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# TMT LAW NEWSLETTER

January, February, March – 2022

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## Fintech

### 1. Reserve Bank of India allows credit bureau access to fintechs

The Reserve Bank of India (“RBI”) *vide* press release dated January 5, 2022, notified the eligibility criteria for entities to be categorized as ‘specified user’ under regulation 3(j) of the Credit Information Companies Regulations, 2021 (“CIC Amendment 2021”) on January 5, 2022. CIC Amendment 2021 enables fintech companies’ accessibility to credit information bureaus’ databases. In 2019, the RBI had intimated and censured banks and non-banking financial companies (“NBFCs”), against the prevailing practice of sharing credit information sourced by banks and NBFCs from credit information bureaus to fintech companies. RBI has also communicated to the banks and NBFCs that appointing fintech companies as brokers/agents will be considered as a violation of the norms of the RBI. This amendment would provide easy access to credit data, which will assist fintech companies to design and market appropriate products like buy-now-pay-later and other innovative credit solutions in partnership with banks and NBFCs.

The CIC Amendment 2021 has amended the Credit Information Companies Regulation, 2006 by the insertion of regulation 3(j) that enables ‘an entity engaged in the processing of information, for the support or benefit of credit institutions, and satisfying the criteria laid down by the RBI from time to time’ to access individual customer credit information.

### 2. RBI releases framework for geo-tagging payment system touch points

The RBI *vide* notification dated March 25, 2022, has released a framework for geo-tagging of payment system touch points (“Framework”). Geo-tagging refers to the capturing of geographical coordinates (latitude and longitude) of payment touch points deployed by merchants to receive payments from their customers.

The Framework recognizes two categories of physical payment touch points i.e., banking infrastructure (like bank branches and ATMs), and payment acceptance infrastructure (like the point of sale and quick response code), which are used by customers for digital payment transactions. RBI requires all banks and non-banks to maintain a registry with an accurate location of all payment

touch points across the country. This registry should include information such as general merchant details, merchant location details, and payment touchpoint details including locations. The Framework also details the reporting mechanism for banks and non-banks for reporting on information in relation to payment touch points to the RBI through the Centralized Information Management System (CIMS).

Geo-tagging of payment touch points would help in monitoring digital payment infrastructure density and measuring penetration levels across the country. The collected data and information can be used to design and implement appropriate policy interventions for enhancing the reach of the digital payments.

### 3. RBI launches unified payment interface for feature phones and 24x7 helpline for digital payments (DigiSaathi)

The RBI *vide* press release dated March 8, 2022, has launched the unified payment interface 123pay (“UPI123pay”), which enables feature phone users to transact on the unified payment interface (“UPI”) platform without an internet connection. UPI123pay requires the users to link their bank account with the feature phones and further allows them to make payments to their friends and family, utility bills, mobile bills, and also check their account balances. UPI123pay includes four distinct options which are mentioned below: -

- a) **App-based functionality:** This requires installation of the UPI application on the feature phone which would enable all UPI functions and transactions like smartphones except scan and pay.
- b) **Interactive voice response (IVR):** It enables users to initiate a secured call from their feature phones to a predetermined number and complete UPI onboarding formalities to be able to start making financial transactions without an internet connection.
- c) **Proximity sound-based payments:** This uses sound waves to enable contactless, offline, and proximity data communication on any device.
- d) **Missed call:** This will allow feature phone users to access their bank account and perform routine transactions such as receiving and transferring funds, regular purchases, bill payments, etc., by giving a missed call on the

number displayed at the merchant outlet. The customer will receive an incoming call to authenticate the transaction by entering UPI PIN.

UPI123pay would help in onboarding a significant number of feature phone mobile subscribers in the country onto the UPI platform and will also help deepen the digital payment ecosystem and achieve financial inclusion. The DigiSaathi is a platform set up by the National Payments Corporation of India (NPCI), which is a 24x7 helpline to address the queries of digital payment users across products and is accessible to the users through the website and chatbot.

#### **4. Advertising Standards Council of India releases the guidelines for advertising and promotion of virtual digital assets and services**

The Advertising Standards Council of India (“ASCI”) *vide* press release dated February 23, 2022, released guidelines related to advertisement of all virtual digital assets (“VDA”), VDA exchanges or featuring VDAs, which would be applicable to all advertisements released or published after April 1, 2022. In accordance with the new guidelines, all such advertisements are required to carry a disclaimer that says ‘*crypto products and non-fungible tokens are unregulated and can be highly risky. There may be no regulatory recourse for any loss from such transaction*’. Amongst other things, the guidelines requires that (a) the disclaimer be prominent and unmissable to the average consumer and makes different prescriptions for advertisements appearing in different forms of media and channels of communication; (b) the words ‘*currency*’, ‘*securities*’ and ‘*depositories*’ and related terms should not be used while advertising VDA products and services because of the risk associated with such products; (c) the advertisements should not contradict or downplay the information or warnings that regulated entities provide to customers and advertising entities should avoid obfuscating cost and profitability, depicting minors in ads, pitching VDA products as a solution to financial or personality problems; (d) all advertisements should clearly give out the names of the advertisers and a method of contacting them; (e) all celebrities should do their own due diligence when it comes to the statements that they make on advertisements to avoid misleading customers.

These guidelines are an important and positive step towards creating uniform standards within an unregulated VDA sector as it recognizes the responsibility of all investment ads and campaigns towards investor education and awareness related to liquidity risks, volatility, and restrictions.

#### **Telecommunications**

#### **5. Department of telecommunications revises policy for issue/renewal of NOC for sale/ rent of international roaming SIM cards/global calling cards of foreign operators in India**

The Department of Telecommunications (“DoT”) *vide* circular dated January 14, 2022, revised the terms and conditions (“T&Cs”) for issue/ renewal of no objection certificate (“NOC”) for sale/ rent of international roaming SIM cards/ global calling cards of foreign operators in India (“**Revised T&Cs**”). The revision in the T&Cs was made in pursuance of the Telecom Regulatory Authority of India (“TRAI”) recommendations on ‘*sale/rent of international roaming SIM cards/ global calling cards of foreign operators in India*’. The Revised T&Cs among other things mandates the NOC holders to make provision for providing information regarding customer care service, contact details, escalation matrix, itemized bills, information related to tariff plans, services offered, etc. Furthermore, the provision has also been made to strengthen billing and consumer grievance redressal mechanism to facilitate time-bound resolution of grievance by the NOC holders with the provision for appellate authority in DoT. The Revised T&Cs are made applicable from January 13, 2022.

The Revised T&Cs are in line with the recent policy reforms announced in the telecom sector and with the other license/ registrations. It aims to strengthen the mechanism to protect the interests of the Indian public visiting abroad and further streamline the application process/ other procedures for the NOC holders and facilitate the resolution/ management of the issues of the NOC holders.

#### **6. DoT amends the INSAT-MSS license agreement, license agreement for provision of VSAT service using INSAT system, & sui-generis category license granted to BSNL for provision and operation of satellite-based services**

## using gateway installed in India, for change in time period of storage of call detail records

DoT *vide* respective circulars dated January 24, 2022, introduced amendment in the [INSAT-MSS, license agreement, license agreement for provision of VSAT service using INSAT system, & sui-generis category license granted to BSNL for provision and operation of satellite based services using gateway installed in India](#). The amendments seek to change the time period for which the respective licensees, are legally mandated to store the call detail records. Prior to the amendment in question, the respective licensees, were obligated to maintain all commercial records, regarding the communications exchanged on the network till DoT clears the same for destruction. Such records were legally mandated to be ‘*archived for at least a year*’ for scrutiny by DoT. As per the post amendment position, the respective licensees shall maintain all commercial records/call records/ exchange call records/IP detail records, regarding the communication exchanged on the network, ‘*for a period of at least 2 years*’ for DoT’s scrutiny. These records can be destroyed, thereafter, unless DoT directs the licensees, otherwise.

## 7. TRAI releases the consultation paper on use of street furniture for small cell and aerial fiber development

The TRAI, on March 23, 2022, released a [consultation paper on use of street furniture for small cell and aerial fiber development. Street furniture like utility poles, billboards, etc.](#) and public structures like bus stops etc. can be utilized to mount small cells and aerial fibers for providing telecom services. Granting access to street furniture by the respective governing authorities could remove a significant hurdle in 5G small cell deployment in the country. The use of public street furniture will remove the need to have greenfield deployment of towers or poles for small cells and fiber, thus reducing the expenditure and time involved for rolling out the networks and services. The sharing of infrastructure amongst various entities is also in sync with the Prime Minister Gati Shakti initiative.

However, there are many factors involved in the deployment of small cells on street furniture, for instance, identifying the suitable street furniture based on availability of backhaul and power, deployment heights, load bearing capabilities of

street furniture for mounting suitable equipment, scalability, and concerns related to local approvals. Further, some other issues like sharing of the street furniture amongst various users, permissions needed for power supply under state electricity laws, exemptions or bulk permissions for small cell deployment etc. are also required to be addressed. With this background, TRAI has released the consultation paper, and invited comments from the stakeholders, on issues related to outdoor small cell and aerial fiber deployment using street furniture.

## 8. TRAI issues Telecom Tariff (Amendment) Order, 2022

The TRAI *vide* notification dated January 27, 2022, issued Telecom Tariff (Amendment) Order, 2022 which mandates every telecom service provider to offer at least one plan voucher, one special tariff voucher and one combo voucher for a period of thirty days, as well as which will be renewable every month. The amendment in question was brought about, after consultation with the concerned stakeholders, and after considering the suggestions put forward by the concerned stakeholders.

### Data Protection

## 9. Ministry of Electronics and Information Technology releases the Draft India Data Accessibility and Use Policy, 2022

The Ministry of Electronics and Information Technology (“MeitY”) on February 21, 2022, released the draft of the ‘[Data Accessibility & Use Policy, 2022](#)’ (“Draft Policy”), with the stated aim to ‘*radically transform India’s ability to harness public sector data*’. The key recommendations as laid out in the Draft Policy proposal include but are not limited to the following: -

- a) The overall ownership of the data will remain with the government and will be guided by principles such as (i) integrated and technology agnostic; (ii) privacy and security by design; (iii) equal and non-discriminatory access; (iv) risk management over risk avoidance. In context of the same, its applicability is to data and information generated by the Government of India (“GoI”) directly or through authorized agencies of various ministries and autonomous bodies. However, an exception has been built-in for datasets categorized under (i) a restricted sharing and access list for trusted users; (ii) a negative list of datasets.

- b) Setting up of the India data council, which will comprise the India data officer and chief data officers of state and central government departments. Its primary task is to define high-value datasets (“HVDs”) and value datasets (“VDs”), finalize data and meta-data standards, data sharing toolkit and review the implementation of the policy.
- c) In addition, an India data office (IDO) will also be instituted to consolidate data access and sharing of public data repositories across the government as well be responsible for coordinating with ministries, states, and other schematic programs to identify and provide access to HVDs.
- d) Creation of detailed, searchable data inventories with clear metadata and data dictionaries, which will then integrate into a government wide searchable database through open application programming interfaces for government-to-government data sharing.
- e) Identification of HVD based on indicators such as their degree of importance in the market and of socio-economic benefits, impact on India’s artificial intelligence (“AI”) strategy and performance on key global indices.
- f) Adoption and publication of domain-specific metadata and data standards related to data sharing, retention that are compliant with interoperability framework, policy on open standards etc., by every department under the GoI.
- g) Minimally processed datasets to be made available at no cost to promote innovation, research, and development. However, detailed datasets that have undergone value addition maybe valued at a transparent price by the specific departments from where the datasets have generated.
- h) Provision of reference anonymization tools and decision-making frameworks to be made for compliance by all ministries to assist data officers in managing data sharing requests.

While the intention behind this Draft Policy proposal is noble and welcome, timely and alongside enactment of the personal data protection law currently under review, would ensure implementation of appropriate safeguards in

context of the fundamental right to privacy as recognized in K.S. Puttuswamy v. Union of India.

## 10. MeitY releases the India Digital Ecosystem Architecture 2.0

The MeitY, in January 2022, [released](#) the revised consultation paper on the India Digital Ecosystem Architecture (“InDEA”) framework, which was first released in 2018. The key shift in InDEA is the policy focus on the creation of ecosystems, instead of standalone systems in the domain of e-governance. The primary purpose of InDEA 2.0 is to lay out an enabling prescriptive framework for governments and private sector enterprises to design infrastructure technology architectures that can span beyond their organizational boundaries and enable delivery of holistic and integrated services to the customers. Specifically, the paper advocates the laying down of the building blocks required for federated digital identities, connected to certain common and unique identifiers like Aadhar or mobile number to empower the citizen by allowing them to exercise control over these identities.

In the absence of a data protection legislation, there is a need to ensure that the adequate privacy safeguards are put in place and implemented to ensure that the interoperable and data sharing architecture set out in InDEA 2.0 operates within the bounds of legality and proportionality.

## Drones

### 11. Ministry of Civil Aviation notifies drone certification scheme

The Ministry of Civil Aviation (“MoCA”) [vide](#) notification dated February 7, 2022, released the certification scheme (“**Certification Scheme**”) for unmanned aircraft systems (“UAS”) which is based on guidelines provided in the international standard ISO/IEC 17067:2013, which guides the development of product certification schemes worldwide. The Directorate General of Civil Aviation (“DGCA”) has signed a memorandum of understanding to establish a mechanism for cooperation with the Quality Council of India (“QCI”), to develop and operate the Certification Scheme for UAS. A multi-stakeholder steering committee (“MSC”) would oversee the scheme, along with a QCI secretariat. Furthermore, the MSC would be supported by a technical committee and a certification committee that will be constituted by QCI. The Certification Scheme for UAS prescribes

the governing structure, certification criteria based on technical standards and regulations, certification process, requirements for certification bodies and the rules for use of certification mark to align the Certification Scheme as per ISO 17065, which is the international standard for product/ process certification. Notably, the type certification is mandatory for all UAS before their operation except model remotely piloted aircraft (“RPA”) and nano UAS.

## 12. MoCA notifies Drone (Amendment) Rules, 2022

In view of further relaxing the Drone Rules, 2021, the MoCA [vide](#) gazette notification dated February 11, 2022, notified the Drone (Amendment) Rules, 2022, which has inter alia abolished the requirement of issuance of remote pilot license. Previously, DGCA was empowered to issue the remote pilot certificate through the digital sky platform, whereas, post amendment, the remote pilot certificates issued by the authorized remote pilot training organizations would be sufficient to operate RPAs in India. This amendment has been brought about to further liberalize the Drone Rules, 2021, give a boost to domestically produced drones in India and minimize the red tape burden on the RPA operators.

## 13. Director General of Foreign Trade prohibits the import of foreign drones in India

Director General of Foreign Trade (“DGFT”) [vide](#) notification dated February 9, 2022, prohibited the import of drones in completely-built-up, semi-knocked-down or completely-knocked-down form. It is to be noted that the said prohibition does not apply to the scenarios where the drones are imported for (a) research and development (“R&D”) purposes by government entities, educational institutions recognized by central or state government, government recognized R&D entities and drone manufacturers (b) defense and security purposes. Further, the said exemptions are subjected to import authorization by DGFT in consultation with the concerned line ministries. However, the import of drone components has been allowed by the DGFT. Previously, the import of UAS/ unmanned aerial vehicles (UAVs)/ RPAs/ drones was in the ‘restricted category’ and was further subjected to prior clearance by DGCA and import license by the DGFT. Furthermore, nano category (less than or equal to 250 grams) and

operating below 50ft/ 15 meters above ground level required to take equipment type approval from wireless planning & coordination wing, DoT for operating in de-licensed frequency band(s) and does not require import clearance of the DGCA or import license from DGFT.

The prohibition on the import of foreign drones is in line with the vision of the ‘AatmaNirbhar Bharat Abhiyan’. While in the short run, this may lead to lesser availability of drones owing to its wider application ranging from photography to agriculture, in the long run it would prove to be beneficial for the domestic manufacturers of the drones in India.

### Artificial Intelligence

## 14. Telecommunication engineering centre released framework for fairness assessment of AI/ machine learning systems

The Telecommunication Engineering Centre (“TEC”) which is the technical arm of the DoT, [vide](#) letter dated February 22, 2022, has initiated a public consultation and invited recommendations and suggestions, to develop a framework for fairness assessment study of AI/ Machine Learning (“ML”) systems (“AI/ML Framework”), from different stakeholders on issues covering the classification of AI/ML systems, types of possible biases, metrics and parameters for measuring bias and fairness and procedural steps for assessing and rating fairness. The TEC aims to set up standard operating procedures to assess the fairness of various AI/ ML systems and create a benchmark. AI/ML Framework would help users make informed decision and choices while choosing AI/ML applications. This is in addition to the NITI Aayog approach paper on “Operationalizing Principles for Responsible AI” (“AI Paper”), which proposed a regulatory approach for enforcement of principles of responsible AI, broad governance structures and policies for the creation of a responsible AI ecosystem in India. Both AI/ML Framework and AIPaper are steps towards bringing parity in an industry that remains unregulated in India.

### Online Gaming

## 15. Karnataka High Court strikes down online gambling ban in Karnataka

The Karnataka High Court [vide](#) order dated February 14, 2022, struck down some of the provisions of the Karnataka Police (Amendment) Act, 2021 (“**Amendment Act 2021**”) and declared the same to be ultra-virus of the Constitution of India, 1949 (“**Constitution**”). The Amendment Act 2021 provided for an inclusive definition of gaming and increased the scope of ‘*wagering and betting*’ to include ‘*any act or risking money, or otherwise on the unknown result of an event including on a game of skill*’, thereby, banning all forms of online gaming including games of skill. The petitioners argued that the State of Karnataka lacked the legislative authority to pass the Amendment Act 2021 because it is contrary to the principles laid down by the Supreme Court of India (“**SC**”) and further the Amendment Act 2021 is violative of Articles 14, 19(1)(g), 21 and 301 of the Constitution. On the other hand, the State of Karnataka argued that in effect the online games including games of skill does not require great skill and was predominantly a game of chance and therefore, playing such games would amount to betting. The Karnataka High Court has issued a writ of mandamus restraining Karnataka police to interfere with the online gaming business and allied activities of the petitioners. It is to be noted that the Karnataka High Court has not struck the Amendment Act 2021 in its entirety and the State of Karnataka may come up with a new legislation but the same should be in consonance with the Constitution. In further development, the State of Karnataka has filed a special leave petition in the SC challenging the Karnataka’s High Court judgement banning all forms of online gaming.

The Karnataka High Court’s decision is in conformity with the recent decisions of the High Court of Tamil Nadu and Kerala, where the court has judicially reaffirmed that the games of skill are outside the ambit of ‘*gambling*’, ‘*betting*’ or ‘*wagering*’. Notably, the Karnataka High Court through its decision has cleared the air around the legality of online games and has relieved the stakeholders of the online gaming industry.

## Broadcasting

### 16. TRAI releases implementation plan for regulatory framework 2020, issued to broadcasters & distribution platform operators

In November 2021, TRAI issued implementation plan for new regulatory framework 2020, to broadcasters & distribution platform operators

(“DPOs”), directing them to submit compliance report on the same. On the basis of requests received from the stakeholders, [TRAI, on February 3, 2022, has extended the date of implementation of the said framework](#). As a consequence, broadcasters are now mandated to report to the TRAI, any change in name, nature, language, maximum retail price per month of channels, composition of bouquets, and maximum retail price of bouquets, as per new regulatory framework, 2020, till February 28, 2022, and simultaneously publish such information on their respective websites. Whereas all the DPOs were directed to report to TRAI, the distribution retail price of pay channels, composition of bouquet channels/free to air channels and price of pay channels, as per new regulatory framework, 2020, by March 31, 2022. Further, all distributors of television channels were directed to ensure that with effect, from June 1, 2022, services to the subscribers are provided as per bouquets or channels opted by the subscribers.

## E-commerce

### 17. GoI releases strategy paper on open network for digital commerce

In the year 2021, GoI proposed a first-of-its-kind initiative, open network for digital commerce (“**ONDC**”), which aims to democratise digital commerce, moving it from a platform-centric model to an open-network.

To bring more clarity to the framework of ONDC, on January 25, 2022, [a strategy paper elucidating the objectives & functioning of ONDC](#) (“**Strategy Paper**”) was brought about. The Strategy Paper analyses the rising interest in e-commerce, among the masses in India, especially in the wake of Covid-19 pandemic. However, as there are many e-commerce platforms functioning in India, sellers offering their goods/services on these platforms could be at disadvantage, as they will be made subject to follow different infrastructure, and fulfil different requirements, as required by various e-commerce models. To solve this very conundrum, and to give a boost to Indian e-commerce ecosystem, ONDC, as an initiative has been proposed.

This paradigm shift from an operator-driven monolithic platform-centric model to a facilitator-driven, interoperable decentralized network warrants: -

- a) encouragement for widespread participation; especially that of small and medium enterprises including hyperlocal merchants from across the country.
- b) enabling flow of value more than the store of value i.e., shift from ‘central platforms storing and exchanging value’ to a ‘decentralized network of interconnected ecosystem actor orchestrating the flow of value.
- c) addressing discoverability and trust, agnostic of a platform and across platforms.
- d) enabling autonomy to buyers and sellers.

The Strategy Paper further explains that the open network is based on the core concepts of decentralization, openness, and greater user utility. Moreover, the open network protocol is expected to act as a force multiplier for various segments; businesses, consumers, application developers, governments, and other relevant participants, through the creation of an interoperable and open playground for various sections to function and compete. The open network also aims to not be restricted to only retail sector, and its use cases and benefits can be extended to sectors like wholesale, mobility, food, delivery logistics etc.

Furthermore, the Strategy Paper elucidates upon the technology components that will be involved in the functioning of ONDC like adapter interfaces, gateways, open registries, & buyer and seller side mobile applications. The Strategy Paper also throws some light upon the policies that the ONDC will adopt, the rules for various participants of the ONDC, as well as how ONDC aims to protect the data of the buyers and the sellers involved.

ONDC, is an initiative in pipeline, which is based on a concept quite new to the Indian e-commerce ecosystem. Thus, this Strategy Paper could prove to be helpful in fleshing out the initiative and backing the initiative up with robust planning every step of the way. Comments from various stakeholders, have been invited on the Strategy Paper, to aid the planning of the initiative, and for government to have a better idea of the demands, and needs of the industry.

**HealthTech**

**18. The National Health Authority of India launches the Unified Health Interface**

The National Health Authority of India (“NHAI”) on [March 25, 2022](#), announced the launch of the Unified Health Interface (“UHI”) under the Ayushman Bharat Digital Mission (“ABDM”). The UHI is one of the main building blocks of ABDM and is an open network, powered by a decentralized health protocol and designed to enable interoperable digital health services like tele-consultations.

The unique value addition that the UHI brings to our digital health ecosystem is of patients and healthcare service providers alike being able to seamlessly interact across different applications and platforms.

**19. The National Health Authority of India launches the Unified Health Interface**

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**20. The NHAI releases consultation paper on data registry**

The NHAI, on March 31, 2022, released a [consultation paper on drug registry](#), envisioning a drug registry that is proposed to function as a centralized database of drugs, and will be made available to public, for their respective perusal. The consultation paper highlights the need to have a drug registry in place, to have a trusted source of data about various drugs in circulation in India. This will also help bring clarity, accountability, and transparency in the system. Most significantly, the consultation paper envisages the establishment of a web-based application called Drug Information Authoring Tool (DIAT), that will facilitate the process. Currently the consultation paper is open for comments from various industry stakeholders.

## CONTACTS



***Rajiv K Luthra***

Founder & Managing Partner  
New Delhi  
rajiv@luthra.com



***Asim Abbas***

Partner  
New Delhi  
aabbas@luthra.com



***Geeta Dhania***

Partner  
New Delhi  
gdhania@luthra.com



***Avisha Gupta***

Partner  
New Delhi  
agupta@luthra.com

## OFFICES

### NEW DELHI

1st and 9th Floor, Ashoka Estate,  
24 Barakhamba Road, New Delhi - 110 001  
Marg,  
T: +91 11 4121 5100 F: +91 11 2372 3909  
E: [delhi@luthra.com](mailto:delhi@luthra.com)

### BENGALURU

3rd Floor, Onyx Centre, No. 5, Museum Road,  
Bengaluru - 560 001 T: +91 80 4112 2800 /  
+91 80 4165 9245 F: +91 80 4112 2332  
E: [bangalore@luthra.com](mailto:bangalore@luthra.com)

### MUMBAI

20th Floor, Indiabulls Finance Center, Tower 2  
Unit A2, Elphinstone Road, Senapati Bapat  
Mumbai - 400 013 T: +91 22 4354 7000 /  
+91 22 6630 3600 F: +91 22 6630 3700  
E: [mumbai@luthra.com](mailto:mumbai@luthra.com)

### HYDERABAD

3rd Floor, Plot No. 8-2-619/1, Road No. 11,  
Banjara Hills Hyderabad – 500 034, Telangana  
T: +91 40 66206662  
E: [hyderabad@luthra.com](mailto:hyderabad@luthra.com)