

DPDP ACT, 2023 · AWARENESS SESSION

# Protecting Citizen Data

A simple guide for government officials: what the law asks, and what each of us does every day

PRESENTED BY

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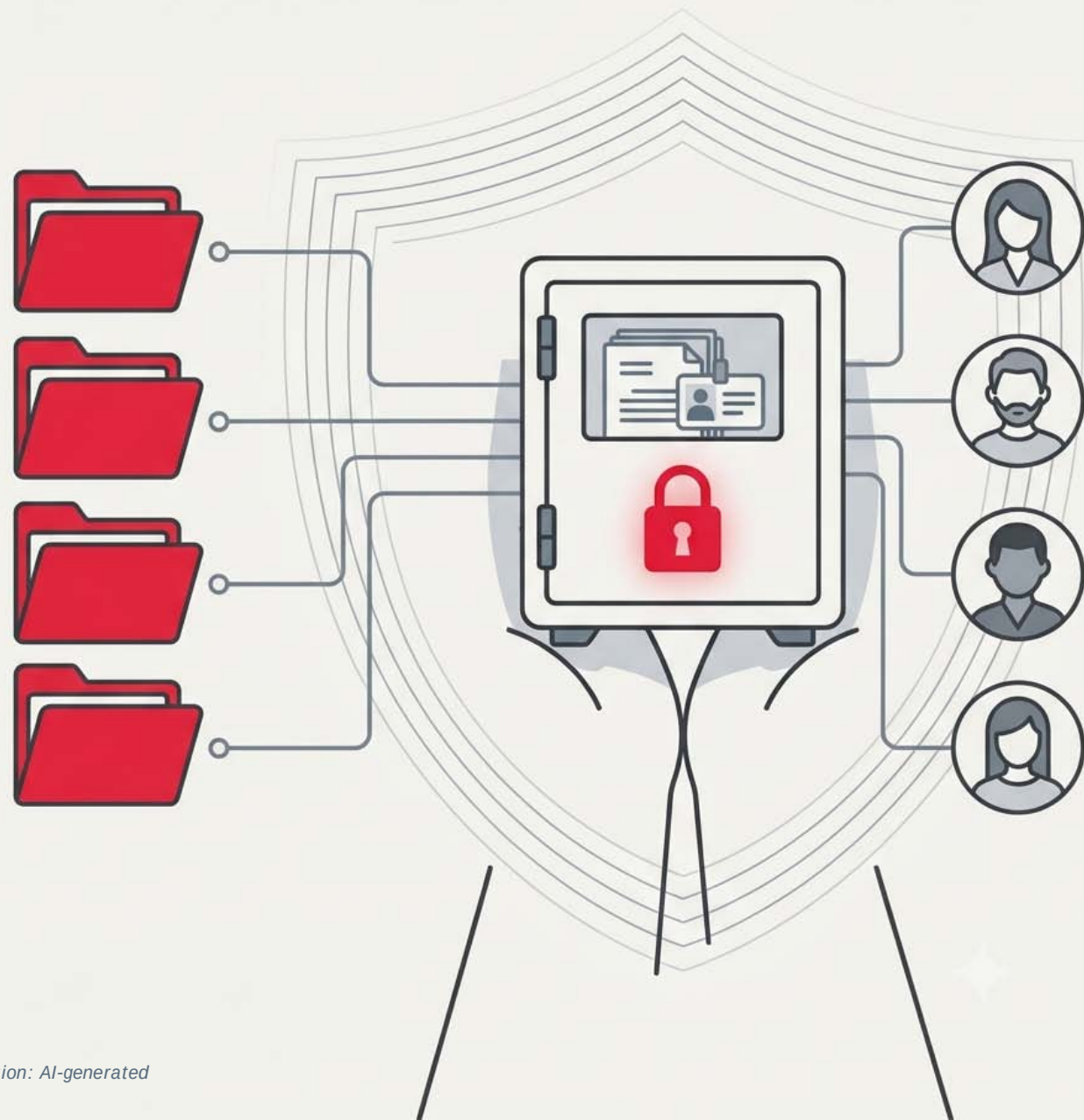


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# Why this matters



## Citizen trust

Citizens hand us their Aadhaar, phone numbers and bank details to get a service. They expect it to stay safe.



## It is the law

The Digital Personal Data Protection Act, 2023 applies to government departments too, with penalties for failures.



## A deadline is coming

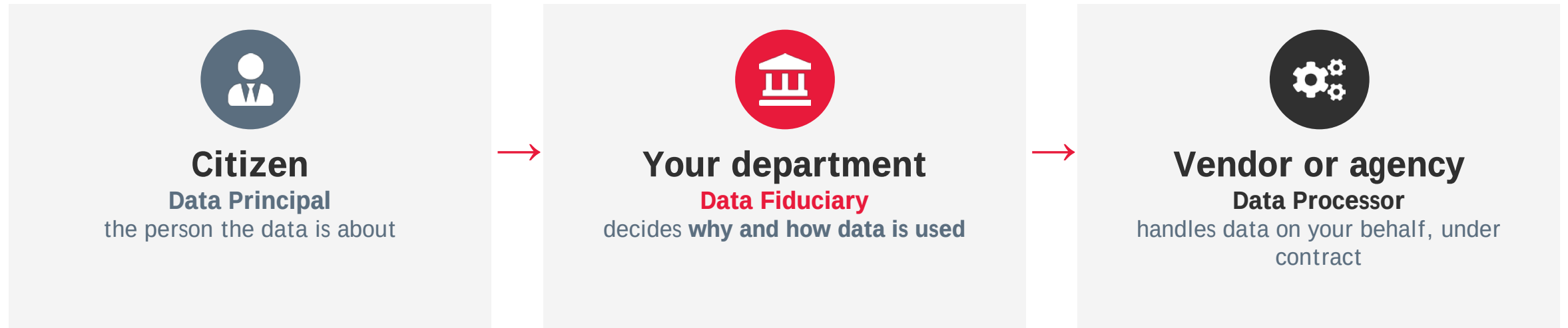
The Cabinet Secretary has asked every ministry and state for a time-bound plan. Full compliance is due in 2027.

**Trust, the law and a deadline: three reasons to act now.**



## The DPDP Act in one idea

**Citizen data is a deposit in a locker.** The department is the bank: it may use the data only for the agreed purpose, and must keep it safe.



**Your department stays responsible, even when a vendor or NIC handles the data.**



# Where does your department get data?

*Most officials do not see these as data sources. Each one holds personal data.*



## Forms and applications

Paper and online



## Portals and apps

Logins, uploads



## Registers and Excel

Office files



## Field surveys

Staff and enumerators



## Biometrics and CCTV

Fingerprints, images



## Emails

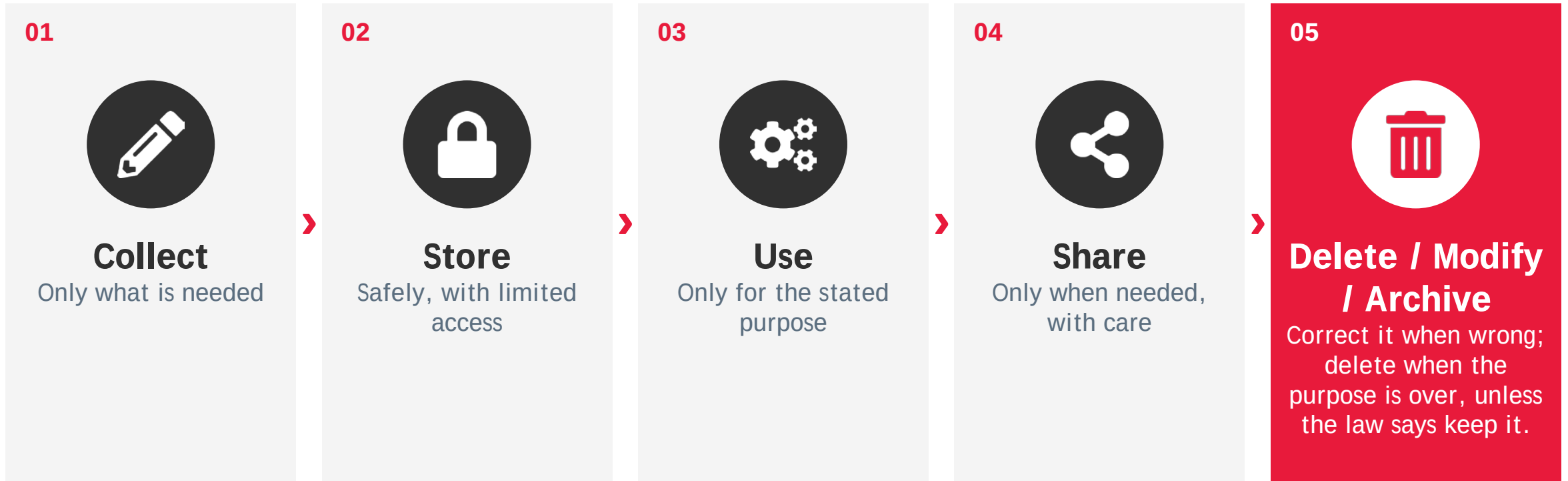
Attachments, forwarded lists, documents

**Raise a hand for each one your department uses.**



# The journey of data

*Responsibility applies at every step, not only at storage.*



**Most mistakes happen at sharing and deleting.**



# Example: one scholarship application, step by step

Priyanka applies online for a State scholarship for her daughter Priya, a Class 11 student. *Illustrative example*

| 01 Collect                                                                                                                                                                          | 02 Store                                                                                                                         | 03 Use                                                                                                                    | 04 Share                                                                                                                                                                        | 05 Delete / Modify                                                                                                                                                         |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <div>✓ Name, class, marks, bank account, income certificate. Category only if the scheme is category-based.</div> <div>Not: ID copies of every family member, “just in case”.</div> | <div>✓ In the scholarship portal, open only to the scheme team.</div> <div>Not: a copy in personal Excel files or inboxes.</div> | <div>✓ To check eligibility and pay the scholarship.</div> <div>Not: reused for unrelated messages without consent.</div> | <div>✓ Bank details only for payment, through the official channel. Merit lists without full Aadhaar or bank details.</div> <div>Not: the full list attached to an email.</div> | <div>✓ Correct a wrong bank account on request. Delete or archive after the scheme year and audit, unless the law requires keeping it.</div> <div>Not: kept forever.</div> |

Same data, same purpose, start to finish.



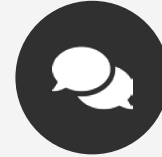
## Rule 1 and 2: Purpose and notice



### RULE 1

#### Collect only what you need

Ask for data only if the service truly needs it. Do not photocopy Aadhaar or collect caste, income or phone number just in case required later.



### RULE 2

#### Tell people why

Say in plain words what data you take, why, and what the citizen can do. Use English and Manipuri, or any of the 22 scheduled languages.

**TEST BEFORE EVERY FORM** If we removed this field, could we still deliver the service?



## Rule 3: Know your legal basis

*Two ways to use data lawfully, and one set of duties that always applies*

### ASK FOR CONSENT

For optional things

- ✓ Surveys, newsletters, apps, outreach
- ✓ Any new or extra use of data already collected
- ✓ Free, specific, informed, and easy to withdraw

#### EXAMPLE

Using scholarship phone numbers to promote another scheme needs consent.

### DELIVERING A SERVICE

Consent usually not required

- ✓ A scheme, certificate, licence or permit for that citizen
- ✓ Work the law requires the department to do
- ✓ Staff records, such as salary and pension

#### EXAMPLE

Processing Priya's scholarship application does not need a separate consent.

### ALWAYS, EITHER WAY

The duties that never switch off

- ✓ Tell citizens the purpose
- ✓ Use the data only for that purpose
- ✓ Keep it accurate and secure
- ✓ Delete it when done, unless the law requires keeping it

**Consent or not, every use needs a stated purpose. A new purpose needs a new basis.**

*Your implementing agency will confirm the exact basis for each of your services.*



## Rule 4 to 6: Keep it accurate, safe, and short-lived

### Do

- ✓ Use strong passwords and your own login
- ✓ Lock files and screens
- ✓ Correct wrong data quickly
- ✓ Delete data when the work is done, unless the law requires you to keep it

### Do not

- ✗ Share lists on WhatsApp or personal email
- ✗ Share one login in the office
- ✗ Leave registers open on desks
- ✗ Keep old data forever

Rule 4: accurate · Rule 5: safe · Rule 6: short-lived



# Citizens have rights, and breaches must be reported



## Citizen rights

They can ask what data we hold, ask us to correct it, make a complaint, and nominate someone to act for them.



## If something goes wrong

Report immediately to your nodal officer. Never hide it. The Board must be told without delay, with a full report within 72 hours.



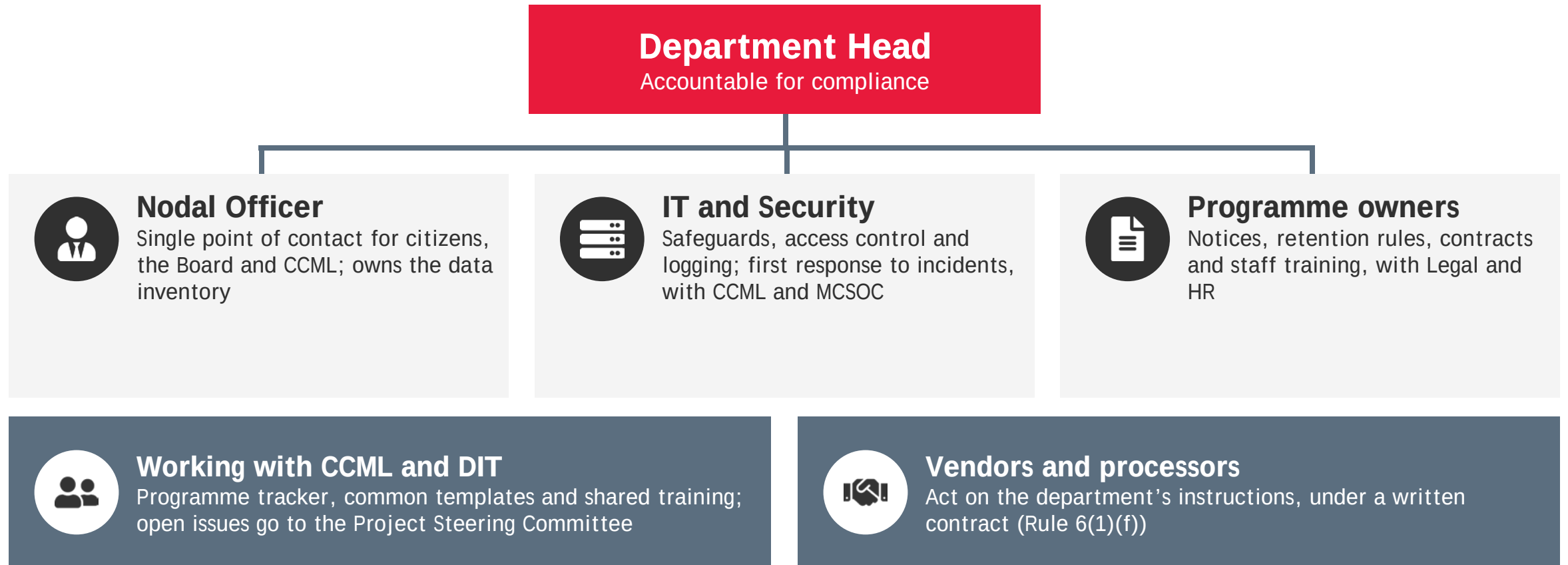
## The cost of failing

Penalties can reach up to ₹250 crore for failing to put reasonable security safeguards in place.

**Hiding a breach makes it worse. Speed of reporting matters.**



# Inside each department: who does what

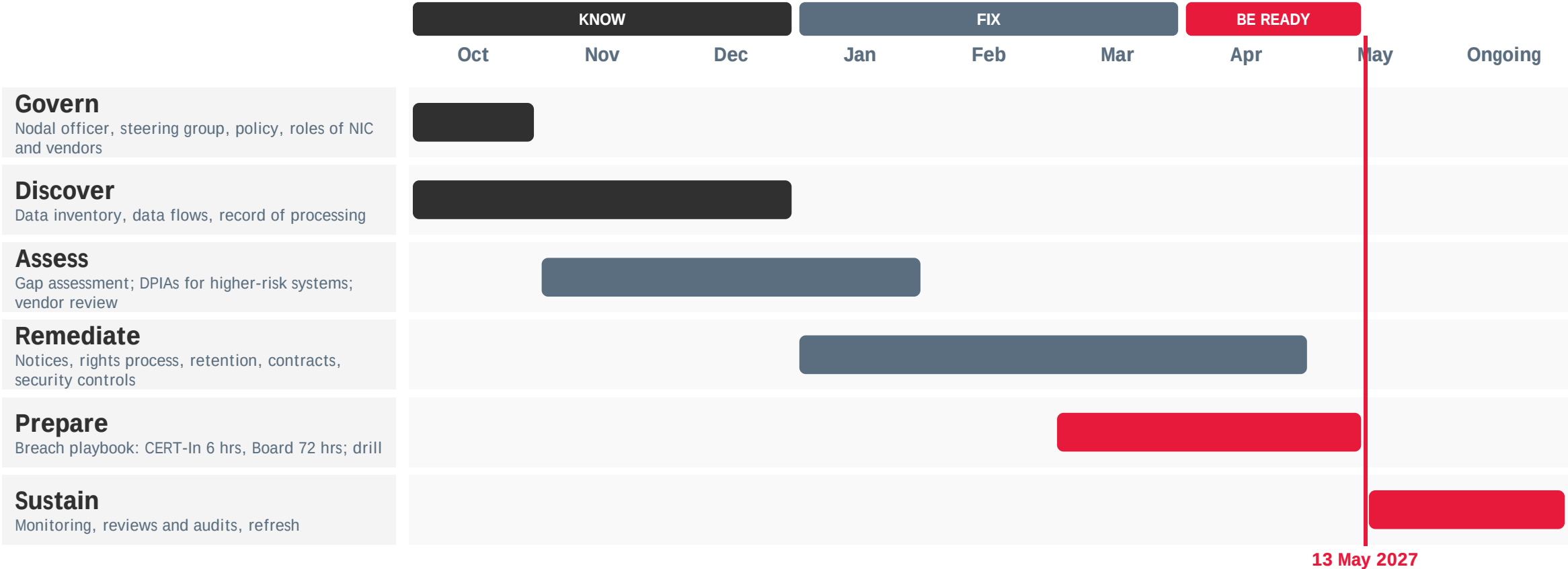


**Accountability stays with the department, even when a platform or vendor does the processing.**



# Seven months is enough: let's start now

*Journey for the department, October 2026 to 13 May 2027 and beyond*



Start with a data inventory, records of processing, DPIAs, and data discovery and classification.



## What your department does next

1

### Appoint

a nodal officer

One named person for privacy questions, citizen requests and breaches. Share their contact widely.

2

### List

your data and systems

What personal data you hold, in which forms, portals, Excel files and emails; who can access it; which vendors handle it.

3

### Fix

the basics first

Mask Aadhaar, give everyone their own login, lock files and screens, stop sending lists by email or WhatsApp, clear old data, and keep reasonable security in place.

4

### Train

your staff

Short sessions for front desk, IT and heads of office. Repeat every year.

5

### Contract

vendors for privacy

Written terms on purpose, security, breach alerts, and deletion when the contract ends.

**Next: the implementing agency will explain the provisions and the rollout plan. Questions?**



# Sample privacy notice: what it must cover

Ten points, in plain words, in English and the local language

|                                                                                                                                                                                  |                                                                                                                                                                                            |                                                                                                                                                                                           |                                                                                                                                                                                      |                                                                                                                                                                                          |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|  <div>01</div> <div><b>Who we are</b><br/>The department responsible, and how to reach it</div> |  <div>02</div> <div><b>What we collect</b><br/>Every item of personal data, listed</div>                  |  <div>03</div> <div><b>Why</b><br/>The specific purpose for each item</div>                            |  <div>04</div> <div><b>Sharing</b><br/>Who else receives or handles it</div>                      |  <div>05</div> <div><b>Where it is stored</b><br/>The system or location that holds it</div>          |
|  <div>06</div> <div><b>Retention</b><br/>How long it is kept, and when it is deleted</div>      |  <div>07</div> <div><b>Your rights</b><br/>Ask what we hold, correct it, erase it, nominate someone</div> |  <div>08</div> <div><b>Grievance</b><br/>Whom to contact, and the right to complain to the Board</div> |  <div>09</div> <div><b>Children</b><br/>Verifiable consent from a parent or lawful guardian</div> |  <div>10</div> <div><b>Consent</b><br/>Free, specific and clear; as easy to withdraw as to give</div> |

One purpose, only the data needed, and clear consent: the law in action.



# Thank you

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For any questions, please reach out

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