

ISSUE BRIEF

Aligning India's Data Governance Frameworks

SEPTEMBER 2020**MARK LINSOTT****ANAND RAGHURAMAN**

A NEW DIGITAL INDIA

India's digital economy has changed dramatically since it undertook its last major legislative overhaul in 2008 with amendments to the Information Technology Act. Mobile devices, social media, and e-commerce are now ascendant. From a truly big-picture perspective, India's digital economy can be characterized by these headline features:

- Indian companies and startups compete alongside US, Chinese, Japanese, Korean, and other companies—making India distinct as one of the world's most diverse, large-scale digital economies.
- India's dynamic and vibrant digital economy hosts nearly half a billion citizens. This figure is set to reach 840 million by 2022 as a dizzying array of apps, services, and devices vie for Indians' attention and wallets.¹
- For the first time ever, there are more rural Indians online than urban Indians.² That is an indicator of the rapid growth in India's digital ecosystem, but also of the potential of a new community with profoundly different life experiences and needs than early internet adopters.
- Nearly half a billion Indians have yet to come online.³ Integrating them into the digital economy is a profound challenge for policy makers, but also a

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1 "VNI Complete Forecast Highlights," CISCO, 2018, https://www.cisco.com/c/dam/m/en_us/solutions/service-provider/vni-forecast-highlights/pdf/India_Device_Growth_Traffic_Profiles.pdf.

2 "PM's address at India Ideas Summit 2020," PMINDIA, July 22, 2020, https://www.pmindia.gov.in/en/news_updates/pms-address-at-india-ideas-summit-2020/?tag_term=pmspeech&comment=disable.

3 Ibid.

tremendous opportunity and incentive for the private sector to invest in India. This includes investment by US companies, which in recent years have made big-ticket bets in homegrown companies such as Reliance Jio and Flipkart and helped accelerate the growth of digital commerce in India.

As the Government of India (GOI) develops a more broad-based approach to regulating digital trade, it must look outward and take into account current global structural shifts that change how individuals interface with technology. These include the devastating impacts of COVID-19 and the migration of the workplace—for those who can—to digital platforms; the United States, India, and many others diversifying supply chains to enhance their resilience and reduce dependence on Chinese producers; the push to rethink cybersecurity, given the rapid growth of digital infrastructure and potential for cyberattacks; and the growth of emerging technologies, including the Internet of Things (IoT), artificial intelligence (AI), blockchain, and 5G broadband.

INDIA'S REGULATORY PUSH

The rapid pace of India's digital transformation underscores the need for new policy frameworks that strengthen India's digital economy and build on its prowess as a top ten service exporter.⁴ The past three years have triggered a flurry of activity in this space; new draft laws, national policies, and sectoral regulations have emerged from and returned to the halls of the Indian bureaucracy, igniting intense debates among stakeholders on the future of Indian data governance. If 2018 and 2019 marked the opening moves in this latest policy push, 2020 may usher in the beginning of an endgame. Policies and draft bills long discussed only in private forums are now in the public domain or in the final stages of development. Presently, a Joint Parliamentary Committee (JPC) is finalizing the Personal Data Protection Bill (PDPB) for parliamentary approval, while the Department for Promotion of Industry and Internal Trade (DPIIT) is finalizing an updated e-commerce policy for stakeholder input. Meanwhile, the Ministry of Electronics and Information Technology (MeitY) is preparing to enact intermediary guidelines, exploring non-personal data (NPD) regulation, and working to overhaul the IT Act amendments. And most recently, NITI Aayog has unveiled a new Draft Data Empowerment and Protection Architecture (DEPA) to boost financial inclusion.

All of the pending measures appear likely to bring significant impacts on the treatment of data in India, including both highly sensitive personal data and more general forms of anonymized data and NPD. They are likely to affect nearly all players in India's digital market—foreign invested companies; exclusively homegrown companies; Indian companies that have strong digital presence in other markets, particularly the United States; and micro, small, and medium-sized enterprises (MSMEs) that rely on a growing suite of digital services, such as cloud computing, and that already store and process cross-border data in South Asian markets and beyond.

Indian regulatory authorities seem to be pursuing an equally diverse and complex set of objectives as they build this new architecture for treatment of data. This includes protecting Indian citizens' privacy; defending individuals and organizations from foreign or domestic cyber-attacks; nurturing the development of Indian digital companies; and using digital tools and legal authorities to enhance law enforcement. All of these objectives can be entirely appropriate, if pursued through thoughtful policies. However, it should not be assumed that they can all be easily balanced and reconciled. Fast-emerging in India is a patchwork architecture for data governance, rather than the kind of coherent strategy necessary for what will be one of the world's largest digital economies. The danger is that different tools used to advance distinct imperatives will act at cross-purposes and undermine each other.

India is at a crossroads, and its new digital policies—particularly with respect to treatment of data—will largely determine its trajectory. India already has attracted significant foreign investment from top international technology firms and its corporate landscape is transforming. It has long had a number of well-established and globally active Indian companies in the digital sphere, and now a new generation of corporate giants are emerging, upending the nation's telecommunications market. Looking ahead to its increasingly digital future, might India be the next incubator for future global tech titans? Will it position itself as a global leader as alliances shift, nurturing stronger strategic and economic relationships with key partners, particularly the United States? Will it succeed in growing new high-tech jobs and advancing the day when it will be a \$5 trillion economy and sit among the three largest in the world?

⁴ "Total trade in services," *2019 e-Handbook of Statistics*, United Nations Conference on Trade and Development, December 10, 2019, <https://stats.unctad.org/handbook/Services/Total.html>.

INDIA'S EMERGING DATA GOVERNANCE ARCHITECTURE

TITLE	GOI ENTITIES	STATUS	KEY FEATURES
Personal Data Protection Bill	JPC on PDPB Parliament	Draft bill released JPC needs to make adjustments to the bill for parliamentary approval	Data localization restrictions on critical and sensitive personal data Proposed Data Protection Authority governing personal data Steep fines for data privacy breaches Exemptions for GOI entities Concept of data fiduciary
Non-Personal Data Governance report	Committee of Experts on Non-Personal Data Governance Framework MeitY	Report released for comments Stakeholders had until September 13 2020 to provide comments	Recommended privacy protections for NPD NPD Authority and enabling legislation Data localization provisions on critical and sensitive NPD Mandatory data sharing provisions and adjudication in the case of disputes Mandatory registration as a "data business"
E-Commerce Policy	DPIIT	First drafts publicly released and consulted The second draft is expected to be circulated for a public consultation	E-commerce regulator Wider definition of e-commerce entities Duty to notify use of NPD Mandatory seventy-two hour window to comply with law enforcement requests GOI can ask for commercially viable/useful information, source code, and algorithms GOI to define categories of e-commerce data that will require mirroring and localization Stricter competition regulations
Intermediaries Guidelines	MeitY	First draft released Awaiting finalization	Mandatory requirements for intermediaries to enable traceability of message origins Seventy-two hour window to respond to law enforcement requests Mandatory physical address/registration and nodal point of contact (POC) for law enforcement cooperation Requirement of proactive monitoring and removal of unlawful content
Data Empowerment and Protection Architecture	NITI Aayog	First draft released Stakeholders have until October 1 2020 to provide comments	Consent-based data sharing framework focused on financial inclusion "Consent manager" entities for streamlining data sharing processes New electronic consent format, open APIs for interoperability, and data information standards Phased rollout across GOI departments
IT Act Overhaul	MeitY	Pending Inter-ministerial consultations began pre-COVID-19	Scope unclear, but potential for a wide-ranging overhaul to reflect dramatic changes in India's digital ecosystem since 2008 Updated definition of intermediaries New or amended cyberlaw tribunals

THE RISKS OF DIGITAL NATIONALISM

Presently, the Modi government is prioritizing policies centered around Indian self-reliance—Atmanirbhar Bharat in its latest manifestation. India understandably seeks to expand the reach of Indian companies and generate significant new employment in the digital sphere. Even with this nationalistic focus, the government has welcomed, to a point, the increasing footprint of foreign technology companies in India because it recognized that their investment helps bring more citizens online and enhances the array of accessible services. But the allure of easy political slogans railing against “data colonialism” and extolling “data sovereignty” has muddled this messaging and led to new regulatory frameworks that could limit the scope of investment in India.

Data sovereignty, a concept grounded in the idea that data is a national public good to be exploited economically, is widely applauded by certain stakeholders in India. However, India will want to guard against setting policies that run counter to its goal of competing successfully against other potential destinations for foreign direct investment (FDI), particularly in Southeast Asia. India should not miss the opportunity to attract investors looking to reduce their dependence on the Chinese market or to compete for a share of India's large consumer base. It should additionally avoid policies that inspire copycat efforts that undermine the success of Indian companies in foreign markets.

Scenarios surrounding efforts to tilt the playing field against foreign competition and in favor of national champions deserve serious and thoughtful debate. Has China's example proven that nationalistic policies, relentlessly driven by heavy-handed state intervention, can be successful? Or, does recent backlash against Chinese companies and the economic model that underpins them indicate that China is unique and that its model lacks sustainability, particularly in an Indian context, over a longer term?

In fact, more attention will need to be focused on the potential impacts of policies deployed in the name of data sovereignty on sustaining India's development trajectory and raising hundreds of millions out of poverty. The policies most effective at promoting this overriding national objective will be those that encourage competition in the provision of digital services. Efforts to increase broad access to digital services will be handicapped if the most innovative and affordable products are blocked for failing to be sufficiently Indian.

NEXT STEPS IN THE PATH FORWARD

As India builds a new regulatory structure for its digital economy, it is critical that policy makers in Delhi align the various pieces of their emerging policy architecture to ensure they advance core strategic objectives. To attain greater policy coherence, Indian authorities should ensure a high degree of transparency in their regulatory processes, including the opportunity for broad-based consultation and clear explanations of the reasoning behind specific decisions. Regulatory reform involves much more than simply setting new rules—it should also promote predictability and accountability in the process of developing regulations.

In parallel, India's relationship with the United States is likely to grow in strategic and economic importance as India emerges from the COVID-19 crisis and simultaneously enacts new policies to neutralize Chinese economic influence and counter perceived Chinese-origin security threats. India will also need to assess carefully how it can create opportunities to advance its global credentials during its United Nations Security Council membership in 2021 and its presidency of the Group of Twenty (G20) nations in 2022, where data governance could emerge as a key focus area. Indeed, the next two years will bring new visibility to India's digital domain and corresponding opportunities to court investment. The more protectionist and nativist its digital trade policies are, the greater the risk that India stumbles in becoming globally competitive across an array of industries in which technology prowess is critical: AI, e-commerce platforms, cloud computing, health, and logistics, to name but a few crucial growth sectors.

India should not miss its moment to build a strong and lasting foundation for a vibrant digital future. Measures presently under consideration—including the PDPB, NPD report, e-commerce policy, DEPA and IT Act—will either anchor this foundation through strong internal alignment or undermine it by promoting divergent approaches to data governance. By making final decisions on specific elements, including those highlighted below, India can send a strong message that its digital policies are among the best in the world.

CORE RECOMMENDATIONS

Creating One Privacy-Focused Regulator:

The PDPB, e-commerce policy, and NPD report each call for new regulators that would have broad jurisdiction, enforcement authority, and unique compliance requirements. Multiple sources of oversight are likely to generate misaligned directives on privacy and data governance for foreign and domestic companies alike, bureaucratic infighting among new and existing regulators, a heavier compliance burden on Indian startups, and a new set of reasons for foreign investors to think twice about increasing their exposure in the Indian market. Streamlining the regulatory architecture will therefore yield clear dividends. As a first step, India should set up a single Data Protection Authority focused primarily on protecting personal data privacy. This is a huge and important task in and of itself, and successful enforcement of privacy protections will help safeguard Indian citizens' constitutional rights across digital domains. Meanwhile, lawmakers in Delhi should recognize that not all policy challenges require new regulators. They should scrap plans to create an NPD regulator and remove data regulation from the jurisdiction of e-commerce regulators, which should instead focus on consumer protection. Indeed, India already has regulators, such as the Competition Commission of India (CCI), that can help address concerns about data dominance and network effects that animate the push for NPD regulation and e-commerce regulation. Ensuring these existing bodies can address such challenges and coordinate with sectoral bodies and other ministries will be crucial for effective oversight going forward.

Leveraging Cross Border Data Flows:

The PDPB, e-commerce policy, and NPD report each call for some form of data localization focused on critical and sensitive data. Broad localization requirements will not only raise compliance costs for companies investing in India but also set a precedent that could lead other countries to impose similar localization restrictions—which would limit Indian firms' ability to serve cross-border customers. As such, India should approach data localization with caution and surgical precision, and simultaneously create flexible and reciprocal pathways and mechanisms allowing for cross-border storage and processing of Indian data in countries that meet specific standards of privacy protection and law enforcement cooperation. Though MeitY officials have previously alluded to this possibility, formally embedding and developing these

mechanisms in the PDPB would create natural opportunities to strengthen digital cooperation and defuse trade tensions with trusted partners, especially the United States and the European Union, and propel India on its path to global leadership in this area as it looks ahead to hosting the G20.

Building a Global Consensus on Non-Personal Data:

As a matter of first principles, the GOI should only encourage data sharing by companies on a voluntary basis through partnerships or other systems that respect property rights and create incentives for data pooling. Data sharing mechanisms envisioned by the NPD report would give uninhibited power to the data regulator and leave firms little to no recourse to appeal frivolous or strategic data sharing requests by their competitors or the state. Far from promoting innovation and investment in India, this approach to data sharing would radically undermine it. India should recognize that NPD regulation is a new and untested field where widely accepted international norms have yet to emerge. Before committing to significant overhauls of existing data governance and intellectual property frameworks, India should create a new working group among fellow leading digital powers to carefully study emerging and comparative approaches to NPD governance and help shape a global consensus on this issue.

Reforming Intermediary Liability Regimes to Curb Online Harms Without Compromising on an Open Internet:

GOI attempts, as reported by the media, to define specific requirements for "social media intermediaries" are a significant development, as industry has raised concerns around broadly applying such requirements to all intermediaries (e.g., to cloud service providers and data processors).⁵ However, these proposed requirements appear to include obligations such as proactive monitoring of content and local incorporation, which would discourage innovation and curtail freedom of expression. A more practical approach to intermediary liability reform could involve: (1) making proactive monitoring voluntary with good samaritan protections; (2) allowing social media intermediaries to appoint a nodal point of contact for engagement with law enforcement agencies instead of requiring social media intermediaries to establish permanent local offices; and (3) prioritizing content review for certain content categories like child sexual exploitation. Further, the GOI should introduce more transparency around its own takedown requests, as well as processes, and regularly publish such information, to create a more predictable regulatory environment and better promote compliance.

5 Karishma Mehrotra, "IT rules to separate social media firms, other online platforms," *the Indian Express*, January 16, 2020, <https://indianexpress.com/article/technology/social/it-rules-to-separate-social-media-firms-other-online-platforms-6218697/>.

CATALYZING DIGITAL INDIA'S GROWTH

Prime Minister Narendra Modi's vision to usher in another half a billion Indians online is a fitting goal for an ambitious, young digital nation. Yet closing India's digital divides and developing a robust digital economy will require a moonshot effort that leaves little room for error. Each actor in India's digital ecosystem has a vital role to play and unique value to contribute. India is too big and its challenges too immense to become the exclusive domain of current global technology leaders or the walled garden of homegrown champions. Policy

frameworks must recognize that the enduring strength of the nation lies in its diversity, dynamism, and connectivity, and that the digital domain must reflect this ethos. Fair and fluid competition, sustained innovation, protection of privacy, and holistic national security policies—these are the hallmarks of a leading digital economy and the benchmarks that should guide India's emerging data governance and digital trade frameworks in the twenty-first century. With clarity of purpose and unity in effort, India can lead with confidence and forge a digital architecture that is a model for the world and a linchpin of its global partnerships.

ABOUT THE AUTHORS

Mark Linscott is a nonresident senior fellow with the Atlantic Council's South Asia Center. Prior to joining the Atlantic Council, Mr. Linscott was the assistant US trade representative (USTR) for South and Central Asian Affairs from December 2016 to December 2018. In this position, he was responsible for development of trade policy with the countries comprising South and Central Asia, including Bangladesh, Bhutan, India, Iran, Kazakhstan, Kyrgyzstan, Maldives, Nepal, Pakistan, Sri Lanka, Tajikistan, Turkmenistan, and Uzbekistan. He led efforts in the bilateral Trade Policy Forum with India and in Trade and Investment Framework Agreements (TIFAs) with Central Asia, Bangladesh, Maldives, Nepal, Pakistan, and Sri Lanka.

Mr. Linscott previously served as the assistant US trade representative for World Trade Organization (WTO) and Multilateral Affairs from 2012 to 2016 with responsibility for coordinating US trade policies in the WTO. His team was responsible for negotiation and implementation of WTO accessions and the Trade Facilitation Agreement and regionally in the Trans-Pacific Partnership (TPP) and Trans-Atlantic Trade and Investment Partnership (TTIP) on customs matters, government procurement, subsidies and trade remedies, and technical barriers to trade. Mr. Linscott also represented the United States in trade meetings of the Group of Twenty (G-20) and the Organization for Economic Cooperation and Development (OECD).

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From 1996 to 2002, Mr. Linscott represented the United States at the US Mission to the WTO in Geneva, covering issues such as trade in services, customs, antidumping, subsidies, and government procurement. Prior to serving in Geneva, he worked in the Office of WTO and Multilateral Affairs in USTR Washington, where he concluded the Uruguay Round Government Procurement Agreement as the lead US negotiator and was responsible for preparations for the entry-into-force of the WTO.

Mr. Linscott started his career at the Department of Commerce, serving from 1985 to 1988 in Import Administration, and from 1988 to 1992 in the Office of Multilateral Affairs. He was awarded a

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