



**Privacy in the Digital Economy:
How the Indian Government
Interprets the Fundamental Right
to Informational Privacy**

Abhineet Nayyar

Privacy Studies Journal

ISSN: 2794-3941

Vol. 4 (2025): 126-151

Abstract

The industrial and political aspects of today's digital economy rely overwhelmingly on users exchanging their personal data for online services. Consequently, informational privacy has emerged as one of the many concerns that have garnered the attention of the Indian government. A crucial shift occurred in 2017 when the Indian Supreme Court declared the 'Right to Privacy' as a fundamental right. Since then, the judgment has led to many policy interventions, including the Digital Personal Data Protection Act, 2023. However, as the Act's clauses reveal, there are stark distinctions between the interpretations of the government and the judiciary on the Right to Privacy. In fact, bound by distinct institutional mandates and responsive to unique power asymmetries, different state authorities also interpret informational privacy in a variety of ways. This paper presents a privacy-centred analysis of key policies and legislations affecting three stakeholder groups: workers and small businesses on platform-based marketplaces, online multimedia content creators, and digital consumers who view online content and participate in ecommerce activities. The comparative analysis further recognizes three distinct interpretations of informational privacy by government authorities and explores how policy interventions materialize these interpretations into reality.

Keywords

Informational privacy – Right to Privacy – digitization – digitalization – platform economy

I. Introduction

1. India's Digital Economy

Since the early 2010s, digital technologies have become a central pillar of India's economic stature.¹ Although historical factors have played an important role in enabling this transformation, its recent cultivation has been led squarely by state and market forces.² In 2009, the Indian government established the Unique Identification Authority of India (UIDAI), tasking the organization with managing and implementing Aadhaar, a 12-digit identification number linked to biometric data.³ Originally created to address duplication in beneficiary rolls, Aadhaar's scope was further clarified and expanded through a range of policy interventions, including, most prominently, the 2016 Aadhaar Act.⁴

Similarly, the liberalization of the country's telecom policy landscape between 2010 and 2016 was integral in expanding the market for spectrum allocation.⁵ Among others, this led to the entry of Reliance Jio, an affiliate of Reliance Industries and owned by Mukesh Ambani, one of the country's richest men.⁶ By offering low-price and often free internet connections in the 4G spectrum, Jio kicked off a downward spiral in prices, enabling a significant proportion of the country's population to access online services.⁷ Between 2014 and 2024, the number of internet subscribers per capita grew from about 19% to over 65%, with at least 900 million using the internet by 2024.⁸

More importantly, this spike was a key driver behind the emergence of India's platform economy. Unlike traditional goods and services, digital platforms operate as aggregators of capital and information, connecting two sides of the market with each other, usually in exchange for a nominal commission fee and/or access to user data.⁹ By holding large

1 PIB Delhi, "Future Ready: India's Digital Economy to Contribute One-Fifth of National Income by 2029-30," *Press Information Bureau*, January 28, 2025, <https://pib.gov.in/pib.gov.in/Pressreleaseshare.aspx?PRID=2097125>.

2 Pradip Ninan Thomas, *Digital India: Understanding Information, Communication and Social Change* (SAGE Publications, 2012), 30–31, <https://doi.org/10.4135/9788132114017>.

3 Planning Commission, "Notification No. A.03011/02/2009-Admn.I," *The Gazette of India*, January 28, 2009, https://uidai.gov.in/images/notification_28_jan_2009.pdf.

4 Ministry of Finance, "Aadhaar (Targeted Delivery of Financial and Other Subsidies, Benefits and Services) Act, 2016," *The Gazette of India*, March 25, 2016, https://uidai.gov.in/images/targeted_delivery_of_financial_and_other_subsidies_benefits_and_services_13072016.pdf.

5 Competition Commission of India, "Market Study on the Telecom Sector in India: Key Findings and Observations," *Competition Commission of India*, January 22, 2021, 7, <https://www.cci.gov.in/images/whatsnew/en/market-study-on-the-telecom-sector-in-india1652177923.pdf>.

6 Naazneen Karmali, "India's 100 Richest," *Forbes*, October 9, 2024, <https://www.forbes.com/lists/india-billionaires/>.

7 Competition Commission of India, "Market Study on the Telecom Sector," 4.

8 PIB Delhi, "Universal Connectivity and Digital India Initiatives Reaching to All Areas, Including Tier-2/3 Cities and Villages," *Press Information Bureau*, August 6, 2024, <https://pib.gov.in/pib.gov.in/Pressreleaseshare.aspx?PRID=2040566>; Worldometer, "India Population," *Worldometer* (n.d.), <http://www.worldometers.info/world-population/india-population/>.

9 Rajat Kathuria, Mansi Kedia, and Kaushambi Bagchi, "India's Platform Economy and Emerging Regulatory Challenges," *ICRIER*, Working Paper No. 47 (2021): 2, <https://www.econstor.eu/handle/10419/267927>. See also Nedo Bartels and Anna Schmitt, "Developing Network Effects for Digi-

swathes of personal and sensitive information, platforms are able to not only improve their performance but also act as key participants in the “data-profile/advertising complex.”¹⁰ Prominent examples include Big Tech platforms such as Google, Amazon, Uber, and Facebook, as well as a range of local startups, such as Ola and Rapido (Uber’s Indian competitors), and Zomato and Swiggy (food delivery platforms).

Despite their distinctions, a uniting factor of these platforms is their deep reliance on data collection and monetization.¹¹ From customizing a user’s experience (which is especially important for nascent startups) all the way to improving ad-targeting and training of Artificial Intelligence (AI) models, personal data has proven to be “the driving force behind the digital economy.”¹² This shift towards a data-driven digital future, however, has not been without its difficulties. Many Indian organizations—including an insurance provider, a police department, and a publicly funded hospital—have experienced data breaches and leaks over the last few years, some in cases where the stolen information reportedly consisted of sensitive details.¹³

It is in this context of an emerging data-maximalist platform economy that the right to informational privacy should be understood.

2. Privacy in the Digital Age

In 2017, ruling in the matter of Justice K.S. Puttaswamy v. Union of India, a nine-judge bench of the Supreme Court unanimously found the Right to Privacy to be a Fundamental Right under the Indian Constitution. Apart from the unanimity, the judgment is considered significant for a number of reasons: first, it marked an important turning point in privacy-related jurisprudence, since it overturned two key precedents—M.P. Sharma v

tal Platforms in Two-Sided Markets – The NfX Construction Guide,” *Digital Business* 2, no. 2 (2022): 2, <https://doi.org/10.1016/j.digbus.2022.100044>.

10 Geert Lovink and Nathaniel Tkacz, “MoneyLab: Sprouting New Digital-Economic Forms,” in *MoneyLab Reader: An Intervention in Digital Economy*, ed. Geert Lovink, Nathaniel Tkacz, and Patricia de Vries (Amsterdam: Institute of Network Cultures, 2015), 15, https://networkcultures.org/wp-content/uploads/2015/04/MoneyLab_reader.pdf.

11 Thomas Poell, David Nieborg, and José van Dijck, “Platformisation,” *Internet Policy Review* 8, no. 4 (2019): 6–7, <https://doi.org/10.14763/2019.4.1425>.

12 Bertin Martens, “An Economic Perspective on Data and Platform Market Power,” *SSRN Scholarly Paper*, February 10, 2021, <https://doi.org/10.2139/ssrn.3783297>; Carola Westermeier, “Money Is Data – the platformization of financial transactions,” *Information, Communication & Society* 23, no. 14 (2020): 2048, <https://doi.org/10.1080/1369118X.2020.1770833>.

13 Christopher Bing and Munsif Vengattil, “Exclusive: Hacker uses Telegram chatbots to leak data of top Indian insurer Star Health,” *Reuters*, September 20, 2024, <https://www.reuters.com/technology/cybersecurity/hacker-uses-telegram-chatbots-leak-data-top-indian-insurer-star-health-2024-09-20/>; Swethavimala M and Ajay Tomar, “Tech lapse possible in TSCOP data leak: Police,” *The New Indian Express*, June 9, 2024, <https://www.newindianexpress.com/states/telangana/2024/Jun/09/tech-lapse-possible-in-tscop-data-leak-police>; Paran Balakrishnan, “AIIMS unprecented data breach sparks fears hackers could misuse information,” *The Telegraph*, December 2, 2022, www.telegraphindia.com/india/aiims-unprecented-data-breach-sparks-fears-hackers-could-misuse-information/cid/1901550.

Satish Chandra (1954, eight-judge bench) and Kharak Singh v State of Uttar Pradesh (1964, six-judge bench).¹⁴

In doing so, the 547-page judgment laid down the agent-agnostic nature of the Right to Privacy by stating that the right “protects the inner sphere of the individual from interference from *both State, and non-State actors* and allows the individuals to make autonomous life choices” (emphasis mine).¹⁵ Recognizing that the Right to Privacy is not absolute, the ruling also explored a few standards for future judicial reviews.¹⁶ The proportionality test, for instance, proposes that for any invasion of the Right to Privacy, there should be “a rational nexus between the objects and the means adopted to achieve them.”¹⁷

The second reason for this judgment’s importance is its impact on subsequent rulings and policy decisions. For instance, In Navtej Johar v. Union of India, the court used the Puttaswamy ruling to find that the colonial-era Section 377 was violative of the Right to Privacy of the LGBTQ+ community, thereby declaring the law unconstitutional and decriminalizing homosexuality.¹⁸ More relevant for the purposes of this paper is the Committee of Experts under the Chairmanship of Justice B.N. Srikrishna, which was constituted by the Ministry of Electronics and Information Technology (MeitY) to explore a data protection framework for “a free and fair digital economy.”¹⁹

In fact, the Personal Data Protection Bill proposed by the Srikrishna Committee (PDP Bill 2018) was based on the agent-agnostic understanding put forth by the Puttaswamy judgment. This is seen most clearly in its recognition of the state’s duty “to put in place a data protection framework which, while protecting citizens from dangers to informational privacy originating from state and non-state actors, serves the common good.”²⁰ However, despite its seemingly radical framing, the PDP Bill 2018 never materialized into an actual law.

14 Supreme Court of India, “Justice K.S. Puttaswamy (Retd.) And Anr. v. Union Of India And Ors.,” *AIR 2017 SC 4161*, August 24, 2017, 546–547, https://www.scobserver.in/wp-content/uploads/2021/10/Right_to_Privacy__Puttaswamy_Judgment_1.pdf.

15 Supreme Court of India, “Puttaswamy v. Union Of India,” 539.

16 Vrinda Bhandari et al., “An Analysis of Puttaswamy: The Supreme Court’s Privacy Verdict,” *IndraS- tra Global* 11 (2017): 2, https://web.archive.org/web/20210308191121/https://www.ssoar.info/ssoar/bitstream/handle/document/54766/ssoar-indrastraglobal-2017-11-bhandari_et_al-An_Analysis_of_Puttaswamy_The.pdf.

17 Supreme Court of India, “Puttaswamy v. Union Of India,” 264.

18 Gautam Bhatia, “‘Civilization has been brutal’: Navtej Johar, Section 377, and the Supreme Court’s Moment of Atonement,” *Constitutional Law and Philosophy*, September 6, 2018, <https://indconlawphil.wordpress.com/2018/09/06/civilization-has-been-brutal-navtej-johar-section-377-and-the-supreme-courts-moment-of-atonement/>.

19 Committee of Experts under the Chairmanship of Justice B.N. Srikrishna, “A Free and Fair Digital Economy,” *Ministry of Electronics & Information Technology*, July 27, 2018, https://web.archive.org/web/20180727170145/https://www.meity.gov.in/writereaddata/files/Data_Protection_Committee_Report.pdf.

20 Committee of Experts under the Chairmanship of Justice B.N. Srikrishna, “A Free and Fair Digital Economy,” 5.

After four years of discussions and consultations, the government withdrew the original draft and replaced it with the Digital Personal Data Protection Bill, 2022.²¹ By 2023, this updated bill was passed into law, thus establishing the Digital Personal Data Protection Act (DPDPA 2023) as the country's primary legislation for all matters pertaining to online privacy of its citizens.²² However, a growing body of research by privacy scholars has articulated how and why the DPDPA 2023 falls short of the standards set by the Puttaswamy judgment and the Srikrishna Committee.²³

3. Ceding Ground to the State's Interests

Unlike PDP 2018, for instance, DPDPA 2023 provides the government with a broad set of exemptions from the law, thereby scrapping the agent-agnosticism central to the Supreme Court's judgment as well as the Srikrishna Committee report.²⁴ In a similar vein, by providing overt discretion to the Executive, DPDPA 2023 dilutes the independence and accountability of the data regulator, further tilting the scales in the state's favour.²⁵ The 2023 law also differs from the 2018 bill in its treatment of personal data.

Take, for instance, the removal of clauses on mandatory localization of sensitive data and information, a step that has been seen as increasingly favourable to Big Tech firms.²⁶ Similarly, by encoding a hierarchy between data fiduciaries and "significant" data fiduciaries, the law empowers the Executive to classify an organization as belonging to the latter group, which is mandated to a more intense compliance regime.²⁷ Taken together, these changes point to a centralization of power that posits the state as the final arbiter of a citizen's right to privacy.

At the heart of this distortion, though, lies the political and industrial potential that the state sees in the processing of our personal data. As we will see, starting with the Aadhaar project, the government has doubled down on its goal of creating Digital Public

21 Joint Committee on the Personal Data Protection Bill, 2019, "Report of the Joint Committee on the Personal Data Protection Bill, 2019," *Government of India*, December 16, 2021, 9–10, https://web.archive.org/web/20230202143515/https://eparlib.nic.in/bitstream/123456789/835465/1/17_Joint_Committee_on_the_Personal_Data_Protection_Bill_2019_1.pdf.

22 Ministry of Electronics and Information Technology, "The Digital Personal Data Protection Act, 2023," *The Gazette of India*, August 11, 2023, <https://www.meity.gov.in/static/uploads/2024/06/2bf1f0e9f04e6fb4f8fef35e82c42aa5.pdf>.

23 Apar Gupta, "The long saga of the data bill holds crucial lessons," *Hindustan Times*, August 4, 2023, <https://www.hindustantimes.com/opinion/the-long-saga-of-the-data-bill-holds-crucial-lessons-101691156631975.html>.

24 Sarvesh Mathi, "India's Digital Personal Data Protection Bill, 2023 Gives the Government Powers to Exempt Itself from the Bill, Block Content, and More," *Medianama*, August 3, 2023, <https://www.medianama.com/2023/08/223-dpdp-bill-2023-government-exemptions-3/>.

25 Raktima Roy and Gabriela Zanfir-Fortuna, "The Digital Personal Data Protection Act of India, Explained," *Future of Privacy Forum*, August 15, 2023, <https://fpf.org/blog/the-digital-personal-data-protection-act-of-india-explained/>.

26 Scott Ikeda, "After Pushback From Big Tech Companies, India Scraps Personal Data Protection Bill and Starts Over," *CPO Magazine*, August 8, 2022, <https://www.cpomagazine.com/data-protection/after-pushback-from-big-tech-companies-india-scraps-personal-data-protection-bill-and-starts-over/>.

27 Roy and Zanfir-Fortuna, "Digital Personal Data Protection Act of India."

Infrastructures (DPIs) for purposes as varied as healthcare, education, and agriculture, among others. Other political impetuses, such as the creation of a global digital economy and a large-scale surveillance state (both of which require vast amounts of aggregated data), have also lent credibility to the changes to the law.

II. About the Paper

The regulatory journey from the Puttaswamy judgment to DPDPA 2023 highlights, among other things, two aspects of India's digital economy: one, it points to the necessary role played by personal data in fuelling the platform economy, including in safety-critical sectors like healthcare and banking; two, it shows that despite a constitutional recognition of the right, the state continues to play an outsized role in navigating the line between data protection and data extraction.

However, the state is not a homogeneous entity and tries to serve overlapping objectives across different authorities. The processing of data (which is a multipurpose resource) depends as much on sectoral context as on quality. As a result, how the state addresses any emergent contradictions is not uniform but depends instead on institutional mandates and shifting power dynamics between government representatives and various stakeholder groups.

In this paper, I describe the condition of three stakeholder groups within the context of India's digital economy: i) workers and small businesses on platform-based marketplaces; ii) online multimedia content creators; and iii) digital consumers. By examining how the lives of these groups are mined for data and how the state responds to their interests vis-à-vis the platforms doing the mining, I present a novel attempt at exploring how power and governance mandates shape informational privacy in practice.

Through a comparative analysis of constitutional, antitrust, and other regulatory orders, data protection laws, ministerial reports, market studies, and similar forms of public reporting, this paper identifies three different interpretations of the Fundamental Right to Privacy across government authorities. Further, the paper highlights how these interpretations map to each of the three stakeholder groups and the role of underlying State mandates and power asymmetries in the process.

The remainder of this article is structured in the following way. The next section begins with the stakeholder groups and introduces them as key participants in the digital economy. Section IV presents three different interpretations of the Right to Privacy by the Indian State through a comparative analysis of its policies. In section V, these interpretations are re-iterated explicitly in the context of our stakeholder groups, before section VI concludes with a brief note of discussion.

III. 'Datafication' of Market and Social Relations

The role of personal data in the sustenance and reproduction of the digital economy cannot be overstated. From enabling targeted advertising and customization of service delivery to its more recent function as the foundation for a growing AI industry, personal, sensitive, and aggregated data has generated large-scale demand. On the one side are the private actors, including Big Tech entities, multinational conglomerates, and startups, whose entire business model depends on data extraction. On the other side is the state, which sees the same tools and technologies as levers for governance and surveillance while also confronting the geopolitical value of its citizens' data.

In the middle of this tug of war between state and private players are those to whom this data relates. As participants in a political economy that is increasingly being digitalized, it is their online personae that are tracked, monitored, and deciphered by both private and public actors.²⁸ In the following section, I provide a systematic introduction to three such groups who are critical to today's digital economy. Because policy interventions often attempt to balance multiple concerns, it is also relevant to understand how these stakeholders relate with other participants, including the state and dominant entities, if any. Figure 1 provides a summary view of these groups and their data relations with other stakeholders.

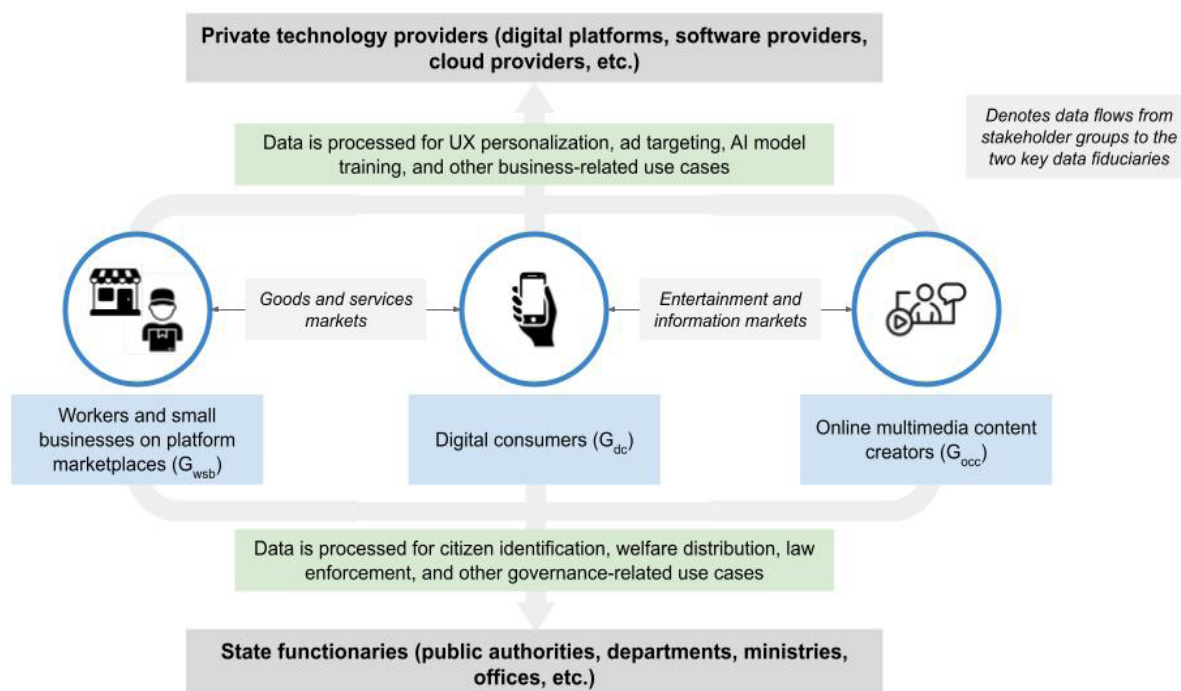


Figure 1: Key stakeholder groups and their 'data relations' with private technology providers and state functionalities.

28 Ivan Manokha, "Surveillance: The DNA of Platform Capital—The Case of Cambridge Analytica Put into Perspective," *Theory & Event* 21, no. 4 (2018): 909–910, <https://muse.jhu.edu/pub/1/article/707015>; David Murakami Wood and Torin Monahan, "Editorial: Platform Surveillance," *Surveillance & Society* 17, no. 1 (2019): 4, <https://doi.org/10.24908/ss.v17i1/2.13237>.

1. Workers and Small Businesses on Platform-based Marketplaces (Group 1 or G_{usb})

The digitalization of the Indian economy rests, most recently, on the advent of the country's ecommerce industry.²⁹ Flipkart, one of India's first successful digital startups, emerged as a promising ecommerce venture in as early as 2007.³⁰ Amazon, the Big Tech behemoth, entered the Indian market six years later and generated over INR 25,000 Cr (nearly USD 3 billion) revenue in the 2024 financial year alone.³¹ The emergence of more niche platforms to order food, hail cabs, or call for at-home beauty services has further accelerated the dependence of local industry and workers on two-sided platforms.

Estimates suggest that the platform economy currently employs at least 10 million workers, most of whom work either as "service providers" (as in the case of ride-hailing) or as delivery personnel in quick commerce and ecommerce sectors.³² Often employed through precarious contracts, with low access to social security and low levels of digital fluency, workers in the platform economy are at an especially disadvantaged location with respect to other market constituents. Most particularly, reports indicate that platforms frequently adopt a data maximization strategy when it comes to their precariously employed workforce.³³

In addition to gathering sensitive details (such as one's Aadhaar number and bank information), this process of 'datafication' also includes practices of continuous surveillance, such as capturing GPS coordinates, tracking call histories, or conducting credit assessments.³⁴ Although recent attempts at unionization have yielded some positive results for the workforce, these have remained limited to the arena of fair employment.³⁵ On the contrary, concerns of informational privacy for these workers have remained highly

29 Invest India, "Investment Opportunities in Retail & E-Commerce – Invest India," *Invest India* (n.d.), <https://www.investindia.gov.in/sector/retail-e-commerce>.

30 India Brand Equity Foundation, "Flipkart Internet Pvt Ltd | E-Commerce," *India Brand Equity Foundation* (n.d.), <https://www.ibef.org/industry/ecommerce/showcase/flipkart-internet-pvt-ltd>.

31 Akshit Pushkarna, "Amazon India Marketplace's Revenue Crosses INR 25K Cr Mark," *Inc42 Media*, November 11, 2024, <https://inc42.com/buzz/amazon-india-marketplaces-revenue-crosses-inr-25k-cr-mark/>.

32 Aryaman Gupta, "Nearly 98% of Gig Workers Earn under Rs 5 Lakh per Annum, Shows TeamLease Data," *Moneycontrol*, February 12, 2025, <https://www.moneycontrol.com/news/business/startup/nearly-98-of-gig-workers-earn-under-rs-5-lakh-per-annum-shows-teamlease-data-12938134.html>.

33 Anita Gurusurthy, Nandini Chami, and Deepti Bharthur, "Platform Labour in Search of Value," *International Labour Organization* (2021): 13, https://www.ilo.org/sites/default/files/wcmsp5/groups/public/@ed_emp/@emp_ent/@coop/documents/publication/wcms_809250.pdf. See also Chandan Kumar, Anousha Peters, and T. Aishwarya, "Gig Economy in India: Labour Rights Violations and Digital Exploitation," *Frontline*, March 18, 2025, <https://frontline.thehindu.com/the-nation/human-rights/gig-economy-india-workers-rights-labour-exploitation-surveillance-data-privacy-laws/article69341247.ece>.

34 Ankit Kapoor and Karthik Rai, "Gig Economy: A Tale of Algorithmic Control and Privacy Invasion," *NLSIR Online*, March 23, 2023, <https://www.nlsir.com/post/gig-economy-a-tale-of-algorithmic-control-and-privacy-invasion>; Malika Anand and Gayatri Murthy, "Putting Gig Data to Work: Innovations in Expanding Credit Access," *CGAP*, June 15, 2023, <https://www.cgap.org/sites/default/files/publications/Putting%20Gig%20Data%20To%20Work.pdf>.

35 Kingshuk Sarkar, "Ensuring a Proper Social Safety Net for the Gig Worker," *The Hindu*, October 15, 2024, <https://www.thehindu.com/opinion/op-ed/ensuring-a-proper-social-safety-net-for-the-gig-worker/article68753585.ece>.

under-articulated in India, unlike other countries where they have even garnered state attention.³⁶

At the same time, market reporting indicates that over 35% of small business owners use ecommerce, quick commerce, and other online channels to make over 50% of their annual revenue, a number that varies according to sectors.³⁷ Despite being more organized than platform workers, small businesses also do not necessarily have explicit control over the mediating platform's data practices. Amazon, for instance, has been under repeated scrutiny for exploiting its seller-side database to either compete directly with small businesses or, at the very least, use manipulative business practices.³⁸

2. Online Multimedia Content Creators (Group 2 or G_{occ})

In addition to facilitating commerce, two-sided digital platforms have also disrupted the distribution of entertainment and information.³⁹ Prominent examples include not just social media platforms such as Facebook and Instagram, but also purely streaming platforms such as YouTube, all of which mediate between advertisers, consumers, and content creators. Most pertinently, both Meta (which owns both Facebook and Instagram) and Alphabet (which owns Google and YouTube) have repeatedly stressed the high value they attach to the Indian market.⁴⁰

This value, however, arises primarily from these platforms' advertising and marketing businesses, which are, in turn, intricately tied to their data collection and processing practices. As a result, digital platforms mediating entertainment and information markets also benefit from data extraction under today's surveillance economy. This includes data

36 Karen Gregory, "'Worker Data Science' Can Teach Us How to Fix the Gig Economy," *WIRED*, December 7, 2021, <https://www.wired.com/story/labor-organizing-unions-worker-algorithms/>; Claudio Agosti et al., "Exercising workers' rights in algorithmic management systems: Lessons learned from the Glovo-Foodinho digital labour platform case," *European Trade Union Institute*, Report No. 2023.11 (2023): 17, <https://www.etui.org/publications/exercising-workers-rights-algorithmic-management-systems>.

37 "62% of Indian SMBs Use a Website, Online Store, or e-Comm Platform as Their Main Sales Channel: Report," *Economic Times*, May 29, 2023, <https://economictimes.indiatimes.com/small-biz/sme-sector/62-of-indian-smbs-use-a-website-online-store-or-e-comm-platform-as-their-main-sales-channel-report/articleshow/100589250.cms>.

38 Krishna Yadav, "Supreme Court Transfers CCI's Amazon-Flipkart Antitrust Probe Case to Karnataka High Court," *Mint*, January 6, 2025, <https://www.livemint.com/companies/news/amazon-flipkart-probe-cci-competition-commission-of-india-karnataka-high-court-supreme-court-cci-probe-antitrust-11736140866470.html>.

39 Anjana Krishnan, "Digital News Report, 2024 | India," *Reuters Institute for the Study of Journalism*, June 17, 2024, <https://reutersinstitute.politics.ox.ac.uk/digital-news-report/2024/india>.

40 "Meta's Sandhya Devanathan Sees India as Key Market for Growth," *Economic Times*, November 25, 2024, <https://economictimes.indiatimes.com/news/company/corporate-trends/metas-sandhya-devanathan-sees-india-as-key-market-for-growth/articleshow/115652894.cms>; Shouvik Das, "'India a Vital Cloud Market for Google besides the US,'" *Mint*, October 19, 2023, <https://www.livemint.com/companies/people/india-a-vital-cloud-market-for-google-besides-the-us-11697735385494.html>; Press Trust of India, "India Key Market, Committed to Bring Digital Revolution: Google India MD," *Business Standard*, October 3, 2024, https://www.business-standard.com/technology/tech-news/india-key-market-committed-to-bring-digital-revolution-google-india-md-124100301038_1.html.

from everyday users as well as content creators. Here, I wish to draw special attention to the latter group.

Conventionally, the data collected from this group has included performance metrics to inform the underlying recommender algorithms, such as those responsible for better ad targeting and content distribution. The recent spurt in commercialization of generative AI software has uncovered another opportunity for data monetization.⁴¹ By scraping the vast library of content across geographies, cultures, languages, and topics stored on their servers, platforms are keen to produce well-trained generative AI tools, such as Meta's image and video-generation products or Google's Veo.⁴²

Although copyright law is seen as the key legal tool to address such allegations, I dwell on the privacy-centric undercurrents that have long been present in the discourse surrounding intellectual property rights.⁴³ It is true that original works of authorship may not qualify as personal data and, therefore, not qualify for the protections afforded under the Right to Privacy. However, I centre my discussion here on the concept of "privacy in the public sphere"—the position that merely existing in the open does not automatically absolve one's right of privacy from being protected.⁴⁴

Notably, even the Puttaswamy judgment's reference to "zones of privacy" echoes a similarly graded understanding of the right of privacy.⁴⁵ Many existing privacy typologies also posit analogous—if not similar—conceptions, such as the privacy of data and image or associational privacy.⁴⁶ In the context of the platform economy, this can be read to include a variety of user-generated content meant for closed groups and communities as displays of private communication, despite being created for public consumption.

41 Karthika Rajmohan and Shravani Nag Lanka, "The Opt out Conundrum: Analysis of Web Scraping to Train AI Models," *Internet Freedom Foundation*, December 19, 2024, <https://internetfreedom.in/analysis-of-web-scraping/>.

42 Sakshi K. Sadashiv, "Instagram Creates AI-Content from Users' Images Triggering Concerns About Meta AI's Privacy and Ownership Over Them," *Medianama*, January 9, 2025, <https://www.medianama.com/2025/01/223-instagram-creates-ai-content-from-users-images-triggering-concerns-about-meta-ais-privacy-and-ownership-over-them/>; Karan Mahadik, "Did Google Use YouTube Videos to Train Its New AI Video Model, Veo?" *Indian Express*, September 25, 2024, <https://indianexpress.com/article/technology/artificial-intelligence/google-youtube-videos-training-ai-video-model-9585999/>; Annie Gilbertson and Alex Reisner, "Apple, Nvidia, Anthropic Used Thousands of Swiped YouTube Videos to Train AI," *WIRED*, July 16, 2024, <https://www.wired.com/story/youtube-training-data-apple-nvidia-anthropic/>.

43 Lidiya Mishchenko, "The Internet of Things: Where Privacy and Copyright Collide," *Santa Clara Computer and High Technology Law Journal* 33, no. 1 (2016): 106, <https://papers.ssrn.com/abstract=4092019>.

44 Beate Roessler, "Privacy and/in the Public Sphere," *Yearbook for Eastern and Western Philosophy* 1 (2016): 245, <https://doi.org/10.1515/yewph-2016-0021>.

45 Supreme Court of India, "Puttaswamy v. Union Of India," 327.

46 Bert-Jaap Koops et al., "A Typology of Privacy," *University of Pennsylvania Journal of International Law* 38, no. 2 (2016): 502, 568, <https://ssrn.com/abstract=2754043>.

3. Digital Consumers Viewing Online Content and Participating in Ecommerce Activities (Group 3 or G_{dc})

Any discussion of informational privacy would remain incomplete without considering the large proportion of digital consumers on these platforms. On ecommerce platforms, this group comprises buyers of goods and services whereas on social networking websites, it largely consists of non-creator accounts who use these platforms to ‘consume’ content and exchange it with their immediate networks. These *netizens* (which together form the G_{dc}) are also usually referred to as the end users of the platform economy.

Due to their sheer size and purchasing power, it is primarily this group whose personal data fuels the advertising industry and, therefore, the business model central to the platform economy. Social media platforms leverage data about their end users’ tastes and preferences to create more personalized feeds and improve ad targeting. Similarly, as many recent global examples (such as the Cambridge Analytica leak) indicate, this level of personal data profiling can also yield significant political returns for state actors.⁴⁷

This tendency towards data maximization is further accelerated by the Indian state’s interest in deploying Digital Public Infrastructures (DPIs) for a variety of governance-related use cases.⁴⁸ Although the Aadhaar project is considered to be the first major demonstration of an Indian DPI, many others have emerged, including in sensitive sectors such as healthcare, banking, and education.⁴⁹ Despite their presumed importance in building India’s digital economy, it cannot be denied that these initiatives also enable further data collection and processing, often of sensitive information.⁵⁰

While all three stakeholder groups are key data principals, their relative function in the digital economy and, consequently, the scope, expanse, and granularity of their data, varies starkly. However, before discussing how these variations affect policy action, I introduce three separate interpretations of informational privacy in the next section, identified through a reading of key policy interventions. Subsequently, in section V, I use this interpretative conceptual framework to shed light on the many ways in which the state conceives the privacy rights of these groups.

47 Nicholas Confessore, “Cambridge Analytica and Facebook: The Scandal and the Fallout So Far,” *The New York Times*, April 4, 2018, <https://www.nytimes.com/2018/04/04/us/politics/cambridge-analytica-scandal-fallout.html>.

48 Justin Sherman, “Issue Brief: Finding Security in Digital Public Infrastructure,” *Atlantic Council*, October 21, 2024, <https://www.atlanticcouncil.org/in-depth-research-reports/issue-brief/finding-security-in-digital-public-infrastructure/>.

49 National Digital Health Mission, “Health Data Management Policy,” *Ministry of Health and Family Welfare*, August 20, 2020, https://abdm.gov.in:8081/uploads/health_data_management_policy_77208f0d26.pdf?updated_at=2022-05-27T13:27:06.812Z; NPCI, “Unified Payments Interface | Product Overview,” *NPCI – National Payments Corporation of India* (n.d.), <https://www.npci.org.in/what-we-do/upi/product-overview>; Ministry of Education, “Ahaar | About Us,” *Ahaar* (n.d.), <https://aahaar.education.gov.in/about>.

50 Mariana Mazzucato, David Eaves, and Beatriz Vasconcellos, “Digital Public Infrastructure and Public Value: What Is ‘Public’ about DPI?,” *UCL Institute for Innovation and Public Purpose*, Working Paper Series (IIPP WP 2024-05): 26, <https://www.ucl.ac.uk/bartlett/publications/2024/mar/digital-public-infrastructure-and-public-value-what-public-about-dpi>.

IV. The Many Interpretations of Informational Privacy

As ‘datafication’ of social relations gains further pace and prominence under today’s digital and platform economies, the state’s duty to protect personal data has become counter-balanced by a range of competing demands. But since different departments are bound to distinct mandates, it is almost inevitable that the right of privacy is interpreted in varying ways. I present below three of the Indian state’s interpretations of the right of informational privacy, evaluated from comparing key policy interventions impacting our stakeholder groups.

1. Privacy as ‘A Cost of Doing Business’

The Indian state’s most evident interpretation of the right of informational privacy is possibly as an economic cost in the country’s burgeoning digital economy. Partly enabled by the COVID-19 pandemic, the policy landscape governing the citizens’ Right to Privacy has become increasingly reflective of this interpretation. For instance, the DPDPA 2023 (much like the PDP Bill, 2018) treats personal data as a market good, and regulates it through a consent-driven model that replicates the market logic of a rational individual imposing informed control.⁵¹

Under this approach, data fiduciaries (companies, businesses, and organizations collecting data) are mandated to follow a set of prescribed rules around aspects like informed and withdrawable consent.⁵² They also provide data principals with access to certain services, such as correction or erasure of their personal data, among others.⁵³ These rules are to be enforced by the Data Protection Board, a regulatory body envisioned under the DPDPA and empowered to conduct inquiries, demand hearings, and levy penalties.⁵⁴

In this interpretation, the state appears to be using, primarily, the threat of monetary penalties to ensure that the data fiduciaries follow the necessary practices laid down in law. By differentiating between ‘data fiduciaries’ and ‘significant data fiduciaries,’ DPDPA 2023 also adopts a form of progressive costing. Here, the latter group is classified differently using certain criteria and is mandated to follow an additional set of obligations.⁵⁵

Moreover, it should be noted here that the DPDPA 2023 provides the state with plenty of discretion to decide whether certain fiduciaries should be made exempt from the law. Section 3(c)(ii) ensures that the provisions of the Act are not applicable to “personal data

51 Amber Sinha, “India’s Data Protection Framework Will Need to Treat Privacy as a Social and Not Just an Individual Good,” *EPW Engage*, May 9, 2018, <https://www.epw.in/engage/article/for-indias-data-protection-regime-to-be-efficient-policymakers-should-treat-privacy-as-a-social-good>. See also Nimit Dixit, “India’s Privacy Puzzle,” *Asian Legal Business*, February 28, 2025, <https://www.legalbusinessonline.com/features/indias-privacy-puzzle>.

52 Ministry of Electronics and Information Technology, “Digital Personal Data Protection Act, 2023,” 4.

53 Ministry of Electronics and Information Technology, “Digital Personal Data Protection Act, 2023,” 10.

54 Ministry of Electronics and Information Technology, “Digital Personal Data Protection Act, 2023,” 12.

55 Ministry of Electronics and Information Technology, “Digital Personal Data Protection Act, 2023,” 8–9.

that is made or caused to be made publicly available” by, among others, the Data Principal. True to its centralizing streak, this clause indicates that the state can exert substantial control to decide who pays this ‘privacy’ cost, and who does not.⁵⁶

2. *Privacy as ‘A Barrier to the State’s Interests’*

Another key feature of DPDPA 2023 is the wide scope of exemptions it provides to the Indian government in pursuing a variety of its goals. Section 7 lists a set of “certain legitimate uses” for which a data fiduciary may process a citizen’s personal data without their consent.⁵⁷ Among others, these uses include those listed in subsections 7(b) and 7(c), which I am reproducing below:

7. A Data Fiduciary may process personal data of a Data Principal for any of following uses, namely:

[...]

(b) for the State and any of its instrumentalities to provide or issue to the Data Principal such subsidy, benefit, service, certificate, licence or permit as may be prescribed, where—

(i) she has previously consented to the processing of her personal data by the State or any of its instrumentalities for any subsidy, benefit, service, certificate, licence or permit; or

(ii) such personal data is available in digital form in, or in non-digital form and digitised subsequently from, any database, register, book or other document which is maintained by the State or any of its instrumentalities and is notified by the Central Government,

subject to standards followed for processing, being in accordance with the policy issued by the Central Government or any law for the time being in force for governance of personal data.

[...]

(c) for the performance by the State or any of its instrumentalities of any function under any law for the time being in force in India or in the interest of sovereignty and integrity of India or security of the State

As this excerpt highlights, the country’s primary data protection legislation allows for the right of privacy to be subverted over the state’s own interests. This trend is further

⁵⁶ Ministry of Electronics and Information Technology, “Digital Personal Data Protection Act, 2023,” 4.

⁵⁷ Ministry of Electronics and Information Technology, “Digital Personal Data Protection Act, 2023,” 6–7.

exacerbated by Section 17, which provides a list of exemptions that restrict the scope of the law.⁵⁸ According to Section 17(1)(c), when “personal data is processed in the interest of prevention, detection, investigation or prosecution of any offence or contravention of any law,” the key provisions of the act will not be applicable.⁵⁹

Under this interpretation, the citizens’ right of privacy is seen as a barrier to the state’s interests. More worryingly, the law allows the government to overrule this barrier to meet its objectives of welfare delivery and national security.

3. Privacy as ‘A Competitive Factor in Digital Markets’

If data is the fuel of the modern digital economy, it is no surprise that the most valued technological platforms of our time are eager to extract, monopolize, and process as much of it as possible.⁶⁰ In addition to better personalization and ad targeting, multi-sided platforms like Google, Amazon, and Instagram also gain in the long-term from exerting protected control over this data.⁶¹ Often collected through basic consent notices filled with legal jargon, our information, now owned by the middling platform, can unlock a range of economic benefits for the firm.

For instance, in late 2021, Reuters reported that Amazon India had been running a “systematic campaign of creating knockoffs and manipulating search results to boost its own product lines in India.”⁶² The Big Tech giant’s private-brands team allegedly accessed proprietary data of sellers from its platform, and subsequently used insights from this data to launch competing products. The issue was also briefly picked up by the Competition Commission of India (CCI) in 2021, but no further investigation was ordered into the charge.⁶³

CCI’s recent order against WhatsApp’s privacy policy is perhaps a better indication of the regulator’s recognition of the anti-competitive effects of data consolidation. By locating the market value held by the users’ personally identifiable information, the Commission imposed a temporary ban on WhatsApp from sharing user data with Meta’s other plat-

58 Anushka Jain and Prateek Waghre, “IFF’s First Read of the Draft Digital Personal Data Protection Bill, 2023,” *Internet Freedom Foundation*, August 3, 2023, <https://internetfreedom.in/iffs-first-read-of-the-draft-digital-personal-data-protection-bill-2023/>.

59 Ministry of Electronics and Information Technology, “Digital Personal Data Protection Act, 2023,” 11.

60 Petter Törnberg, “How Platforms Govern: Social Regulation in Digital Capitalism,” *Big Data & Society* 10, no. 1 (2023): 6, <https://journals.sagepub.com/doi/pdf/10.1177/20539517231153808>.

61 Lina M. Khan, “Amazon’s Antitrust Paradox,” *The Yale Law Journal* 126, no. 3 (2017): 785, https://www.yalelawjournal.org/pdf/e.710.Khan.805_zuvfyyeh.pdf.

62 Aditya Kalra and Steve Stecklow, “Amazon Copied Products and Rigged Search Results to Promote Its Own Brands, Documents Show,” *Reuters*, October 13, 2021, <https://www.reuters.com/investigates/special-report/amazon-india-rigging/>.

63 Competition Commission of India, “Re: Allegations pertaining to private label brands related to Amazon sold on Amazon India marketplace,” *Suo Motu Case No. 04 of 2021*, March 11, 2022, 4, <https://www.cci.gov.in/images/antitrustorder/en/suo-motu-case-no-0420211652510352.pdf>.

forms (Facebook and Instagram).⁶⁴ Under this interpretation, then, users' right to informational privacy is closely tied to competitive outcomes in a digital market.

The recent wave of Generative Artificial Intelligence (GenAI) applications, such as ChatGPT and DeepSeek, has further foregrounded this interpretation. Built on Large-Language Models (LLMs), such foundational AI systems require access to large swathes of user data. This reinvigorated demand for highly contextualized datasets has meant that Big Tech enterprises, because of their historical access to users' personal information, have been handed another competitive advantage. Meta, for example, announced in Europe last year that it would be using all public posts on Facebook and Instagram to train Llama, its own foundational GenAI model.⁶⁵

Unlike the previous two, this interpretation not only relies on the commodified nature of our personal data, but also on network effects afforded to first-moving digital platforms. Consequently, informational privacy, by providing users with more agency over their data, has also been understood as a key competitive factor in the platform economy.

V. Applicability in a Digital India

As constituents of the digital economy, our stakeholder groups are exposed to these interpretations through real policy measures. I elaborate now on some of these measures to reiterate how they adopt these interpretations, and to understand how they affect the lives of our stakeholder groups. Figure 2 captures an overview of this analysis.

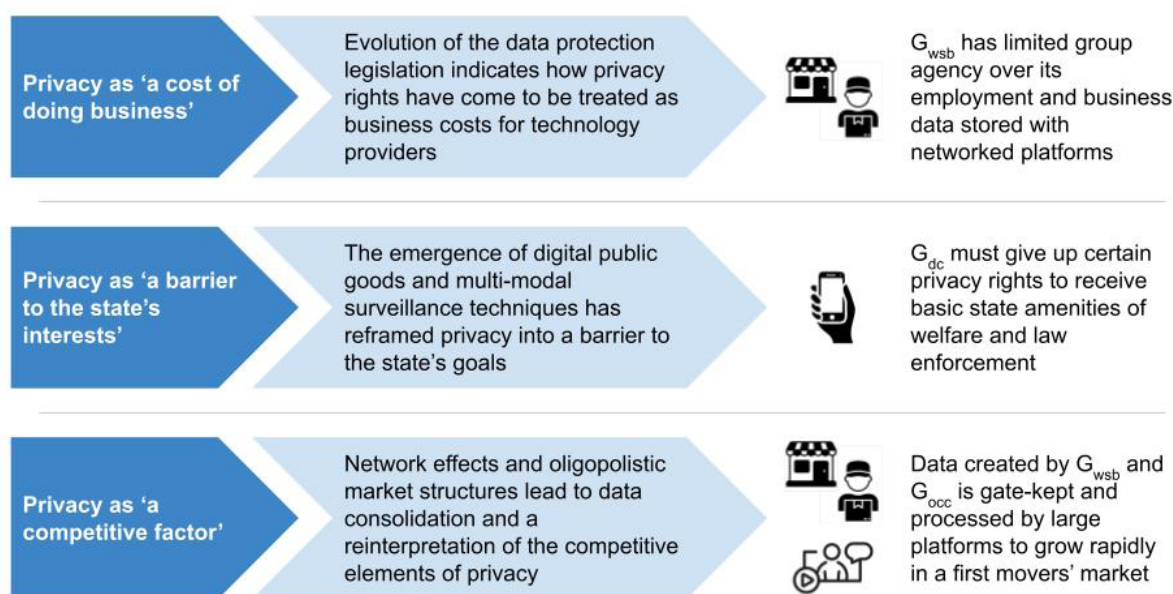


Figure 2: Interpretations of privacy and their applicability across stakeholder groups.

64 Competition Commission of India, "Re: Updated Terms of Service and Privacy Policy for WhatsApp users," *SM Case No. 01 of 2021 and Case Nos. 05 of 2021 & 30 of 2021*, November 18, 2024, 148, <https://www.cci.gov.in/images/antitrustorder/en/order1732001619.pdf>.

65 Thomas Claburn, "Meta to Feed Europe's Public Posts into AI Brains Again," *The Register*, April 15, 2025, https://www.theregister.com/2025/04/15/meta_resume_ai_training_eu_user_posts/.

1. Privacy as 'A Cost of Doing Business'

Under this policy interpretation, the “cost” of privacy for all three stakeholder groups (G_{wsb} , G_{occ} and G_{dc}) is weighed against the economic value that data processing can unlock for the data fiduciary. Below, I present what this interpretation means for a stakeholder group that currently lacks the power to impose this cost on digital platforms.

Platform workers (part of G_{wsb}) are deeply reliant on two-sided digital platforms, particularly on their ability to ‘match’ the former with the relevant consumer group(s).⁶⁶ In exchange, the platform demands and processes information about the workers’ skill levels and educational qualifications, as well as relevant sensitive geolocation, medical, and earnings-related data. One analysis found that a leading food delivery platform goes miles further to also check for other apps on the workers’ phones, including personal loan apps.⁶⁷ Recent research focusing on other countries also conveys similar patterns of evasive data collection and processing.⁶⁸

Because this information is collected through worker-side mobile applications, revoking access to any of these demands can lead to the workers’ delisting from the platform’s interface, and, consequently, from the market it mediates. Unlike conventional labour relations, the law classifies a platform worker as an independent contractor, significantly affecting her bargaining position in this data transaction. Combined with limited worker organizing around issues of data protection, G_{wsb} ’s privacy is regulated purely through private contracts that may fall under the purview of DPDPA 2023.⁶⁹

In essence, then, the workers’ Right to Privacy becomes tantamount to them losing their livelihoods. By not imposing the full cost of privacy on data fiduciaries, policy measures (the DPDPA 2023 in this case) instead place the burden on individual and unorganized workers to choose between the bad and the worse.

2. Privacy as 'A Barrier to the State's Interests'

Starting from the Aadhaar project, the large-scale deployment of DPIs is possibly the most popular manifestation of this interpretation, under which the state’s responsibility of providing for its citizens is contingent on a data transaction. G_{dc} is expected to hand over its personal information to the state to allow the latter to fulfil its goals of welfare

66 Ada Shaharbanu and Namita Kaushik, “Gig Workers’ Personal Data Protection,” *India Business Law Journal*, December 30, 2024, <https://law.asia/gig-economy-data-protection-india/>.

67 Pea Bee, “Everyone Knows All the Apps on Your Phone,” *Pea Bee*, March 27, 2025, <https://peabee.substack.com/p/everyone-knows-what-apps-you-use>.

68 Farah Diba Almayanda Alauddin et al., “The Influence of Digital Platforms on Gig Workers: A Systematic Literature Review,” *Heliyon* 11, no. 1 (2025): 6–7, <https://doi.org/10.1016/j.heliyon.2024.e41491>.

69 ILO Bureau for Employers’ Activities, “Expansion of the Gig Economy in India and Opportunities for Employers and Business Members Organizations,” *International Labour Organization*, January 15, 2024, 33, https://www.ilo.org/sites/default/files/2024-04/ILO%20Platform%20workers%20and%20EBMOs%20India%20Report_3%20April%20%28LIGHT%20PDF%29.pdf.

delivery, safety, and security. Recent evidence, however, indicates that the DPI logic may have only been the first attempt at materializing such an interpretation.

Consider, for our purposes, the Income Tax (No. 2) Bill 2025 (IT Bill). The legislation defines ‘computer systems’ as consisting of a wide bucket of technologies, like ‘virtual digital spaces’, which it declares to include email servers, social media accounts, and digital application platforms, among others.⁷⁰ Section 247(1)(b)(iii) of the Bill allows “authorised officers” to override “the access code to any said computer system [...] where [...] the access code to such computer system [...] is not available.”⁷¹ By making clear use of the wide-ranging exemptions provided to the Indian state under DPDPA 2023, the IT Bill presents a draconian version of this interpretation.⁷²

Through this example, we see yet another interpretative distortion of the Fundamental Right to Privacy. Instead of satisfying its constitutional obligation of upholding fundamental rights while meeting its governance mandate, the IT Bill sacrifices the former for the latter, leaving little option for groups like G_{dc} .

3. Privacy as ‘A Competitive Factor’

Last, but not least, is the competitive advantage provided by personal datasets. As discussed in the previous section, Amazon’s treatment of G_{wsb} and Meta’s treatment of G_{occ} indicates the immense value that market consolidation can unlock for Big Tech entities trying to monetize our personal information. The incentives and the structures of today’s platform markets ensure that there is a clear tension between a platform’s desire to grow its user-base, and the right of privacy afforded to the relevant market constituents.⁷³

How this tension is addressed by the Indian state depends crucially on the policy decisions it makes under this interpretation. Take, for example, the draft Digital Competition Bill (DCB) 2024, which considers the anti-competitive implications of data usage in digital markets.⁷⁴ Put simply, Section 12 of the draft bill places pro-competition restrictions on how digital enterprises (including platforms) can use their users’ personal data. Even in 2022, the Ministry of Corporate Affairs (MCA, the nodal body for DCB) saw data use as “a

70 Aryan Sharma and Tania Bagwe, “India’s New Income Tax Bill: A Digital Privacy Nightmare?,” *Centre for Comparative Constitutional Law and Administrative Law*, June 3, 2025, <https://www.calj.in/post/india-s-new-income-tax-bill-a-digital-privacy-nightmare>.

71 Ministry of Finance, “The Income Tax (No.2) Bill, 2025,” *Bill No. 104 of 2025 (2025): 276*, [https://prsindia.org/files/bills_acts/bills_parliament/2025/Bill_Text-Income-tax\(No.2\)_Bill_2025.pdf](https://prsindia.org/files/bills_acts/bills_parliament/2025/Bill_Text-Income-tax(No.2)_Bill_2025.pdf).

72 Apar Gupta and Medha Garg, “IFF Writes to the Select Committee to Review the Digital Search and Seizure Powers under the Income Tax Bill, 2025,” *Internet Freedom Foundation*, March 10, 2025, <https://internetfreedom.in/iff-writes-to-the-select-committee-to-review-the-digital-search-and-seizure-powers-under-the-income-tax-bill-2025/>.

73 Committee on Digital Competition Law, “Report of the Committee on Digital Competition Law,” *Ministry of Corporate Affairs*, February 27, 2024, 122, <https://www.mca.gov.in/bin/dms/getdocument?mds=gzGtvSkE3zIVhAuBe2pbow%253D%253D&type=open>.

74 Committee on Digital Competition Law, “Report of the Committee,” 162–163.

zero-price or non-price factor that can hamper privacy.”⁷⁵ As seen earlier in CCI’s actions against Meta, even the antitrust regulator has used this interpretation to deliver on its mandate of curbing anti-competitive conduct through data consolidation.

However, the fact that the Bill has not yet been introduced in the Parliament shows that the government may not be too keen on formalizing this interpretation just yet. Notably, this decision has come after stakeholder consultations conducted by the MCA, with business organizations, civil society groups, and MeitY (the nodal body behind DPDPA 2023).⁷⁶ A major point of contention for the critics of DCB was that by considering data (and, therefore, privacy) as a competitive factor, MCA was committing *ex-ante* regulation, something they see as placing an additional compliance burden on businesses.⁷⁷

Interestingly, by re-framing privacy as a cost factor more than a competitive factor, DCB’s opponents end up reproducing the first interpretation we discussed in this paper!

VI. Discussion and Conclusion

Like other fundamental, but non-absolute, rights, informational privacy is inherently susceptible to competing interests, more so in the digitalized political economies of our day. And why would it not be?

Personal data, in all its tastes and flavours, represents a critical resource for a market-based private industry as well as for a modern state invested in welfare and surveillance. Although the Puttaswamy judgment provided a much-needed rights-based framework for privacy, its implementation through subsequent policy instruments has been anything but uniform. Not only has the original spirit of the ruling been diluted over time through legislations like DPDPA 2023, varied interpretations of privacy have also emerged between different public authorities under the same government.⁷⁸

Bound to distinct institutional mandates and subservient to unique power asymmetries among their constituents, these authorities have understood privacy in many ways. Interpreting privacy as a cost is, for example, integral to the project of creating an under-regulated digital economy based on principles of data extraction and commodification. Similarly, the tax authority’s mandate provides it with reason to interpret privacy as a bar-

⁷⁵ Standing Committee on Finance (2022–23), “Anti-Competitive Practices by Big Tech Companies,” *Ministry of Corporate Affairs*, December 19, 2022, 7, https://eparlib.nic.in/bitstream/123456789/1464505/1/17_Finance_53.pdf.

⁷⁶ Ministry of Corporate Affairs, “Unstarred Question No. 91 | Current Status of the Draft Digital Competition Bill,” *Lok Sabha* 18, session 5, July 21, 2025, 2, https://sansad.in/getFile/loksabhaquestions/annex/185/AU91_YsV2C2.pdf?source=pqals.

⁷⁷ Kanya Pandey, “IAMAI continues to oppose ex-ante regulation in its comments on the draft Digital Competition Bill,” *Medianama*, May 16, 2024, <https://www.medianama.com/2024/05/223-iamai-oppose-ex-ante-regulation-comments-draft-digital-competition-bill/>.

⁷⁸ Tanmay Singh and Gayatri Malhotra, “The Digital Personal Data Protection Bill, 2022 Does Not Satisfy the Supreme Court’s Puttaswamy Principles,” *Internet Freedom Foundation*, December 16, 2022, <https://internetfreedom.in/the-digital-personal-data-protection-bill-2022-does-not-satisfy-the-supreme-courts-puttaswamy-principles/>.

rier to the state's interests, which is further validated by the exemption-heavy nature of DPDPA 2023. On the other hand, the ongoing tussle between MCA and the DCB's critics is revealing because it emerges directly from a conflict between opposing interpretations.

Furthermore, the stakeholder-centric analysis presented above also poses a challenge to individualist framings of data ownership and consent. If the Right to Privacy is non-absolute and interpreted according to competing interests (as this paper shows), then it is inevitable that securing the right would require collectivization and organization. In fact, G_{wsb} 's treatment under the first interpretation clearly highlights the pitfalls of relying on individual consent artefacts, which shift the burden of choice on to users with limited real autonomy. Instead, a communitarian model of data ownership that contrasts the privacy rights of platform workers (as a group) against the potential benefits of data processing could achieve fairer policy tradeoffs.⁷⁹

It is likely that contextualized interpretations of the right of privacy will keep emerging, often contradicting each other. Although non-exhaustive, the policy actions discussed in this paper indicate that the state's interpretation of the right of informational privacy is neither a static nor a homogeneous one. Recognizing these variations is only the first step towards creating a more effective and consistent policy landscape for India's proliferating digital economy. By articulating and debating these differences, civil society organizations, researchers, and policymakers can also expand popular understandings of privacy and provide a strong challenge to the data-hungry trajectory of the modern internet.

VII. Disclosure Statement

The author would like to thank Simran Pavecha, for giving her invaluable time towards intellectual sparring that finally led to this piece. To the best of their knowledge, the author has no conflicts of interest pertinent to the contents of this article. The research and writing activities relevant for this paper were conducted during the author's tenure with an India-based civil society organization working on issues of technology, society, and policy. However, these activities were undertaken independent of any particular organizational grant.

⁷⁹ Siddharth Peter de Souza and Kritika Bhardwaj, "India's Conception of Community Data and Addressing Concerns for Access to Justice," *Digital Society*, March 23, 2024, 16, <https://doi.org/10.1007/s44206-024-00102-5>.

Bibliography

- Agosti, Claudio, Joanna Bronowicka, Alessandro Polidoro, and Gaetano Priori. "Exercising Workers' Rights in Algorithmic Management Systems: Lessons learned from the Glovo-Foodinho digital labour platform case." *European Trade Union Institute*. Report No. 2023.11 (2023): 5–70. <https://www.etui.org/publications/exercising-workers-rights-algorithmic-management-systems>.
- Alauddin, Farah Diba Almayanda, Aini Aman, Mohd Fahmi Ghazali, and Sity Daud. "The Influence of Digital Platforms on Gig Workers: A Systematic Literature Review." *Heliyon* 11, no. 1 (2025): 1–14. <https://doi.org/10.1016/j.heliyon.2024.e41491>.
- Anand, Malika, and Gayatri Murthy. "Putting Gig Data to Work: Innovations in Expanding Credit Access." *CGAP*, June 15, 2023. <https://www.cgap.org/sites/default/files/publications/Putting%20Gig%20Data%20To%20Work.pdf>.
- Balakrishnan, Paran. "AIIMS unpreceded data breach sparks fears hackers could misuse information." *The Telegraph*, December 2, 2022. www.telegraphindia.com/india/aiims-unprecedented-data-breach-sparks-fears-hackers-could-misuse-information/cid/1901550.
- Bartels, Nedo, and Anna Schmitt. "Developing Network Effects for Digital Platforms in Two-Sided Markets – The NfX Construction Guide." *Digital Business* 2, no. 2 (2022). <https://doi.org/10.1016/j.digbus.2022.100044>.
- Bhandari, Vrinda, Amba Kak, Smriti Parsheera, and Faiza Rahman. "An Analysis of Puttaswamy: The Supreme Court's Privacy Verdict." *IndraStra Global* 11 (2017): 1–5. https://web.archive.org/web/20210308191121/https://www.ssoar.info/ssoar/bitstream/handle/document/54766/ssoar-indrastraglobal-2017-11-bhandari_et_al-An_Analysis_of_Puttaswamy_The.pdf.
- Bhatia, Gautam. "'Civilization has been brutal': Navtej Johar, Section 377, and the Supreme Court's Moment of Atonement." *Constitutional Law and Philosophy*, September 6, 2018. <https://indconlawphil.wordpress.com/2018/09/06/civilization-has-been-brutal-navtej-johar-section-377-and-the-supreme-courts-moment-of-atonement/>.
- Bing, Christopher, and Munsif Vengattil. "Exclusive: Hacker uses Telegram chatbots to leak data of top Indian insurer Star Health." *Reuters*, September 20, 2024. <https://www.reuters.com/technology/cybersecurity/hacker-uses-telegram-chatbots-leak-data-top-indian-insurer-star-health-2024-09-20/>.
- Claburn, Thomas. "Meta to Feed Europe's Public Posts into AI Brains Again." *The Register*, April 15, 2025. https://www.theregister.com/2025/04/15/meta_resume_ai_training_eu_user_posts/.
- Committee on Digital Competition Law. "Report of the Committee on Digital Competition Law." *Ministry of Corporate Affairs*, February 27, 2024. <https://www.mca.gov.in/bin/dms/getdocument?mds=gzGtvSkE3zIVhAuBe2pbow%253D%253D&type=open>.
- Committee of Experts under the Chairmanship of Justice B.N. Srikrishna. "A Free and Fair Digital Economy." *Ministry of Electronics & Information Technology*, July 27, 2018. https://web.archive.org/web/20180727170145/https://www.meity.gov.in/writeread-data/files/Data_Protection_Committee_Report.pdf.
- Competition Commission of India. "Market Study on the Telecom Sector in India: Key Findings and Observations." *Competition Commission of India*, January 22, 2021.

- <https://www.cci.gov.in/images/whatsnew/en/market-study-on-the-telecom-sector-in-india1652177923.pdf>.
- — —. “Re: Allegations pertaining to private label brands related to Amazon sold on Amazon India marketplace.” *Suo Motu Case No. 04 of 2021*. March 11, 2022. <https://www.cci.gov.in/images/antitrustorder/en/suo-motu-case-no-0420211652510352.pdf>.
- — —. “Re: Updated Terms of Service and Privacy Policy for WhatsApp users.” *SM Case No. 01 of 2021 and Case Nos. 05 of 2021 & 30 of 2021*. November 18, 2024. <https://www.cci.gov.in/images/antitrustorder/en/order1732001619.pdf>.
- Confessore, Nicholas. “Cambridge Analytica and Facebook: The Scandal and the Fallout So Far.” *The New York Times*, April 4, 2018. <https://www.nytimes.com/2018/04/04/us/politics/cambridge-analytica-scandal-fallout.html>.
- Das, Shouvik. “India a Vital Cloud Market for Google besides the US.” *Mint*, October 19, 2023. <https://www.livemint.com/companies/people/india-a-vital-cloud-market-for-google-besides-the-us-11697735385494.html>.
- De Souza, Siddharth Peter, and Kritika Bhardwaj. “India’s Conception of Community Data and Addressing Concerns for Access to Justice.” *Digital Society* 3, no. 16 (2024): 1–19. <https://doi.org/10.1007/s44206-024-00102-5>.
- Dixit, Nimit. “India’s Privacy Puzzle.” *Asian Legal Business*, February 28, 2025. <https://www.legalbusinessonline.com/features/indias-privacy-puzzle>.
- ET Online. “62% of Indian SMBs Use a Website, Online Store, or e-Comm Platform as Their Main Sales Channel: Report.” *The Economic Times*, May 29, 2023. <https://economictimes.indiatimes.com/small-biz/sme-sector/62-of-indian-smb-s-use-a-website-online-store-or-e-comm-platform-as-their-main-sales-channel-report/articleshow/100589250.cms>.
- — —. “Meta’s Sandhya Devanathan Sees India as Key Market for Growth.” *The Economic Times*, November 25, 2024. <https://economictimes.indiatimes.com/news/company/corporate-trends/met-sandhya-devanathan-sees-india-as-key-market-for-growth/articleshow/115652894.cms>.
- Gilbertson, Annie, and Alex Reisner. “Apple, Nvidia, Anthropic Used Thousands of Swiped YouTube Videos to Train AI.” *WIRED*, July 16, 2024. <https://www.wired.com/story/youtube-training-data-apple-nvidia-anthropic/>.
- Gregory, Karen. “‘Worker Data Science’ Can Teach Us How to Fix the Gig Economy.” *WIRED*, December 7, 2021. <https://www.wired.com/story/labor-organizing-unions-worker-algorithms/>.
- Gupta, Apar. “The long saga of the data bill holds crucial lessons.” *Hindustan Times*, August 4, 2023. <https://www.hindustantimes.com/opinion/the-long-saga-of-the-data-bill-holds-crucial-lessons-101691156631975.html>.
- Gupta, Apar, and Medha Garg. “IFF Writes to the Select Committee to Review the Digital Search and Seizure Powers under the Income Tax Bill, 2025.” *Internet Freedom Foundation*, March 10, 2025. <https://internetfreedom.in/iff-writes-to-the-select-committee-to-review-the-digital-search-and-seizure-powers-under-the-income-tax-bill-2025/>.
- Gupta, Aryaman. “Nearly 98% of Gig Workers Earn under Rs 5 Lakh per Annum, Shows TeamLease Data.” *Moneycontrol*, February 12, 2025. <https://www.moneycontrol.com/news/business/startup/nearly-98-of-gig-workers-earn-under-rs-5-lakh-per-annum-shows-teamlease-data-12938134.html>.

- Gurumurthy, Anita, Nandini Chami, and Deepti Bharthur. "Platform Labour in Search of Value." *International Labour Organization* (2021): 3–78. https://www.ilo.org/sites/default/files/wcmsp5/groups/public/@ed_emp/@emp_ent/@coop/documents/publication/wcms_809250.pdf.
- Ikeda, Scott. "After Pushback From Big Tech Companies, India Scraps Personal Data Protection Bill and Starts Over." *CPO Magazine*, August 8, 2022. <https://www.cpo-magazine.com/data-protection/after-pushback-from-big-tech-companies-india-scraps-personal-data-protection-bill-and-starts-over/>.
- ILO Bureau for Employers' Activities. "Expansion of the Gig Economy in India and Opportunities for Employers and Business Members Organizations." *International Labour Organization* (2024): vii–38. https://www.ilo.org/sites/default/files/2024-04/ILO%20Platform%20workers%20and%20EBMOs%20India%20Report_3%20April%20%28LIGHT%20PDF%29.pdf.
- India Brand Equity Foundation. "Flipkart Internet Pvt Ltd | E-Commerce." *India Brand Equity Foundation* (n.d.). <https://www.ibef.org/industry/ecommerce/showcase/flipkart-internet-pvt-ltd>.
- Invest India. "Investment Opportunities in Retail & E-Commerce – Invest India." *Invest India* (n.d.). <https://www.investindia.gov.in/sector/retail-e-commerce>.
- Jain, Anushka, and Prateek Waghre. "IFF's First Read of the Draft Digital Personal Data Protection Bill, 2023." *Internet Freedom Foundation*, August 3, 2023. <https://internet-freedom.in/iffs-first-read-of-the-draft-digital-personal-data-protection-bill-2023/>.
- Joint Committee on the Personal Data Protection Bill, 2019. "Report of the Joint Committee on the Personal Data Protection Bill, 2019." *Government of India*, December 16, 2021. https://web.archive.org/web/20230202143515/https://eparlib.nic.in/bitstream/123456789/835465/1/17_Joint_Committee_on_the_Personal_Data_Protection_Bill_2019_1.pdf.
- Kalra, Aditya, and Steve Stecklow. "Amazon Copied Products and Rigged Search Results to Promote Its Own Brands, Documents Show." *Reuters*, October 13, 2021. <https://www.reuters.com/investigates/special-report/amazon-india-rigging/>.
- Kapoor, Ankit, and Karthik Rai. "Gig Economy: A Tale of Algorithmic Control and Privacy Invasion." *NLSIR Online*, March 21, 2023. <https://www.nlsir.com/post/gig-economy-a-tale-of-algorithmic-control-and-privacy-invasion>.
- Karmali, Naazneen. "India's 100 Richest." *Forbes*, October 9, 2024. <https://www.forbes.com/lists/india-billionaires/>.
- Kathuria, Rajat, Mansi Kedia, and Kaushambi Bagchi. "India's Platform Economy and Emerging Regulatory Challenges." *ICRIER*, Working Paper No. 47 (2021): i–41. <https://www.econstor.eu/handle/10419/267927>.
- Khan, Lina M. "Amazon's Antitrust Paradox." *The Yale Law Journal* 126, no. 3 (2017): 564–907. https://www.yalelawjournal.org/pdf/e.710.Khan.805_zuvfyeh.pdf.
- Koops, Bert-Jaap, Bryce Clayton Newell, Tjerk Timan, Ivan Škorvánek, Tom Chokrevski, and Maša Galič. "A Typology of Privacy." *University of Pennsylvania Journal of International Law* 38, no. 2 (2016): 483–575. <https://ssrn.com/abstract=2754043>.
- Krishnan, Anjana. "Digital News Report, 2024 | India." *Reuters Institute for the Study of Journalism*. June 17, 2024. <https://reutersinstitute.politics.ox.ac.uk/digital-news-report/2024/india>.

- Kumar, Chandan, Anousha Peters, and T. Aishwarya, "Gig Economy in India: Labour Rights Violations and Digital Exploitation." *Frontline*. March 18, 2025. <https://frontline.thehindu.com/the-nation/human-rights/gig-economy-india-workers-rights-labour-exploitation-surveillance-data-privacy-laws/article69341247.ece>.
- Lovink, Geert, and Nathaniel Tkacz. "MoneyLab: Sprouting New Digital-Economic Forms." In *MoneyLab Reader: An Intervention in Digital Economy*, edited by Geert Lovink, Nathaniel Tkacz, and Patricia de Vries, 14–18. Institute of Network Cultures, 2015. https://networkcultures.org/wp-content/uploads/2015/04/MoneyLab_reader.pdf.
- Mahadik, Karan. "Did Google Use YouTube Videos to Train Its New AI Video Model, Veo?" *The Indian Express*, September 25, 2024. <https://indianexpress.com/article/technology/artificial-intelligence/google-youtube-videos-training-ai-video-model-9585999/>.
- Manokha, Ivan. "Surveillance: The DNA of Platform Capital—The Case of Cambridge Analytica Put into Perspective." *Theory & Event* 21, no. 4 (2018): 891–913. <https://muse.jhu.edu/pub/1/article/707015>.
- Martens, Bertin. "An Economic Perspective on Data and Platform Market Power." *SSRN Scholarly Paper*, February 10, 2021. <https://doi.org/10.2139/ssrn.3783297>.
- Mathi, Sarvesh. "India's Digital Personal Data Protection Bill, 2023 Gives the Government Powers to Exempt Itself from the Bill, Block Content, and More." *Medianama*, August 3, 2023. <https://www.medianama.com/2023/08/223-dpdp-bill-2023-government-exemptions-3/>.
- Mazzucato, Mariana, David Eaves, and Beatriz Vasconcellos. "Digital Public Infrastructure and Public Value: What Is 'Public' about DPI?" *UCL Institute for Innovation and Public Purpose*, Working Paper Series (IIPP WP 2024-05): 4–29. <https://www.ucl.ac.uk/bartlett/publications/2024/mar/digital-public-infrastructure-and-public-value-what-public-about-dpi>.
- Ministry of Corporate Affairs. "Unstarred Question No. 91 | Current Status of the Draft Digital Competition Bill." *Lok Sabha* 18, session 5, July 21, 2025. https://sansad.in/getFile/loksabhaquestions/annex/185/AU91_YsV2C2.pdf?source=pqals.
- Ministry of Education. "Apar | About Us." *Apar* (n.d.). <https://apar.education.gov.in/about>.
- Ministry of Electronics and Information Technology. "The Digital Personal Data Protection Act, 2023." *The Gazette of India*, August 11, 2023. <https://www.meity.gov.in/static/uploads/2024/06/2bf1f0e9f04e6fb4f8fef35e82c42aa5.pdf>.
- Ministry of Finance. "Aadhaar (Targeted Delivery of Financial and Other Subsidies, Benefits and Services) Act, 2016." *The Gazette of India*, March 25, 2016. https://uidai.gov.in/images/targeted_delivery_of_financial_and_other_subsidies_benefits_and_services_13072016.pdf.
- . "The Income Tax (No. 2) Bill, 2025." *Bill No. 104 of 2025* (2025): (i)–604, [https://prsindia.org/files/bills_acts/bills_parliament/2025/Bill_Text-Income-tax\(No.2\)_Bill_2025.pdf](https://prsindia.org/files/bills_acts/bills_parliament/2025/Bill_Text-Income-tax(No.2)_Bill_2025.pdf)
- Mishchenko, Lidiya. "The Internet of Things: Where Privacy and Copyright Collide." *Santa Clara Computer and High Technology Law Journal* 33, no. 1 (2016): 90–115. <https://papers.ssrn.com/abstract=4092019>.

- National Digital Health Mission. "Health Data Management Policy." *Ministry of Health and Family Welfare*, August 20, 2020. https://abdm.gov.in:8081/uploads/health_data_management_policy_77208f0d26.pdf?updated_at=2022-05-27T13:27:06.812Z.
- NPCI. "Unified Payments Interface | Product Overview." *NPCI – National Payments Corporation of India* (n.d.). <https://www.npci.org.in/what-we-do/upi/product-overview>.
- Pandey, Kanya. "IAMAI continues to oppose ex-ante regulation in its comments on the draft Digital Competition Bill." *Medianama*, May 16, 2024. <https://www.medianama.com/2024/05/223-iamai-oppose-ex-ante-regulation-comments-draft-digital-competition-bill/>.
- Pea Bee. "Everyone Knows All the Apps on Your Phone." *Pea Bee*, March 27, 2025. <https://peabee.substack.com/p/everyone-knows-what-apps-you-use>.
- PIB Delhi. "Future Ready: India's Digital Economy to Contribute One-Fifth of National Income by 2029–30." *Press Information Bureau*. January 28, 2025. <https://pib.gov.in/pib.gov.in/Pressreleaseshare.aspx?PRID=2097125>.
- . "Universal Connectivity and Digital India Initiatives Reaching to All Areas, Including Tier-2/3 Cities and Villages." *Press Information Bureau*, August 6, 2024. <https://pib.gov.in/pib.gov.in/Pressreleaseshare.aspx?PRID=2040566>.
- Planning Commission. "Notification No. A.03011/02/2009-Admn.I." *The Gazette of India*. January 28, 2009. https://uidai.gov.in/images/notification_28_jan_2009.pdf.
- Poell, Thomas, David Nieborg, and José van Dijck. "Platformisation." *Internet Policy Review* 8, no. 4 (2019). <https://doi.org/10.14763/2019.4.1425>.
- Press Trust of India. "India Key Market, Committed to Bring Digital Revolution: Google India MD." *Business Standard*, October 3, 2024. https://www.business-standard.com/technology/tech-news/india-key-market-committed-to-bring-digital-revolution-google-india-md-124100301038_1.html.
- Pushkarna, Akshit. "Amazon India Marketplace's Revenue Crosses INR 25K Cr Mark." *Inc42 Media*, November 11, 2024. <https://inc42.com/buzz/amazon-india-marketplaces-revenue-crosses-inr-25k-cr-mark/>.
- Rajmohan, Karthika, and Shravani Nag Lanka. "The Opt out Conundrum: Analysis of Web Scraping to Train AI Models." *Internet Freedom Foundation*, December 19, 2024. <https://internetfreedom.in/analysis-of-web-scraping/>.
- Roessler, Beate. "Privacy and/in the Public Sphere." *Yearbook for Eastern and Western Philosophy* 2016, no. 1 (2016): 243–256. <https://doi.org/10.1515/yewph-2016-0021>.
- Roy, Raktima, and Gabriela Zanfir-Fortuna. "The Digital Personal Data Protection Act of India, Explained." *Future of Privacy Forum*, August 15, 2023. <https://fpf.org/blog/the-digital-personal-data-protection-act-of-india-explained/>.
- Sadashiv, Sakshi K. "Instagram Creates AI-Content from Users' Images Triggering Concerns About Meta AI's Privacy and Ownership Over Them." *Medianama*. January 9, 2025. <https://www.medianama.com/2025/01/223-instagram-creates-ai-content-from-users-images-triggering-concerns-about-meta-ais-privacy-and-ownership-over-them/>.
- Sarkar, Kingshuk. "Ensuring a Proper Social Safety Net for the Gig Worker." *The Hindu*, October 15, 2024. <https://www.thehindu.com/opinion/op-ed/ensuring-a-proper-social-safety-net-for-the-gig-worker/article68753585.ece>.

- Shaharbanu, Ada, and Namita Kaushik. "Gig Workers' Personal Data Protection." *India Business Law Journal*, December 30, 2024. <https://law.asia/gig-economy-data-protection-india/>.
- Sharma, Aryan, and Tania Bagwe. "India's New Income Tax Bill: A Digital Privacy Nightmare?" *Centre for Comparative Constitutional Law and Administrative Law*, June 3, 2025. <https://www.calj.in/post/india-s-new-income-tax-bill-a-digital-privacy-nightmare>.
- Sherman, Justin. "Issue Brief: Finding Security in Digital Public Infrastructure." *Atlantic Council*, October 21, 2024. <https://www.atlanticcouncil.org/in-depth-research-reports/issue-brief/finding-security-in-digital-public-infrastructure/>.
- Singh, Tanmay, and Gayatri Malhotra. "The Digital Personal Data Protection Bill, 2022 Does Not Satisfy the Supreme Court's Puttaswamy Principles." *Internet Freedom Foundation*. December 16, 2022. <https://internetfreedom.in/the-digital-personal-data-protection-bill-2022-does-not-satisfy-the-supreme-courts-puttaswamy-principles/>.
- Sinha, Amber. "India's Data Protection Framework Will Need to Treat Privacy as a Social and Not Just an Individual Good." *EPW Engage*. May 9, 2018. <https://www.epw.in/engage/article/for-indias-data-protection-regime-to-be-efficient-policymakers-should-treat-privacy-as-a-social-good>.
- Standing Committee on Finance (2022–23). "Anti-Competitive Practices by Big Tech Companies." *Ministry of Corporate Affairs*. December 19, 2022. https://eparlib.nic.in/bitstream/123456789/1464505/1/17_Finance_53.pdf.
- Supreme Court of India. "Justice K.S. Puttaswamy (Retd.) And Anr. v. Union Of India And Ors." *AIR 2017 SC 4161*, August 24, 2017. https://www.scobserver.in/wp-content/uploads/2021/10/Right_to_Privacy__Puttaswamy_Judgment_1.pdf.
- Swethavimala M, and Ajay Tomar. "Tech lapse possible in TSCOP data leak: Police." *The New Indian Express*, June 9, 2024. <https://www.newindianexpress.com/states/telangana/2024/Jun/09/tech-lapse-possible-in-tscop-data-leak-police>.
- Thomas, Pradip Ninan. *Digital India: Understanding Information, Communication and Social Change*. SAGE Publications, 2012. <https://doi.org/10.4135/9788132114017>.
- Törnberg, Petter. "How Platforms Govern: Social Regulation in Digital Capitalism." *Big Data & Society* 10, no. 1 (2023): 1–13. <https://journals.sagepub.com/doi/pdf/10.1177/20539517231153808>.
- Westermeier, Carola. "Money Is Data – the platformization of financial transactions." *Information, Communication & Society* 23, no. 14 (2020): 2047–2063. <https://doi.org/10.1080/1369118X.2020.1770833>.
- Wood, David Murakami, and Torin Monahan. "Editorial: Platform Surveillance." *Surveillance & Society* 17, no. 1 (2019): 1–6. <https://doi.org/10.24908/ss.v17i1/2.13237>.
- Worldometer. "India Population." *Worldometer* (n.d.). <http://www.worldometers.info/world-population/india-population/>.
- Yadav, Krishna. "Supreme Court Transfers CCI's Amazon-Flipkart Antitrust Probe Case to Karnataka High Court." *Mint*, January 6, 2025. <https://www.livemint.com/companies/news/amazon-flipkart-probe-cci-competition-commission-of-india-karnataka-high-court-supreme-court-cci-probe-antitrust-11736140866470.html>.