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Government of India

Ministry of Electronics and Information Technology (MeitY)

Cyber Laws Division

Electronics Niketan, 6, CGO Complex, New Delhi – 110003

Website: www.meity.gov.in

Date: 25.04.2026

ADVISORY

To,

All Virtual Private Network (VPN) Service Providers and Intermediaries

Subject: Observance of due diligence by VPN service providers and intermediaries under the Information Technology Act, 2000 and the Information Technology (Intermediary Guidelines and Digital Media Ethics Code) Rules, 2021 in relation to facilitating access to illegal and blocked online betting and prediction market platforms.

It has come to the attention of the Ministry of Electronics and Information Technology (“MeitY”) that certain virtual private network (“VPN”) service providers and intermediaries are facilitating access to illegal and blocked prediction market and online betting platforms, including websites such as *Polymarket and few other similar sites*, which have been blocked for access in India under section 69A, Information Technology, 2000 (“IT Act”). It is further observed that certain users are circumventing the legal restrictions imposed on such platforms by misusing VPN services to access these websites. In addition, such users are engaging in financial transactions through conversion of Indian Rupees into virtual digital assets such as USD Coin (USDC) or other stablecoins, thereby enabling participation in such platforms despite domestic prohibitions. This raises serious concerns relating to unlawful online betting, circumvention of regulatory frameworks, potential financial risks, and threats to public order and economic integrity.

2. In this regard, it is reiterated that intermediaries, including VPN service providers, are bound by due diligence obligations under the IT Act and the Information Technology (Intermediary Guidelines and Digital Media Ethics Code) Rules, 2021 (“IT Rules, 2021”) to ensure that their platforms are not used for hosting, transmitting, sharing, etc. any information that violates any law for the time being in force in India, including those which may be prejudicial to public order, sovereignty and integrity of India, or security of state, including its economic security. It is further pertinent to note that the Promotion and Regulation of Online Gaming Act, 2025 (“PROG Act”) expressly prohibits online real-money gaming activities in all forms. Accordingly, any platform facilitating or enabling access including facilitation of financial transactions to such prohibited online money gaming platforms including prediction market activities, directly or indirectly, including through circumvention mechanisms, would be in violation of the provisions of the PROG Act, in addition to the applicable provisions of the IT Act.

3. As part of such due diligence obligations, it is the responsibility of concerned intermediaries, including VPN service providers to take immediate and effective action to ensure that reasonable efforts are made not to host or store any information which is in violation of

applicable law, including online betting and prediction market platforms. To this end, it is being brought to your notice that hosting or making available any unlawful information, which includes access to websites or applications facilitating online betting, including those which have been blocked for access under section 69A of IT Act in India may amount to failure in complying with due diligence obligations under the IT Rules, 2021.

4. Further, the exemption from liability for any third party information, data, or communication link made available or hosted by intermediaries as provided under section 79 of the IT Act shall not apply if such intermediaries fail to observe the due diligence obligations as prescribed under the IT Act read with IT Rules, 2021, or act in a manner that abets, aids, induces or conspires the commission of the unlawful acts. In case of failure of the intermediaries to observe the due diligence obligations as provided in the IT Rules, 2021, the provision of section 79 of the IT Act shall not be applicable to such intermediary, and they shall be liable for consequential action as provided under any law, including the IT Act and the Bharatiya Nyaya Sanhita, 2023 and applicable online gaming law which prohibits all forms of online money games, irrespective of whether such games are based on skill, chance, or both.

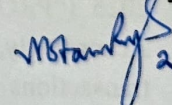
5. Considering the serious nature of the situation, MeitY hereby reiterates, with heightened emphasis, that all VPN service providers and other intermediaries must make reasonable efforts to not host or store or permit the access to any such platforms making available unlawful information, including "Polymarket" and such other similar violative platforms operating in violation of law.

6. In addition to the above, the IT Act obligates the intermediaries including VPN service providers to provide information under its control or possession, or assistance to the Government agency which is lawfully authorised for investigative or protective or cyber security activities, for the purposes of verification of identity, or for the prevention, detection, investigation, or prosecution, of offences under any law for the time being in force, or for cyber security incidents, well within the stipulated timeframes.

7. Any non-compliance by the intermediaries with the statutory due diligence obligations may result in loss of exemption provided under section 79 of the IT Act and exposure to consequential legal action under applicable laws.

8. This issues with the approval of the competent authority in the MeitY, without prejudice to any other action that may be taken by the Government or law enforcement agencies under any law for the time being in force.

Yours faithfully,

 25/04/2026

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