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INTERNATIONAL JOURNAL OF LAW MANAGEMENT & HUMANITIES

[ISSN 2581-5369]

Volume 9 | Issue 3

2026

Protecting Online Shoppers: E-Commerce's Role in Socio-Economic Progress in India

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ABSTRACT

This paper examines the rapid expansion of e-commerce in India and its implications for the protection of online shoppers and for inclusive socio-economic progress. It traces the structural shift from physical markets to digital platforms, analyses the threats that online consumers face, including counterfeit goods, deceptive advertising, fraud and the misuse of personal data, and evaluates the adequacy of the prevailing legal framework, comprising the Consumer Protection Act, 2019, the Consumer Protection (E-Commerce) Rules, 2020 and the Digital Personal Data Protection Act, 2023. Drawing on doctrinal analysis and secondary empirical data covering internet penetration, market growth, consumer complaints and the participation of micro, small and medium enterprises and women, the paper situates Indian regulation against the comparative benchmarks of the European Union General Data Protection Regulation and the United States Federal Trade Commission model. It further surveys judicial and quasi-judicial interventions, including decisions of consumer commissions in disputes involving major platforms, that have advanced platform accountability and economic justice for consumers. The paper concludes that, although a substantial regulatory architecture exists, persistent implementation gaps demand stricter enforcement, greater transparency and faster grievance redressal to build trust in India's growing digital marketplace.

Keywords: *E-commerce, Consumer protection, Data privacy, Digital Personal Data Protection Act, Consumer Protection Act 2019, Online shopping, Socio-economic progress.*

I. INTRODUCTION

Retail in India has been transformed by e-commerce, which is expected to exceed ₹5 lakh crore by 2025, having stood at ₹2.4 lakh crore in 2018, with the support of platforms such as Amazon, Flipkart and Meesho. The convenience that it provides to the consumer, the broadened selection and competitive prices, and doorstep delivery, particularly to remote locations such as Azara, Assam, make it a digital boon. Nevertheless, it has a significant effect on consumer rights under the Consumer Protection Act, 2019.[1] The rapid development of the e-commerce market in India

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[1] Bain & Company, E-COMMERCE AND CONSUMER PROTECTION IN INDIA: EMERGING TRENDS 15-20 (Indian Law Institute 2022).

has introduced a number of new challenges, including concerns over consumer rights, misleading advertisements, fraud and the misuse of personal data. The key legal issues in this area are the privacy of data and the safety of consumers, both of which are fundamental to establishing trust in online platforms.

II. Objectives

This paper analyses consumer issues on e-commerce sites, such as counterfeit merchandise, privacy breaches and fraud. It evaluates the sufficiency of the current framework in India, including the Consumer Protection Act, 2019, the Consumer Protection (E-Commerce) Rules, 2020 and the Digital Personal Data Protection Act, 2023, in governing consumer rights in the light of increasing complaints. The identified gaps include enforcement delays, jurisdictional ambiguities and ineffective privacy protection compared with the GDPR and FTC models. The paper also addresses targeted measures that can secure consumer privacy and confidentiality on online platforms.

III. Methodology

This study employs both doctrinal analysis and the analysis of secondary data in order to assess the efficacy of the digital ecosystem framework within the Indian economy.

IV. Structural shift from the physical market to the online market

The traditional physical market in India has been transformed into an e-commerce ecosystem that has experienced a booming trade, accelerated by the COVID-19 pandemic, low-cost data and smartphone penetration. Kirana stores and bazaars, which once constituted more than 95 percent of the retail business, have been supplemented by online platforms that now command 5 to 6 percent of the overall retail business, with the e-retail market estimated at 57 to 60 billion dollars in 2023 and projected to reach 160 billion dollars by 2028.[2] This shift places consumers in a position of convenience but also places consumer protection regimes under pressure, exposing purchasers to a distinct form of vulnerability addressed by legislation such as the Consumer Protection Act, 2019 and other related enactments.

In the third millennium, information and communication technology has affected all facets of society. Information technology is one of the technologies gaining momentum across the world. Most countries have abandoned reliance on paper and adopted electronic trade as a result of the impact of information technology.

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[2] *Id.* See also Indian Law Institute, *Transition from Physical to Online Retail* 12 (2021).

The move to the online market began before the pandemic but expanded as the number of internet users surged towards 900 million by 2025. Platforms such as Amazon, Flipkart and Meesho, together with quick-commerce applications such as Blinkit and Zepto, added between 100 and 230 million shoppers after 2020, many of them from Tier-2 and Tier-3 cities. Small sellers digitised rapidly, with 53 percent of micro-enterprises adopting online channels by late 2020, fuelling a hybrid model in which offline brands such as Reliance Retail integrate omnichannel strategies.[3] Physical markets persist for high-touch goods such as fashion and groceries, but e-commerce drives 70 percent growth in frequent-purchase categories through faster logistics and UPI payments.

E-commerce platforms are classified into the following categories, based principally on the interaction between the buyer and the seller: business-to-business, or the e-hub; business-to-consumer, such as e-learning and e-news; consumer-to-business, such as e-banking and e-contracts; consumer-to-consumer, such as eBay; and m-commerce. Electronic trade is highly cost-effective. In contrast to a physical business, e-commerce eliminates the requirement for infrastructure investment, insurance and physical store space. Customers can shop or conduct other transactions at any place, by day or night, owing to electronic commerce. Customers have additional options and may choose from a wide range of goods at affordable prices from numerous sellers.

India's internet economy is expected to grow at an exponential rate and to reach one trillion dollars by 2030, offering both consumers and businesses a wide range of opportunities. At the vanguard of this expansion is e-commerce, which is expected to reach a market size of 325 billion dollars by 2030. E-commerce gives businesses a means to reach a larger customer base, to make use of affordable marketing platforms and to explore prospects for growth across different categories and geographical areas. It also offers consumers unmatched accessibility and convenience. Customers may browse a wide variety of products, compare prices and make purchases from the convenience of their homes with only a few clicks. In addition, customers can save money on their purchases owing to the competitive pricing, discounts and offers that e-commerce platforms frequently provide. Customised shopping experiences and recommendations further raise customer satisfaction and encourage engagement and loyalty over time. However, logistical obstacles, cybersecurity risks and regulatory complexities must be addressed if the e-commerce industry is to continue growing. In a similar vein, efforts to improve consumer knowledge and digital literacy can also increase confidence and trust in

[3] Indian Law Institute, *Transition from Physical to Online Retail* 12 (2021).

online transactions.[4] International giants such as Alibaba and eBay compete aggressively with local firms such as Flipkart, Amazon India and Snapdeal in India's e-commerce market. These platforms provide a large selection of goods and services, frequently at reasonable prices. To improve the shopping experience and provide tailored recommendations, shopping applications use advanced technologies such as artificial intelligence, machine learning and data analytics.

Other industries in India, such as online food delivery, holiday booking, digital entertainment and e-learning, have expanded quickly in addition to traditional retail. When the COVID-19 outbreak prompted lockdowns and social-distancing measures, compelling consumers to shop online, the popularity of e-commerce accelerated once more.[5]

V. E-COMMERCE AND THREATS TO THE RIGHTS OF CONSUMERS IN THE ONLINE WORLD

The potential of the internet, electronic communication, digital information gathering and electronic shopping is vast, and many people who, some years ago, would have been considered excluded from these unprecedented opportunities now embrace the digital world. Electronic commerce has become a potential symbol of a new global virtual economy as a result of this e-revolution. Customers have grown accustomed to ease, speed and a wide range of options when buying goods and services and comparing prices in this era of online shopping. The repercussions of shopping in the globalised online marketplace operate in ways distinct from those in the physical world. When it comes to privacy, money and online transactions, the consumer's position is generally weaker in an electronic environment.

Customers typically do not have the opportunity to learn more about the supplier's identity, the terms and conditions of any transaction, the cost of delivery, the quality of the goods or services, or how to resolve disputes in a fair, prompt and economical manner. User privacy is essential because e-commerce platforms invariably gather users' personal information, such as identity and financial details, for transactions. Unauthorised access to and exploitation of this data are major concerns. A significant consideration in online transactions is privacy. The Supreme Court, in *Kharak Singh v. State of Uttar Pradesh* and *People's Union for Civil Liberties v. Union of India*,[6] recognised the right to privacy as part of the right to life and personal liberty under Article 21. However, constitutional remedies apply only to State action; violations by non-State

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[4] Dewangi Sharma, *E-commerce Bloom in India: Current Trends and Prospects*, Invest India (Apr. 30, 2024), https://www.investindia.gov.in/blogs/e-commerce-boom-india-current-trends-and-prospects.

[5] Shashwat Vajpayee, *India's E-Commerce and Consumer Protection Laws and Applications*, 11(5) JOURNAL OF EMERGING TECHNOLOGIES & INNOVATIVE RESEARCH (2024).

[6] *Kharak Singh v. State of Uttar Pradesh*, AIR 1963 SC 1295; *People's Union for Civil Liberties v. Union of India*, AIR 1997 SC 568.

actors fall under tort principles. The Information Technology Act addresses privacy breaches where private images of the body are captured, published or transmitted without consent in circumstances where a reasonable expectation of privacy exists.[7]

The e-consumer is also more readily manipulated as a result of polished marketing strategies and has less control over what exactly happens to the data, information and communication processes. The consumer determines whether a business succeeds or fails in a competitive market through the decision whether or not to purchase its goods and services.[8] Cybercriminals now primarily use social media, rather than email, to socially engineer victims into divulging private information and falling for fraud. E-platforms shape consumer information, even in relation to the use of services or the purchase of goods, which gives rise to a demand for consumer privacy. The emerging dark web has swiftly come to supplement social networking as a vector for such harms.

VI. Legal and regulatory framework for the protection of consumers in online shopping

India has enacted a number of rules governing consumer protection on e-commerce sites. In order to address consumer complaints, India has developed safer and more secure legislation. The Information Technology Act governed e-commerce issues prior to the passage of the Consumer Protection Act, 2019. In *World Wrestling Entertainment, Inc. v. M/s Reshma Collection & Ors.*,[9] the Division Bench applied Section 134(2) of the Trade Marks Act, 1999 and Section 62(2) of the Copyright Act, 1957 to clarify jurisdiction in e-commerce intellectual property disputes. It concluded that the plaintiff operated a business in which contracts for online sales to local purchasers were completed instantaneously upon acceptance through the website, thereby establishing an essential part of the cause of action in accordance with the principles laid down in *Dhodha House v. S.K. Maingi*.[10] This overturned the Single Judge's rejection of the plaint, which had been based on mere accessibility of the website, although jurisdiction in such matters is tied to the intellectual property owner's business locus and not exclusively to the buyer's residence.

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[7] Hina Kausar, *E-commerce and Rights of E-consumers*, Manupatra, https://docs.manupatra.in/newsline/articles/Upload/755BA66E-1F56-447F-A2A2-FA160F1D43D2.pdf.

[8] Amrita & Harvinder, *The Role of the Consumer Protection Act 2019 in Addressing E-commerce Challenges and Consumer Grievances in the Digital Age*, International Journal of Law, Policy and Social Review (2025).

[9] *World Wrestling Entertainment, Inc. v. M/s Reshma Collection & Ors.*, FAO (OS) 506/2013, decided Oct. 15, 2014 (Del. H.C.).

[10] *Dhodha House v. S.K. Maingi*, (2006) 9 SCC 41 (India).

 [ISSN 2581-5369]

One of the first laws in India to address matters pertaining to digital transactions and electronic commerce was the Information Technology Act, 2000. The Act addresses cybercrimes and provides a legal framework for electronic transactions. It contains provisions stipulating that businesses handling sensitive personal information must adopt reasonable practices to ensure that data breaches are thwarted through reasonable security practices, as required by Section 43A of the Act. In addition, the Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Data or Information) Rules, 2011 provide specifications concerning the protection of sensitive personal data.[11]

The Consumer Protection Act, 2019 expressly addresses e-commerce platforms, because these platforms act as intermediaries between buyers and sellers. To prevent manipulation or unfair practices, it imposes obligations to secure the rights of consumers, including the full disclosure of the professional information of sellers and of goods, services and prices. To earn trust, sites must be transparent about their prices, offers, returns and customer service, and should eliminate any ambiguous charges and false advertising. E-commerce businesses are also required to appoint a Grievance Officer, to establish efficient dispute-resolution measures such as online dispute settlement, and to resolve grievances within stipulated time limits. Violations may be severely punished by the Central Consumer Protection Authority. Such measures address digital problems of fraud, delay and weak accountability, consistent with the objective of the Consumer Protection Act, 2019 to advance consumer satisfaction and fairness in India's fast-expanding e-commerce market, in the light of the increase in online transactions.

More recently, the Ministry of Consumer Affairs, Food and Public Distribution notified the Consumer Protection Act, 2019 and the Consumer Protection (E-Commerce) Rules, 2020. The Consumer Protection Act, 2019 made significant amendments to the 1986 law in order to address specific issues that have arisen in this era of digital and online commerce. The E-Commerce Rules provide a framework through which the promotion, sale and acquisition of products and services online are regulated.

Online platforms such as Amazon and Flipkart are marketplace entities that provide information technology infrastructure to mediate the relationship between third-party sellers and consumers without owning the goods or services being sold. Inventory entities, such as certain operations of Reliance Retail or Myntra, are by contrast the owners of a stock of goods or services that they sell to customers, taking full responsibility for quality and delivery.[12] The Consumer

[11] Arun Klair & Sarita, *Ensuring Consumer Protection in the Era of E-commerce: Strategic Approaches through the Lens of Consumer Protection Laws in India*, II HPNLU JOURNAL OF LAW, BUSINESS AND ECONOMICS (2023).
[12] Kumaravel K. & Saraswathy G., *A Study on E-commerce and Consumer Protection Laws in India along with International Standards*, 5(1) INTERNATIONAL JOURNAL OF ADVANCED RESEARCH IN SCIENCE, COMMUNICATION

Protection (E-Commerce) Rules, 2020 specifically cover both kinds of entity, as they require transparency in disclosures, grievance redressal and liability for unfair practices. These regulations are also extraterritorial in nature and apply to any entity that is not incorporated in India, such as Shein or Temu, but that systematically provides goods or services to Indian consumers by means of digital targeting, advertisements or delivery logistics. This system enhances the protection of consumers in the context of the transition from physical to online markets, thereby addressing issues such as counterfeit sales and the misuse of data. The Consumer Protection (E-Commerce) Rules, 2020 contain the principal requirements for all e-commerce businesses to protect consumers.[13] Their name, contact information and address must be displayed prominently on their platforms. They are obliged to maintain proper consumer grievance redressal systems, such as a dedicated customer-care telephone number and a Grievance Officer, the details of which must be posted on the site. Organisations ought to make their best efforts to join the National Consumer Helpline so that complaints may be resolved within a short time. In the case of imported goods or services, the name and details of the importer must be provided. The process of obtaining consumer consent to purchases should take the form of explicit, affirmative actions, such as the ticking of unchecked boxes, rather than pre-selected or automatic options. Finally, any refunds should be made in accordance with the directions of the Reserve Bank of India and within a reasonable period of time.

The Advertising Standards Council of India has taken up cases against businesses such as Flipkart, Meesho and Amazon over claims that goods were '100% original', and against Amazon Kindle over misleading 'unlimited' reading offers, in order to protect the interests of consumers. More recently, the Bureau of Indian Standards raided warehouses of Amazon and Flipkart in Gurugram and Lucknow and found toys, hand blenders, pipes and other items that lacked the BIS mark and the requisite certification. Consumers frequently neglect to verify the official standards required. The Bureau of Indian Standards helps consumers make informed purchasing decisions through the BIS Care application. This application provides consumers with crucial information on products that require mandatory BIS certification and allows consumers to verify the authenticity of a product's BIS certification by checking the ISI mark and the

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AND TECHNOLOGY (2025).

[13] Dr. Kunal Shaktawat, *Exploring Legal Challenges in E-commerce and Consumer Protection*, 8(5) INTERNATIONAL JOURNAL OF LAW MANAGEMENT & HUMANITIES 2241 (2025).

manufacturer's licence number.[14] The expansion of the digital market gives rise to new challenges for consumers and to fresh demands on the enforcement and regulatory authorities.[15]

Amid surging consumer complaints about counterfeit and substandard goods on e-commerce platforms, India has implemented robust legal, regulatory and enforcement measures. Lok Sabha data dated 6 August 2025 reveal that the Ministry of Consumer Affairs reported over 17,500 grievances relating to fake online products registered with the National Consumer Helpline between 2022 and mid-2025. The Government has taken the initiative of introducing a safety pledge with the top twenty e-commerce companies, in order to maintain standards and quality, to uphold consumer rights and to align with international standards.

India may draw upon the United States Federal Trade Commission model and the European Union General Data Protection Regulation to strengthen the e-commerce consumer rights regime, especially in the light of the Consumer Protection (E-Commerce) Rules, 2020 and the Digital Personal Data Protection Act, 2023. Through rigorous consent requirements, rights such as the right to erasure, and fines of up to 4 percent of worldwide turnover imposed by independent authorities, the GDPR guarantees comprehensive data privacy. In order to combat unfair and deceptive practices, the United States Federal Trade Commission relies on sector-specific enforcement with an emphasis on education and comparatively less severe sanctions. While granting more extensive State exemptions, India's data protection regime places strong emphasis on fiduciary responsibility and consent.

VII. Empirical analysis

The last ten years have seen India transform into a dense digital market in which connectivity functions as economic infrastructure. At the core of this shift lies a subtle yet significant development: the slow disappearance of the digital divide. Traditionally, gaps in internet access have limited engagement in internet economies. Nevertheless, the gradual increase in internet penetration, especially since 2020, indicates a narrowing of the gap in access to digital markets and a corresponding increase in participation in them.

This has empowered new economic actors, such as rural craftsmen, women entrepreneurs and small-scale vendors, who are now moving to e-commerce platforms in order to bypass traditional market intermediaries, thereby increasing their income possibilities and market

[14] Press Information Bureau, *Bureau of Indian Standards Cracks Down on E-Commerce Platforms Selling Unsafe Non-Certified Products* (Mar. 15, 2025).

[15] Navdeep Singh Suhag & A. Raj, *Antitrust Investigation against E-Commerce Platforms in Goods Category in India: A Review from a Timeliness Perspective*, 10 Competition Commission of India Journal on Competition Law and Policy 53 (2020).

presence. In this context, digital marketplaces represent not merely an act of mediation but a remaking of the very form of market access.

The empirical explanation that follows situates this dynamic within a framework of quantifiable patterns, and demonstrates that the shrinking of the digital divide has expanded not only the scale of e-commerce within India but also the boundaries of consumer relations, dispute management and inclusive economic growth.

A. Empirical analysis (2019 to 2025)

Table 1: Internet penetration and the digital divide (India).[16]

Year	Total Internet Users (Million)	Rural Users (Millions)	Urban Users (Millions)
2019	574	264	309
2020	622	299	323
2021	692	351	341
2022	759	399	360
2023	821	442	378
2024	886	488	497
2025	900+	------------	

Rural internet usage has increased by roughly 85 percentage points, compared with urban internet usage, which increased by 61 percentage points, between 2019 and 2024. This expansion correlates directly with rural e-commerce adoption and digital grievance filings. The data reflect a decisive shift from urban-centric digital growth to rural-led expansion, signalling not merely the reduction of the digital divide but the emergence of a new, participation-driven digital economy.

Table 2: E-commerce market growth (US dollars, billions).[17]

Year	Market Size	Annual Growth Rate
2019	46.05	-
2020	46.30	+0.54
2021	67	+44.70
2022	84	+25.37

[16] Internet and Mobile Association of India (IAMAI) & Kantar, *Internet in India Report* (2024).

[17] India Brand Equity Foundation, *E-commerce Industry in India*, https://www.ibef.org/industry/ecommerce (last visited Feb. 21, 2026); U.S. Department of Commerce, *India - Online Marketplace and E-Commerce*, https://www.trade.gov/country-commercial-guides/india-online-marketplace-and-e-commerce (last visited Feb. 21, 2026); *Indian E-commerce Market to Touch USD 84 Billion in 2021: Report*, THE ECONOMIC TIMES (last visited Feb. 21, 2026), https://economictimes.indiatimes.com/industry/services/retail/indian-e-commerce-market-to-touch-usd-84-billion-in-2021-report/articleshow/68169239.cms.

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2023	102	+21.42
2024	125	+22.54
2025	145	+ 16
2026 (proj.)	163	+ 14.4

The annual growth rate of India's e-commerce market declined from a peak of 44.7 percent in 2021 to 16 percent in 2025, indicating a transition from rapid expansion to market stabilisation. Moreover, the tabulated compound annual growth rate of 19.79 percent for the Indian e-commerce market is notable, as it outpaces the growth rate of the Indian economy, indicating that e-commerce is the primary driver of growth in the digital economy.

Table 3: Consumer complaints filed through e-Daakhil.[18]

Year	Online Complaints Filed	% Increase YoY
2020-2022	23,640	-
2023	70,251	+197
2024	1,98,725	+182
2025 (Integrated with E-Jaagriti)	1,62,474	-18

There has been an increase in the filing of consumer complaints from 2020 to 2024, following the introduction of the e-Daakhil platform, indicating that increased digital participation has been matched by sustained use of online grievance mechanisms rather than by a proportional rise in malpractice. The sharp rise reflects increased digital awareness and accessibility rather than rising malpractice alone.

Table 4: Participation of MSMEs and women in e-commerce.[19]

Indicator	2019	2025
MSME’s linked to digital commerce ecosystem	4.8 million	47.7 million
Women Owned MSMEs	17–20% of total MSMEs	26.2% of total establishments

Between 2019 and 2025, the number of digitally registered micro, small and medium enterprises increased nearly tenfold, from approximately 4.8 million to 47.7 million, while women's share

[18] Ministry of Consumer Affairs, Food and Public Distribution, *Consumer Commissions Dispose over 100 Percent of Cases during 2022 and 2023*, https://www.pib.gov.in/PressReleasePage.aspx?PRID=2039121 (last visited Feb. 21, 2026); *Over 65,537 Consumer Complaints Resolved by Consumer Affairs Ministry in 2025 So Far*, Storyboard18 (last visited Feb. 21, 2026), http://storyboard18.com/how-it-works/over-65537-consumer-complaints-resolved-by-consumer-affairs-ministry-in-2025-so-far-77867.htm.

[19] Ministry of Labour and Employment, *Nari Shakti se Viksit Bharat: Women Leading India's Economic Transformation Story*, https://www.pib.gov.in/PressReleasePage.aspx?PRID=2160547 (last visited Feb. 21, 2026).

in MSME ownership rose from roughly 17 to 20 percent to over 26 percent, indicating that digital platforms and e-commerce ecosystems have significantly expanded both enterprise formalisation and gender-inclusive participation. The empirical trends outlined above reveal a compelling structural shift: India's digital expansion has not merely increased connectivity but has reconstituted the architecture of market participation. The steady rise in internet penetration, particularly in rural and semi-urban regions, has narrowed the digital divide and enabled wider engagement with electronic trade.

At the same time, the data underscore that inclusion through access is only a preliminary step. The parallel increase in online consumer complaints and digital grievance filings reflects a more complex reality: as new users enter the digital marketplace, they encounter not only opportunities but also informational and transactional vulnerabilities. The rise in complaints is therefore not merely indicative of increased malpractice but signals heightened awareness, the greater accessibility of redressal mechanisms and a growing assertion of consumer rights in digital spaces.

VIII. Judicial intervention ensuring economic justice to consumers facing e-commerce disputes

The Consumer Protection Act, 2019[20] and the Consumer Protection (E-Commerce) Rules, 2020[21] marked a breakthrough over the earlier regime under the Consumer Protection Act, 1986. These instruments subject India to a 'seller and platform beware' regime, as opposed to the older 'buyer beware' regime. Several important provisions of the Consumer Protection Act, 2019 help to promote economic justice for consumers, including Section 2(34), which concerns product liability.[22] In addition, Section 94[23] addresses unfair trade practices in the e-commerce field. Finally, a lower threshold of pecuniary jurisdiction is established in Sections 34[24] and 47,[25] thereby enabling consumers to pursue larger amounts of compensation in local fora that are more convenient to access. Accordingly, the District and State Commissions are now able to handle cases of up to ₹50 lakh and ₹2 crore respectively. Further, the Consumer Protection (E-Commerce) Rules, 2020, in particular Rule 4 and Rule 5,[26] establish a system of platform

[20] The Consumer Protection Act, 2019, No. 35, Acts of Parliament, 2019 (India).
[21] Consumer Protection (E-Commerce) Rules, 2020 (India).
[22] The Consumer Protection Act, 2019, No. 35, Acts of Parliament, 2019, s. 2(34) (India).
[23] The Consumer Protection Act, 2019, No. 35, Acts of Parliament, 2019, s. 94 (India).
[24] The Consumer Protection Act, 2019, No. 35, Acts of Parliament, 2019, s. 34 (India).
[25] The Consumer Protection Act, 2019, No. 35, Acts of Parliament, 2019, s. 47 (India).
[26] Consumer Protection (E-Commerce) Rules, 2020, rr. 4-5 (India).

accountability that, among other things, prohibits price manipulation and prescribes schedules for refunds.

The e-commerce market provides frictionless purchases, but behind it lie recurring lines of failure: deficiencies in service, excessive pricing, wrongful cancellations and frozen deliveries. Indian case law intervenes in this field of consumer litigation and places emphasis on the upstream responsibility of both the seller and the platform. The decisions that follow indicate a meaningful acknowledgement of consumer rights and economic justice. In *Shaikh Umar Farooq v. Flipkart Internet Pvt. Ltd.*,[27] a dispute arose between Flipkart and the complainant over charging in excess of the printed maximum retail price on oil sachets purchased through an online marketplace, amounting to an overcharge of ₹140, which the Commission held to be an unfair trade practice. The Commission treated Flipkart as an intermediary in the marketplace within a tripartite consumer-seller-platform framework and held it jointly and severally liable alongside the seller. The complaint was partly allowed, with an order for a refund of ₹140, payment of ₹50,000 in damages for mental agony and unfair trade practice, and ₹3,000 towards litigation expenses, thereby reinforcing accountability in pricing and economic fairness in electronic commerce.

In *Supriyo Ranjan Mahapatra v. Amazon Development Centre India (P) Ltd.*,[28] a complaint was adjudicated by the Odisha State Consumer Disputes Redressal Commission. The dispute arose after a law student placed a confirmed online order for a laptop at ₹190, but the platform unilaterally cancelled the order on the pretext of a pricing error, even though payment had already been received. The Commission imposed liability on Amazon on the principles of deficiency in service and unfair trade practice, rejecting the defence of post-confirmation cancellation. It awarded relief by way of compensation for mental agony and punitive damages, thereby upholding the sanctity of contracts and economic fairness in e-commerce dealings.

In *Akshay Vijay Loke v. Flipkart Internet Pvt. Ltd.*,[29] the Central Mumbai District Consumer Disputes Redressal Commission dealt with a case in which the complainant purchased an iPhone for ₹39,628 from Flipkart, but the order was unilaterally cancelled despite his availability to receive delivery. The principal issue was that Flipkart sought to defend its position on the ground that it was merely an intermediary. The Commission nonetheless determined that the consumer had interacted only with Flipkart, and not with the parent

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[27] *Shaikh Umar Farooq v. Flipkart Internet Pvt. Ltd.*, 2022 SCC OnLine NCDRC 519 (July 26, 2022).

[28] *Supriyo Ranjan Mahapatra v. Amazon Development Centre India (P) Ltd.*, Consumer Complaint No. 42 of 2015 (Odisha State Consumer Disputes Redressal Comm'n Jan. 11, 2021).

[29] *Akshay Vijay Loke v. Flipkart Internet Pvt. Ltd.*, Consumer Complaint No. 22/190 (Dist. Consumer Disputes Redressal Comm'n, Central Mumbai, Feb. 23, 2024).

company, over the telephone. No attempt to make a genuine delivery was shown, and no contractual terms governing cancellation were produced. Besides the purchase price, which was refunded, the Commission held Flipkart liable for deficiency in service and unfair trade practice, awarding compensatory damages of ₹10,000 and litigation costs of ₹3,000, thereby emphasising the responsibility of platforms beyond the mere refund of payment.

In *Dr. Choubarga Nayak v. Flipkart Internet Pvt. Ltd.*,[30] before the District Consumer Disputes Redressal Commission, Sambalpur, Odisha, a consumer brought a complaint after receiving a slab of marble in place of a prepaid laptop worth ₹60,799 delivered through the platform. The principal issue was a serious deficiency in delivery coupled with unredressed grievances. The Sambalpur consumer commission found the platform guilty of deficiency in service and unfair trade practice, and ordered it to refund ₹60,799 for the laptop, to pay compensation of ₹25,000 and to bear ₹5,000 in litigation costs within thirty days.

The trajectory of these rulings demonstrates that judicial action is not concerned merely with resolving individual complaints but also stabilises confidence in the online market. By enforcing transparency of prices, the sanctity of contracts, responsibility in delivery and adherence to its decrees, the judiciary transforms the abstract rights of consumers into concrete economic rights.

The courts have increasingly become more than mere referees in the market, assuming the role of institutional guarantors of fair play, so that the architecture of digital trade does not undermine the protection of consumers. Judicial intervention strengthens equity rather than economic divides. Courts and consumer commissions have made platforms and sellers jointly and severally liable by removing the convenient escape of mere intermediary status, thereby securing the confidence of customers and encouraging their participation in e-commerce.

IX. Conclusion

India's booming online market demands robust safeguards for consumer rights and data privacy, especially in a developing nation where millions rely on e-commerce. Vulnerable shoppers face widespread scams, fraud and privacy breaches, underscoring the urgent need for broad awareness campaigns about these risks and for mandatory disclosures by platforms. Although the Consumer Protection Act, 2019, the Consumer Protection (E-Commerce) Rules, 2020 and the Digital Personal Data Protection Act, 2023 exist, implementation gaps persist. Strict,

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[30] *Dr. Choubarga Nayak v. Flipkart Internet Pvt. Ltd.*, Consumer Complaint No. 09 of 2024 (Dist. Consumer Disputes Redressal Comm'n, Sambalpur 2024).

detailed regulations, enforcing real-time product transparency, verified seller details and swift grievance redressal, are essential to bridge these gaps and to foster trust.

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