

DELHI FORUM EXECUTIVE INTELLIGENCE REPORT

DATA GOVERNANCE IN THE AGE OF AI

What senior governance leaders are wrestling with —
and the decision patterns emerging from the room.

THIS IS PROPRIETARY GOVERNANCE INTELLIGENCE
generated from a room of experienced practitioners.



10 SEPTEMBER 2026 • THE LEELA AMBIENCE GURUGRAM • CLOSED-DOOR • PRACTITIONER-LED

Anonymous aggregate report for participants and senior professionals evaluating the GC360 decision environment.

01 • EXECUTIVE SNAPSHOT

The signal from the room

Delhi produced something more useful than an event recap: a concentrated picture of the governance decisions senior practitioners are trying to make inside complex organisations. The evidence points consistently toward implementation, accountability, peer benchmarking and practical decision-making.

53

participant challenge / decision
submissions

64

substantive forum-day insights

12

challenge roundtable themes

SIX SIGNALS THAT MATTER

01 REAL-WORLD OVER THEORY

Participants repeatedly valued real problems, practical implementation and what actually works in organisations.

02 HARD-WON EXPERIENCE

The room's value came from practitioners sharing what worked, what did not and what they would do differently.

03 CROSS-INDUSTRY BENCHMARKING

Different industries face different constraints, but the underlying governance questions often rhyme.

04 DECISION CLARITY

The conversation moved toward ownership, decision rights, escalation, controls and evidence.

05 TAKE-BACK VALUE

Participants identified concrete practices: data classification, cross-functional reviews, AI/data governance, ZDR clauses and breach escalation.

06 CONTINUITY

Participants asked for more sessions and described this kind of candid peer exchange as difficult to find elsewhere.

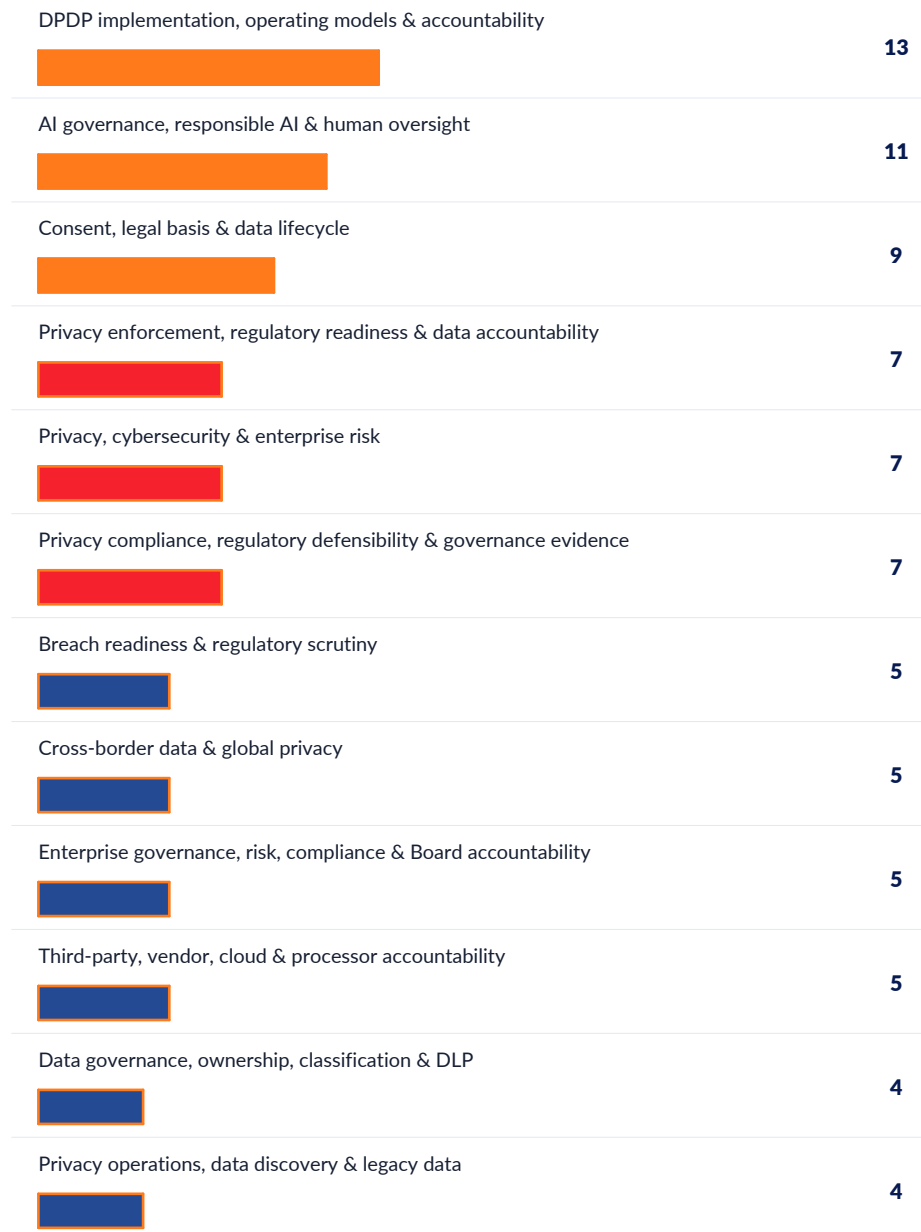
Bottom line: the strongest value was not access to more information. It was access to relevant experience against a real decision.

02 • DEMAND INTELLIGENCE

What leaders came to the room wanting to solve

The 53 submitted challenges were not a random list of topics. They clustered around a small set of recurring operating decisions. The highest-demand areas were DPDP implementation, AI governance, consent/lifecycle questions and the accountability layer connecting Legal, Privacy, Security, Risk, Technology and Business.

CHALLENGE MIX • 53 SUBMISSIONS



What this means: The market is not asking only 'Are we compliant?'. It is asking 'How do we operationalise this, who owns it, what controls work, and how do we prove the decision?'

03 • THE QUESTIONS UNDER THE TOPICS

Twelve themes. One underlying problem.

Across the challenge submissions, the surface topics varied. Underneath them were recurring questions about ownership, proportionality, implementation, evidence and decision rights.

01 DPDP OPERATIONALISATION

How do we translate principles into processes, controls, evidence and daily decisions?

02 AI GOVERNANCE

Where should AI governance begin, and how much is fundamentally data governance?

03 CONSENT & LIFECYCLE

When is consent appropriate, and how do we manage legacy data, purpose and deletion?

04 CROSS-FUNCTIONAL OWNERSHIP

Who owns data risk when several functions are involved—and who decides when they disagree?

05 THIRD-PARTY RISK

Which vendor, cloud and processor controls genuinely work without creating business friction?

06 BREACH READINESS

Who decides, who escalates, what evidence is needed, and what happens in the first 72 hours?

07 REGULATORY DEFENSIBILITY

What evidence and decision records will withstand audit, Board or regulatory scrutiny?

08 DATA CLASSIFICATION

How do we make classification proportionate without making everything "confidential"?

09 CROSS-BORDER DATA

How do we balance business needs with multiple privacy regimes and transfer constraints?

10 DATA REUSE & PURPOSE

When can existing or trained data be repurposed, and who owns the decision?

11 GOVERNANCE DEBT

What must be built early before AI/data products make governance expensive to retrofit?

12 BOARD / ENTERPRISE GOVERNANCE

How do we connect risk, compliance, cyber, privacy and operational decisions without duplicating approvals?

A useful test for any governance programme: if the team cannot answer who owns the decision, what options were considered, what trade-offs mattered, what was implemented and what evidence exists, the governance model is probably still too abstract.

04 • INSIGHT 01

DPDP maturity is an operating-model question

The strongest DPDP signal from Delhi was that policy is only the beginning. Participants repeatedly moved the discussion toward implementation: ownership, processes, controls, evidence, cross-functional reviews and accountability embedded in business operations.

01

MOVE FROM POLICY → OPERATING MODEL

EXECUTIVE IMPLICATION

Define the operating model around business processes: owners, decision rights, controls, evidence, escalation and review cadence.

BUILD EARLY

Involve Legal and Business from the outset when new technology or data-driven processes are designed. Build safeguards into the process rather than retrofitting them.

MAKE ACCOUNTABILITY VISIBLE

Several insights pointed to organisation-wide responsibility: every function handling data should understand its role, while business-unit accountability does not become diluted.

PRACTICAL DESIGN PRINCIPLES

- Assign decision owners, not just process owners. Clarify who can approve, reject, escalate and accept residual risk.
- Put recurring cross-functional reviews on the calendar. One participant specifically proposed regular reviews covering DPDP, third-party risk, breach readiness and AI oversight.
- Measure operational adoption. Data protection is reflected in day-to-day responsibilities and, where appropriate, employee KPIs.
- Build evidence as the work happens. If a control matters, decide what evidence will demonstrate that it operates.

Executive question: “If a regulator, Board member or auditor asked us tomorrow to demonstrate how DPDP works in one real business process, could we show the owner, control, evidence and escalation path end-to-end?”

05 • INSIGHT 02

AI governance keeps colliding with data governance

The challenge submissions repeatedly connected AI adoption to data ownership, privacy, security, accountability and human oversight. One participant's take-back was especially direct: treat AI governance as a data governance problem first—not only an AI problem.



THE SIGNAL

AI governance is moving from a policy question to an operating question: which uses are approved, what data can enter them, who is accountable, what human review is required, and how the organisation knows the controls are working.

The challenge set also included shadow AI, AI risk assessment, approved vs. unapproved tools, AI-generated data assets and responsible AI deployment.

A PRACTICAL AI GOVERNANCE STACK

1	USE CASE What is the AI being used for? What decision or workflow does it affect?
2	DATA What data enters, trains, informs or is produced by the system? Who owns it?
3	RISK What can go wrong—privacy, security, bias, reliability, confidentiality, regulatory or business risk?
4	DECISION RIGHTS Who approves, monitors, overrides, escalates and accepts residual risk?
5	EVIDENCE What records demonstrate that the approved controls, monitoring and human oversight actually operate?

Key implication: Do not design AI governance as a separate layer sitting above existing data governance. Use the data lifecycle, ownership and control environment as part of the AI governance foundation.

06 • INSIGHT 03

The hardest question is often: who owns the decision?

Across DPDP, AI, privacy, cyber and enterprise risk, participants repeatedly returned to the same friction point: risk crosses functions faster than organisational accountability does.

THE ACCOUNTABILITY CHAIN

BUSINESS	Owns the business context and the outcome
LEGAL / PRIVACY	Interprets obligations, risk and defensibility
SECURITY / TECHNOLOGY	Designs and operates technical controls
RISK / COMPLIANCE	Challenges, monitors and assures
LEADERSHIP / BOARD	Escalates, accepts material risk and sets direction

WHAT THE ROOM SUGGESTS

- Accountability does not be reduced to naming a DPO or a central privacy team. Multiple participants explicitly described data privacy as an organisation-wide responsibility.
- When data risk crosses functions, the critical control is often decision rights: who can decide, who must be consulted, who can challenge and who escalates.
- Continuous communication matters. A participant highlighted the need for constant communication between IT, Legal and Security so each function understands the other's perspective.
- Good governance does not eliminate disagreement. It makes the disagreement visible and gives the organisation a defined path to resolve it.

Decision-rights test: Take one high-impact data or AI decision. Write down the decision owner, required contributors, challenge function, escalation point and final evidence. If two functions can reasonably believe they own the same decision, the model needs clarification.

This is where governance moves from “who has a role?” to “who has the right to decide?”

07 • INSIGHT 04

Third-party risk and breach readiness are operational tests

The challenge set included vendor accountability, cloud risk, processor controls, audits, contractual protections and breach readiness. The forum-day insights added a practical layer: periodic vendor audits, clear escalation and preparation before an incident happens.

THIRD-PARTY GOVERNANCE

Participants raised vendor assessment, periodic audits, accountability and the practical value of contractual controls such as Zero Data Retention clauses.

BREACH READINESS

The room surfaced escalation, early reporting, evidence, operational preparedness and the first 72 hours as decision questions—not merely policy topics.

THE PRACTICAL CONTROL LOOP

1	ASSESS — Know the vendor, data, access, processing, criticality and risk.
2	CONTRACT — Put meaningful obligations into agreements, including appropriate retention, security, incident and accountability provisions.
3	MONITOR — Periodically test whether the controls you relied upon are still operating.
4	ESCALATE — Make the chain of decision-making explicit before the incident or breach occurs.
5	REHEARSE — Preparedness is more credible when teams have practised the situation in advance.

Participant signal: “Zero Data Retention” and clear breach escalation appeared as concrete practices participants intended to take back. That is a useful reminder that governance value often sits in specific control decisions.

08 • INSIGHT 05

Consent is only one part of the lifecycle decision

The challenge submissions exposed a broader lifecycle problem: legal basis, legacy data, data mapping, reuse, cross-border flows and the practical question of where technology helps—or simply adds another layer of complexity.

CONSENT	When is consent the right basis? How do workflows move from notice through capture, proof and deletion?
LEGACY DATA	How do organisations identify, consolidate and govern historical personal data across systems and tools?
PURPOSE / REUSE	When trained or existing data is reused for due diligence or a new use case, what changes in purpose, accountability and controls?
CROSS-BORDER	How can organisations balance business requirements with Indian and global privacy obligations without blocking the business?
TECHNOLOGY	Which tools genuinely simplify privacy governance, and which create another layer of process without solving the underlying problem?

A BETTER LIFECYCLE QUESTION

Instead of asking only “Do we have consent?”, ask:

What is the purpose? → What is the lawful basis? → What data do we actually need?
→ Who owns the decision? → Where does the data move? → How long do we keep it?
→ What evidence proves the control?

This reframes privacy from a collection exercise into an ongoing data lifecycle and decision discipline.

09 • EXECUTIVE DECISION PLAYBOOK

Ten questions to take back to your organisation

The most useful output of an intelligence report is not another list of issues. It is a better set of questions. These are derived from the challenges, takeaways and forum-day signals.

01	WHO OWNS THE DECISION? EXECUTIVE IMPLICATION Use this as a standing governance review prompt.	02	WHAT IS THE BUSINESS CONTEXT? EXECUTIVE IMPLICATION Use this as a standing governance review prompt.
03	WHAT ARE THE REAL OPTIONS? EXECUTIVE IMPLICATION Use this as a standing governance review prompt.	04	WHAT ARE THE TRADE-OFFS? EXECUTIVE IMPLICATION Use this as a standing governance review prompt.
05	WHAT MUST BE BUILT EARLY? EXECUTIVE IMPLICATION Use this as a standing governance review prompt.	06	WHAT CONTROLS ACTUALLY OPERATE? EXECUTIVE IMPLICATION Use this as a standing governance review prompt.
07	WHAT EVIDENCE WILL WE NEED? EXECUTIVE IMPLICATION Use this as a standing governance review prompt.	08	WHERE DOES ACCOUNTABILITY CROSS FUNCTIONS? EXECUTIVE IMPLICATION Use this as a standing governance review prompt.
09	WHAT HAPPENS UNDER PRESSURE? EXECUTIVE IMPLICATION Use this as a standing governance review prompt.	10	WHAT WILL WE REVIEW AGAIN? EXECUTIVE IMPLICATION Use this as a standing governance review prompt.

A useful governance culture does not only produce answers. It creates better questions before the next decision arrives.

10 • PARTICIPANT VOICE

What leaders said they valued — and took back

The strongest proof is specific. The perspectives below capture what experienced practitioners valued most: practical implementation, candid peer exchange, stronger questions and decision-ready governance.

“The insights were so helpful that they will provide a roadmap for organisational checks and balances around data.”

— Legal Manager | Energy

“Treat AI governance as a data governance problem first—not an AI problem.”

— AI Risk Manager | Financial Services & FinTech

“The most valuable insights came from honest conversations about what is actually working in practice.”

— Assistant Manager – Governance, IT | Technology & Events Technology

“The real value was the people — leaders willing to trade hard-won experience openly rather than talk in generalities.”

— Senior Manager – Legal & Corporate Governance | Technology & AI

“Sometimes, an event doesn’t just give you knowledge—it gives you new questions to think about.”

— Senior Legal & Governance Leader | Technology

“The real challenge with privacy compliance is translating principles into decisions, processes and controls that actually work within a complex organisation.”

— Executive Director – Legal | Transportation & Rail

The pattern is consistent: practicality, candid experience, peer comparison and take-back value.

11 • FROM DELHI TO YEAR-ROUND VALUE

The forum created the environment. Membership keeps the decision intelligence moving.



DELHI WAS THE EXPERIENCE.

Membership is the continuation.

Participants asked for more insightful sessions and highlighted the value of ongoing peer exchange. The GC360 model extends that environment through recurring digital and in-person engagement.

WHAT A MEMBER CAN CONTINUE TO ACCESS

LIVE DIGITAL DECISION SESSIONS

Focused practitioner-led discussions around real governance decisions and implementation challenges.

PEER BENCHMARKING

Compare how relevant practitioners are approaching similar problems across organisations and industries.

BRING YOUR GOVERNANCE CHALLENGE

Bring a real question, problem or decision for consideration in a future GC360 discussion.

REAL IMPLEMENTATION JOURNEYS

Learn from practitioners who have actually faced and implemented the work.

DECISION & INSIGHT LIBRARY

Access selected practical lessons, implementation insights and decision intelligence from GC360 discussions.

DECISION MATCH + CONNECTIONS

Discover relevant discussions, practitioners and insights aligned to the challenges you are working through.

PRIORITY PHYSICAL FORUM ACCESS

Priority consideration for Governance Decision Forums, with preferred member rates where physical participation is paid.

MEMBER NETWORK & VISIBILITY

Build your professional presence within the GC360 governance network and participate in relevant practitioner connections.

JOB MATCH

Access relevant governance opportunities surfaced through the GC360 network.

₹9,999 + GST / YEAR • 12 MONTHS OF GC360 GOVERNANCE DECISION MEMBERSHIP

BETTER GOVERNANCE DECISIONS. THROUGHOUT THE YEAR.

12 • MEMBERSHIP VALUE

Keep the benchmarking going when the next question arrives.

GC360 Governance Decision Membership keeps practitioners connected to live decision conversations, peer experience and the accumulated intelligence generated through the GC360 ecosystem.

WHEN THE QUESTION IS NEW

Benchmark against how experienced practitioners have handled comparable governance questions.

WHEN THE OPTIONS ARE UNCLEAR

Explore different approaches, trade-offs, controls and decision rights before committing.

WHEN IMPLEMENTATION GETS HARD

Learn from real implementation journeys across privacy, AI, data, cyber, risk and enterprise governance.

WHEN THE DECISION NEEDS DEFENDING

Use practitioner experience and documented decision intelligence to sharpen the reasoning and evidence behind the choice.

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Your next governance decision does not have to be made in isolation.

Learn from people who have done it. Benchmark your thinking.
Explore your options. Bring the problem you are trying to solve.

REQUEST ACCESS

generalcounsel360.com/governance-membership

GC360 does not end with one Forum. It connects real challenges, practitioner experience and decision intelligence across the year.

13 • METHOD & SOURCE NOTE

How this report was built

This report is intentionally an anonymous aggregate intelligence document. It converts the underlying challenge submissions, forum-day insight capture and participant feedback into reusable decision intelligence rather than publishing a list of individual responses.

SOURCE	WHAT WAS USED
Pre-forum challenge workbook	83 delegate records were mapped; 53 contained a non-empty submitted challenge / decision field. These were grouped into 12 challenge roundtable themes.
Forum-day insight capture	68 form submissions were captured. Quality control identified 64 substantive participant insights and 4 test / placeholder entries, which were excluded from the substantive analysis.
Participant takeaways & LinkedIn feedback	Post-forum comments were used to identify concrete take-back practices, experience signals and participant language around what made the room valuable.
Proof & content asset bank	Used as the editorial source for the strategic synthesis, challenge intelligence, Decision Room validation and membership continuity logic.

SOURCE & EDITORIAL BASIS

- 64 substantive forum-day insights are presented as anonymous aggregate intelligence.
- Challenge patterns are grouped into themes and generalised to protect organisational confidentiality.
- Participant perspectives are presented without names and identified only by role and industry.

GC360 METHOD

REAL CHALLENGE → PRACTITIONER EXPERIENCE → TRADE-OFFS → PEER BENCHMARK → NEXT MOVE

The Delhi Forum is the evidence. The recurring decision environment is the product.

GC360 creates a continuing decision environment where leaders have relevant experience to benchmark against.

14 • PARTNER ACKNOWLEDGEMENT

Governance Culture & Accountability Partner



THANK YOU, RAINMAKER

Our Governance Culture & Accountability Partner for the Delhi Privacy Decision Forum.

Rainmaker led the ₹250 Crore Question: A DPDP Regulatory Simulation — bringing a practical, scenario-based governance exercise into the Forum and adding another dimension to executive decision-making.

GC360 CREATES THE DECISION ENVIRONMENT

REAL CHALLENGES → PRACTITIONER EXPERIENCE → PEER BENCHMARKING → DECISION INTELLIGENCE

Continue benchmarking beyond the Forum through GC360 Governance Decision Membership.

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ACCESS**

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