

Annexure-I

Phased Implementation under Rule 1(2) of the Digital Personal Data Protection Rules, 2025

Phase	Applicable Rules	Effective Date	Broad Compliance Focus
Phase I	Rules 1, 2 & 17–21	14 November 2025	Operational provisions, commencement of the Rules and institutional framework. Departments should familiarise themselves with the Act and Rules and initiate compliance planning.
Phase II	Rule 4	14 November 2026	Consent Manager framework becomes operational. Departments should review citizen-facing digital services and prepare for implementation, wherever applicable.
Phase III	Rules 3, 5–16, 22 & 23	14 May 2027	Core statutory obligations under the Act and Rules become enforceable. Departments should ensure compliance before the applicable enforcement date.

Major Compliance Areas under Phase III

Sl. No.	Compliance Area	Relevant Act Provision	Relevant Rule Provision
1	Lawful processing of digital personal data	Sections 4, 7 & 8	Rules 3 & 5
2	Privacy notices and consent management	Sections 5 & 6	Rules 3 & 4
3	Rights of Data Principals	Sections 11–14	Rule 12
4	Grievance redressal mechanism	Sections 8(6) & 11	Rules 9 & 12
5	Reasonable technical and organisational security safeguards	Section 8(5)	Rule 6
6	Personal data breach management and reporting	Section 8(6)	Rule 7
7	Data retention and erasure	Section 8(7)	Rule 8
8	Accountability of Data Processors	Section 8(2)	Rule 12
9	Processing of children's personal data	Section 9	Rule 10

10	Additional obligations of Significant Data Fiduciaries (where notified)	Section 10	Rule 13
11	Maintenance of records, logs and compliance documentation	Sections 8 & 10	Rules 6, 8 & 13
12	Periodic review, risk assessment and systemic compliance monitoring	Sections 8 & 10	Rules 6, 8 & 13

Note: The above references are intended to provide a broad mapping of the principal compliance areas under the Digital Personal Data Protection Act, 2023 and the Digital Personal Data Protection Rules, 2025. They are indicative in nature and shall be read in conjunction with the Act, the Rules, notifications, directions and amendments issued by the Central Government from time to time.