Process large volumes of personal data of children

Rights of Data Principal



Restriction of Transfer of Personal Data outside India

Personal Data	Sensitive Personal Data	Critical Personal Data
There are no restrictions on transfer of personal data.	• All sensitive personal data must continue to be stored in India, but may be transferred outside for processing. • Explicit consent must be obtained for such transfers.	All critical personal data must be stored only in India and cannot be transferred outside India.

- Cross-border transfers also permitted with explicit consent to countries or entities permitted by the Central Government based on criteria specified under Section 22 of the PDP Bill. However, the intra-group scheme for data transfer is to be approved by the DPA.
- All the above must be read harmoniously with sector-specific legislations.

Other Provisions

Sharing of Data with government (Section 91)

- Government of India may, in consultation with the DPA, direct Data Fiduciaries to provide anonymized data or other non-personal data to enable better targeting of delivery services or formulation of evidence based policies.
- Standards of anonymization to be specified by the DPA.

Transitional Provisions

- No transitional provisions under the PDP Bill – Central Government may, by notification, appoint effective dates – different dates for specific provisions of the Act.
- The draft Personal Data Protection Bill, 2018 submitted by the Committee of Experts proposed an 18 (eighteen) month transitional period for the Bill to be implemented. This transitional period is removed from the PDP Bill.
- Ambiguity on grandfathering of existing data

Regulatory Sandboxes

Criteria for inclusion
• PDP Bill provides for a regulatory sandbox for a 12-36 month period. • Data Fiduciaries must have their privacy by design policies certified by the DPA. • Exemption from purpose, storage and consent requirements.

Information to be furnished: The Data Fiduciary will furnish information in relation to:

a) term for utilization of benefits of sandbox;

b) innovative use of technology and beneficial uses;

c) Data Principals (or categories) participating under the processing; and

d) any other information specified by regulations.

Comparing the PDP Bill with the GDPR

Parties

- Data Controller vis-à-vis Data Fiduciary; and
- Data Subject vis-à-vis Data Principal

Breach Notification

- GDPR adopts a two-step approach for breach notification.
- PDP Bill requires reporting to DPA, which will make further determination.

PDP Bill vis-à-vis GDPR

- Consent
- Functions of the State
- Compliance with Law or any Order of any Court or Tribunal
- Prompt Action
- ~~Performance of a Contract~~
- ~~Legitimate Interest~~
- Reasonable Purpose

Cross-Border Data Transfer (Ss. 33, 34)

DATA LOCALIZATION

The PDP Bill provides for a data localization regime which does not find an equivalent under the GDPR.

- Critical personal data (***as may be notified***) must be stored and processed only within India;
- Sensitive personal data may be processed outside India but a copy of the same must be stored within India; and
- No restrictions on transfer of personal data.

CROSS-BORDER TRANSFER

- Sensitive personal data may be transferred under the PDP Bill after obtaining explicit consent from Data Principal. Apart from obtaining explicit consent, transfer can be operationalized on the basis of the following:
  - Contract / intra-group scheme approved by the DPA;
  - Central Government has approved transfer to country/entity – based on 'adequate level of protection' and 'enforcement of relevant laws'.
- On the other hand, the GDPR provides for the **adequacy** standard. It also provides for binding corporate rules, standard contractual clauses etc. in addition to adequacy.

Sectoral Regulations & Recent Developments

Sectoral Regulations

RBI Storage of Payment System Data Circular dated April 6, 2018 ("Notification")

- Notification requires all data relating to payment systems to be stored in India
- Payment System is defined as *"a system that enables payment to be effected between a payer and a beneficiary, involving clearing, payment or settlement service or all of them excluding stock exchange"* .
- It includes, without limitation, systems enabling credit card, debit card, smart card and money transfer operations (end-to-end transaction details).
- The FAQ clarifies that if processing is done abroad, data should be deleted from systems abroad and brought back within 24 (twenty-four) hours.

eCommerce Policy (DPIIT)

- Data is a 'national asset';
- Concept of Infant industries;
- Restriction on transferring/storing specified data abroad even after consent;
- Measures to check intellectual property violation to be established; and
- Reviews and rating for products or services must be authentic and reliable.

Other sectoral regulations

- IRDAI (Outsourcing of Activities by Indian Insurers) Regulations, 2017 – policy holder records to be maintained in India.
- Companies Acr, 2013 r/w Companies (Accounts) Rules, 2014 - back-up copies of company's books of accounts and other books in servers in India.
- Draft amendment to Drugs & Cosmetics Rules, 1945 – data generated through e-Pharmacy localized.

Recent Developments

Aadhaar based e-KYC

- **Authentication** – voluntary submission to a banking or reporting entity notified under Notification of Ministry of Finance dated May 9, 2019.
- Where Aadhaar is collected for **offline verification** or **proof of possession of Aadhaar**, REs are required to redact the Aadhaar number. Virtual ID (VID) generated by UIDAI may be used in its place.

PMLR Amendments

- Mandatory reaction of Aadhaar Number and QR code (in case of older versions only) prior when conducting offline verification.
- Digital KYC Process – Annexure to PML Rules.

RBI KYC Master Direction

- Introduction of video-based customer identification process ("**V-CIP**") – recording of video and photograph;
- OTP-based Aadhaar e-KYC authentication or offline verification in addition to PAN and geo-tagging location;
- Sequence / types of questions during V-CIP are varied to establish real-time nature of interaction;
- XML/QR must not be older than 3 (three) months; and
- Adequate precautions and concurrent audits to ensure integrity.

Impact of PDP Bill on Business and Industry

Impact on Business #1

Preliminary Analysis of the existing landscape

- Review of data in-flow, out-flow and storage practices across all third-parties (including customers, suppliers and employees), including cross-border flow, if applicable;
- Analysis and categorization of data as ***personal data or sensitive personal data***; and
- Examination of current policies on data including privacy policy, data sharing agreements and other documentation like employment agreements, non-disclosure agreements and other commercial documents.

Exemptions

- Examining exemptions that may be applicable, including for 'employment', 'research and statistical purposes' etc. that may be applicable;
- Regulatory sandbox applicability to the business; and
- Examining alternative processing grounds (apart from consent), including, credit scoring, fraud prevention etc.

Impact on Business #2

At instance of data collection	At instance of processing	At instance of storage/retention
• Requirement for consent notices and other consent related documentation for specific instances e.g. storage of data outside India; • Developing 'privacy by design' policies (to be certified by the DPA for eligibility for sandbox); • Notices/information for exercise of Data Principal rights; and • Agreements with data processors and other entities where data is being shared.	• Reviewing agreements with data processors and/or any other third-parties as a result of which data is processed and ensuring relevant agreements e.g. intra-group schemes are approved by DPA; • Developing internal processes for response to queries, requests by Data Principals, including erasure requests; • Interactions with 'consent managers'; and • Harmonization of sector-specific regulations with the PDP Bill, for instance, RBI's payment storage data circular.	• Complying with data localization requirements, as applicable; • Policies to be drafted for data storage, retention, access-control, data security and internal guidance on data breach notifications; • Internal process flows, policies etc. to be developed for handling Data Principal requests for porting, erasure, updating etc.; • Responding to DPA/ government pursuant to data requests; and • Standards of anonymization, sharing of non-personal/ anonymized personal data.

Compliance Chart *(based on the current version of the PDP Bill)*

General Compliance

General Obligations

- Valid ground for processing – consent (S. 7 requirements) or other reasonable purposes
- Obligations *viz.* limits on purpose, collection, processing, retention, data quality etc.
- Rights of data principal
- Data Localization – sensitive personal data / critical data

Fair Processing

- Privacy by design (approval)
- Transparency – disclosure
- Security safeguards (significant)
- Data breach reporting
- Grievance Redressal
- Significant data fiduciaries (DPIA, audit, maintenance, DPO appointment).
- Bar on biometric processing

Exemptions

- Other reasonable purposes employment, credit scoring, debt recovery, statistics/research etc.
- Data processors – foreign data
- Manual processing
- Regulatory Sandbox

Employee Data

- Employee information may be processed without consent

Categorization

- Children's Data & Guardian Data Fiduciary
- Processing of Sensitive personal data / critical

Other Provisions

- Sharing of anonymized/ non-personal data with the Government
- Penal Regime under PDP Bill

Conclusion

- Businesses to be well-advised to align their operations and processes with data protection obligations under the PDP Bill to ensure compliance with the Bill when enacted.
- The Joint Parliamentary Committee has sought views or suggestions on the PDP Bill 2019 *vide* press communique dated January 22, 2020.
- A sizeable portion of the operational aspects of the PDP Bill are dependent upon the regulations by the government, DPA issued codes of practice and guidance put out.
- DPA will consult with sectoral regulators and other stakeholders prior to issuance of codes of practices.

Mr. Arun Prabhu

Arun Prabhu
Partner

- Arun is a Partner with the Bengaluru offices of **Cyril Amarchand Mangaldas**, and is part of the Technology, Media and Data Protection practices. Arun has been ranked as an 'up and coming' lawyer by Chambers and Partners, 2020. Further, clients have complimented him for his "extremely impressive understanding of the subject matter", as well as "his cogent advice and the way he thinks outside of the box".
- Arun advises extensively on matters relating to data protection and privacy including issues surrounding data collection, processing (including data mining), protection and retention, in addition to the formulation of policies and best practices designed to mitigate the legal risks associated with handling of data.
- He offers sector specific, cutting edge advice to clients handling sensitive data, such as hospitals, banks and financial institutions and assist them in complying with the extensive guidelines issued by regulators including the Reserve Bank of India ("**RBI**"), Insurance Regulatory and Development Authority of India and the Telecom Regulatory Authority of India ("**TRAI**").
- He writes, speaks, comments and consults extensively with various industry and government bodies in relation to developments in the rapidly evolving data protection space in India including on the Right to Privacy and Aadhaar judgements, Personal Data Protection Bill, 2019, intermediary guidelines, e-commerce policy and various white papers and circulars released by TRAI and Department of Telecommunications. He has also authored a number of articles on issues surrounding data privacy for 'India Business Law Journal', 'DataGuidance' and 'FICCI CAM Entertainment Law Book 2019'.

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