

Asked if it is fair to assess compliance now when the DPDP Act is not fully enforced yet, Shivani Singh, programme coordinator, for law and critical emerging technologies, ASIA, and first author of the report, 'DPDP Compliance in Respect to Children's Data, A Comprehensive Assessment of AI Tools Extensively Used by Minors in India', the report on which the NHRC notice was based, told ET on March 26, "The compliance window should not be treated as a legal vacuum. It is meant to prepare systems and processes. If organisations wait until enforcement begins, they risk becoming non-compliant immediately."

"Compliance is not just about updating policies, and adding consent prompts. It requires integrating data protection into operational systems and workflows, which takes time," she said.