

client alert

February 11, 2026



cyril amarchand mangaldas
ahead of the curve

Summary Note – Synthetic Information Related Amendments to Intermediary Guidelines

The Ministry of Electronics and Information Technology has notified the Information Technology (Intermediary Guidelines and Digital Media Ethics Code) Amendment Rules 2026 on February 10, 2026 (**SGI Rules**). The SGI Rules will be made effective from February 20, 2026, which is an aggressive timeline. An overview of the key stipulations under SGI Rules are below.

Clarified scope of SGI

The final rules clarify the previously ambiguous definition of “synthetically generated information” (**SGI**). SGI means audio, visual, audio-visual information that is artificially or algorithmically created, generated, modified, or altered in such manner that despite the falsehood, it appears to be real, authentic, true, in the context of a natural person or a real-world event. Exemptions cover good-faith or routine dealings (such as formatting for better accessibility, clarity, etc.) that do not alter or misrepresent the substance of the information. These carve-outs distinguish regular enhancements from SGI creation. Intermediaries must now account for SGI in their platform obligations, enabling better safeguards against deep fakes and false information.

New due diligence obligations

Intermediaries enabling AI modules must quarterly inform users about implications of hosting unlawful SGI, including immediately disabling access, removal of contravening information, suspension or termination of user account, disclosure of identity of the violator, and initiation of criminal action under criminal statutes. These intermediaries must enforce their terms upon knowledge



of such content. Existing due diligence processes, platform documentation, and grievance redressal SOPs will require revision, potentially necessitating additional backend technical measures.

Takedown timelines reduced

The take down mandate of 36 hours has been reduced to 3 hours, and the timeline for grievance resolution have been reduced from 15 days to 7 days (with even shorter timeline of 2 hours where the information is in breach of bodily privacy of a user). It is pertinent to note that reduced timelines were not suggested in the draft rules released in October 2025. Further, the reduced timelines will apply to all information and not limited to SGI, requiring compliance by all intermediaries irrespective whether they offer AI enabled features or not.

client alert

February 11, 2026

Due diligence for SGI

Intermediaries facilitating SGI must deploy reasonable technical measures to prohibit unlawful SGI (e.g., CSAM, false records, or deceptive depictions). They must ensure: (i) prominent labelling of SGI (visual or audio disclosure); and (ii) metadata or provenance mechanisms with unique identifiers to identify computer sources. This requires intermediaries to actively identify and prevent unlawful SGI, not merely respond to takedown requests. It is not clear whether this will cover LLMs.

Obligations on SSMIs

SSMIs must obtain user declarations for SGI, deploy technical measures to verify such declarations, and display clear labels for SGI. The reasonable and proportionate threshold means reliance on declarations alone is insufficient; verification and labelling are required.

The Partners would like to acknowledge the contributions made by Arpita Sengupta (Principal Associate) and Apoorva Sundar (Principal Associate).

client alert

February 11, 2026



Key contacts

Arun Prabhu

Partner (Co-Head – Digital | TMT)

arun.prabhu@cyrilshroff.com

Mihir Rale

Partner (Co-Head – Digital | TMT)

mihir.rale@cyrilshroff.com

Huzefa Tavawalla

Partner (Head - Digital Disruption)

huzefa.tavawalla@cyrilshroff.com

Arya Tripathy

Partner

arya.tripathy@cyrilshroff.com

Anirban Mohapatra

Partner

anirban.mohapatra@cyrilshroff.com

Disclaimer

All information given in this alert has been compiled from credible, reliable sources. Although reasonable care has been taken to ensure that the information contained in this alert is true and accurate, such information is provided 'as is', without any warranty, express or implied as to the accuracy or completeness of any such information.

Cyril Amarchand Mangaldas shall not be liable for any losses incurred by any person from any use of this publication or its contents. This alert does not constitute legal or any other form of advice from Cyril Amarchand Mangaldas.

Should you have any queries in relation to the alert or on other areas of law, please feel free to contact us on cam.publications@cyrilshroff.com

Cyril Amarchand Mangaldas
Advocates & Solicitors

100⁺ years of legacy

1200 Lawyers

Over 220 Partners

Peninsula Chambers, Peninsula Corporate Park, GK Marg, Lower Parel, Mumbai 400 013, India
T +91 22 6660 4455 E cam.mumbai@cyrilshroff.com W www.cyrilshroff.com
Presence also in Delhi-NCR | Bengaluru | Ahmedabad | Hyderabad | Chennai | GIFT City | Singapore | Abu Dhabi