PRIVACY DIALOGUES

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by EduLegaL

Conversations on Data Privacy, Protection & Trust in Education

An Awareness & Knowledge Series for Educational Institutions

STAGE | ADMISSION

Admission Data and Privacy Law FAQ

Twelve questions every admission office asks

13.05.2027
main compliance date

DPDP Rules apply to every educational institution so necessary readiness and preparedness is must.

Swipe for the answers >

Ravi Bhardwaj | Education Law Practitioner | mail@edulegal.in

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WHY ADMISSION MATTERS

Every admission starts a data trail

1. **Enquiry**
   Name, phone, email, course interest
2. **Entrance form**
   Identity proofs, photographs, marks, parent details
3. **Counselling**
   Category, income and preference details
4. **Fee payment**
   Bank, card and UPI details
5. **Enrolment**
   Student file, ERP and LMS records



Each step is personal data. The institution is the Data Fiduciary from the very first enquiry.

Ravi Bhardwaj | Education Law Practitioner | mail@edulegal.in

THE PRIVACY STAKES

Why admission is the riskiest moment



Children's data

Many applicants are below 18. The law requires verifiable parental consent for a child's data.



Many hands touch the form

ERP, payment gateway, exam agency, counselling agents and messaging vendors. The institution answers for all.



Real penalties

Up to Rs 250 crore for failing reasonable security safeguards. Up to Rs 200 crore for breach and children's data duties.

Ravi Bhardwaj | Education Law Practitioner | mail@edulegal.in

ADMISSION DATA AND PRIVACY LAW FAQ

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CONSENT AND WHAT YOU COLLECT

1 Can a 17 year old applicant give valid consent on the admission form, or is parental consent needed?

Answer: Below 18 is a child. Verifiable parental consent is needed, and the institution must check that the parent is an adult.

Example: *A 17 year old ticks "I agree" on her phone. Not enough. The parent must consent separately, say by OTP on the parent's number.*

2 Can we ask applicants for category, income or religion details, and for what purposes?

Answer: Only if necessary for a stated purpose that is listed in the notice. Ask only those who need it.

Example: *Caste certificate only from those claiming a reserved seat. Income proof only from fee concession applicants.*

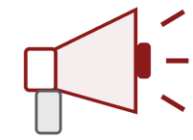
3 Can we collect parents' occupation and income details on the admission form?

Answer: Parents are also Data Principals. Collect only what the stated purpose needs, after a notice.

Example: *Parent's income for a fee concession is fine. Occupation and income from every applicant "for our records" is not.*

Ravi Bhardwaj | Education Law Practitioner | mail@edulegal.in

MARKETING, RIGHTS AND CONTACT



4 Can we use applicants' contact details to market other courses to them?

Answer: Not without separate, specific consent that is easy to withdraw. For applicants below 18, targeted advertising is prohibited.

Example: *A number given for admission updates cannot be used to promote a coaching batch without fresh consent.*

5 Can an applicant ask to see or correct the personal data we hold about them?

Answer: Yes. She can get a summary, the names of those it was shared with, correction and erasure, subject to retention required by law.

Example: *A wrong date of birth in the ERP is corrected on her request, with written confirmation.*

6 Whom should an applicant contact for a complaint about the use of their personal data?

Answer: Publish a contact person and a grievance process, with a response time of not more than 90 days.

Example: *Print "Privacy contact: Registrar's office, response within 30 days" on the form and the website.*

Ravi Bhardwaj | Education Law Practitioner | mail@edulegal.in

VENDORS, SHARING AND PUBLICATION



7 What is our liability if an outside exam agency leaks applicants' data?

Answer: The institution remains responsible. Inform the Board and each applicant without delay, with details in 72 hours. Penalty up to Rs 250 crore.

Example: *Answer scripts sit on an unprotected agency server. The institution answers, then recovers under the contract.*

8 Can we share lists of applicants with coaching partners or feeder schools?

Answer: Not without specific consent for that purpose. Sharing beyond the stated purpose is a breach.

Example: *Handing 500 names and phone numbers to a coaching chain needs each applicant's prior consent.*

9 Can we publish merit lists and admission results with applicants' names and marks?

Answer: Say so in the notice and publish only what is needed. In the event that a regulator rule requires the list, follow the rule.

Example: *Publish roll number and marks. Keep phone numbers, addresses and category off the public list.*

Ravi Bhardwaj | Education Law Practitioner | mail@edulegal.in

RECORDS AND RETENTION



10 How long can we keep OMR sheets and answer scripts after the entrance examination?

Answer: Follow the regulator or university period. Keep them until any dispute closes, then erase and record the period and reason.

Example: *A university rule says 1 year. Hold them for that year and until any re evaluation or court matter ends.*

11 Does the data privacy law cover admission forms collected on paper?

Answer: Yes, once the data is digitised. A paper form never typed in or scanned stays outside.

Example: *The clerk types the handwritten form into the ERP. Notice, consent and security rules now apply.*

12 How long can we keep the data of applicants who did not take admission?

Answer: Only until the purpose is served, meaning the admission cycle plus any refund or grievance window. Fix and record your own period.

Example: *2026 applicants who joined elsewhere: erase after counselling and refund claims end, not carried into next year's marketing.*

Ravi Bhardwaj | Education Law Practitioner | mail@edulegal.in

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MYTH VERSUS FACT

Four things institutions get wrong

MYTH A signed admission form covers every use of the data.

FACT **Consent is specific. Marketing and sharing with partners need their own consent.**

MYTH Our ERP vendor handles privacy, so we are safe.

FACT **The institution stays responsible for its vendors, and needs written agreements with them.**

MYTH Only online forms are covered by the law.

FACT **Paper forms are covered once they are typed into a system or scanned.**

MYTH Keep all admission records for ever, to be safe.

FACT **Data must be erased once its purpose is served, unless a law requires keeping it.**

Ravi Bhardwaj | Education Law Practitioner | mail@edulegal.in

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SPOT THE DIFFERENCE

Red flag or green flag on your form?

RED FLAG	GREEN FLAG
Aadhaar number compulsory for every applicant	**Aadhaar optional, purpose stated, number masked**
One tick box: I agree to everything	**Separate boxes for admission, marketing and sharing**
A 17 year old applicant ticks consent alone	**Parent gives separate, verified consent**
Records kept for ever, no period stated	**Retention period and erasure date written down**
No contact for complaints	**Named privacy contact printed on the form**

Ravi Bhardwaj | Education Law Practitioner | mail@edulegal.in

READY TO USE

Model notice for your admission form

_____ (institution) collects your name, contact details, marks, photograph and parent details to process your admission to _____ for the year _____.

We use the data only for this purpose. In the event that you are below 18, your parent or guardian must give consent.

We share the data only with _____ (exam agency, payment gateway) under written agreements.

We keep the data of applicants who do not join until __.__.____ and then erase the same.

You may see, correct or ask us to erase your data, or withdraw consent, by writing to _____ at _____. We respond within ____ days.

Marketing messages are sent only with your separate consent.

Ravi Bhardwaj | Education Law Practitioner | mail@edulegal.in

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SELF CHECK

How ready is your admission office?

- ☐ Our admission form has a privacy notice.
- ☐ Parents consent separately for applicants below 18.
- ☐ We ask for category and income only when needed.
- ☐ Marketing consent is separate and optional.
- ☐ Aadhaar is optional and stored masked, if at all.
- ☐ Every vendor has a written agreement with us.
- ☐ A privacy contact is printed on the form.
- ☐ Admission records have written retention periods.
- ☐ Merit lists show only roll number and marks.
- ☐ We have a plan to report a data breach.

Score ____ out of 10

8 to 10: well placed. 5 to 7: fix the gaps this month. Below 5: start now.

Ravi Bhardwaj | Education Law Practitioner | mail@edulegal.in

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ACTION LIST

Five things to do this month

1. Make Aadhaar optional on every form.
2. Add a privacy notice and a parent consent step for applicants below 18.
3. Write a retention date for every admission record.
4. Sign written agreements with every vendor.
5. Publish the contact person and grievance process.

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WORK WITH US

Send us your admission form.

We will mark the gaps in a 30 minute call.

mail@edulegal.in

Comment FAQ to receive the full document.



Ravi Bhardwaj | Education Law Practitioner | mail@edulegal.in

ABOUT US

About EduLegaL

EduLegaL: empowering the education sector

The education sector law vertical of RSB LegaL, Advocates & Consultants, Pune.

Ravi Bhardwaj, Education Law Practitioner

Around 25 years of legal experience: litigation, arbitration, corporate advisory, trust law, employment law and education sector regulation.

Our Group Firms

Startup LegaL for founders, RSB LegaL for General Corporate and Litigation and Surakshitam for POSH and disciplinary inquiries.

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HOW WE CAN HELP

Data privacy services for institutions

- Readiness assessment and data mapping
- Notices, consent forms and parent consent workflow
- Retention and erasure schedules
- Vendor and processor agreements
- Advice on CCTV, bus tracking, biometrics and photographs
- Breach response plan and mock drill
- Staff training and annual audit with a privacy desk
- Representation before the Data Protection Board

Write to us: mail@edulegal.in

RSB LegaL, 201A, PT Gera Centre, Bund Garden Road, Pune 411001

General guidance only, not legal advice for any particular institution.

Ravi Bhardwaj | Education Law Practitioner | mail@edulegal.in