COPYRIGHT PROTECTION IN THE DIGITAL ERA: CHALLENGES AND LEGAL DEVELOPMENTS IN INDIA A STUDY OF THE COPYRIGHT ACT, 1957, DIGITAL PLATFORMS, ONLINE PIRACY AND ARTIFICIAL INTELLIGENCE

by

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ABSTRACT

Digital technology has altered both the circulation of creative works and the practical ability of their owners to control copying. A book, photograph, film, musical recording or computer programme may now be reproduced and distributed through websites, social networks, cloud services and streaming applications with little cost and across national borders. These developments widen public access to creative material, but they also complicate questions of permission, ownership, platform responsibility and enforcement. In India, the principal statutory framework remains the Copyright Act, 1957, read with the changes introduced by the Copyright (Amendment) Act, 2012 and the relevant provisions of the Information Technology Act, 2000. This paper considers the operation of copyright in online settings. It explains the rights protected by the 1957 Act, the role of fair dealing and other statutory exceptions, and the legal position of intermediaries that host or transmit user content. It examines judicial decisions including R.G. Anand v. Deluxe Films, Eastern Book Company v. D.B. Modak, MySpace Inc. v. Super Cassettes Industries Ltd., Shreya Singhal v. Union of India and UTV Software Communication Ltd. v. 1337X.to. The paper also discusses piracy, software infringement, digital manipulation and the unresolved questions created by generative artificial intelligence. In particular, it distinguishes the December 2025 DPIIT working-paper proposal on AI training from binding legislation. It concludes that effective protection requires proportionate enforcement, clear licensing, accessible remedies and safeguards for lawful speech, education and research.

Keywords: Copyright; digital technology; Copyright Act, 1957; online piracy; fair dealing; intermediary liability; digital rights management; artificial intelligence; India.

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1. INTRODUCTION

Copyright law protects the particular form in which an author or creator expresses an idea. It does not ordinarily grant control over the idea itself. Under Indian law, protection extends to qualifying literary, dramatic, musical and artistic works, cinematograph films and sound recordings. The Copyright Act, 1957 is the central legislation governing these rights, their limitations and the remedies available when they are violated.

The internet has changed the environment in which those rights are exercised. In the past, large-scale copying commonly required printing facilities, physical recordings or distribution networks. Digital material can be duplicated accurately, uploaded under an anonymous identity and shared repeatedly through services located in different countries. A file removed from one website may quickly return through another domain, a mirror page or a messaging group. At the same time, digital distribution gives independent creators, educators and small businesses a way to reach audiences without relying entirely on traditional publishers or broadcasters.

The central legal question is therefore one of balance. A rule that is too weak may leave creators without meaningful control or remuneration. A rule applied too broadly may restrict criticism, reporting, teaching, research and access to information. Courts and lawmakers must also determine when a platform is a neutral technical intermediary and when its knowledge or conduct justifies responsibility. Generative AI adds another layer: training datasets may contain protected works, while machine-generated outputs may sometimes resemble existing material.

This study follows a doctrinal and analytical method. It considers the relevant Indian statutes, selected judicial decisions, international instruments and government policy material. The analysis is focused on India; international developments are discussed only where they assist in understanding the domestic framework.

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2. MEANING, SCOPE AND BASIC PRINCIPLES OF COPYRIGHT

2.1 Copyright as a set of exclusive rights

Section 14 of the Copyright Act describes the rights attached to different categories of protected work. Depending on the subject matter, these may include the right to reproduce a work, issue copies, perform or communicate it to the public, make a film or sound recording, translate it or prepare an adaptation. Digital activity can engage more than one of these rights. For example,

placing a protected song on a streaming service may involve making a digital copy as well as communicating the recording to the public.

2.2 Works eligible for protection

Section 13 identifies the principal categories in which copyright may subsist: original literary, dramatic, musical and artistic works, cinematograph films and sound recordings. Computer programmes are treated as literary works. Protection is directed at original expression rather than information, facts, general concepts, procedures or methods. Thus, copyright may protect the particular photograph taken by a photographer, but it does not give that photographer ownership of the person, building or landscape shown in the image.

2.3 Originality and the idea-expression distinction

Originality does not mean that a work must be entirely unprecedented. In Eastern Book Company v. D.B. Modak, the Supreme Court required the exercise of skill and judgment accompanied by at least a modest creative contribution; effort alone is not enough. In R.G. Anand v. Deluxe Films, the Court emphasised that an idea, theme or subject cannot be monopolised through copyright. The inquiry is whether a substantial part of the protected expression has been copied. These principles are relevant to online compilations, adaptations, remixes and digital publications.

2.4 When protection begins and the value of records

Copyright generally comes into existence automatically when an eligible original work is created and expressed in a legally recognisable form. Registration is not a prerequisite to protection. Nevertheless, registration and reliable creation records may assist a claimant in establishing ownership or other particulars during a dispute. Creators working digitally should retain dated drafts, original files, project histories, metadata, contracts, invoices and records showing when and where material was first published.

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3. DIGITAL TECHNOLOGY AND THE CHANGING PATTERN OF INFRINGEMENT

3.1 Rapid reproduction and repeated distribution

A digital copy can be reproduced without the deterioration associated with repeated copying of physical media. Peer-to-peer networks, file-hosting services, cyberlockers and unauthorised streaming websites can therefore circulate protected works on a substantial scale. Removing one link may not end the activity if operators create replacement domains or redirect users to mirror

sites. Enforcement consequently involves more than obtaining a single takedown; it may require evidence preservation, cooperation with service providers and appropriately framed court orders.

3.2 Social networks and material uploaded by users

Social platforms host a wide range of material, including photographs, music, short film extracts, reviews, performances, memes and classroom resources. The legal status of each upload depends on the facts. Some material is licensed by its owner; some may fall within an exception under Section 52; and other uses may reproduce protected expression without permission. Automated detection systems can identify matching files, but they may not reliably assess the purpose of an upload, the amount used or whether the use is criticism, review or reporting.

3.3 Streaming and subscription-based distribution

Streaming services have reshaped the commercial distribution of music and films. Their operations commonly depend on agreements with producers, record labels, publishers, collecting societies or other right holders. Disputes may concern the territory covered by a licence, the permitted formats, the calculation and payment of royalties, or whether a service has used content beyond the agreed scope. Permission for one mode of exploitation should not automatically be treated as permission for every later use.

3.4 Cloud services and cross-border questions

Cloud storage and content-delivery networks may distribute data across servers situated in several jurisdictions. Copyright, however, is enforced through territorial legal systems. A right holder may have difficulty discovering who controls an infringing service, identifying the relevant operator, serving proceedings or enforcing an Indian judgment where the service and its assets are located abroad. These practical barriers make international cooperation important.

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3.5 Deepfakes and altered media

Digital tools can modify a photograph, reproduce a voice or combine existing video and audio into synthetic material. Copyright may be relevant where the process copies protected expression, such as a recording or a substantial part of a film. But a misuse of someone's identity is not necessarily a copyright violation. Depending on the circumstances, privacy, personality rights, passing off, consumer-protection rules or criminal law may also become relevant.

4. THE INDIAN STATUTORY FRAMEWORK

4.1 Copyright Act, 1957

The Copyright Act supplies the main legal structure. Section 14 sets out the exclusive rights associated with different works. Section 17 addresses first ownership, subject to its stated qualifications. Sections 18 and 19 regulate assignment, while Section 30 deals with licences granted by copyright owners. Section 51 identifies acts that amount to infringement, and Section 52 lists uses that are not treated as infringement. The statutory scheme applies to works in digital form just as it applies to works distributed through physical media.

4.2 The 2012 amendment

The Copyright (Amendment) Act, 2012 updated the Indian framework in response to developments in the exploitation of creative works and the international digital environment. Among other changes, it addressed authors' and performers' interests, royalty arrangements, technological protection measures and rights-management information. The amendments were intended in part to bring Indian law into closer alignment with the WIPO Copyright Treaty and the WIPO Performances and Phonograms Treaty.

4.3 Infringement under Section 51

Section 51 covers, among other matters, the unauthorised exercise of an exclusive right and specified commercial dealings in infringing copies. In the online context, uploading, hosting, streaming, downloading or distributing a protected work may fall within the provision if the relevant right is exercised without authority and no statutory exception or defence applies. The outcome depends on the particular work, the rights involved and the conduct of the parties.

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4.4 Fair dealing and other exceptions under Section 52

Section 52 preserves defined activities from being treated as infringement. Section 52(1)(a), for example, addresses fair dealing for specified purposes that include private or personal use, research, criticism or review, and reporting current events and current affairs, subject to the exact statutory language. Other clauses deal with educational uses, judicial proceedings, library activities, accessible formats for persons with disabilities and additional situations identified by Parliament. These exceptions are an essential part of the copyright system: they help reconcile creators' rights with education, public discussion and access to knowledge. Indian law should not be described as having the same broad, open-ended fair-use provision found in United States law.

4.5 Technological protection and rights-management information

Sections 65A and 65B address two forms of digital interference. Section 65A concerns circumvention of effective technological measures used to protect rights under the Act, subject to the section's conditions and exceptions. Section 65B deals with the unauthorised removal or alteration of rights-management information and certain dealings in copies after such information has been changed or removed. These provisions are relevant to encryption, access controls, embedded ownership data and other systems used to manage digital works.

4.6 Remedies

Section 55 provides civil remedies, which may include injunctions, damages and accounts of profits, subject to the Act and the facts of the case. Section 58 concerns infringing copies. Section 63 provides criminal consequences for knowing infringement or abetment, while Section 64 deals with seizure by police in specified circumstances. A remedy should be selected with regard to the evidence, seriousness of the conduct, applicable procedure and proportionality.

4.7 Information Technology Act, 2000

Online copyright disputes frequently involve intermediaries such as hosting providers, search engines, social networks and internet service providers. Section 79 of the Information Technology Act, 2000 creates a conditional safe-harbour framework for qualifying intermediaries. The protection depends on statutory requirements and applicable due-diligence obligations; it is not blanket immunity for every platform or every activity. The relationship between this provision and copyright claims has been considered in cases including MySpace Inc. v. Super Cassettes Industries Ltd.

5. INTERMEDIARY RESPONSIBILITY AND ONLINE PLATFORMS

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5.1 The role of an intermediary

An intermediary may receive, store or transmit electronic records for another person or provide a service connected with those records. The category includes internet access providers, web hosts, search engines, social networks and online marketplaces. Their functions are not identical. A service that merely transmits information may occupy a different position from one that selects, recommends, monetises or actively manages user content. Section 79 protects eligible intermediaries from certain forms of liability for third-party information when the statutory conditions are satisfied.

5.2 MySpace Inc. v. Super Cassettes Industries Ltd.

In MySpace Inc. v. Super Cassettes Industries Ltd., the Delhi High Court examined claims concerning copyrighted material uploaded by users to an online platform. The judgment discussed the operation of intermediary safe harbour, the significance of actual knowledge and the need to identify the allegedly infringing material with sufficient precision. It recognised the practical problems involved in requiring a platform to inspect every user upload before publication. At the same time, a sufficiently specific complaint may call for action under the applicable legal framework. The decision illustrates the need to reconcile effective copyright enforcement with the scale and design of user-generated services.

5.3 Notice, review and takedown safeguards

A useful complaint should identify the person asserting rights, the work said to be protected, the precise online location of the disputed material and the reason permission is said to be absent. A fair process should also allow appropriate review or a counter-notice, particularly where the uploader claims to own the material, hold a licence or rely on a statutory exception. An excessively broad notice can remove lawful criticism or educational content; an ineffective process can allow genuine infringement to remain available.

5.4 Shreya Singhal v. Union of India

In Shreya Singhal v. Union of India, the Supreme Court considered intermediary takedown obligations in the wider setting of online speech and constitutional protections. The Court read down aspects of the relevant framework in relation to the removal of unlawful information. The decision is not a complete ruling on copyright infringement and should not be substituted for the copyright-specific reasoning in MySpace. It is nevertheless important when considering legal clarity, lawful authority and protection against arbitrary restrictions on expression.

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6. SIGNIFICANT JUDICIAL DECISIONS

6.1 R.G. Anand v. Deluxe Films, (1978) 4 SCC 118

The Supreme Court's discussion of the idea-expression distinction remains a foundation of Indian copyright analysis. A claimant cannot prevent others from using a general idea or theme merely because it appeared in the claimant's work first. The legal question is whether protected expression has been copied. This approach is relevant when online creators allege that another video, post or adaptation resembles their work.

6.2 Eastern Book Company v. D.B. Modak, (2008) 1 SCC 1

This decision clarified the standard of originality required for copyright. The Court rejected a test based solely on labour or effort and required at least a minimal degree of creativity involving skill and judgment. The ruling has particular significance for databases, edited legal materials and digital compilations, where the selection or arrangement may be claimed as original.

6.3 Cambridge University Press v. Rameshwari Photocopy Services, 2016 SCC OnLine Del 6229

The Delhi High Court considered the educational exception in Section 52(1)(i) in a dispute involving course packs prepared for students. Although the case concerned photocopying rather than internet-based piracy, its reasoning is relevant to digital learning environments, where educational platforms and institutions distribute course material. It demonstrates that statutory exceptions must be applied in light of their purpose and the circumstances of the use.

6.4 UTV Software Communication Ltd. v. 1337X.to, 2019

In UTV Software Communication Ltd. v. 1337X.to, the Delhi High Court dealt with online services associated with large-scale piracy and considered website-blocking relief. The judgment discussed 'rogue websites' and the use of dynamic injunctions to address mirror or redirect sites that continue substantially the same infringing activity under new domain names. Such orders can respond to the limitations of static blocking directions, although they must be supported by evidence and framed carefully to avoid restricting lawful material.

7. COMMON FORMS OF DIGITAL COPYRIGHT VIOLATION

7.1 Piracy of films, music and books

Unauthorised websites and applications may offer protected films, television programmes, songs, e-books or software for streaming or download. Such activity can undermine the income of creators and legitimate distributors. It can also expose users to malicious software, fraudulent advertisements and data theft. Depending on the facts, responses may include civil proceedings, injunctions, blocking measures, criminal investigation and cooperation with relevant intermediaries.

7.2 Software infringement

Computer programmes fall within the statutory category of literary works. Installing unlicensed copies, circulating cracked versions or bypassing licence restrictions may infringe copyright and

may also breach contractual obligations. Organisations can reduce risk by keeping an accurate inventory of installed programmes, purchasing appropriate licences and retaining proof of authorised use.

7.3 Plagiarism and copyright infringement

Plagiarism and copyright infringement should not be treated as interchangeable terms. Plagiarism is generally an ethical or academic wrong involving the presentation of another person's work or ideas as one's own. It may arise even where the material is no longer protected by copyright or a statutory exception applies. Copyright infringement, by contrast, concerns the unauthorised exercise of rights protected by law. Giving credit is important, but attribution alone does not make an otherwise unauthorised reproduction lawful.

7.4 Photographs, memes and short videos

Images and video clips are often copied from creators' accounts and reused in promotional posts, reels, advertisements or commercial pages. The fact that a work can be viewed publicly online does not place it automatically in the public domain. A meme or short extract must be assessed in context, including the amount taken, the purpose of the use and whether an exception is available.

7.5 Circumvention of access controls

Encryption, digital locks and access controls are commonly used to manage licensed content. Circumvention may raise issues under Section 65A, subject to its qualifications and exceptions. A careful assessment should distinguish conduct intended to facilitate infringement from activities that may be permitted, such as legitimate accessibility, interoperability or security research where the statutory conditions are met.

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8. ARTIFICIAL INTELLIGENCE AND COPYRIGHT

8.1 Use of protected material in AI training

Generative AI systems are developed using datasets that may contain books, photographs, news articles, music, software code and other creative material. A central legal question is whether the collection, copying, storage or processing of those works involves an exercise of rights reserved by Section 14. A further question is whether a relevant exception under Section 52 applies. The existing Indian statute does not set out a clearly defined, general text-and-data-mining exception specifically for commercial generative-AI training.

8.2 DPIIT working paper and the proposed licensing approach

In December 2025, the Department for Promotion of Industry and Internal Trade published Part I of a working paper on the relationship between AI and copyright. The paper considered possible approaches such as a text-and-data-mining exception, rights-holder opt-outs, voluntary licences and extended collective licensing. It discussed a hybrid proposal under which AI developers could obtain a blanket licence for lawfully accessed copyrighted material used for training, with remuneration linked to commercialisation and collected through a central arrangement. The proposal was put forward for stakeholder consultation. It must be described as a policy proposal, not as an amendment to the Copyright Act or a presently binding rule.

8.3 Ownership of AI-generated material

Section 2(d)(vi) of the Copyright Act refers to the person who causes a computer-generated literary, dramatic, musical or artistic work to be created as its author. This provision predates current generative-AI systems and does not settle every issue concerning human creative contribution, the role of prompts, model developers, users or the originality of an output. A separate issue arises where generated material reproduces a substantial part of an existing protected work. The answer may depend on the output itself, the source material, the user's actions and the role played by the service provider.

8.4 The need for a predictable policy

It would be premature to assume either that every use of protected material for AI training is lawful or that all technical processing necessarily amounts to infringement. The analysis should identify the rights involved, how the material was obtained, the purpose and scale of processing, the availability of exceptions and licences, and the effect on creators. Transparent data practices and workable remuneration arrangements could provide greater certainty to both technology developers and creative professionals.

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9. INTERNATIONAL FRAMEWORK

9.1 Berne Convention

The Berne Convention for the Protection of Literary and Artistic Works establishes important international principles, including national treatment, automatic protection and minimum standards for protected works. It remains relevant to material circulated through digital networks, even though the practical methods of distribution have changed considerably.

9.2 TRIPS Agreement

The Agreement on Trade-Related Aspects of Intellectual Property Rights establishes minimum standards for copyright and related rights among World Trade Organization members. Article 9 recognises the distinction between ideas and expression. Article 13 requires limitations and exceptions to be confined to certain special cases that do not conflict with normal exploitation of a work or unreasonably prejudice the legitimate interests of the right holder.

9.3 WIPO Internet Treaties

The WIPO Copyright Treaty and the WIPO Performances and Phonograms Treaty, both adopted in 1996, address aspects of protection in the digital environment. They recognise rights relevant to online communication and contain obligations concerning technological protection measures and rights-management information. The 2012 amendments to Indian copyright law were intended in part to align domestic law with these instruments.

9.4 Different national approaches

Countries have taken different routes in dealing with digital copying and AI training. Some have adopted specific text-and-data-mining provisions, sometimes with conditions or opt-out mechanisms. Other jurisdictions rely more heavily on fair-use analysis or licensing. India should assess such models against the wording of Section 52, the domestic system of copyright societies, the interests of its diverse creator community and constitutional protections.

10. CONTINUING PROBLEMS IN THE INDIAN SYSTEM

- Anonymity and concealed identities can make it difficult to trace the person responsible for an infringing upload orwebsite.
- The volume and speed of online copying may make individual enforcement proceedings expensive and slow.
- Servers, operators and assets located abroad can complicate jurisdiction, service of process and enforcement ofcourt orders.
- Automated detection and takedown systems may mistakenly remove licensed material or lawful criticism,reporting and educational uses.
- Independent creators may not have the financial resources, technical knowledge or legal support required topursue a claim.

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- Unclear licensing language and fragmented royalty arrangements can create disputes about the scope ofpermission and the person entitled to payment.
- The relationship between copyright rules, intermediary safe harbour and platform-specific conduct dependsheavily on the facts of each case.
- AI training and machine-generated outputs raise unsettled questions about copying, exceptions, authorship,originality and responsibility.
- Broad website-blocking orders may affect access to lawful material if the target is not identified with sufficientprecision.
- Many internet users continue to assume incorrectly that material visible online is free to reuse without permission.

These difficulties show that enforcement cannot depend only on stronger penalties. A workable system must be accessible to small right holders, technically realistic for platforms and careful not to treat every online use as unlawful.

11. RECOMMENDATIONS AND THE WAY FORWARD

- **Make digital licences precise.** Agreements should clearly state the permitted services, territories, duration, formats, streaming and download rights, sublicensing conditions and method of calculating royalties.
- **Improve complaint procedures.** A notice should identify the work and the exact online location in dispute. Platforms should provide an appropriate route for review and counter-notice.
- **Build creator awareness.** Training and public information should explain ownership, evidence preservation, licensing, takedown procedures and available remedies.
- **Make enforcement accessible.** Small creators should be able to use proportionate complaint mechanisms, mediation and affordable legal assistance.
- **Keep blocking orders targeted.** Dynamic injunctions should be based on reliable evidence and directed at clearly identified infringing services, with safeguards against accidental overblocking.
- **Improve royalty transparency.** Digital services and copyright societies should provide comprehensible payment statements and make distributions within a reasonable time.
- **Protect legitimate exceptions.** Enforcement should respect statutory uses for research, education, criticism, review, reporting and accessibility.

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- **Develop AI policy through consultation.** Any future licensing or remuneration mechanism should be transparent, administratively workable and attentive to individual creators, small developers and research institutions.
- **Preserve evidence.** Creators and businesses should retain original files, timestamps, contracts, licences, invoices and communications with platforms.
- **Strengthen cross-border cooperation.** Online infringement requires coordination among courts, regulators, platforms and rights-management bodies in relevant jurisdictions.

12. CONCLUSION

Digital technology has not made copyright obsolete. Instead, it has increased the speed, scale and complexity of both lawful distribution and unauthorised copying. The same networks that allow creators to reach audiences directly can also be used to reproduce and circulate their work without permission. Indian law addresses these problems principally through the Copyright Act, 1957, including its provisions on exclusive rights, infringement, exceptions, remedies and technological protection. The Information Technology Act, 2000 adds a conditional framework for intermediary safe harbour.

The decisions in R.G. Anand, Eastern Book Company, MySpace and UTV show that copyright disputes require attention to the nature of the work, the right said to have been exercised, the purpose of the use, the role of the platform and the proportionality of the remedy. The legal system must protect creative labour without assuming that every online use is unlawful. Exceptions for education, research, criticism, review and reporting are not defects in copyright protection; they are part of the statutory balance.

Artificial intelligence is likely to remain a major subject of legal and policy debate. The DPIIT working paper published in December 2025 indicates that India has considered a possible licensing and remuneration model for the use of protected works in AI training. That proposal should not be confused with enacted law. Any future approach will need transparent consultation, clear rules and safeguards for both creators and innovators. In the long term, effective protection will depend on fair licensing, responsible platforms, accessible remedies, better public awareness and enforcement that is strong but proportionate.

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