

INFORMATIONAL PRIVACY AND DATA PROTECTION IN INDIA

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ABSTRACT

India's new slogan "AI (artificial intelligence) for all" was revealed in the discussion paper of the National strategy for AI. This is the development in the aftermath of Justice Puttaswamy case's judgement in August 2017. The judgement analysed in length and breadth the right to privacy and the data protection. The judgement established "right to privacy" as a fundamental right when Indian Government massively started collecting the data for "digital India". It has come to the stage of balancing the collective rights and individual rights. This time India is heavily relying on the latest technological development like AI to reflect on social, legal and political institutions. India wants to fortify the institutions through technology, as it is a land of masses. It is impossible to handle 'big data' in the real sense without using complex latest technology. Collecting personal details massively and protecting them is a complicated process. This paper critically analyse India's way of governing 'Big data' and its implication on vital institutions.

1. INTRODUCTION

The "informational self-determination", is a concomitant right of "right to privacy" ,has been established as a fundamental right in the recent judgement of Justice Puttaswamy's case¹ ,2017. The right to privacy, though it is inherent in Article 21 of the Indian constitution, has not been expressly recognised since the commencement of the Constitution of India. This case induced a lot of academic debates regarding certain rights which are yet to be emerged and formulated. One among them is informational self-determination or informational privacy.

¹Justice K. S. Puttaswamy (Retd.) and Anr. vs Union Of India And Ors, On 24th August, 2017 (WRIT PETITION (CIVIL) NO 494 OF 2012)

This emerging right gets established and recognised along with the right to privacy in the judgement. Now the government of India is massively collecting data regarding personal details of its citizens for “digital India” programme. It aims to connect all villages digitally to implement its hallmark schemes like “aadhar card” and “jan dhan yojana”. By 2018, approximately 32 crores bank accounts were opened for Pradhan Mantri Jan Dhan Yojana. All schemes are in need of a big data. Amid this process, the 547 pages recent Supreme court judgement created a havoc in India. Justice K.S. Puttaswamy (retired) and another v. Union of India and others case (WRIT PETITION (CIVIL) NO 494 OF 2012), has precisely declared the right to privacy as a fundamental right which comes under Part III of Indian constitution in Article 21. Even though the right to privacy is considered as inherent in Article 21, it was openly denied its status in many judicial pronouncements earlier and it is recognised only in this case. We will study in detail the judgement towards right to privacy and the evolution of it through various earlier judgements in the coming chapters.

2. IMPACT OF JUSTICE PUTTASWAMY’S JUDGEMENT ON GOVT OF INDIA’S PROGRAMMES.

On one side the government is in the process of collecting compulsorily the personal details of its people for developing digital India and on the other side the supreme court, in its landmark judgement of Justice Puttaswamy’s case, has established the right of holding their personal details as a matter of right in the name of informational privacy. The judgement caused an embarrassment situation to the government. Following the judgement an experts’ committee under the chairmanship of Justice B.N. Srikrishna has been created to find ways to protect the personal data collected and it submitted its report on a Data Protection Framework to the Ministry of Electronics and Information Technology. The Committee which was constituted in August, 2017 had examined the issues regarding data protection, recommended methods to resolve them, and consequently draft the data protection Bill.

We all know India is the largest and most successful democracy in the world with wide diversity. It faces the criticism worldwide that the growth and development of India has been slow and not as expected since independence. True, because the huge population was mostly under the grip of illiteracy, ignorance, discrimination and poverty at the time of independence. India’s strive towards a civilised nation amid the thousands of languages, hundreds of castes and sub-castes and many major religious differences is noteworthy and amazing. The

religious and caste problems may be reduced but still persist and prevalent. While drafting constitution of India, Dr .Ambedkar rightly said that achieving social and economic justice would be a herculean task in India ,but political justice could be ensured through ‘one man one vote’².It happened in India. He guaranteed the political justice and also he did not forget to ensure some core constitutional rights to safeguard the rights of an individual to live with dignity. The bold and brave ideas while framing the Constitution of India did help India to restore and preserve the core human rights. It was a great challenge to the first Prime minister of free India Pandit Jawaharlal Nehru to develop science and technology as the whole nation was greatly in need of basic education, sanitation, nutrition and employment. The information and technology field in India needed a great thrust after independence as the fight for the basic needs has become never ending. The clash between the individual’s right and the collective rights was prominent, right from the beginning of the Constitution of India. The first amendment in 1951 to the constitution brought ninth schedule to give primacy to directive principles of State policy over fundamental rights. From then on till Justice Puttaswamy case, the individual’s right saw so many ups and downs. Even though the Article 21 ensured the right to life and liberty as a constitutional mandate for the citizens of India, the concomitant right, the right to privacy has been debated and not recognised over a period of time. The recent land mark judgement in Justice Puttaswamy and another vs Union of India and others³ case ignited the dignity aspect of right to privacy to take the centre stage. What Justice Puttaswamy’s case judgement clarified is, the right to privacy, though not expressed, is infused in Article 21 (right to life and liberty) and it is a fundamental right not to be violated or infringed. Now the established fundamental right to privacy gives room to the right to informational self-determination as an emerging right.

3. ANALYSIS OF JUSTICE PUTTASWAMY’S JUDGEMENT.

Following issues are critically analysed in the light of Justice Puttasway case judgement.

1. Establishment of informational self-determination.
2. Impact of the establishment of the above right.
3. Follow up measures of recognising the above right.
4. Data protection strategy and its legislation

² Shukla.V.N.,Costitution Of India(Eastern Book Company ,2006)

³ no 494 of writ petition (civil) 2012.

5. Exploring latest technology like Artificial intelligence, study of algorithm and governance of “big data”

In India the talk of informational self-determination (herein after ISD) started after the massive collection of personal information from its citizens for ‘jan dhan yojana and aadhar card’ schemes. The implementation of the above schemes paved the way for knowing the term ISD. The Puttaswamy’s case judgement made it clear that the right to privacy is inherent in right to life and liberty of Article 21 and it is a guaranteed fundamental right. It also led to the establishment of the emerging right to informational privacy. Actually, Germany was the first country to recognise the right to ISD in 1983 through a census case judgement (Volkszählungsurteil, BVerfGE Bd. 65, S. 1ff.),. In that judgement it recognised the right to ISD from a general concept of respecting an individual’s personality. Even before this judgement also, German was the first country which adopted a law exclusively for the data protection, thus Germany was pioneer in executing the right to ISD and data protection laws in right spirit. The Census Act 1983, handled the similar situation as India faces now. When personal data was collected from the citizen, the loyal citizens on the other side warned about the alarming situation of the infringement of informational privacy. The Federal Constitutional Court of Germany in this judgement clearly explained the need of ISD⁴. when personal data is collected, there is every chance of deprivation of informational privacy. It also specifically mentioned the data anonymization. The judgement in detail analysed when the personal data collected and analysed on a huge scale, there was the absolute chances of going out of control and will of an individual. The citizen becomes a “glass person “as everything about the personality made transparent.⁵The judgement (Volkszählungsurteil, BVerfGE Bd. 65, S. 1ff.),,also stated it is the constitutional duty to protect the citizens because if personalities’ secrets go transparent their dignity become brittle. Life includes not only the survival but also the dignity. It declared the right to informational self-determination as a constitutional right and it has to be safe guarded with an effective data protection technology.

In simple terms ISD means every individual has the right to control over his/her personal information, and the right to determine how far his/her personal information has to be disclosed or revealed. The consent and the control of the individual over the disclosure of his/her personal information is concomitant to right to privacy. It is clear that Germany was the first country to

⁴ <http://sorminiserv.unibe.ch:8080/tools/ainfo.exe?Command=ShowPrintText&Name=bv065001>

⁵ Ibid.,

recognise the right to ISD in 1983 through a census case judgement (Volkszählungsurteil, BVerfGE Bd. 65, S. 1ff.), Even before the judgement German was the first one to adopt a law which is exclusively for the data protection, thus Germany was pioneer to the right to ISD and data protection. To critically analyse the situation I have taken an air crash investigation finding which motivated me to write this paper. Before we start the analysis, we do some research in ISD.

Actually, the Germany was the first country to recognise the right to ISD in 1983 through a census case judgement (Volkszählungsurteil, BVerfGE Bd. 65, S. 1ff.), In that judgement it recognised the right to ISD from a general concept of respecting an individual's personality. Even before the judgement German was the first country to adopt a law exclusively for the data protection, thus Germany was pioneer to the right to ISD and data protection. In 1983, Germany wanted to conduct a census survey of its citizens in a massive way. As soon as the news spread, the people of Germany decided to fight against the census reading. They felt that the census survey would invade their privacy and filed a case against it in the federal constitutional court Bundesverfassungsgericht. The court found that Census Act was unconstitutional and put an end to the decision which gave birth to a new right the 'informational self-determination'(ISD)⁶. This informational self-determination and privacy mainly to protect the individualism in any individual especially in cases of sensitive issues like marriage ,medical treatment of children, any civil or criminal liability etc., .The protection of individual rights takes primacy over the collective rights or to protect the individualism in the developed countries are not complicated as the citizens are civilised and sophisticated in the nature. Out of the development Germany had enacted strong data protection laws.

The impact of privacy laws in Germany can be explained by an air crash investigation in a dramatic way. The critical analysis of the air crash investigation a consequential act of the right to ISD and data protection which show us how far the ISD rights in Germany safeguarded. The following are the facts and findings of an air crash by the BEA (French Civil Aviation Safety Investigation Authority) which was published in March 2016. An Air-Bus 320, flight 9525 which was operated by German wings crashed in French mountain Alps on 24 March 2015. The investigation was taken by BEA and it submitted its investigation report one year later on the same month in March 2016. The plane crashed with 144 passengers, the

⁶<http://dx.doi.org/10.1016/j.clsr.2008.11.002>

investigation revealed a shocking truth that the data protection, privacy and confidentiality of any individual in Germany found to be the major cause of the aircraft crash. The flight was crashed by the co-pilot deliberately out of his depression. It was just a suicidal act. The co-pilot Andreas Gunter Lubitz's privacy led to this crash. Germany has strict privacy laws and data protection. The pilot who took advantage of this did not reveal the fact of his mental illness due to the thought of losing his job and insurance money. The German government too did not violate the privacy to know about the medical condition of the pilot, the result was the loss of life of many. The following factors have contributed to the air craft crash,

1. the co-pilot's probable fear of losing his ability to fly as a professional pilot if he had reported his decrease in medical fitness to be an AME;
2. the potential financial consequences generated by the lack of specific insurance covering the risks of loss of income in case of his unfitness to fly;
3. the lack of clear guidelines in German regulations on when a threat to public safety outweighs the requirements of medical confidentiality.⁷

The report was just an example of how Germany protects the privacy of the individuals.

In the process of a country's development it is necessary for the legislations to get reformed in such a way to protect the dignity of the individual. After the Germany's experiment with its privacy law, OECD and other UN agencies has come forward to lay a clarity to data protection and privacy.

OECD INITIATIVE IN DATA PROTECTION AND PRIVACY

It was the initiative of the *OECD* regarding *ISD* paved way for many countries and even United Nation office of drugs and crimes (UNODC) to focus towards *ISD* and its impact on the need of the hour.

In 1980, *OECD* under "*OECD* guidelines for protection of privacy and personal data made a very clear framework for the sake of managing the personal information of the people and also

⁷ https://www.bea.aero/uploads/tx_elydrapports/BEA2015-0125.en-LR.pdf.

how to safeguard the data in case of departing them. It derived eight principles as given below for ISD,

1. Collection limitation
2. Data quality
3. Purpose specification
4. Use limitation
5. Security safeguards
6. Openness
7. Individual participation
8. Accountability⁸

It made it clear by declaring as follows,

“The *OECD* Working Party on Information Security and Privacy (*WPISP*) develops policy options by consensus to sustain trust in the global networked society. It addresses the complementary issues of privacy and information security, at the core of our digital activities.

- Provides an active network of experts from government, business and civil society.
- Serves as a platform to monitor trends, share and test experiences, analyse the impact of technology on information security and privacy, and provide policy guidance.⁹

After the *OECD* guidelines and the German laws, ISD has got a vital status and recognised by the world community. In 2007 *UNODC* made a detailed report on certain serious crimes if ISD and personal data not protected. It gave its report under a topic emerging crimes¹⁰.

THE DIMENSIONS OF INFORMATIONAL PRIVACY FROM THE JUDGEMENT OF JUSTICE PUTTASWAMY’S CASE¹¹.

Now we come to India, Though the Puttaswamy judgement established the constitutional status of privacy and other concomitant rights, it caused a stir in the country at large. We know government of India needs personal information of its citizens to take the country to the next level of digital India. Indian judiciary also moved to the next stage of

⁸ <https://www.oecd.org/sti/ieconomy/37626097.pdf>

⁹ <http://www.oecd.org/sti/security-privacy>

¹⁰ <http://www.unodc.org/unodc/en/organized-crime/intro/emerging-crimes.html>.

¹¹ no 494 of writ petition (civil) 2012

protecting the human life's sanctity by establishing the right to privacy as a fundamental right. Now the impact of this situation in India is to be carefully observed for the sake of India and the Indians. The process of collecting personal details is correlated with the duty of protecting them from potential hackers. The right of collecting personal details is correlated with the duty to protect them. India is yet to build a strong technological structure for data protection. We have to remember at this time a point which was said by Justices Warren -Brandeis in 1850, it is a wonder to observe even now it is applicable. "it has been found necessary from time to time to define anew the exact nature of protection' ,here the protection of person and his personal rights".¹² When Puttaswamy's case judgement(WP CIVIL NO 494 OF 2012)cleared the right to privacy as a fundamental right , automatically the right to informational self-determination and other allied rights like personality ,image rights also have to be established in India . The follow up of recognising ISD right leads to the construction of another major work of 'data protection'. Presently India goes through a massive personal data collection for the sake of 'Jan Dhan Yojana' and 'Aadhar card' at this stage the judgement pronounced., this situation may hinder the data collection in India only to build a strong technology for the data protection. On one side the judiciary protecting the privacy and on the other side the government invading the privacy. How far this tug war to be allowed and how to attain a balance between the both is million-dollar question to be answered in future. Giving outright power to right to privacy and its sustainability automatically comes under the scanner.

The nine judges bench constituted for the Puttaswamy's case to analyse and overcome the limitations of the ratios given in 8 judges bench in M.P.Sharma¹³ and 6 judges bench in Kharak Singh case¹⁴.In both the cases they wanted to emphasize that the right to privacy is protected as a fundamental right in our constitution. Actually this limitation or this ratio is cleared in Justice Puttaswamy case judgement that there is an inherent protection of right to privacy and without any doubt the right to privacy and its allied rights are fundamental and constitutional. Para S of the Justice Puttaswamy case (The Puttaswamy's case judgement (WP CIVIL NO 494 OF 2012) says in part R, para 168, page 242 that the essential nature of privacy which actually started by Warren Brandies in 1890 as right to be let alone was recognised in 2017.It states that the providing undisturbed private space and protection of it should be the constitutional right and its high time to recognise for Indian citizens. Under article 21 of Indian

¹² Warren and Brandeis, "The Right to Privacy", Harvard Law Review (1890), Vol.4, No. 5, at page 1.

¹³ M. P. Sharma And Others vs Satish Chandra, District: 1954 AIR 300, 1954 SCR 1077

¹⁴ Kharak Singh vs The State Of U. P. & Others : 1963 AIR 1295, 1964 SCR (1) 332

constitution, 'privacy' is the dignity of an individual at any cost it is inalienable and inviolable. Though Indian constitution did not explain separately the importance of privacy and dignity, but every thread of the constitution embraces privacy and dignity to assure the individual's ultimate sanctity rests in letting him alone.

Thus in para R the judgement established the right to privacy as fundamental right in our constitution. The next very big problem crops up or in consequence of or impact of the judgement is 'data protection'. The concept of 'big data' in India is in real sense a big one. Only China and India are the countries to take a lot of pain for this 'big data'. In the coming chapter. We can analyse as to how India will cope with the technological revolution for protecting 'big data'.

INFORMATIONAL PRIVACY AND GOVERNANCE OF BIG DATA.

At one side Indian Government needed personal information or a way to the private space of the individual to take India to the next level of 'Digital India', on the other side the judgement compels the government to protect privacy. If right to privacy is sustained, then the next task of data protection will take the centre stage. Data protection in India will be a herculean task. Before going to the topic we can discuss some core issues why this 'big data' concept is so important for India. When first industrial revolution happened in England from 1700's to 1850s, it is history that India was colonised and ruled by the British. All efforts laid in India for the foundation stone for industrial development was only to support the industrial revolution (IR, hereinafter) in England. India did not experience the mass industrialization and really missed the first IR, now every technological developments talking about the fourth IR in the world. The fourth industrial revolution is the culminating point of technology, due to the missing of the first IR in India it will be a difficult task for India to go for the fourth revolution. When 1991 economic policy of India opened up for Liberalisation, Privatization and Globalisation (LPG, hereinafter), it was not self-sufficient and sustainable. In the threshold of fourth revolution India has to undergo a sea change to utilise this era for its sustainable development. As far as informational self-determination, we are in the so called era of big concepts like 'big data', 'Artificial Intelligence', 'Deep learning' etc., Now what all the developed countries talk about 'big data', 'artificial intelligence', 'deep learning concept' etc., have to be realised and applied judiciously as we started collecting mass and massive data. All the latest innovations in technology have the usage in India and to a greater extent China. This

time, even though once again India is going to be a big market for all the technological developments, India tries to assimilate and absorb those big technologies to become self-sufficient and sustainable and not to miss the fourth IR. From the Puttaswamy case judgement we can come to know the preparatory work for establishing right to privacy in India and the measures taken for the governance of 'big data' in India. Now we analyse the para S of the judgement which talks about the Informational privacy and data protection. India is known for the diversity and huge population, it stands second in the world and will reach the mark of one hundred and fifty crores soon as of worldometer information.¹⁵ Around 30% of the people below poverty line as per government statistical data¹⁶. India is lacking of many basic needs and struggling to reduce the poverty and to improve the standards of people. In this current situation informational privacy and data protection is creating an opportunity to India to make use of the fourth industrial revolution technologies to,

- investigate the core issues,
- find out the measures to resolve the issues
- reach out to people below poverty line and organise
- provide easy access to the welfare schemes
- find out whether the government policies get implemented
- address the basic needs of the huge population

The new technology such as artificial intelligence, algorithms, machine and deep learning concepts are boon to India to collect, organise and protect "big data". India ensured to make use of this technologies in an effective way, so that what was missed in the first IR, will be sustainably restored. In para S judges clearly explained how India is one among the effective users of technology even though lacking in health, hygiene, sanitation and education. Now India can improve the standard of its people by using the same technology or even an improved means of it. A statistical report by 'TRAI', the Telecom regulatory authority of India revealed the real numbers of internet users in the urban and rural areas. It is quite astonishing and amazing. Whether the basic needs of the life of the people is satisfied or not but the access to

¹⁵<http://www.worldometers.info/world-population/india-population/>

¹⁶http://mospi.nic.in/sites/default/files/publication_reports/India_in_figures-2018_rev.pdf.

information and technology reached sky. Some of the statistics which are declared on 4th May 2018 is as follows,

Total Internet Subscribers 445.96 Million (% change over previous year 13.91%)

Narrowband subscribers 83.09 Million,

Broadband subscribers 362.87 Million,

Wired Internet Subscribers 21.28 Million,

Wireless Internet Subscribers 424.67 Million

Urban Internet Subscribers 313.92 Million

Rural Internet Subscribers 132.03 Million

Total Internet Subscribers per 100 populations is 34.42

Urban Internet Subscribers per 100 populations is 76.76

Rural Internet Subscribers per 100 population is 14.89¹⁷

The above numbers show the extensive and intensive use of information and technology in India. Now it's a proved fact that India is advancing to become 'digital India'. It wanted to make everything to be computerised and is the need of the hour for implementing policies for everything from eradicating poverty to globalisation. It started the procedure massively, for Pradhan Mantri Jan Dhan Yojana scheme around 29.48 crores bank accounts were opened by Mid-August, 2017 out of which 17.61 crores accounts were in rural/semi-urban areas and the rest 11.87 crores in urban areas¹⁸ which registered in Guinness book of world record. A huge wave of collecting personal data is going on India. At this juncture the judgement on August 2017, rightly pointed the value of informational self-determination and data protection because there is always a threat that the data collected has the risk of getting stolen. Data protection is ineluctable and India is very well aware of the preparedness for this task. Collection of data is for collective right means protection of data is for individual right at any cost we have to balance the both for better civilization.

¹⁷<https://main.trai.gov.in/sites/default/files/YPIRReport04052018.pdf>.

¹⁸<http://pib.nic.in/newsite/PrintRelease.aspx?relid=170445>.

Indian government preparedness for data protection is as follows,

1. Report of the group of experts on privacy, Oct, 2012,¹⁹
2. White paper of the committee of experts on a data protection framework for India²⁰.
3. Personal Data Protection Bill 2018.²¹

The special features of the above reports are taken from different countries' privacy and data protection Acts. Some of the important features are as follows,

1. Single law for public and private entities
2. Sensitive personal data includes financial data and passwords
3. Local storage of a copy insists mandatory storage of critical data inside the country
4. Cross border data transfer is permitted with the approval of the government
5. Potentially harmful breach of data attracts criminal penalty up to five years of imprisonment²²

Under the chairmanship of Justice A.P. Shah in 2012 and Justice B.N. Srikrishna in 2017, the group of experts have done the preparatory work for data protection legislation. For storing and protecting "big data" India is aggressively trying to use Artificial Intelligence (AI), machine learning and deep learning technologies. In its discussion paper it has brought out the national strategy for AI²³. In June 2018 "Niti ayog" presented the discussion paper for the effective use of AI for various purposes. It includes financial inclusion, social and economic development etc., AI can be used in all the sectors for the greater good of India and also to improve the quality and standard of the people.

The above are the India's preparatory work for protecting "big data". The above documents included all the ingredients of the data protection technologies and drafted a bill which is at an infant stage yet to get its approval in parliament. It has got a lot of loop holes in it. It will all be addressed one by one and step by step in the coming of years. Meanwhile, India

¹⁹http://planningcommission.nic.in/reports/genrep/rep_privacy.pdf

²⁰ <https://innovate.mygov.in/data-protection-in-india/>.

²¹ <http://www.prsindia.org/billtrack/draft-personal-data-protection-bill-2018>

²² Ibid.,

²³ https://www.niti.gov.in/writereaddata/files/document_publication/NationalStrategy-for-AI-Discussion-Paper.pdf.

has to observe carefully the international standards of protecting the ‘big data. .I want to present a UK model of data protection²⁴ “Data Protection Act and General Data Protection Regulation”. It has given data protection technologies in detail. Report on “Big data, artificial intelligence, machine learning and data protection” clearly explains the big concepts in a simple way²⁵.The following is the key given by UK authorities the latest techno –concept for “big data “protection(as India has a very big data in its real sense)

““...the set of techniques and tools that allow computers to ‘think’ by creating mathematical algorithms based on accumulated data.”

Now India is in its way trying to make the machines “think” to protect the privacy and big data.

CONCLUSION

India is gradually picking up speed in assimilating the latest technology. Individuals are vastly getting habituated to information and technological services like Amazon ,Swiggy, Zomato, Uber, Ola etc., and providing personal data for commercial purposes and Social media like facebook, whatsapp, instagram etc. Collecting information for connecting people. The government too collecting all personal details for the sake of collective welfare measures of the whole of the country. By this way individually and collectively the data get collected in a massive way which is carrying the risk of getting stolen at any stage. The individual departs personal detail for technological support on one side and his privacy and dignity to be protected on the other side. India is a country of huge population thus balancing the collective and individual right is complicated. Machine learning, artificial intelligence, study of algorithms and other related computer skills and technologies have to be explored. Schools, colleges and universities have to bring effective curriculum in artificial intelligence to prepare the next generation for the future. In service sectors, technical training to be provided at the lower level to handle the latest technology. This will help people to be aware of data protection, and the computer data theft. India has to participate in the fourth industrial revolution in a big way to bring in all techno concepts to make the individual and the country strong and competitive in the “LPG” arena.

²⁴<https://ico.org.uk/>.

²⁵ <https://ico.org.uk/media/for-organisations/documents/2013559/big-data-ai-ml-and-data-protection.pdf>.

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