

The following is not a comment on the technicalities of the legislation but a comment on the role and advocacy of ONDC in terms of data sharing that supports efficiency and innovation. In particular, I'd like to bring to attention the role of Differential Privacy in secure and efficient data sharing. Differential privacy allows a scaled control of data sharing. It allows a sharing ranging from the whole datasets to only the statistics of the data and anything in-between. This can decrease the risk of unregulated access to the whole dataset while still allowing statistics that might be important for innovation. A more thorough analysis can be found in for example the following paper: <https://ieeexplore.ieee.org/document/8592628>. Another comment that might be relevant is around Federated Learning. Federated learning is a model for Machine Learning where in essence the algorithm comes to the user rather than the data leaving the user. This will allow a higher level of privacy of users data, while still permitting some measure of learning. <https://federated.withgoogle.com> is a good place to get an introduction.