
THE LEGALITY OF DIGITAL DOPPELGANGERS: A STUDY OF EVOLVING PERSONALITY RIGHTS

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ABSTRACT

Personality is a vital part of every human being. It is what distinguishes one person from another: it includes the name, reputation, likeness, identity or any other characteristic trait of an individual. Generally, while every person has a right of exclusive control over any such aspect or trait of his/her personality, these rights are much more essential for celebrities like actors, sportspersons, singers, etc. as they play a very significant role in influencing choices of their audience. They serve as a great marketing tactic for commercial entities to use and exploit by doing so, while promoting and selling their products or services. When these rights are given by the celebrities to such firms, with consent, it creates a mutually beneficial relationship between the celebrities and the commercial entities. Entering into contractual relationships of such a nature lead to significant financial gains for both the parties. On the other hand, if their name, identity or likeness are used without their consent, it leads to a violation of their legally enforceable rights.

Even though there is no separate legislation in India for protection and enforcement of personality rights, the courts in India have been proactively coming to the aid of aggrieved celebrities and commercial entities through an expansive interpretation of constitutionally guaranteed fundamental rights such as that under Article 21 (Right to Life), or that under Article 19(1)(a) (Right to freedom of speech and expression). The personality of a person is a form of expression and is, therefore, protected under Article 19(1)(a) and it also is adjacent to the right to privacy, inherent under Article 21. The courts also utilize the IP legislations such as the Copyright Act and the Trademarks Act to further the protection of personality rights.

Who is a celebrity?

A celebrity refers to a well-known person, who is admired by many and attracts the attention and interest of an audience due to his or her name, likeness, photographs, voice or other characteristic persona traits. The Delhi High Court had in the case of *Titan Industries Ltd. v. Ramkumar Jewellers*¹ defined the word ‘celebrity’. This case was concerned with the publicity rights of the well known bollywood star, Amitabh Bachchan, as a celebrity. The Court recognised that, if such a celebrity is clearly identifiable from another’s unauthorized use, there will be no need to prove any other falsity or deception.

Publicity and Privacy

Personality rights are composed of two inherent rights: publicity rights and privacy rights. Both of these are contrasting but complement each other. One gives the owner the right to protect and profit from his/her name, reputation or likeness and the other gives one the right to be left alone.

Right to privacy is a fundamental right inherent under Article 21 as established in the judgment of *KS Puttaswamy v. Union of India*². Right to Privacy guarantees protection against undue interference in a person’s life through excessive paparazzi or media coverage or focus on a person in invasion of their personal space and private activities.

Right to publicity ensures that no unauthorized or non-consensual use of a person’s name or likeness occurs. If a company sells t-shirts with a celebrity’s face implying an endorsement by such celebrity when there has been no such authorisation, then the right to publicity comes into play. In the *Titan Industries* case, the court also established what right to publicity entails. The court opined, “*the right to control commercial use of human identity is the right to publicity.*”³

Personality rights under IP Legislations

Personality rights can be protected indirectly under intellectual property legislations. Courts in India have recognised the name and other recognisable distinctive traits of a celebrity as a form

¹ *Titan Industries Ltd. v. Ramkumar Jewellers*, (2012) PTC 50 Delhi 486.

² *KS Puttaswamy v. Union of India*, (2017) 10 SCC 1.

³ *Titan Industries*, *supra* note 1, at 5.

of property akin to a trademark. A celebrity's picture or painting could also be amenable to protection under copyright law..

Indian Copyright Act, 1957

Several provisions of the Copyright Act protect rights of an artist, musician, actor or a celebrity of such a nature by protecting their works and restricting others from using or causing damage to the same, these are:

- **Section 17⁴** recognises the author of a literary, dramatic or artistic work to be the first owner of the work and grants them the rights for the same.
- **Section 38⁵** together with 38A and 38B recognises a performer's rights to his performance including an exclusive right to do some actions that only the author can do with regard to the work and moral rights entailing his performance such as the right to be identified as the performer and the right to restrain any damage to his performance.
- **Section 39⁶** and **52⁷** recognise certain exceptions by way of fair use where an act or the use of a performance would not lead to any infringement, for example, if used for private use or teaching purposes.
- **Section 51⁸** deals with infringement of a copyright when someone does an act that is the exclusive right of the owner.
- **Section 57⁹** which protects the special and personal rights of the author including the right to claim authorship and restrain damages with regard to his work.

Trade Marks Act, 1999

The Trade Marks Act does not per se protect personality rights, but several provisions of the Act provide recognise usage of the name or likeness of a person including:

⁴ Copyright Act, 1957, §17, No. 14, Acts of Parliament, 1957 (India).

⁵ Copyright Act, 1957, §38, No. 14, Acts of Parliament, 1957 (India).

⁶ Copyright Act, 1957, §39, No. 14, Acts of Parliament, 1957 (India).

⁷ Copyright Act, 1957, §52, No. 14, Acts of Parliament, 1957 (India).

⁸ Copyright Act, 1957, §51, No. 14, Acts of Parliament, 1957 (India).

⁹ Copyright Act, 1957, §57, No. 14, Acts of Parliament, 1957 (India).

- **Section 2(m)¹⁰** defines a mark so as to include ‘name’ and ‘signature’ as well, which is a part of a celebrity’s personality and can be used to seek relief, if violated.
- **Section 14¹¹** deals with the use of names of living or recently dead persons in a trade mark and provides a remedy against any use made falsely or without consent.
- **Section 35¹²** states that the use of a name would not amount to infringement if done under a bona fide belief.

Judicial Precedents on the protection of personality rights

1. *R. Rajagopal v State of Tamil Nadu (1994)¹³*

Popularly known as the “Auto Shankar” case, it was the first case to recognise the right to publicity of an individual. It was a judgment by the SC, where the extent of right to privacy, right to freedom of expression and freedom of press came to be interpreted and applied in a fact situation involving a Tamil magazine called ‘Nakkheeran’. The editors of the Tamil magazine wanted to publish the autobiography of a serial killer, Auto Shanker who had written the same in prison and requested them to publish the same in the said magazine. However, on announcement of the publication, the prison officials tried to prevent the publication of the autobiography. The SC struck a middle ground between ‘freedom of press’ and ‘right to privacy’ and it held that the State had no authority to impose restrictions on the publication prior to its actual publication, but its officials can sue for defamation after the publication. The court also held that the magazine would have the right to publish anything with regard to the life of Auto Shankar insofar as it was based on public records. If it publishes anything outside the records, it would lead to violating the right to privacy of Auto Shankar.

2. *Sourav Ganguly v. Tata Tea Ltd. (1997)¹⁴*

The plaintiff in this case was Sourav Ganguly, a popular cricketer, he was also the brand manager for Tata Tea. When he returned from India’s tour of England after scoring centuries, he came to know about the new marketing strategy used by Tata Tea wherein the consumers

¹⁰ Trade Marks Act, 1999, §2(m), No. 47, Acts of Parliament, 1999 (India).

¹¹ Trade Marks Act, 1999, §14, No. 47, Acts of Parliament, 1999 (India).

¹² Trade Marks Act, 1999, §35, No. 47, Acts of Parliament, 1999 (India).

¹³ R. Rajagopal and Ors. v. State of Tamil Nadu, 1994 SCC (6) 632.

¹⁴ Sourav Ganguly v. Tata Tea Ltd., C.S. No. 361 of 1997, Calcutta High Court.

could congratulate the cricketer through postcards inside each tea packet. He claimed that this advertisement implied his endorsement of the scheme which was not true and thus carried a misrepresentation to the consumers. Even though the dispute came to be settled, the Calcutta High Court recognised that the cricketer's fame and popularity were his intellectual property.

3. *D.M. Entertainment Pvt. Ltd v. Baby Gift House & Ors (2002)*¹⁵

This case revolved around the merchandising rights of a celebrity, Daler Mehndi, a well-known singer. He had granted the plaintiff, DM Entertainment, all of his publicity rights including the right to make endorsements. The defendant was a toy store who made dolls that looked identical in appearance to the singer and even sang a few lines of his famous songs. The plaintiff sued the defendant for infringing the singer's right to publicity. The DHC held that the singer was extremely famous and his persona had a commercial value; that the defendants had used the singer's persona without any authorization and thus were held liable for false endorsement and passing off.

4. *Arun Jaitley vs Network Solutions Private Limited and Ors (2011)*¹⁶

This case dealt with the question of whether the names of celebrities can be used as domain names by anybody. The plaintiff was a well-known Indian political leader and celebrated lawyer, Arun Jaitley. When he wanted to register a domain name as 'www.arunjaitley.com', he soon found out that it had already been registered. He sought an injunction to prohibit the use of the impugned domain name and a direction for transfer of the same. The DHC held that the name of the plaintiff carried with it great value due to his fame and achievements, and it could be treated as a trademark and must be protected against any violation.

5. *Titan Industries Ltd. v. Ramkumar Jewellers (2012)*¹⁷

The plaintiff in this case was a well-known jeweler, Tanishq. It had acquired the publicity rights of actor, Amitabh Bachchan, and actress, Jaya Bachchan, for all media and advertising purposes. The defendant was also in the jewellery business and used the same advertisement as the plaintiff's carrying an identical picture of the celebrity pair in one of their billboards.

¹⁵ D.M. Entertainment Pvt. Ltd v. Baby Gift House & ors, CS(OS) 893/2002.

¹⁶ Arun Jaitley vs Network Solutions Private Limited and Ors, (2011) 181 DLT 716.

¹⁷ Titan Industries v. M/s. Ramkumar Jewelers, CS(OS) No.2662/2011.

The Hon'ble Delhi High Court declared that this infringed the copyright of the plaintiff and the personality rights of the celebrity couple and restrained the same.

6. *Shivaji Rao Gaikwad v. Varsha Production (2015)*¹⁸

This case revolved around the personality rights of the very well-known South Indian film star, Rajnikanth. He filed a suit challenging the release of a film called “Main Hoon Ranjikanth”. This film used his name, persona, dialogues, styles and caricature, all without his consent or permission. Further, he averred that third parties were also promoting this film on the internet; that the advertisements damaged his reputation. It was further claimed that the film and the advertisements also had immoral scenes and taglines. The Madras High Court, ruling in favor of the famous film star, held that he enjoyed reputation all around the world in his name, likeness and other personality traits and the defendant had no right to use the name, persona, style and likeness of the celebrity without his consent and its unauthorised use violated the personality rights of the film star.

7. *Amitabh Bachchan v. Rajat Negi and Ors (2022)*¹⁹

The case was filed by Amitabh Bachchan against 9 identified defendants and several unknown ones, seeking an injunction against use by the defendants of his voice, photographs, and other aspects of his identity and likeness without any consent or authorisation in connection with their illegal/ immoral acts including lottery scams. The Delhi High Court recognised that the celebrity was a very well-known and popular figure and such acts would only cause him loss and disrepute. In a first of its kind in India, the Court granted an omnibus or blanket order in favour of the plaintiff, Amitabh Bachchan and restrained not only the known defendants, but also the unknown defendants from infringing the celebrity's personality rights. The Court also notified the MeitY or the Ministry of Electronics and Information Technology to take down all websites and links claiming to be associated with the celebrity and directed the Department of Telecommunications to block all phone numbers which were circulating fake Whatsapp forwards misappropriating the celebrity.

Personality Rights in the Age of Artificial Intelligence

With the advent of Automated technology and AI, there is an increasing need to protect and

¹⁸ *Shivaji Rao Gaikwad v. Varsha Productions, 2015 SCC OnLine Mad 158.*

¹⁹ *Amitabh Bachchan v. Rajat Negi and Ors., [CS(COMM) 819/2022].*

preserve one's personality rights. Today it has become so very effortless to duplicate a celebrity's voice or appearance through the likes of apps and websites available on the internet. The multiplying of such sites and the increasing accuracy of AI has enabled an unfettered exploitation of personality rights. A new case regarding personality rights has been coming up almost on daily basis today, a few of the most key cases are as follows:

- *Anil Kapoor v. Simply Life India & Ors (2023)*²⁰

In a very detailed judgment, the Delhi High Court dealt with several aspects of personality rights which were not previously discussed. The case was brought forth by the well-known Bollywood actor, Anil Kapoor, asserting his rights in his personality, the dialogue "jhakaas", his style, tone and etc. He instituted this case against 21 defendants, all of whom were infringing his personality rights in some way or the other and making financial gains from the same. Some were selling stickers with his picture or his dialogues, some sold posters, T-shirts, fake signatures, some used domain names using his name, some circulated GiFs and cartoons of the actor and some even used AI and deepfake tools to make immoral and offensive videos of the actor with other actresses.

The Court ruled in favor of the celebrity and recognised that fame also has its negative effects; that many a time the negative effects resulting from unauthorised uses of the kind involved in the dispute disrupt the privacy of a famous person such as the plaintiff and can cause disrepute due to unlawful acts of false association with the famous person, resulting in financial damage to such celebrity for whose his fame and endorsements are a form of livelihood. The Court recognised multiple indirect aspects of personality including tone, gestures, signatures and held that these are also essential to a celebrity and must be protected.

The Court took into consideration the right to freedom of speech and expression of a person and held that this freedom extends to news, satire, parody and any genuine criticism, but it is not absolute and cannot be mandated when it jeopardizes a person's personality. The Court finally held that using any form of Anil Kapoor's name in GiFs, ringtones, domain names, or merchandise without his consent, would infringe his personality rights and was, therefore, illegal.

²⁰ Anil Kapoor v. Simply Life India & Ors., CS (COMM) 652 of 2023.

- ***Jaikishan Kakubhai Saraf alias Jackie Shroff v. the Peppy Store & ors. (2024)*²¹**

This case was instituted by a renowned actor, Jackie Shroff, claiming that his personality and publicity rights were violated by several defendants. These defendants, by unauthorized usage of his name, nickname, voice and image for commercial purposes caused him not only financial losses but also violated his right to live with dignity. The plaintiff sought an order to protect his persona identifiers such as “Jackie Shroff”, “Jaggu Dada” and “Bhidu” which were being used without his consent. The Court acknowledged his status as a celebrity and restrained the defendants from infringing his personality rights. However, the Court refused to injunct a YouTube video by Thugesh as it was considered to be a form of artistic expression.

The Court passed the following directions to restrain the defendants from any of the following acts:

- Using or misappropriating the plaintiff’s name, “Jackie Shroff”, “Jaggu Dada” and other forms, his voice and images.
- Distorting videos of the plaintiff in a way that tarnished the image of the plaintiff and violated his moral rights.
- Commercially exploiting the plaintiff’s personality through an unlicensed AI Chatbot that mimicked aspects of the plaintiff’s personality.

Besides these orders of injunction, the court also instructed the Department of Telecommunications and MeitY to block all links that infringed the plaintiff’s personality rights.

- ***Arijit Singh v. Codible Ventures LLP (2024)*²²**

In this case, the defendants had developed an AI tool that facilitates voice cloning, they allegedly fed a data set containing 400+ songs of the plaintiff into the AI program and the outcome was that it could replicate the popular bollywood singer’s voice. Several of these clips went viral and were monetized. The court restraining the defendants from using the plaintiff’s voice, held that it was the plaintiff’s means to create copyrightable content and the AI tool

²¹ Jaikishan Kakubhai Saraf Alias Jackie Shroff v. The Peppy Store & Ors. CS(COMM) 389/2024.

²² Arijit Singh v. Codible Ventures LLP, 2024 SCC OnLine Bom 2445.

infringed his personality rights and caused him irreparable loss, further its training data was also taken without the plaintiff's consent.

- ***Karan Johar v. Ashok Kumar/John Doe & Ors (2025)***²³

The famous Bollywood Film producer, Karan Johar, approached the Delhi HC challenging the unauthorised use of his name, the name KJo, also associated to him, his image, likeness and persona, by several fake profiles on social media platforms and various websites by spreading fake content, deepfake videos which were abusive, misleading and inappropriate and therefore harmed his reputation. The Court ordered the social media platforms to take down such infringing content and restrained Perfect Privacy LLC, Giphy, and GoDaddy from hosting or facilitating any material infringing Johar's personality rights, including AI-generated content such as voice swaps, deepfakes, GIFs, and merchandise.

- ***Asha Bhosle v. Mayk Inc. (2025)***²⁴

This was a case wherein the defendants had created an AI tool that allowed for the transformation of any voice into that of a celebrity's, in this instant case, it was the voice of the renowned playback singer, Asha Bhosle. It was also alleged that the defendants used Asha's images to promote and publicise the AI tool. The Bombay HC ordered for an immediate removal of all such voice cloned content that infringed the plaintiff's personality rights and also granted an ad interim relief to the plaintiff refraining the defendants from using her name, image, likeness or voice through the AI tool or otherwise.

- ***Ravi Shankar v. John Doe(S) / Ashok Kumar(S) & Ors (2025)***²⁵

The DHC in this case, passed a john doe order, against unknown entities which were infringing the personality rights of Sri Sri Ravi Shankar the founder of the 'Art of Living' Foundation. He approached the court upon gaining knowledge that his image, likeness, and particular style of talking or delivery were being cloned by AI technologies. Several of these Deepfakes and voice- cloned content appeared on facebook and other meta platforms that falsely displayed the plaintiff promoting certain ayurvedic cures and medicines for serious disorders. The Court

²³ Karan Johar v. Ashok Kumar/John Doe & Ors, 2025 LiveLaw (Del) 1152.

²⁴ Asha Bhosle v. Mayk Inc. [Interim Application (L) NO. 30382 OF 2025 in Commercial IP Suit (L) No. 13215 of 2025].

²⁵ Ravi Shankar v. John Doe(S) / Ashok Kumar(S) & Ors, 2025 LiveLaw (Del) 1242.

ordered Meta to remove and block any such content or accounts promoting such content on social media.

Personality rights of a corporation

The right to personality emerges from the right to privacy which in turn emerges from the right to life under Article 21. But this raises a question as to whether a corporation can also have these rights. This question was dealt with by the DHC in the case of *ICC Development (International) Ltd. v. Arvee Enterprises*.²⁶

The DHC answered the above question in the negative and held that corporations could not have personality rights. The Court held that the right to publicity came out of the right to privacy which is in relation to a particular individual and his personality. It refers to one's name, identity, voice, style and likeness, therefore it cannot apply to non-living creatures as they do not possess the same features. It was established that a person may acquire his publicity rights due to his relation with any event, movie or sport but on the contrary, the event or the event manager cannot gain publicity rights due to its association with a person.

Posthumous Personality Rights

The question as to where personality rights subsist even after one's death and whether such rights can be inherited is a thought that comes to one's mind. Outside India, the stance on this varies, for example in the USA, several states recognise and protect posthumous publicity rights. In such cases, the rights are inherited by the legal heirs. In the UK, the legal heirs or estate of the deceased cannot sue for any damage to the reputation of the deceased but if anyone uses any mark such as a photograph or video of the deceased they must seek the permission of the estate first. In India posthumous personality rights do not exist as the right to privacy is said to only exist 'until a person's last breath'. The same has been discussed in the following cases:

- *Makkal Tholai Thodarpu Kuzhumam Ltd. v. V. Muthulakshmi (2007)*²⁷

This case pertained to the privacy rights of an infamous poacher and bandit, Veerappan. After

²⁶ ICC Development (International) Ltd. v. Arvee Enterprises, 2003 (26) PTC 245 (Delhi).

²⁷ Makkal Tholai Thodarpu Kuzhumam Ltd. v. V. Muthulakshmi, 2007 (5) CTC 694.

his death, there was a tele-series under the name of “Maveeran Veerappan”. His wife and daughter challenged the same and contended that this series would infringe the bandit’s and their right to privacy. The Madras High Court held that Veerappan’s right to privacy extinguished on the day of his death and with regard to the privacy of his wife and daughter, the Court directed the series to be based only on public records and information in the public domain so that it would not infringe their rights.

- ***Deepa Jayakumar v. A.L. Vijay*²⁸**

This case was instituted by a former Tamil Nadu Chief Minister and former actress, Jayalalitha’s niece. She claimed that the upcoming movies and series based on Jayalalitha’s life such as “Thaliavi” and “Queen” which were made without the consent of her family, infringed the personality rights of her aunt and the right to privacy of her family. The Madras High Court held that the personality rights of a person cannot be inherited by legal heirs and their fame and popularity ends with their death. The Court rejected the injunction sought by the plaintiff, but directed the producers of the movie to ensure the privacy of the plaintiff and her family.

- ***Krishna Kishore Singh v Sarla A Saraogi & Ors*²⁹**

The question of posthumous personality rights was raised again in this case. This case pertained to the books, movies and series produced after the death of the Bollywood actor, Sushant Singh Rajput. The late actor’s father challenged the movies such as “Nyay: The Justice”, “Suicide or Murder: A Star was Lost”, “Shashank” on the basis that these violated the personality and publicity rights of the actor. The Delhi High Court rejected the plaintiff’s challenge, holding that, while there are some rights of celebrities that are licensed and protected under intellectual property, personality or publicity rights originate from the right to privacy which dies with the death of the celebrity and cannot be inherited.

Global Perspective

United States of America

In the States, personality rights emerged through the emergence of privacy and publicity rights. Privacy rights were first recognized in the 1890’s through a paper titled “*The Right to*

²⁸ Deepa Jayakumar v. A.L. Vijay & Ors, 2021 SCC OnLine Mad 2642.

²⁹ Krishna Kishore Singh v. Sarla A. Saraogi, 2023 SCC OnLine Del 3997.

*Privacy*³⁰ published in the Harvard Law Review, written by Samuel Warren and Louis Brandeis. Consecutively, emerged publicity rights as a subset of privacy rights.

The landmark judgment which first used the term “right of publicity” was that of *Haelan Laboratories, Inc v. Topps Chewing Gum, Inc.*³¹ in 1953. The facts of the case revolved around two competing chewing gum manufacturers who used baseball cards to boost their sales. The plaintiff had obtained pictures of baseball players through an exclusive contract whereas the defendant used pictures of the baseball players in its cards as well. The plaintiff alleged that their exclusive rights were violated, but these rights could not be protected under privacy laws and therefore emerged the concept of right to publicity.

The USA, does not have any direct federal law to protect personality rights but many individuals have been successful in protecting their name, likeness and identity through the Lanham Act, individuals also rely on state laws and common law. New York was the first state to recognise these rights and they are also recognised under the Tennessee Code, the California Civil Code³² and etc.

In 2014, in the case *Michael Jordan v. Jewel Food Stores, Inc*³³, a well known basketball player, Michael Jordan sued a food store chain called Jewel food stores in Chicago for misusing his name and a picture of his famous jordan shoes in an advertisement. The Court ruled in his favour and held that his right to publicity was violated and he received damages. There have been several similar cases involving other celebrities in the US.

United Kingdom

The development of personality rights in the United Kingdom was much later than the development in the USA. In the UK, there are no separate legislations protecting personality rights but a combination of Copyright laws and Trademark laws facilitates the recognition and protection of image rights, false endorsements and of one's name, nickname, style, voice, slogan and likeness. The UK's position on personality rights also greatly expanded after the *Human Rights Act of 1998*³⁴, which incorporates the *European Convention on Human Rights*³⁵

³⁰ Samuel D. Warren & Louis D. Brandeis, The Right to Privacy, 4 Harv. L. Rev. 193, 193-220 (1890).

³¹ *Haelan Labs., Inc. v. Topps Chewing Gum, Inc.*, 202 F.2d 866 (2d Cir. 1953) (U.S.).

³² Cal. Civ. Code § 3344 (2025).

³³ *Michael Jordan v. Jewel Food Stores, Inc.*, 743 F.3d 509 (7th Cir. 2014) (U.S.).

³⁴ Human Rights Act 1998, c. 42 (U.K.).

³⁵ Convention for the Protection of Human Rights and Fundamental Freedoms, Nov. 4, 1950, 213 U.N.T.S. 221.

which in turn has several provisions safeguarding the right to privacy.

An important case that recognized publicity rights in the UK was that of *Douglas v. Hello!*³⁶. The facts of the case involved the unauthorized publication by a magazine 'Hello!' of the wedding photographs of Michael Douglas and Catherine-Zeta Jones who entered into an exclusive agreement with another magazine 'OK!'. The court upheld their right to privacy and publicity and ruled in favour of the plaintiff.

In 2003, in the case of *Irvine v. Talksport Ltd*³⁷, Eddie Irvine, a Formula 1 driver for Ferrari sued a Radio Station called Talksport for using an image of him, without any authorization, for the purposes of advertising. The court held him eligible for compensation and a reasonable endorsement fee.

Conclusion and suggestions

In India, personality rights today enjoy a fairly established legal standing due to several precedents, highlighting the significant aspects of it and facilitating protection of the same. It would definitely add more consistency if there was a legislation guiding and regulating the same. Personality rights evolved from the right to privacy which slowly also extended to include the right to publicity. Personality rights cases have become the most common cases in the realm of entertainment law today, with the increase in deepfakes and AI generated content, it has become easier to duplicate celebrities' likeness, images, videos and voices. This is a matter of grave concern and it leads to not only their commercial exploitation but also a violation of their privacy and this is more so prevalent when it comes to inappropriate usage of their personality to create insulting and insinuative content that causes harm and irreparable loss to the celebrities.

So far, the judiciary is the only authority playing a role to curb the exploitation of personality rights, however, the judiciary has not ordered for a blanket ban towards AI tools that clone voices, or create deepfakes, and nor does it have the power to do so. This begs the requirement of a legislation or amendment that would address the issues of infringement posed by such AI tools. The judiciary can only deal with cases, singularly, and grant protection only to the plaintiffs that institute legal proceedings, this however is not a sustainable solution as such

³⁶ Douglas v. Hello! Ltd (No. 3), [2005] EWCA (Civ) 595, [2006] Q.B. 125 (Eng.).

³⁷ Irvine v. Talksport Ltd., [2002] EWCA (Civ) 423, [2003] 1 W.L.R. 1576 (Eng.).

cases are only increasing in number. An amendment or legislation to curb such AI tools will be much more effective to deal with these cases and would reduce the burden of courts multifold.