



A COMPREHENSIVE PRIVACY NOTICE GENERATOR

INFORMATION GUIDE

Privy
by IDfy

DSCI
PROMOTING DATA PROTECTION

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Background and Context

In August 2023, India enacted its Digital Personal Data Protection Act ('DPDPA') with a mandate for provision of notice and request for consent to data principals. As compared to global data protection regulations, India's DPDPA takes a more consent-centric approach and requires personal data processing to be undertaken for specified purposes. For an individual's consent to be considered valid under the law, it should be free, specific, informed, unconditional, unambiguous, and based on a clear affirmative action. These requirements under the law signify a shift from prevalent practices where the use of simplistic methods for obtaining consent fails to provide individuals with genuine control over their personal data. Data principals often unknowingly agree to broad terms without fully understanding how their data will be collected, processed, or shared.

The DPDPA will also act as a catalyst for change for the Indian data protection ecosystem and industry practices. The mandates under the law, including for provision of notice and request for consent, will likely require data fiduciaries and data processors alike to revisit their data processing activities. A study of diverse industry sectors in India indicates that while privacy policies are often provided to users, only [9% websites obtain clear and explicit consent from data principals](#). Similarly, another [survey](#) indicates that 32% organisations foresee technical challenges and about 50% organisations are yet to acquire skills for implementation of DPDPA. Thus, a fundamental shift is upcoming with the enactment of the DPDPA, both for individuals and for businesses. To facilitate the entire ecosystem's journey towards transparency, accountability, and privacy awareness, the Data Security Council of India (DSCI) and Privy by IDfy are introducing **PriView**- A comprehensive privacy notice generator.

Developing PriView: A Collaboration between DSCI and Privy by IDfy

Contrasted against global requirements for notice and consent, the DPDPA in India has specific mandates such as multi-lingual provision of notice, specificity of purposes, grievance redressal, etc. PriView's capabilities are designed to cater to these requirements.

PriView is a free-to-use, intuitive, and comprehensive web-based tool to help create a customised template version of a privacy notice for their organisation's digital products and services. It is a tool designed specifically for the Indian context which helps in creating privacy notices tailored to each digital journey involving personal data.

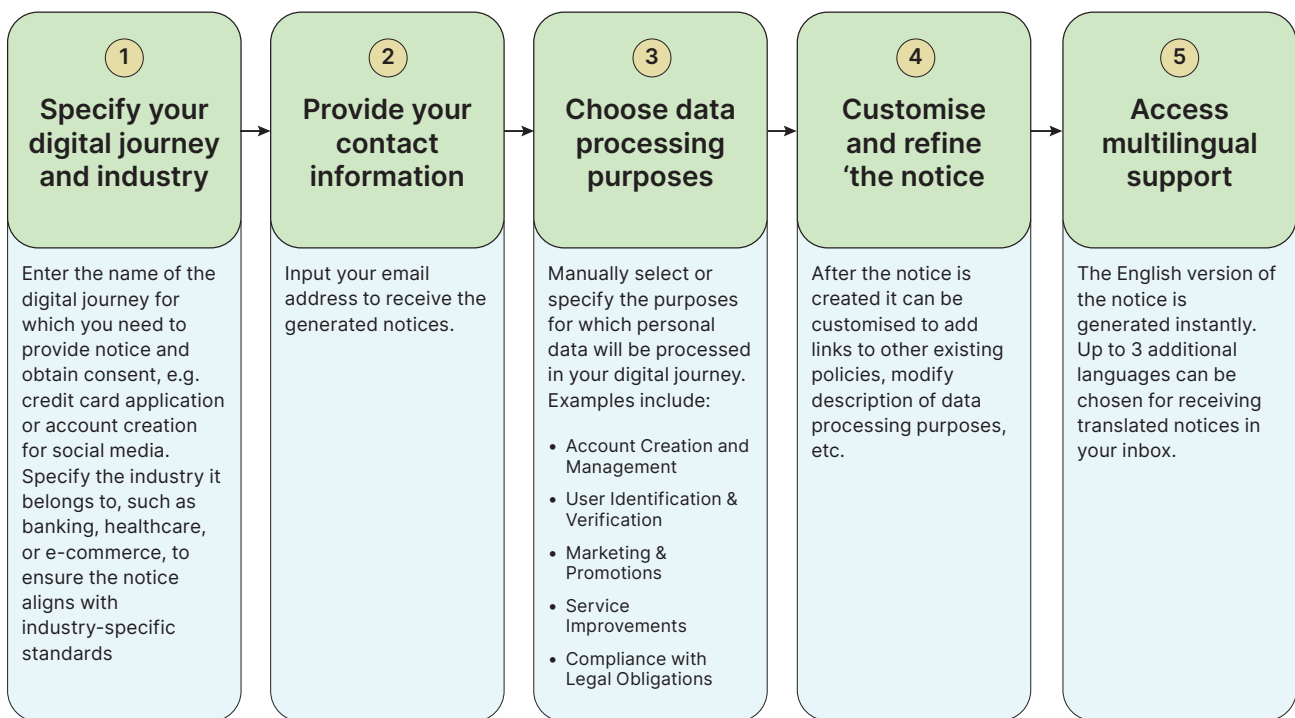
The objective behind this collaboration between DSCI and Privy by IDfy was to equip privacy professionals, data protection officers, CISOs, CTOs etc. with a resource that can facilitate easier creation of notices across different types of data processing purposes and diverse industry sectors.

How does PriView work?

PriView is intended to generate a customisable template of a privacy notice that organisations can add to, amend, and then use as a reference point for incorporation into their products and services. Leveraging advanced AI models, PriView offers two flexible methods to generate precise, and digital journey specific notices.

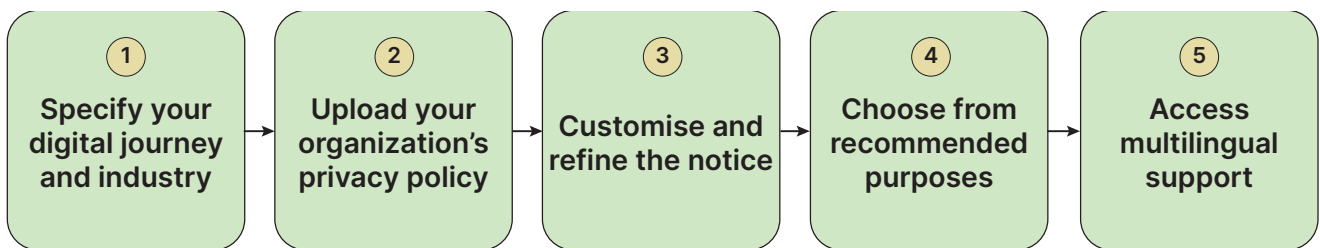
Two options for creating a customisable notice

Option 1: Create your privacy notice manually- If your organization does not currently have a comprehensive privacy policy, you can create your privacy notice in a few simple steps with this option. The user can manually select the applicable industry sector and the corresponding purposes relevant to the digital product/service/journey for which the notice is intended. The tool will then create an editable privacy notice based on the data input by the user. Here's how it works:



*Diagrammatic representation of user flow for generating a privacy notice
by manual description of data processing purposes*

Option 2: Create your privacy notice using existing privacy policy- If your organization already has a comprehensive privacy policy, you can create a digital product/service/journey specific notice using this option. Upon selecting the relevant industry sector and uploading the existing privacy policy of your organization, the algorithms underpinning the tool will automatically identify relevant purposes and tied personal data being processed for said purposes. The tool will then create an editable privacy notice based on the available information. The AI models powering PriView not only extract relevant purposes from the privacy policy uploaded but also consider the guidelines put forward by applicable sectoral regulations based on the industry sector you have specified. You can review these recommended purposes and select the ones that apply to your use case Here's how it operates:



*Diagrammatic representation of user flow for generating a privacy notice
by uploading organisation's privacy policy*

How does PriView make AI-based recommendations?

When creating a digital journey specific privacy notice which is based on a larger comprehensive organisational privacy policy, PriView's AI models analyze the privacy policy to extract references to personal data being collected. This includes identifying fields like name, contact details, financial information, government IDs, and other personal data.

AI is then used to scan the privacy policy to identify explicit and implied purpose statements—why the personal data is being collected or processed. Examples include purposes like account creation, fraud detection, customer support, or regulatory compliance. This ensures that each purpose aligns with the principles of transparency and legality. Identified personal data is then mapped against the purposes for which it is being processed based on a pre-defined purpose taxonomy.

After analyzing the privacy policy, the AI models also provide tailored recommendations for additional data processing purposes based on the digital journey and industry sector specified by the user. This step leverages insights from sectoral regulations to ensure the creation of a comprehensive privacy notice.

Next Steps and the Road Ahead

As of December 2024, PriView is in its early stages of development and will be improved iteratively based on user feedback, expert consultations, and regulatory changes.

While the underlying AI models strive to provide accurate recommendations based on user inputs and existing regulations, they may not account for specific legal nuances or contextual requirements. It is strongly recommended to consult a qualified legal expert to validate and refine the purposes identified and the mapping of categories of personal data to said purposes to ensure full compliance and alignment with organizational needs.

DSCI and Privy by IDfy look forward to a continued collaboration to improve the functionality of PriView and receive industry feedback on its utility.

About DSCI:

DSCI is a leading think tank and industry association focused on data protection, cybersecurity, and privacy. Our mission is to promote a safer cyberspace by establishing standards, best practices, and initiatives in these areas. We work closely with governments, regulators, and industry stakeholders for policy advocacy and capacity building. Through research, training, and outreach programs, including events and certifications, we aim to strengthen India's presence in the global cybersecurity landscape and cultivate a robust security culture.

For more information, visit: <https://www.dsci.in/>

About Privy:

Privy is India's first suite of DPDP solutions brought to you by IDfy. The Privy suite offers instant compliance checks, monitoring of digital journeys, personal-data discovery, consent governance (from collection to deletion), and Data Protection Officer dashboards for privacy management controls.

With Privy, you can confidently navigate the complexities of data privacy and protection, ensuring your organization is fully compliant and building trust with your users.

For more information, contact: <https://www.privyyone.com/>

About IDfy:

IDfy is an Integrated Identity Platform offering products and solutions for KYC, KYB, Background Verifications, Fraud and Risk Mitigation, Digital Onboarding and Digital Privacy. We establish trust while delivering a frictionless experience for you, your employees, customers and partners.

Only IDfy combines enterprise-grade technology with business understanding and has the widest breadth of offerings in the industry. With more than 13 years of experience and 2 million verifications per day, we are pioneers in this industry