



Crack the Code

December 2025



An E-Newsletter from CoralMetrix



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Crack the Code

OIDAR and NRTP taxpayers are exempt, except OIDAR taxpayers who have appointed a representative in India.



CA SUJATHA G
GST



Auto Suspension of GST Registration due to Non-Furnishing of Bank Account Details as per Rule 10A

GST Update: Furnishing of Bank Account Details under Rule 10A

As per Rule 10A of the CGST Rules, newly registered GST taxpayers are required to furnish their bank account details within 30 days from the date of registration or before filing GSTR-1 or IFF, whichever is earlier. This requirement applies to all taxpayers except those registered under TDS, TCS, or Suo-moto categories.

The GST Portal has enabled automatic suspension of registration if bank details are not furnished within the prescribed time. The suspension order can be viewed under Services > User Services > View Notices and Orders.

Taxpayers can add bank account details through a non-core amendment by navigating to Services > Registration > Amendment of Registration (Non-Core Fields).

Once the bank details are updated, cancellation proceedings are automatically dropped. If not dropped on the same day, taxpayers may manually click “Initiate Drop Proceedings” under the Notices and Orders section.

Court room Series: A Balanced Judicial Path

JUDGEMENT • PROCEEDINGS • LEGAL NEWS



The Guwahati High Court undertook a nuanced analysis, acknowledging both the legal mandate and the practical realities of GST compliance.

1. The provision imposes a heavy burden on purchasers

The Court observed that the requirement is “iniquitous” because:

- A purchaser cannot control whether a supplier uploads invoices.
- The law places a condition on ITC based on an act of another person.
- Such a condition could lead to denial of ITC even when the purchaser has acted in absolute good faith.
- This practical difficulty cannot be ignored in a value-added tax system.

2. Yet, Section 16(2)(aa) cannot be struck down

The Court held that the Legislature’s intention — preventing fraudulent claims and improving transparency is legitimate. ITC, being a concession, may be accompanied by reasonable limitations.

Thus, the Court declined to invalidate the provision.

3. The doctrine of “reading down” applied

Recognising the need for fairness, the Court adopted a middle ground:

Section 16(2)(aa) must be read down so that ITC cannot

be denied without giving the recipient an opportunity to prove bona fides.

A recipient can now establish compliance by producing:

- Valid tax invoices,
- Proof of GST payment to the supplier,
- Goods receipt evidence,
- Other documentary proof.

This protects genuine taxpayers while preserving the legislative intent.

4. CBIC must develop a practical mechanism

The Court explicitly noted that a long-term solution must come from the executive:

The reading down is temporary until CBIC devises a workable system to address the difficulty.

This is an important observation, signalling the need for systemic reform.

Implications for Taxpayers and Professionals

1. Relief for bona fide taxpayers

The judgment ensures that recipients cannot be mechanically denied ITC merely because an invoice does not appear in GSTR-2B. If the taxpayer can prove genuineness, ITC should not be disallowed.

2. Reduced exposure to litigation and double taxation

The ruling strengthens the defence of recipients in ITC mismatch cases and aligns with the broader judicial trend of protecting honest taxpayers.

3. Importance of documentation increases

While relief is available, it is not unconditional. Taxpayers must maintain:

- Invoice copies
- Proof of payment
- Delivery challans / e-way bills
- Supplier communication records
- Reconciliation workings

Proper documentation becomes the cornerstone of defending ITC claims.

4. Department cannot issue automatic rejections

Authorities must now:

- Issue notices
- Allow opportunity
- Examine documents
- Provide a reasoned order

before denying ITC.

5. Expected change in compliance ecosystem

The judgment puts pressure on CBIC to introduce:

- A recipient-level challenge mechanism for supplier default
- A dispute resolution window
- A system for reporting supplier non-compliance
- A safe-harbour threshold for ITC mismatch

These reforms could significantly improve the functionality of the GST credit chain.

Conclusion:

Reinforcing the Core Philosophy of GST

The McLeod Russel judgment stands out as a thoughtful and equitable interpretation of the GST law. It carefully balances the government's objective of curbing tax evasion with the taxpayer's right to fair treatment. By reading down Section 16(2)(aa), the Court has ensured that:

- The integrity of the ITC system is preserved,
- Genuine taxpayers are protected, and
- The cascading effect of taxation is avoided.

This decision also reiterates a fundamental principle: In a consumption-based, value-added tax system, ITC should not be denied when the taxpayer has acted with honesty and diligence.

The ball is now in the CBIC's court to introduce a practical mechanism that resolves supplier-recipient mismatches without burdening compliant businesses. Until then, this judgment serves as a critical shield for bona fide taxpayers who face challenges due to factors beyond their control.



CA SUJATHA G
GST

THE DIGITAL PERSONAL DATA PROTECTION ACT, 2023

DIGITAL PERSONAL DATA PROTECTION REGULATION • SECURITY • RIGHTS



DPDP ACT

Lays out the manner of processing the individual's digital personal data so as to protect the rights of her personal data to be used for certain specified legitimate purposes

The highlight being it gives the option to withdraw the rights provided earlier and deletion/erase of data

It is the need of the hour as our country is spearheading through the technological advancements, novel technologies and the advent of inevitable Artificial Intelligence.

Application of the act:

- To all the personal data being collected either in digital form or in non-digital form and digitised subsequently.
- Applicable within the territory of India
- Applicable outside the territory of India, if it is related to any offering of goods or services to Data Principals within the territory of India

Who is Data Principal?

Any individual who has an identifiable data such as Registered Mobile number, Contact address, Personal email address, etc

What comes under Personal data?

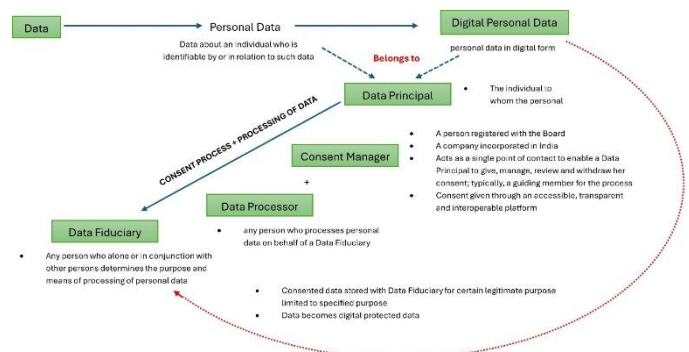
Most commonly used data are as follows:

- Government provided/approved identifiers - Aadhaar details, PAN details, Ration card details, Passport details, Electoral Card details, Driver's license details
- Contact number
- Residential Address
- Email address
- Vehicle details

When the above data is digitised, it becomes digital personal data. And this act specifically deals with digital personal data.

Hence it does not apply to personal data

- Processed for personal or domestic purposes (Eg., contact number details shared at Supermarket for accumulation of point, contact details shared in an invitation card); and
- Those that is made publicly available (Eg., Contact details shared in a website, shared through Business card, etc)



Who is Data Fiduciary?

- Any person who alone or in conjunction with other persons determines the purpose and means of processing of personal data.
- She can be an incorporation who provides goods and/or services to individual(s) Eg., Bank, Insurance, e-Commerce service provider, telecom service provider, Auditors, product selling companies (Vehicles, Home appliances, etc), Enrolment with registered association/committee/organization, etc

- Data is retained only till the consent is active or for a specified period governed under another law in force.

Who is a Consent Manager?

Acts as a single point of contact to enable a Data Principal to give, manage, review and withdraw her consent through an accessible, transparent and interoperable platform

Who is a Data Processor?

Any person who processes personal data on behalf of a Data Fiduciary

The flow of consent process

- The consent Manager acts as a guiding force and as an intermediary in this process.
- He shall develop and maintain a website or app (a digital platform). Both Data Principal and Data Fiduciary have access to it
- Data Principal purpose, noted with notice that is understandable independently, is in clear and plain language stating the personal details necessary to be shared along with its purpose; She gives consent to processing the personal data in the platform
- Following which the Data Fiduciary maintains those personal data (consented) in his platform.
- The withdrawal of the consent also follows the same process

Data Protection Board of India

- Independent body established specifically for the purpose of this Act with Chairperson leading the board along with other members (experts having special knowledge and practical experience) and function as a 'digital office' (proceedings, receipt of complaints, intimation of directions, order and appeal are conducted in online or digital mode)
- Deals with all complaints or issues pertaining to all digital data
- Comes into play when data breach occurs.

Appeal and Alternate Dispute Resolution

- Appeals against the order or direction filed before Appellate Tribunal within 60 days from the date of receipt of order or direction of the Board as per the procedural norms
- Appellate Tribunal also operate as a 'digital office'
- An order passed by the Appellate Tribunal under this Act shall be treated as a decree of civil court, and for this purpose, the Appellate Tribunal shall have all the powers of a civil court.
 - In spite of the above, Appellate Tribunal may transmit any order made by it to a civil court having local jurisdiction and such civil court shall execute the order as if it were a decree made by that court

Penalties**Breach in observing the**

- obligation of Data Fiduciary to take reasonable security safeguards to prevent personal data breach - may extend to 250 Crores INR
- obligation to give the Board or affected Data Principal notice of a personal data breach & additional obligations in relation to children - may extend to 200 Crores INR
- duties of data principal – upto 10000 INR

Interestingly, it may be seen with a viewpoint that the penalties are imposed with the intentions to avoid any data breach rather than going to the stage of imposing penalty.

Immunities

- No suit, prosecution or other legal proceedings shall lie against the Central Government, the Board, its Chairperson and any Member, officer or employee who perform in good faith under the provisions of this Act or the rules made thereunder
- The Central Government possess the power to call for information from the Board and any Data Fiduciary or intermediary.
- No civil court shall have the jurisdiction to entertain any suit or proceeding in respect of any matter for which the Board is empowered; no injunction shall be granted as well.

Enforcement timeline

This landmark bill will be enforced in 3 stages with various Sections coming in force at different stages.

- The first stage starts with the date of publication of the Act (13th Nov 2025)
- One year from the date of publication of the Act
- 18 months from the date of publication of the Act.

Adv.Meenakshi G

How Finance and Accounting Innovation Hubs Drive Digital Transformation and AI



Finance & Accounting (F&A) functions are no longer just about compliance, reporting, and cost control. They are rapidly evolving into strategic enablers of business growth, powered by digital transformation and artificial intelligence.

At the center of this evolution are Finance and Accounting Innovation Hubs—dedicated centers that help organizations experiment, adopt, and scale modern finance technologies in a structured and low-risk manner.

What is a Finance and Accounting Innovation Hub?

An F&A Innovation Hub acts as a sandbox for finance transformation. It brings together accounting expertise, data analytics, automation tools, and AI capabilities to design, test, and deploy next-generation finance solutions. Instead of implementing technology in isolation, innovation hubs allow organizations to co-create use cases aligned to real business problems.

Accelerating Digital Transformation in Finance

One of the biggest challenges companies face in digital finance transformation is knowing where to start. Innovation hubs help organizations identify high-impact, low-effort opportunities such as invoice automation, reconciliations, reporting automation, and workflow digitization. By piloting solutions in a controlled environment, companies can validate outcomes before rolling them out across business units, reducing both risk and cost.

Use Case: AI-Driven Invoice Processing and Spend Intelligence

One of the most common and high-impact use cases implemented through F&A Innovation Hubs is AI-driven invoice processing. Using document intelligence and

machine learning, organizations can automatically extract data from vendor invoices, validate it against purchase orders and contracts, flag exceptions, and post entries directly into the accounting system. Beyond automation, the same AI layer provides spend intelligence—highlighting cost leakages, duplicate payments, vendor concentration risks, and negotiation opportunities. Customers typically see faster AP cycles, lower processing costs, and improved visibility into enterprise-wide spending, making this an ideal starting point for AI adoption in finance.

Democratizing AI Adoption in F&A

AI adoption often feels complex and resource-intensive. F&A Innovation Hubs simplify this by packaging AI into practical use cases—such as document intelligence, anomaly detection, predictive cashflow forecasting, and automated compliance checks. Customers gain hands-on exposure to AI tools without needing deep in-house data science teams, making AI adoption more accessible and business-focused.

Driving Data-Driven Decision Making

Modern finance leaders need real-time insights, not static reports. Innovation hubs help organizations move from spreadsheet-driven reporting to live dashboards and analytics platforms. By integrating accounting systems, ERPs, CRMs, and operational data, finance teams can deliver actionable insights on profitability, working capital, and business performance.

Building Future-Ready Finance Teams

Beyond technology, innovation hubs play a crucial role in upskilling finance teams. Exposure to automation tools, analytics platforms, and AI workflows helps finance professionals transition from transactional roles to analytical and advisory roles. This cultural shift is essential for long-term digital success.

A Scalable Model for Continuous Innovation

Perhaps the biggest advantage of an F&A Innovation Hub is continuity. Digital transformation is not a one-time project—it's an ongoing journey. Innovation hubs provide a scalable framework where organizations can continuously test new tools, refine processes, and respond to regulatory, market, and technological changes.

Conclusion

CoralMetrix helps customers tap into a structured innovation program to move their finance function future-ready by combining domain expertise with digital and AI capabilities in its India Center Advisory. By offering a safe space to experiment, validate, and scale innovation, these hubs help customers take ownership of their digital transformation journey—turning finance from a back-office function into a strategic growth engine.

**Dipali Kumari**



Financial year 2025 - 2026 Compliance Calendar

Disclaimer: Dates are subject to change as per notification from government authorities

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APR	MAY	JUNE	JULY	AUG	SEPT
07TH MONTHLY TDS PAYMENT	07TH MONTHLY TDS PAYMENT	07TH MONTHLY TDS PAYMENT	07TH MONTHLY TDS PAYMENT	07TH MONTHLY TDS PAYMENT	07TH MONTHLY TDS PAYMENT
07TH GOVT. DEDUCT	10TH GSTR 7	10TH GSTR 7	09TH ECB 2 RETURN	10TH GSTR 7	09TH ECB 2 RETURN
09TH ECB 2 RETURN	11TH GSTR 1	10TH ECB 2 RETURN	10TH GSTR 7	11TH ECB 2 RETURN	10TH GSTR 7
10TH GSTR 7	12TH ECB 2 RETURN	11TH GSTR 1	11TH GSTR 1	11TH GSTR 1	11TH GSTR 1
13TH GSTR 1 (QRMP/IFF)	13TH GSTR 1 (QRMP/IFF)	13TH GSTR 1 (QRMP/IFF)	13TH GSTR 1 (QRMP/IFF)	13TH GSTR 1 (QRMP/IFF)	13TH GSTR 1 (QRMP/IFF)
18TH CMP - 08	20TH GSTR 3B	15TH Q4 TDS CERTIFICATE	15TH FLA RETURN	15TH Q1 TDS CERTIFICATE	15TH Q2 ADVANCE TAX 45%
20TH GSTR 3B	29TH PAS 6	15TH Q1 ADVANCE TAX 15%	18TH CMP 08	20TH GSTR 3B	20TH GSTR 3B
22ND QRMP	30TH LLP ANNUAL RETURN	20TH GSTR 3B	20TH GSTR 3B (QRMP)		30TH TAX AUDIT
25TH PMT 06	31ST TDS Q4 FILING (24-25)	30TH DPT 3	22ND QRMP		30TH DIRECTOR KYC
30TH GSTR 4	31ST FORM 61A		31ST TDS Q1 FILING (25 - 26)		
30TH MSME1			31ST INDIVIDUAL ITR FILING		
30TH GOVT. NON DEDUCT					

OCT	NOV	DEC	JAN	FEB	MAR
07TH MONTHLY TDS PAYMENT	07TH MONTHLY TDS PAYMENT	07TH MONTHLY TDS PAYMENT	07TH MONTHLY TDS PAYMENT	07TH MONTHLY TDS PAYMENT	07TH MONTHLY TDS PAYMENT
10TH ECB - 2 RETURN	10TH GSTR 7	09TH ECB 2 RETURN	09TH ECB 2 RETURN	10TH GSTR 7	10TH GSTR 7
10TH GSTR 7	11TH ECB 2 RETURN	10TH GSTR 7	10TH GSTR 7	11TH ECB 2 RETURN	11TH ECB 2 RETURN
11TH GSTR 1	11TH GSTR 1	11TH GSTR 1	11TH GSTR 1	11TH GSTR 1	11TH GSTR 1
13TH GSTR 1 (QRMP/IFF)	13TH GSTR 1 (QRMP/IFF)	13TH GSTR 1 (QRMP/IFF)	13TH GSTR 1 (QRMP/IFF)	13TH GSTR 1 (QRMP/IFF)	13TH GSTR 1 (QRMP/IFF)
18TH CMP - 08	15TH Q2 TDS CERTIFICATE	15TH Q3 ADVANCE TAX 75%	18TH CMP 08	15TH Q3 TDS CERTIFICATE	15TH Q4 ADVANCE TAX 100%
20TH GSTR 3B	20TH GSTR 3B	20TH GSTR 3B	20TH GSTR 3B	20TH GSTR 3B	20TH GSTR 3B
22ND QRMP	28TH MGT-7/MGT - 7A	31ST BELATED/REVISED ITR	22ND GSTR 3B (QRMP)	25TH PMT 06	25TH PMT 06
29TH AOC 4	29TH PAS -6	31ST GSTR - 9/9A/9C	25TH PMT 06		31ST FORM CSR - 2
30TH LLP FORM 8	30TH FINAL ITC	31ST TDS Q3 FILINGC (25 - 26)	31ST Q3 TDS FILING (25 - 26)		31ST ITR U (FY 2022 - 23)
31ST MSME1		31ST APR RETURN			
31ST COMPANY ITR					
31ST TDS Q2 FILING (25 - 26)					

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