

Lexygen India Digest

December 2025

The December 2025 issue of the Lexygen India Digest summarises the notification by the Ministry of Electronic and Information Technology's Digital Personal Data Protection Rules, 2025 which lay down obligations for collection, processing, and protection of digital personal data. The regulatory updates section also reports the notification of the new Labour Codes by the Ministry of Labour and Employment which consolidate multiple labour laws and simplified compliance requirements. The market updates section of this issue reports some significant private equity deals in the information technology, e-commerce, real estate, manufacturing, and consumer good sectors; fundraising by Indian private equity and venture capital funds; mergers and acquisitions in the manufacturing, technology sectors; and certain other important deals.

REGULATORY UPDATES

A. MEITY NOTIFICATIONS

MeitY notifies the DPDP Rules

The Ministry of Electronic and Information Technology ("MeitY") has, *vide* notification no. GSE 846(E) dated November 13, 2025, notified the Digital Personal Data Protection Rules, 2025 ("DPDP Rules"). This marks the full operationalisation of the Digital Personal Data Protection Act, 2023 ("DPDP Act").

Earlier, on August 11, 2023, the parliament had enacted the DPDP Act, which established a comprehensive framework for protecting digital personal data in India. The DPDP Act imposed clear obligations for organisations collecting or processing such data, along with actionable guidelines to ensure clarity for individuals and businesses.

The DPDP Rules set out detailed operational guidelines to give full effect to the DPDA Act, with a focus on safeguarding citizen rights and promoting responsible data use by organisations, including measures to curb unauthorized data exploitation, minimise digital harm, and foster a trusted digital economy.

The key aspects of the DPDP Rules are summarised below:

- Creation of Data Protection Board of India ("Board"): The DPDP Rules have established a fully digital, independent Board to oversee compliance, investigate data breaches, and ensure corrective measures are implemented. Any person can lodge complaints and track their status through a dedicated online portal and mobile application, enabling faster resolution and a streamlined grievance-redressal process.
- Rights of the data principal: Every person has the right to grant or withdraw clear and informed consent regarding the collection and processing of their personal data. They may request the correction of any inaccurate or incomplete information, seek the deletion of their personal data in applicable circumstances, and access comprehensive information about what data is being collected, the purpose of such collection, and how it is being used or shared by the data fiduciary.
- Special protection for children: When processing a child's personal data, verifiable consent from a parent or guardian is required, except in cases

where the data is used for essential services such as healthcare, education, or real-time safety.

- Obligations of the data fiduciary: Data fiduciaries must ensure that individuals can access, correct, update, or request the deletion of their personal data and may permit them to appoint a representative to act on their behalf, all such requests must be addressed within 90 days. In addition, data fiduciaries are required to promptly notify data principals of any personal data breach, providing complete details of its nature and scope. They must also designate an officer or a Data Protection Officer for addressing queries related to personal data.

- Consent managers: A consent manager is a registered entity that acts as an intermediary between data principals and data fiduciaries, facilitating the granting, management, and withdrawal of consent by data principals. Consent managers must be registered with the Board and remain accountable to the data principals for their actions.

The DPDP Rules provide companies with an 18