



## Foundation of Data Protection Professionals in India

[Not for Profit, Section 8 Company limited by guarantees: CIN No: U72501KA2018NPL116325]  
Registered Office: No 37, "Ujvala", 20<sup>th</sup> Main, BSK first Stage, Second Block, Bangalore 560050  
Web: [www.fdppl.in](http://www.fdppl.in): E Mail [fdppi@fdppi.in](mailto:fdppi@fdppi.in): Ph: 08026603490: Mob: +91 8310314516

31<sup>st</sup> January 2021

To

**My GOV**

**New Delhi**

### **Further Inputs on Draft Non Personal Data Governance Framework**

Dear Sir,

Further to our inputs provided on 14<sup>th</sup> January 2021, consequent to the introduction of the new Crypto currency bill in the Parliament during the budget session, the following additional recommendation is made on our behalf for your consideration.

In order to ensure that under the proposed Section 2((1)(a) of the Banning of Cryptocurrency and Regulation of Official Digital Currency Act, 2019, the words "or otherwise" in line 2 is not mis-interpreted and extended to the "Valuation of Non Personal Data" under the proposed Non Personal Data Governance Act, an appropriate explanation is introduced in the proposed Non Personal Data Governance Bill that

"Any valuation of Data as envisaged under the Non Personal Data Governance Act" shall not be considered as "Crypto Currency" under the Banning of Cryptocurrency and Regulation of Official Digital Currency Act, 2019.

It is also better if in the proposed Banning of Cryptocurrency and Regulation of Official Digital Currency Act, 2019, also that a provision may be introduced to state

"Explanation (Under Section 2(1)(a): The valuation accorded to digital data as an asset under any regulation that may provide for bringing the value of data into the financial accounting of an asset owner shall not be regarded as a "Crypto Currency".

Request that this suggestion may be incorporated in the Crypto currency bill during the Parliamentary discussions.

Yours sincerely

Na.Vijayashankar (Naavi)

Chairman