

FOLLOWING SARAL APPROACH FOR DECODING PRIVACY

Insight into Digital Personal Data
Protection Rules, 2025





SARAL FRAMEWORK

S - Simple

- Language used should be unambiguous and plain
- Use basic grammar for sentence construction
- Limit sentence-level complexity

A - Accessible

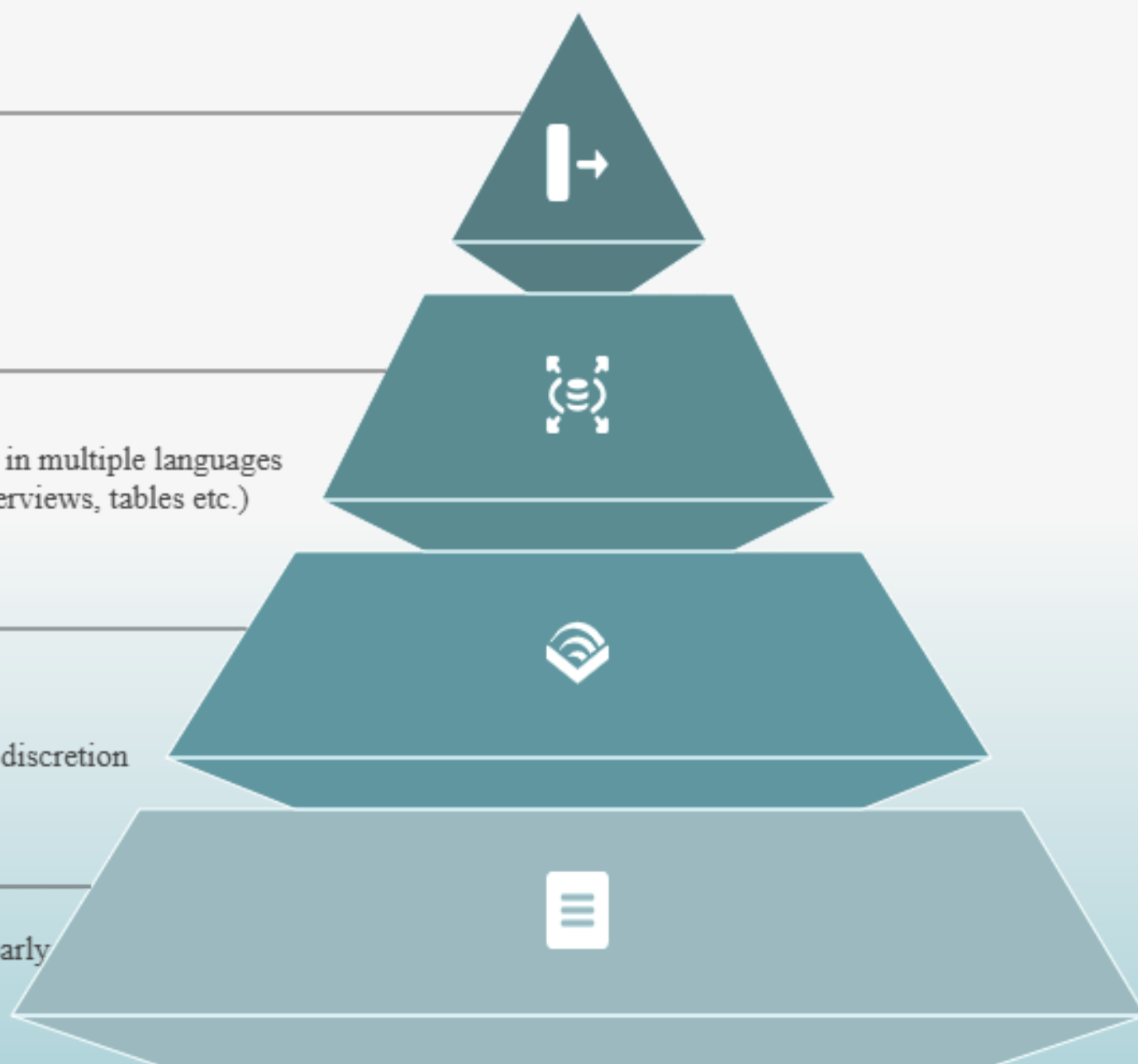
- Ensure accessibility for persons with disabilities
- Ensure laws are capable of translation and published in multiple languages
- Use internal and external aids (explainers, FAQs, overviews, tables etc.)

R - Rational

- Provide a coherent logical structure to the text
- Ensure linguistic and logical consistency
- Ensure certainty by reducing vagueness and guiding discretion

AL - Actionable

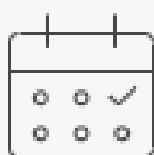
- Identify roles and responsibilities of stakeholders clearly
- Provide clear guidance for enforcement and administration of the law
- Provide remedies for non-compliance and non-implementation





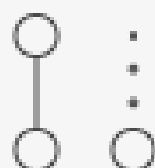
NOTICE BY DATA FIDUCIARY

Compliance Timeline



The rules are effective 18 months post publication.

Notice Presentation



The notice must be presented as independent information, not interlinked with other content.

Consent Withdrawal



Withdrawing consent must be as easy as giving consent.

Hyperlink Provision



A link must be provided so the Data Principal can withdraw consent, exercise rights, and

Language Requirements



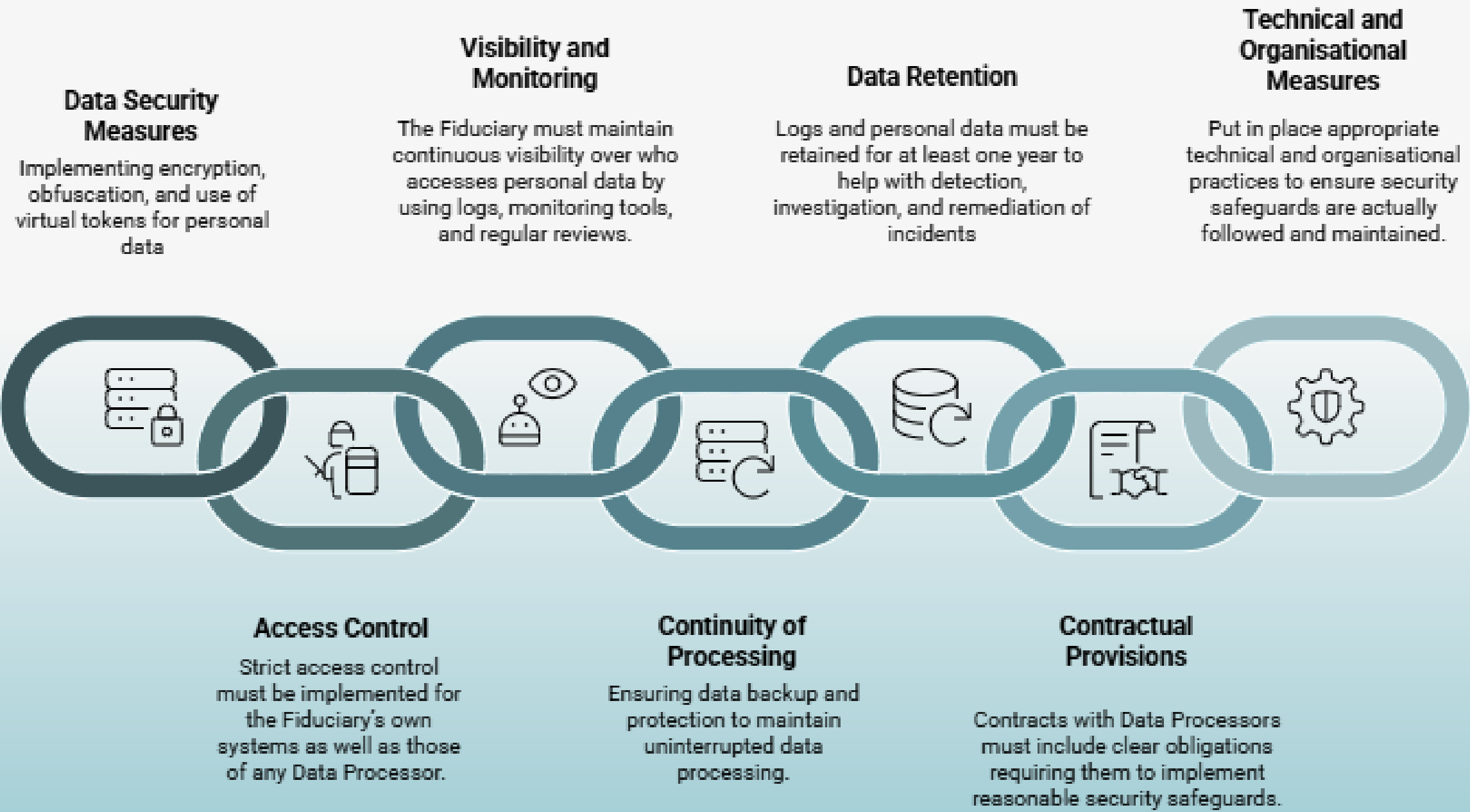
The notice must be plain, clear, and fair, including an itemized description of personal data collected, the purpose of data collection, and goods or services enabled by such collection.



REASONABLE SECURITY SAFEGAURDS

Data fiduciaries must set guardrails to recognize consent managers as legitimate channels for receiving consent directions from data principles

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PERSONAL DATA BREACH INTIMTATION PROCESS

Data Fiduciary Aware of Breach

The Data Fiduciary
recognizes a data
breach.



Notify Data Protection Board

The Data Fiduciary
alerts the regulatory
body.



Notify Data Principal

The Data Fiduciary
informs affected
individuals.

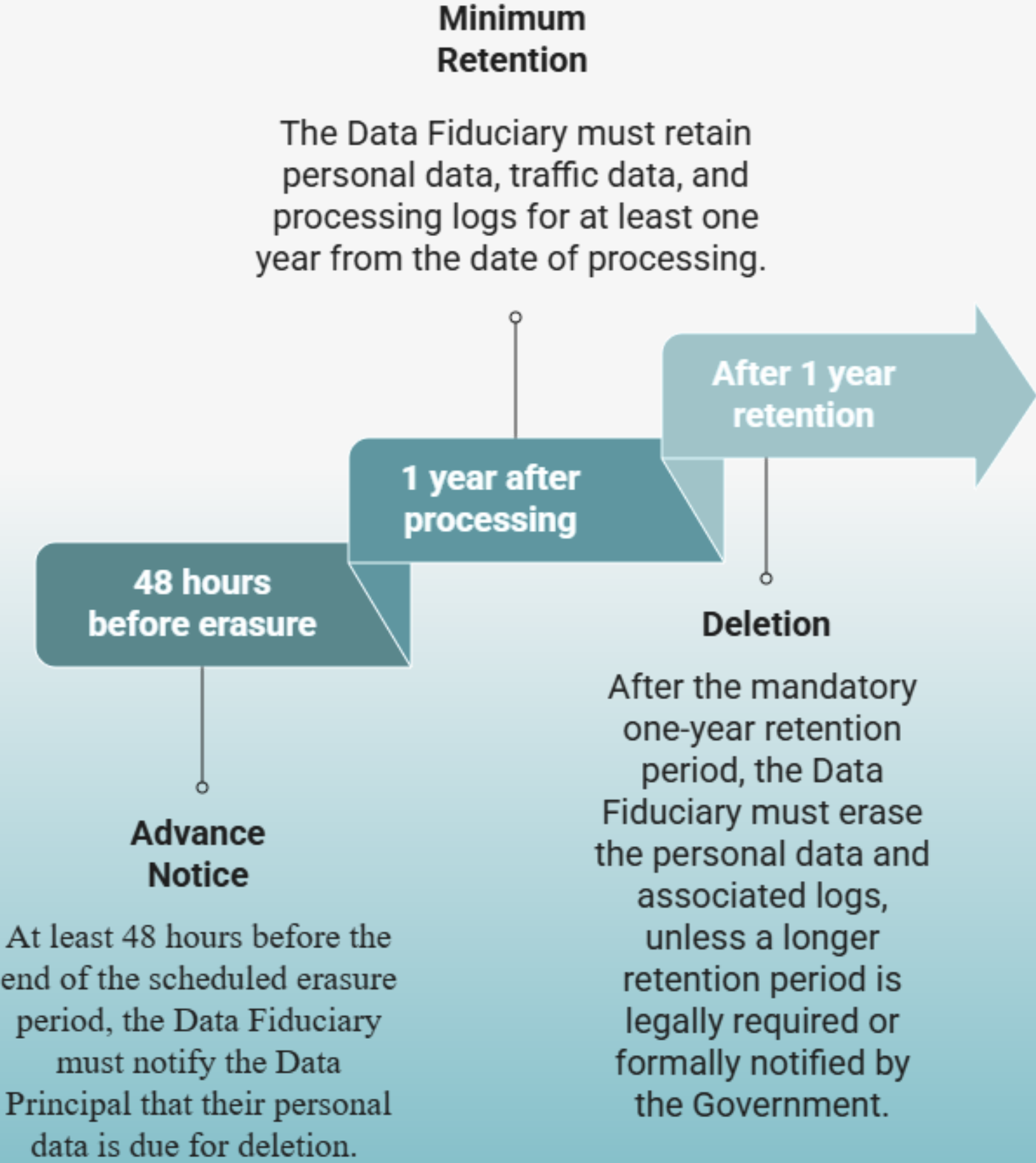


Provide Breach Details

The Data Fiduciary submits
comprehensive breach
information within 72 hours to
the Data Protection Board.

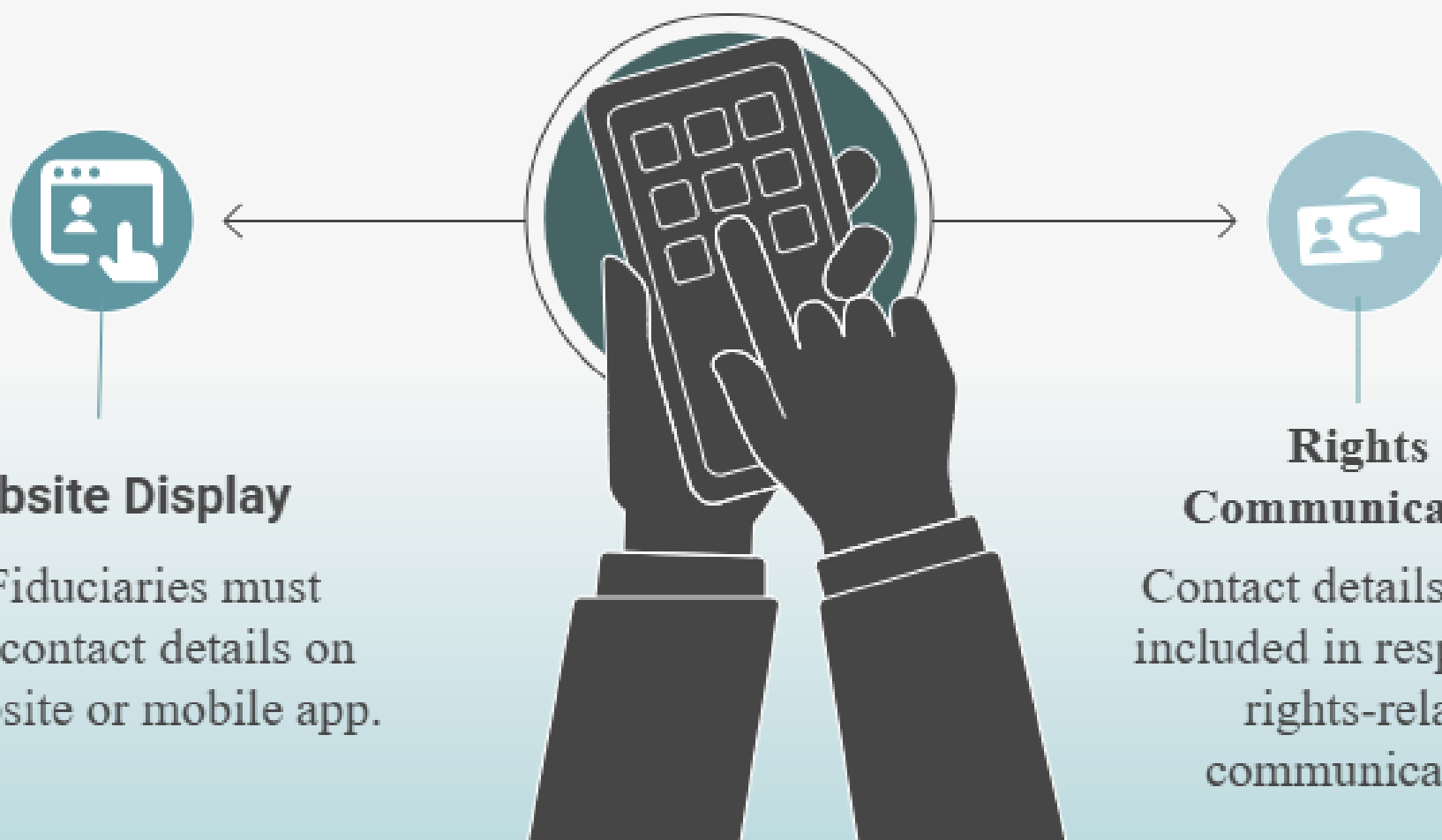


ERASURE TIMELINE AND RETENTION OBLIGATIONS





DISCLOSURE OF DATA PROTECTION CONTACT DETAILS





VERIFIABLE PARENTAL CONSENT FOR CHILD DATA PROCESSING

Verification Using Provided or Token-Based Information

Alternatively, verification can be based on identity and age details voluntarily provided by the individual, or through a virtual token issued by an authorised entity and mapped to the individual's verified details.

Requirement of Verifiable Parental Consent

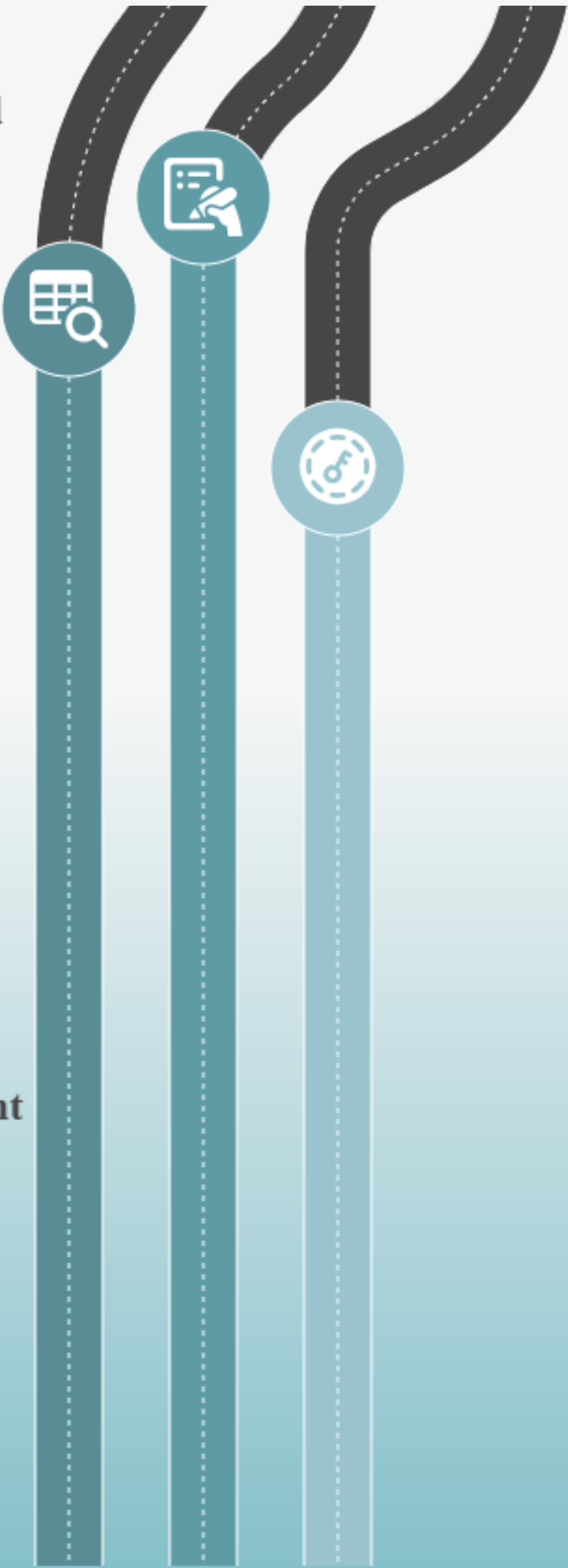
The Data Fiduciary must implement appropriate technical and organisational measures to ensure that verifiable consent from the parent is obtained before processing any personal data of a child.

Verification Using Existing Records

Verification may be carried out using reliable identity and age information already available with the Data Fiduciary.

Duty to Confirm Identity of the Parent

The Data Fiduciary must exercise due diligence to verify that the individual claiming to be the parent is a real, identifiable adult.





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