

The background of the slide is a photograph of a person wearing a dark blue hoodie, holding a tablet computer. They are in a server room, with server racks and cables visible in the background. The lighting is dim and blue-toned. There are decorative orange and black geometric shapes in the top-left and bottom-right corners.

Digital Personal Data Protection (DPDP) Act Real estate

October 2024

Key stakeholders defined in the DPDP Act

Data principals

A data principal is an individual whose data is the subject of the processing (customers, vendors, employees etc.).

Data fiduciary

Data fiduciary is a person or an organisation that (either alone, or jointly with others) determines the purpose and the means of processing personal data (i.e. company).

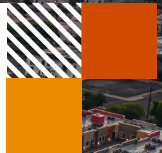
Data processor

Data processor is a person or an organisation (other than an employee of the data controller) that processes the data on behalf of the data fiduciary (e.g. outsourced contact centre, third-party payroll agency, background verification [BGV] agencies, marketing partners etc.).





DPDP touchpoints across the real estate value chain



Land

- Landowners
- Consultants (deal/diligence/others)
- Channel partners/brokers



Design and development

- Consultants, vendors, contractors, property management companies (PMCs)
- Contract labour (principle employer)



Finance, IT and others

- Lenders/investors
- Consultants
- Third-party service providers (e.g. application providers [AP], IT outsourcing)



Human capital

- Existing/exited employees and families (e.g. emergency contact)
- Third-party service providers (e.g. payroll outsourcing)
- Consultants (hiring, training, others)



Sales/leasing and marketing

- Prospective/existing customers and tenants
- Channel partner/broker/third-party portals (e.g. leads)
- Marketing agencies, event management companies



CSR, legal and regulatory

- CSR initiatives (internal, event management companies)
- Consultants/third-party service providers
- Regulators



Customer relations

- Third-party contact centre
- Existing customers
- Third-party service providers (e.g. events, customer satisfaction survey [CSAT] etc.)



Corporate governance

- Board of directors/independent directors/committees
- Designated/covered persons (listed companies)



Facility management

- Visitors/customers/tenants (visitor management system [VMS], building management systems [BMS] - CCTV recordings)
- Third-party service providers (e.g. licensed professional contractors [LPCs], security, housekeeping)
- Third-party contact centre

Key considerations and potential challenges of the DPDP Act

The real estate sector works around a large ecosystem, and there have been significant developments with respect to technology, processes and external alliances. Some potential challenges that would need to be addressed by companies have been highlighted below.

Data

Data volume and diverse channels

- Significant data collection across the sector value chain (Figure 1)
- Diverse channels of data collection through direct and indirect sources (contact centre, brokers, website/digital channels, sales teams, housing portals, contractors etc.)

Cultural shift

- Data movement within and outside the organisation via formal/informal channels (WhatsApp/chats, personal emails, etc.)
- Structured process for data collection, retention and deletion (including access management and centralised controls)

Data processors/third parties

- Responsibility of data fiduciary to secure adequate safeguards on data processed by third parties
- Significant use of third parties across the value chain (channel partners, contact centre, marketing agencies, outsourced accounting/payroll, IPCs, etc.)
- Contractual safeguards and assurance mechanism for third-party transactions

Breach prevention, detection and response

- Responsibility of data fiduciary to inform data principle and data protection board in case of breach
- Structured mechanism to prevent and quickly detect any data leakage
- Ability to respond quickly in case of data leakage and restore trust of impacted parties

A structured approach can help in addressing these challenges.



About PwC

At PwC, our purpose is to build trust in society and solve important problems. We're a network of firms in 151 countries with over 360,000 people who are committed to delivering quality in assurance, advisory and tax services. Find out more and tell us what matters to you by visiting us at www.pwc.com.

PwC refers to the PwC network and/or one or more of its member firms, each of which is a separate legal entity. Please see www.pwc.com/structure for further details.

© 2024 PwC. All rights reserved.

Contact us



Sunil Mehta
Partner – Risk Consulting
PwC India
sunil.mehta@pwc.com

pwc.in

Data Classification: DC0 (Public)

In this document, PwC refers to PricewaterhouseCoopers Private Limited (a limited liability company in India having Corporate Identity Number or CIN : U74140WB1983PTC036093), which is a member firm of PricewaterhouseCoopers International Limited (PwCIL), each member firm of which is a separate legal entity.

This document does not constitute professional advice. The information in this document has been obtained or derived from sources believed by PricewaterhouseCoopers Private Limited (PwCPL) to be reliable but PwCPL does not represent that this information is accurate or complete. Any opinions or estimates contained in this document represent the judgment of PwCPL at this time and are subject to change without notice. Readers of this publication are advised to seek their own professional advice before taking any course of action or decision, for which they are entirely responsible, based on the contents of this publication. PwCPL neither accepts or assumes any responsibility or liability to any reader of this publication in respect of the information contained within it or for any decisions readers may take or decide not to or fail to take.

© 2024 PricewaterhouseCoopers Private Limited. All rights reserved.

HS/October 2024 - M&C 41300