

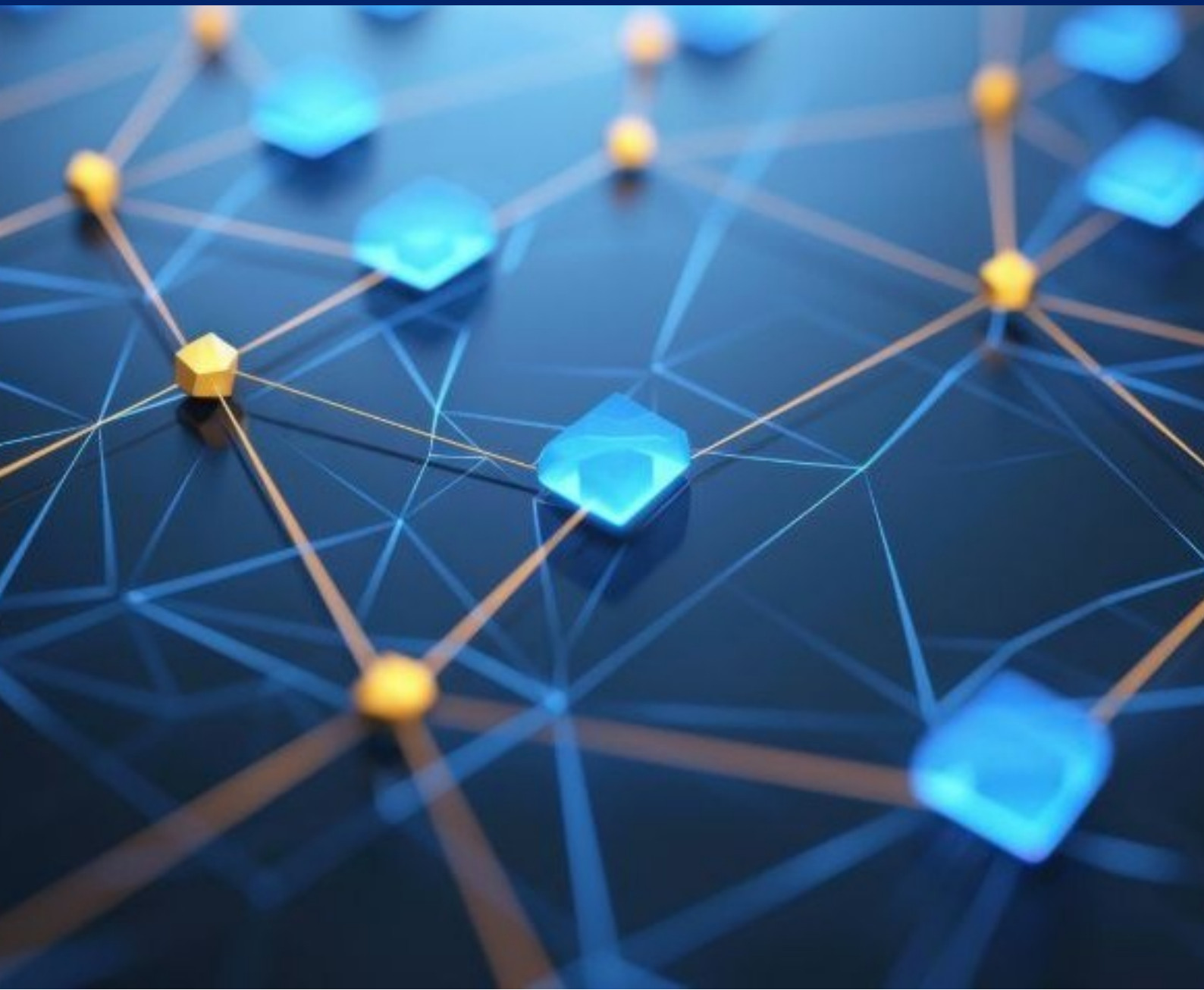
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# TMT Law: Year In Review 2025

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## 2025 at a Glance



### MeitY Notifies Amendments Allowing Private Access to Aadhaar Infrastructure

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The Aadhaar Authentication for Good Governance (Social Welfare, Innovation, Knowledge) Amendment Rules, 2025 expand Aadhaar authentication beyond government bodies to approved private entities for public-interest services—explicitly covering ease of living, innovation, and knowledge dissemination, subject to a structured approval mechanism where applications are vetted by the Unique Identification Authority of India (UIDAI) and authorised by the Ministry of Electronics and Information Technology (MeitY) through official notification.

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### Telecom Commercial Communications Customer Preference (Second Amendment) Regulations, 2025 Notified

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The Telecom Regulatory Authority of India tightened the spam and commercial communications regime through amendments to the Telecom Commercial Communications Customer Preference Regulations. The changes strengthened consent architecture, scrubbing obligations and accountability for telemarketers and aggregators, increasing compliance exposure for enterprises using bulk digital communications.

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## CERT-In's Comprehensive Cyber Security Audit Policy Guidelines, 2025 Issued

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CERT-In's Comprehensive Cyber Security Audit Policy Guidelines (Version 1.0, issued 25 July 2025) established a standardised, risk-based framework for conducting cybersecurity audits in India, detailing roles, responsibilities, scope, principles (independence, objectivity, confidentiality), and procedures for both auditors and auditee organisations seeking to evaluate their cybersecurity. They cover broad audit categories (e.g., risk assessment, compliance, vulnerability testing, cloud/AI/IoT audits), mandate secure data handling, reporting timelines, and quality control, and aim to shift audits from mere compliance exercises to ongoing, strategic risk-management tools to bolster national cyber resilience.

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## SEBI Consultation Paper on Guidelines for Responsible Usage of AI/ML in Indian Securities Markets Released

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The Securities and Exchange Board of India released a consultation paper on the responsible use of AI/ML by market intermediaries and infrastructure institutions. The paper addressed governance, explainability, bias mitigation, and accountability, marking SEBI's structured regulatory move on the adoption of AI and emergent risks.

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## Guidelines for Examination of Computer-Related Inventions Notified

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The Indian Patent Office reaffirmed that only natural persons may be named as inventors under the Patents Act, 1970. It aims to cover emerging tech like AI, ML, Blockchain, and Quantum Computing, offering clearer assessment steps, flowcharts, and examples for Section 3(k) patentability.

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## Telecommunications (Telecom Cyber Security) Amendment Rules, 2025 Notified

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The Department of Telecommunications notified amendments strengthening telecom cybersecurity obligations under the Telecommunications Act, 2023. The rules introduced mechanisms such as Telecom Identifier User Entities and mobile number validation framework to curb fraud and misuse of telecom identifiers.

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## RBI Master Direction on Payment Aggregators (PA) Issued

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The Reserve Bank of India issued consolidated directions governing payment aggregators, by providing a framework that harmonises and strengthens compliance obligations, addresses risk management gaps, and resolves longstanding ambiguities in areas like escrow management, safeguarding of merchant funds, and minimum capital thresholds, providing much-needed regulatory certainty for the fintech ecosystem.

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## Digital Personal Data Protection Rules Notified

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The Government notified the Digital Personal Data Protection Rules, 2025, operationalising the DPDP Act, 2023. The Rules detailed consent mechanisms, fiduciary duties, breach reporting, and phased implementation timelines.

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## Promotion and Regulation of Online Gaming Act, 2025 Enacted

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Betting and gambling, being a State subject, were regulated disparately across States, with online gaming facing bans or significant restrictions in several jurisdictions. The Promotion and Regulation of Online Gaming Act, 2025 introduces India's first central statutory framework for online gaming, providing for licensing, consumer protection measures, and regulated oversight. It encourages e-sports, educational games, and online social games while prohibiting online money games.

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## Private Member's Bill on Deepfake Regulation Introduced

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A Private Member's Bill seeking to regulate deepfakes was introduced in the Lok Sabha. It intends to formally place consent-based regulation, establish a Deepfake Task Force, and impose criminal penalties for malicious deepfakes on the parliamentary record.

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## India AI Governance Guidelines Published

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MeitY released the India AI Governance Guidelines under the IndiaAI Mission. The guidelines adopted a principles-based, risk-oriented approach to AI governance, signalling India's preference for soft-law coordination over immediate hard regulation.

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## Karnataka Hate Speech and Hate Crimes (Prevention) Act, 2025 Enacted

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Karnataka Government enacted the Karnataka Hate Speech and Hate Crimes (Prevention) Act, 2025 to define and criminalise hate speech and related offences, including online dissemination of hateful content, with penalties (up to 10 years' imprisonment and fines) and provisions for blocking or removing hate content. This legislation supplements existing central laws (like the Information Technology Act, 2000 and the Bharatiya Nyaya Sanhita, 2023) by granting state authorities powers to regulate expressive conduct that causes disharmony or hatred against protected groups.

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## Delhi High Court Mandates e-KYC for Domain Registrants

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The Delhi High Court in *Dabur India Ltd. v. Ashok Kumar & Ors.*, directed strict e-KYC verification for domain name registrants to curb cyber fraud and impersonation. The judgment expanded judicial oversight of digital infrastructure and imposed compliance obligations on registrars and intermediaries.

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## Information Technology (Intermediary Guidelines and Digital Media Ethics Code) Amendment Rules, 2025 Notified

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The IT (Intermediary Guidelines and Digital Media Ethics Code) Amendment Rules, 2025 tighten the takedown framework by limiting “actual knowledge” to court orders or reasoned notices from senior government officers, with strict content-specific requirements. All such takedown directions must be reviewed monthly for necessity and proportionality, aiming to curb arbitrary removals.

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## MeitY Issued Standard Operating Procedure to Curtail Dissemination of Non-Consensual Intimate Imagery (NCII) Content

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MeitY issued a Standard Operating Procedure (SoP) to curb the dissemination of Non-Consensual Intimate Imagery (NCII) online, in compliance with directions from the Madras High Court in WP 25017/2025. The SoP mandated 24-hour takedown timelines, multiple reporting avenues for victims, and requires intermediaries, especially significant social media platforms, to use technologies like hash-matching to prevent reposting of flagged content, reinforcing implementation of Rule 3(2)(b) and 3(2)(c) of the IT (Intermediary Guidelines and Digital Media Ethics Code) Rules, 2021.

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## Announcement of Major Strategic Reforms in India's Telecom Security Ecosystem for 2026

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The Department of Telecommunications has announced forward-looking telecom security reforms for 2026, aimed at strengthening national security while significantly reducing compliance costs for industry. Key measures include a two-year extension of the Pro Tem Security Certification Scheme, substantial fee reductions for Telecom Security Testing Laboratories, and simplified ITSAR certification for Optical Network Terminator (ONT) devices. Together, these steps signal a shift toward a more pragmatic, industry-friendly telecom security regime under the MTCTE framework, aligned with Aatmanirbhar Bharat and ease of doing business objectives.

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### *What's Next in 2026*

2026 is expected to mark a shift from legislative intent to regulatory execution across India's technological, digital and telecom ecosystems. Several frameworks notified or consulted upon in 2025 are likely to be enforced, testing both institutional readiness and industry compliance capacity.



### DPDP Rules

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The phased operationalisation of obligations under the Digital Personal Data Protection framework is expected to begin in earnest. Data fiduciaries, particularly significant data fiduciaries, may see the rollout of registration requirements, consent management obligations, grievance redress mechanisms, and breach reporting standards. Regulatory clarity on timelines, exemptions, and sectoral carve-outs will be critical in determining compliance strategies in 2026.

## Payment Aggregators

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The RBI's authorisation regime for payment aggregators is expected to reach a decisive phase as transition timelines mature. Entities operating under in-principle approvals or interim arrangements may face final regulatory outcomes, bringing consolidation and regulatory certainty to the digital payments space. Enhanced supervisory oversight and enforcement action against non-compliant operators cannot be ruled out.

## SEBI's AI Framework

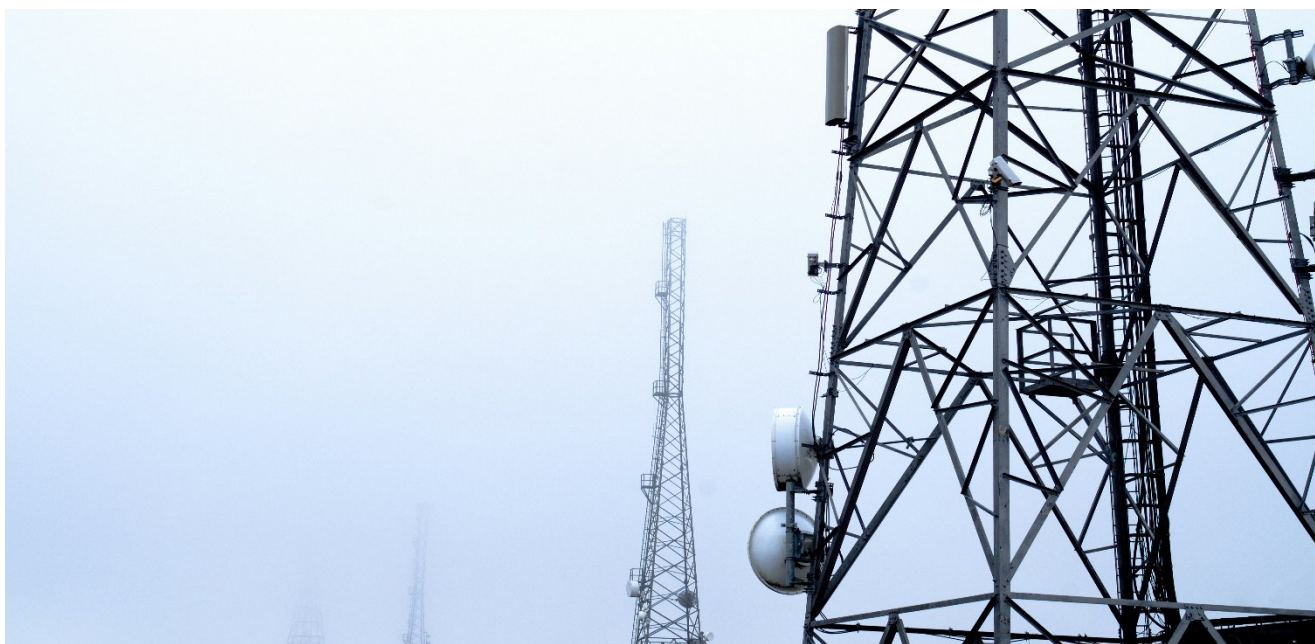
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Building on its 2025 consultation, SEBI may issue formal guidelines governing the use of artificial intelligence and machine learning tools in securities markets. Any framework introduced is likely to prioritise risk management, transparency, auditability, and human oversight, particularly in algorithmic trading, investment advisory services, and compliance functions.

## Implementation of Telecom Sector Reforms

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Beyond rulemaking, 2026 will be a key year for the implementation of broader telecom sector reforms announced in recent years. Focus areas may include spectrum administration, infrastructure sharing, rationalisation of levies, and reduced regulatory friction.



## *Looking Ahead*



Overall, 2026 is likely to be a year of regulatory consolidation. The emphasis will shift to enforcement readiness, interpretative guidance, and early compliance benchmarks. For stakeholders across the technology and telecom sectors, we can anticipate more on navigating how existing frameworks are operationalised in practice.

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