



DPDP Act for Industrial SMBs — The 1-Page Field Guide

What is enforced. When it matters. What to do first.

- ③ The Digital Personal Data Protection Act applies to every Indian business that handles a citizen's personal data. There is no small-business exemption. These are the dates, obligations, and first steps that matter for a 50–200-person industrial SMB.

The 3 Dates That Matter

NOV 2025

Phase 1 Active

Rules notified. Data-mapping and board-level sponsorship should be under way.

NOV 2026

Consent Manager Live

Consent-manager provisions take effect. Every consent flow (website, app, onboarding, forms) must work end-to-end.

MAY 2027

Full Enforcement

72-hour breach notification, grievance redressal, and penalty exposure begin here.

Who It Applies To

- ⚠️ If you process the personal data of even one Indian citizen, DPDP applies. No small-business exemption. Section 17(5) allows classes of micro-entities to be exempted — nothing has been notified yet.

Penalty Exposure

- ⊗ Up to **₹250 crores per violation** for significant data fiduciaries. SMBs face proportionate penalties, but director liability applies.

Your 4 First Moves

01

Build a data map

What personal data you collect, from whom, where it lives, who can see it. Spreadsheet. Two hours.

02

Nominate a DPO-equivalent

Not a full hire. One leadership-team member as your named data point. Part-time is fine.

03

Draft a breach-response one-pager

First 4 hours: five steps, three people to call, where the logs live. The 72-hour rule in practice.

04

Update customer consent copy

Website forms, onboarding, WhatsApp consent. Plain language, opt-in/opt-out by November 2026.