WHO OWNS AN AI-GENERATED VOICE? RETHINKING PERSONALITY, PERFORMER'S RIGHTS AND COPYRIGHT IN INDIA

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ABSTRACT

Generative artificial intelligence can now reproduce recognisable human voices with increasing accuracy and can make those voices speak words that the original person never said. This creates a difficult question for Indian intellectual property law. If an AI-generated recording sounds like a real person's voice, is the problem one of copyright, performers' rights, personality rights, or a combination of these? This article examines the Copyright Act, 1957 and recent Indian judicial developments concerning personality and publicity rights, with particular attention to Arijit Singh, Anil Kapoor, Karan Johar and Kumar Sanu. It argues that copyright by itself may not be enough because a person's distinctive voice is not necessarily a copyrighted work and an AI output may be newly generated rather than copied from an existing recording. At the same time, an unlimited personality right could affect parody, criticism, artistic freedom and useful technological development. The article therefore proposes a Consent–Context–Harm framework. Courts should examine consent, the purpose and setting of the use, the possibility of deception, the harm caused, and the remedy that is actually needed. The article concludes that Indian law should protect voice as an important part of personal identity without turning every form of vocal similarity into exclusive intellectual property.

Key Words: *- Artificial Intelligence; Voice Cloning; Personality Rights; Publicity Rights; Copyright; Performers' Rights; Generative AI*

I. INTRODUCTION

Artificial intelligence has developed from a tool used mainly for automated tasks into a technology capable of producing highly realistic human-like speech. AI voice cloning is one of the clearest examples of this development because it can reproduce the distinctive characteristics of a person's voice and generate new speech that the person may never have spoken. This creates a difficult legal question: when a synthetic voice is recognisable as belonging to a particular person, what exactly has been unlawfully appropriated—the copyright in a recording, the performer's rights, the person's identity, or a combination of these interests?

The difficulty becomes greater where the AI-generated recording does not reproduce an existing recording. Traditional copyright law is primarily concerned with protected works and performances, whereas personality and publicity rights are concerned with the identity and commercial value associated with an individual. Recent Indian cases involving Arijit Singh, Karan Johar and Kumar Sanu demonstrate that courts are beginning to address unauthorised AI-based uses of voices and other identity attributes[1][2]. However, these decisions are largely interim in nature and do not yet provide a comprehensive statutory framework[3].

This article therefore examines the relationship between copyright, performers' rights and personality rights in the context of AI-generated voices. It argues that Indian law should protect individuals against harmful and deceptive appropriation of their voices without creating an unlimited property right over vocal characteristics. To achieve this balance, the article proposes a Consent–Context–Harm framework, under which courts should consider whether consent was given, the purpose and context of the use, the likelihood of deception or confusion, the harm caused and the proportionality of the remedy.

II. WHAT IS AI VOICE CLONING?

AI voice cloning refers to the use of artificial intelligence to create synthetic speech that imitates the distinctive characteristics of a particular person's voice. A voice-cloning system can analyse recordings of a speaker and identify features such as pronunciation, pitch, rhythm, tone

[1]Arijit Singh v. Codible Ventures LLP, Interim Application (L) No. 23560 of 2024 (Bom. H.C., July 26, 2024).
[2]Karan Johar v Ashok Kumar/John Doe &Ors, CS(COMM) 974/2025 (Delhi HC, 17 September 2025) .
[3]Kumar SanuBhattacharjee v Jammable Ltd &Ors, CS(COMM) 1097/2025 (Delhi HC, 15 October 2025)

and other patterns of speech. The system can then generate new speech using those characteristics, including words and sentences that the original speaker never actually recorded.

This is different from simply editing or reproducing an existing voice recording. In an ordinary recording, the person's actual performance is captured and stored in a sound recording. In voice cloning, the technology may instead generate a new audio output from text or another audio input. The final recording may therefore be new in its wording and digital form while still sounding sufficiently similar to a real person to make listeners believe that the person actually spoke those words.

The term "AI clone" should therefore not be understood as creating an exact physical copy of a person. It is better understood as a synthetic representation of a person's vocal identity. The legal significance arises when that representation is used without permission, particularly where it creates a false impression of endorsement, participation or association. The same technology may also be used for legitimate purposes, such as authorised dubbing, entertainment, accessibility and clearly identified parody.

The legal problem is consequently not merely whether the generated audio is technically similar to an existing recording. The more important questions are whether the individual is identifiable, whether consent was given, what purpose the voice is being used for, whether listeners are likely to be deceived and what harm results from the use. This distinction is central to determining whether copyright, performers' rights, personality rights or other areas of law provide the appropriate form of protection.

III. COPYRIGHT AND THE LIMITS OF THE COPYRIGHT MODEL

A. Copyright in Existing Recordings

Section 13 of the Copyright Act identifies the classes of works in which copyright subsists, including sound recordings.[4]Section 14 sets out the exclusive rights of copyright owners, including reproduction and communication to the public.[5]If a defendant copies an existing sound

[4]Copyright Act 1957, s 13
[5]Copyright Act 1957, s 14

recording, these provisions can provide a direct basis for relief.[6] Where an AI system reproduces protected material in a way that amounts to a restricted act under the Act, copyright can also become relevant, depending on the facts and any applicable exception.

The difficulty appears when the AI output is genuinely new. Suppose an AI system generates the words "I support this product" in a singer's voice without reproducing an earlier recording. The output is a new digital file, but it may still cause listeners to associate the message with the singer. Copyright may not fully address that identity-based harm because the alleged wrong is not necessarily the copying of an existing sound recording.

This distinction also prevents copyright from becoming a general right over style. If every recognisable vocal technique were protected by copyright, performers could potentially control ordinary influences, accents, rhythms and methods of expression. That would create uncertainty and could restrict creativity. Copyright should therefore remain focused on protected works, while identity appropriation can be considered through personality and publicity principles.

B. Authorship of AI-Generated Material

Another question is who owns an AI-generated output. The Copyright Act defines "author" by reference to categories of works and section 17 generally identifies the author as the first owner, subject to statutory exceptions.[7] Indian copyright law does not provide a complete rule for every form of autonomous AI generation. This issue should not, however, be confused with permission to use another person's identity.

Even if a user can establish a copyright interest in a sufficiently original human contribution to an AI-assisted advertisement, that ownership would not automatically permit the user to exploit another person's voice. In the same way, a celebrity cannot simply rely on copyright to claim every newly generated recording that happens to resemble their voice. The court must identify the particular legal interest that has been affected.

C. Performers' Rights

[6] Copyright Act 1957, s 13(1)
[7] Copyright Act 1957, ss 2(d), 17

The Copyright Act also protects performers. Section 38A recognises economic rights in performances, while section 38B gives performers moral rights, including protection against distortion, mutilation or other modification of a performance that would be prejudicial to the performer's reputation.[8]These provisions are particularly relevant where an actual performance has been used or altered.

The difficulty is that a purely synthetic output may not modify an existing performance. If an AI system generates a new sentence in a singer's voice, there may be no particular performance that has been distorted. The harm may instead be that the public is led to believe that the performer actually spoke or endorsed something. Performers' rights are therefore important but may not cover every form of voice cloning.

IV. PERSONALITY AND PUBLICITY RIGHTS IN INDIA

India does not have one comprehensive statute that sets out personality rights in a single chapter. Protection has developed through constitutional privacy principles, passing off, publicity concepts, intellectual property law and the equitable powers of courts. This is important because personality rights sit between personal dignity and the commercial value of identity.

In R Rajagopal v State of Tamil Nadu,[9] the Supreme Court dealt with the constitutional dimensions of privacy and publication.Although the case did not create a complete statutory publicity right, it contributed to the wider understanding of an individual's interest in controlling aspects of personal identity. Later decisions involving celebrities developed the commercial side of the idea.

In D M Entertainment Pvt Ltd v Baby Gift House,[10] the Delhi High Court recognised the right of publicity and the commercial value attached to a celebrity's persona. The case is useful because it shows that the commercial value of identity can be legally distinct from copyright in a particular work.

The principle developed further in cases such as Amitabh Bachchan v RajatNagi and Anil

[8]Copyright Act 1957, ss 38A–38B
[9]R Rajagopal v State of Tamil Nadu (1994) 6 SCC 632
[10]DM Entertainment Pvt Ltd v Baby Gift House, 2010 SCC OnLine Del 4790

Kapoor v Simply Life India. In the latter, the Delhi High Court considered unauthorised use of the actor's name, voice, signature, image and other attributes and recognised that such exploitation could affect privacy, dignity, reputation and commercial interests.[11] The Court also recognised that news, information, satire, parody and genuine criticism need protection, while unlawful commercial exploitation can cross the legal line.[12]

For AI, the significance is fairly direct. The law can protect an identity attribute without saying that the attribute itself is a copyrighted work. A distinctive voice can therefore receive protection because it identifies a person and has been appropriated in a legally harmful way, not because every sound made by that person is automatically copyright protected.

V. RECENT INDIAN AI VOICE CASES

A. Arijit Singh v Codible Ventures LLP

The Bombay High Court's 26 July 2024 order in Arijit Singh v Codible Ventures LLP is one of the clearest Indian judicial responses to AI voice cloning. The plaintiff alleged unauthorised exploitation of his name, voice, vocal style, manner of singing, image, likeness and signature. The pleadings referred to AI platforms capable of converting text, speech or audio into an AI version of his voice.[13]

The Court granted ex parte ad-interim protection in terms of specified prayers. The relief referred to the plaintiff's personality and publicity rights and specifically addressed AI voice models, voice-conversion tools, synthesised voices, digital avatars and related technologies.[14]This shows that AI-generated voice use can fall within the scope of personality-rights protection even when the technology produces new audio.

The order should still be understood carefully. It was an interim order and did not create a new statute or finally settle every issue about AI training, voice models or lawful imitation. Its importance is that it shows a court's willingness to protect a distinctive voice when its unauthorised exploitation is alleged, particularly in a commercial setting.

[11]Anil Kapoor v Simply Life India, 2023 SCC OnLine Del 6914 (Delhi HC, 20 September 2023)
[12]Ibid
[13]Arijit Singh v Codible Ventures LLP (n 1)
[14]Ibid

B. Karan Johar v Ashok Kumar/John Doe

In Karan Johar v Ashok Kumar/John Doe, the Delhi High Court considered alleged infringement of personality rights through merchandise, fake profiles, cybersquatting, AIgenerated images and audio-visual content, deepfakes and other digital manipulation.[15]The Court noted the plaintiff's distinctive voice, tone and manner of speech as attributes capable of identifying him.

The Court relied on earlier personality-rights decisions and restrained specified defendants from using the plaintiff's name, likeness, image, voice and personality through technological tools such as AI and deepfakes for commercial purposes in a manner that violated his rights.[16] The case shows how existing personality-rights principles can be applied to newer forms of identity appropriation.

The case also shows why context matters. A public figure can be discussed, criticised or parodied. The stronger case for relief arises where technology is used to make people believe that the celebrity actually participated in, endorsed or authorised content, or where the use commercially exploits the person's identity.

C. Kumar SanuBhattacharjee v Jammable Ltd

The Delhi High Court's 15 October 2025 order in Kumar SanuBhattacharjee v Jammable Ltd concerned services alleged to enable users to generate audio in the singer's voice or vocal style through generative AI.[17] The case followed the developing line of personality-rights decisions and treated voice and related attributes as potentially protectable aspects of personality.

The importance of the case is that AI voice cloning was approached through existing legal principles rather than being treated as a completely separate legal field. At the same time, the case shows the need for clearer standards. Interim orders can deal with urgent harm, but repeated disputes need predictable rules for separating unlawful exploitation from legitimate expression.

VI. THE CENTRAL LEGAL GAP: NEW OUTPUT, OLD IDENTITY

[15]Karan Johar v Ashok Kumar/John Doe (n 2)
[16]Ibid
[17]Kumar SanuBhattacharjee v Jammable Ltd (n 3).

The hardest case is one where the AI output is entirely new. Imagine an advertisement containing a sentence that a famous singer never spoke. The audio is generated by AI and sounds like the singer. No existing recording is copied and the advertisement does not say that it is synthetic. Consumers may reasonably think that the singer endorsed the product.

It is difficult to describe this only as copyright infringement. There may be no reproduction of a protected sound recording. It is also not necessarily a traditional passing-off case, although deception and false association may be relevant. The clearest issue may be identity appropriation: the advertiser has taken a distinctive part of the singer's persona and used it to obtain commercial value.

Now change the facts. A comedian creates a short AI parody of the singer, clearly identifies it as parody and uses it to comment on celebrity culture. The voice is still recognisable, but the purpose is expressive rather than deceptive. If the law prohibited both uses in the same way, it would protect commercial appropriation at the cost of legitimate expression.

The legal gap is therefore not simply a need for a new prohibition. It is a need for a test that can separate harmful appropriation from legitimate imitation.

VII. WHY AN ABSOLUTE PERSONALITY RIGHT WOULD ALSO BE PROBLEMATIC

Personality rights are important, but they should not become an unlimited monopoly over recognisable human characteristics. Voices develop through culture, language and artistic influence. A singer may have a distinctive style, but other singers should remain free to work in the same genre. Actors and comedians also use imitation as part of performance and satire.

An absolute right could create problems for technology as well. Speech-to-speech systems, accessibility tools and dubbing technologies may sometimes need to approximate or reproduce voices for legitimate purposes. A rule that treats every resemblance as infringement would create uncertainty and could discourage useful innovation.

A better approach is to look for the additional harm caused by the use. Commercial endorsement, impersonation, fraud and serious reputational damage are stronger reasons for intervention than

mere similarity. This approach also leaves room for satire and criticism.

VIII. CONSENT AS THE FOUNDATION

Consent should be the starting point for lawful commercial cloning. A person should normally be able to decide whether their distinctive voice may be digitally reproduced for advertising, entertainment or other commercial purposes. Consent should, however, be specific enough to have real meaning.

A performer who agrees to a digital replica for one film should not automatically be treated as having agreed to unlimited advertisements. Similarly, a singer who licenses a particular recording should not necessarily be taken to have authorised a general-purpose AI model trained on all of the singer's performances. Contracts should distinguish between use of a particular recording, creation of a digital replica, training of a voice model and generation of new content.

Consent also creates questions after a performer's death. Contracts may not have anticipated synthetic replicas that can speak new words. Estates may have commercial interests, while the public may have legitimate reasons to discuss or recreate historical figures. Any future legal framework will need to think about duration, inheritance and the limits of post-mortem protection.

IX. FREEDOM OF EXPRESSION, PARODY AND TRANSFORMATION

The strongest counterweight to personality protection is freedom of expression. Public figures are legitimate subjects of reporting, criticism and satire. A recognisable voice can sometimes be part of the expressive message itself. A legal framework should therefore avoid making permission necessary for every reference to a public figure.

The distinction between endorsement and expression is especially important. A synthetic advertisement that makes a celebrity appear to recommend a product uses the celebrity's commercial goodwill. A clearly labelled parody using a recognisable voice to criticise celebrity culture communicates a different message. The two situations should not automatically receive the same legal treatment.

Relevant factors can include purpose, commerciality, transformation, likelihood of confusion,

whether the content is labelled as synthetic or fictional, the fame of the person, the extent of the identity used and the nature of any reputational harm. No single factor should decide every case.

X. PROPOSED CONSENT–CONTEXT–HARM FRAMEWORK

This article proposes a three-stage framework for Indian courts and policymakers. It is a proposed analytical model, not a statement that Indian law has already formally adopted this test.

Stage One: Consent

The first question is whether the person consented to the relevant digital use. The court should identify the scope, purpose and duration of the consent. Lack of consent should weigh strongly in a commercial exploitation case, but it should not by itself make every expressive use unlawful.

Stage Two: Context

The second question is why and how the voice was used. Commercial advertising, endorsement, merchandising and impersonation deserve closer scrutiny than news reporting, criticism or parody. The court should also consider whether the output was presented as genuine or clearly identified as synthetic.

Stage Three: Harm and Remedy

The third question is whether the use causes or is likely to cause commercial appropriation, consumer confusion, reputational harm, privacy harm or another legally recognised injury. The remedy should be proportionate. Fraudulent commercial use may justify urgent injunction or takedown, while a transformative parody may require no relief or a much narrower order.

The framework can therefore be stated simply: Consent → Context → Harm → Proportionate Remedy. Its purpose is to prevent every voice imitation from being treated as infringement while still giving meaningful protection against deceptive and exploitative cloning.

XI. INTERACTION WITH COPYRIGHT AND PERFORMERS' RIGHTS

The proposed framework should not replace copyright. The different legal regimes can operate together when their requirements are met. If an AI tool reproduces a protected sound recording,

copyright remains relevant. If it improperly modifies a protected performance, performers' rights may become relevant. If it uses a distinctive voice to create a false commercial association, personality and publicity rights may be central.

This layered approach also makes remedies clearer. Copyright remedies can respond to copying of protected works. Performers' rights can respond to unauthorised use or prejudicial treatment of performances. Personality remedies can respond to identity appropriation. A single act may sometimes involve more than one right, but the court should identify the elements of each claim separately.

XII. POLICY RECOMMENDATIONS

First, Indian policymakers should clarify that a voice may be protected as an identity attribute without treating every vocal style as intellectual property. This would reduce uncertainty for both rights holders and creators.

Second, performer and recording contracts should expressly address AI replicas, model training and synthetic outputs. Permission to record a performance should not automatically be interpreted as permission for unlimited AI cloning.

Third, AI voice platforms should consider reasonable safeguards for identifiable persons. Services that allow generation of a named celebrity's voice should consider consent verification, reporting mechanisms and quick responses to fraudulent or harmful uses.

Fourth, commercial synthetic audio should, where appropriate, be disclosed as AIgenerated. Disclosure cannot make every use lawful, but it can reduce deception and help distinguish parody or experimentation from an apparent endorsement.

Fifth, courts should develop proportionate remedies. Takedown orders, injunctions, disclosure of relevant information and damages may be suitable in serious cases, but remedies should account for expressive interests and the actual level of harm.

Sixth, policy should protect ordinary individuals as well as celebrities. Celebrity cases provide clear examples because the commercial value of their identities is easy to see, but voice cloning can also be used against ordinary people for fraud, harassment and humiliation. A future

framework should not make celebrity status the only basis for protection.

XIII. COMPARATIVE PERSPECTIVE

Comparative cases show that a distinctive voice can receive legal protection even where the exact original recording is not copied. In Midler v Ford Motor Co, a US court recognised a claim involving imitation of a distinctive singer's voice in an advertisement.[18] In Waits v FritoLayInc, the use of an imitation of a singer's voice in advertising also resulted in liability.[19]These cases are useful because they focus on identity and commercial association rather than treating voice itself as ordinary copyright.

The comparative lesson should not simply be copied into India. Indian constitutional principles, statutory copyright law and developing personality-rights jurisprudence are different. Still, the cases demonstrate a useful distinction: commercial appropriation of a recognisable voice can be legally different from copying a protected recording.

Recent Indian decisions suggest that a similar distinction can be developed through personality and publicity rights while copyright continues to focus on protected works and performances.[20]

XIV. DOCTRINAL IMPLICATIONS OF RECOGNISING VOICE AS IDENTITY

A. Voice as an Identifying Attribute, Not an Absolute Property

The most useful way to understand voice in this area is as an identifying attribute. A person's voice may have economic value because the public associates it with that person, but this does not mean the person owns every sound that resembles it. This distinction is important for intellectual property law because copyright protects defined categories of subject matter rather than every personal characteristic. Treating voice identity as a protected attribute can therefore address serious appropriation without creating a new and uncertain copyright category.

This also explains why celebrity cases are useful but should not be the only source of protection. A celebrity's voice may function like a brand identifier. An ordinary person's voice may have

[18]Midler v Ford Motor Co, 849 F 2d 460 (9th Cir 1988)
[19]Waits v Frito-Lay Inc, 978 F 2d 1093 (9th Cir 1992)
[20]See Arijit Singh v Codible Ventures LLP (n 1); Karan Johar v Ashok KumarJ/John Doe (n 2); Kumar SanuBhattacharjee v Jammable Ltd (n 3).

less commercial value but can still be used for fraud, harassment or false statements. In those situations, privacy, dignity, consumer protection or criminal and cyber laws may also become relevant. Protection should therefore depend on the harm and the legal interest affected, not only on fame.

The distinction between identity and expression is also important when discussing vocal style. A style can contain techniques that other performers may learn and develop. Giving one singer control over every use of a particular singing technique could restrict artistic development. Deliberately creating a recording that makes listeners believe the singer actually performed it is different. The problem in that situation is the appropriation of identity and the resulting deception or commercial exploitation.

B. Training, Generation and Dissemination Should Be Analysed Separately

AI voice disputes can involve several different stages. Recordings may first be collected or used as training data. A model may then be developed or configured to reproduce a particular voice. A user may generate an output, and that output may later be distributed or used commercially. These stages should not automatically be treated as one legal act.

For example, a model might be trained on a large dataset without a claimant being able to show that one particular recording determined the final output. In another case, a platform might openly market a named celebrity voice model and provide a simple interface for generating new speech in that voice. The factual questions are different. Looking at each stage separately can help a court identify the precise source of the alleged wrong.

The separation is also important for remedies. A claimant may seek removal of a public voice model even when proving the exact training source is difficult. In another case, the claimant may mainly object to a particular advertisement. Courts should therefore be able to tailor relief to the activity that causes the legally recognised harm.

XV. A PRACTICAL TEST FOR INDIAN COURTS

Question 1: Is the Person Identifiable?

The first question should be whether an ordinary listener is likely to identify the claimant from

the generated voice. A merely similar voice should not automatically attract protection. Distinctiveness matters because personality rights concern the connection between an attribute and an individual. Evidence may include public recognition, professional use, expert comparison and the circumstances in which the audio was used. The test should remain factual rather than depending on a fixed percentage of acoustic similarity.

Question 2: Was There Consent or a Valid Licence?

The second question should examine consent. The court should identify who gave consent, what was licensed, for what purpose and whether the present use falls within that permission. A licence to use an original song should not automatically become a licence to generate unlimited new speech in the singer's voice. Similarly, permission for a digital double in one film should not necessarily permit unrelated commercial advertisements.

Question 3: What Is the Purpose of the Use?

Purpose should be a central contextual factor. Commercial advertising, product endorsement, merchandising and impersonation deserve close scrutiny because audiences may be influenced by an implied association with the person. Educational uses, criticism, documentary discussion and parody may require greater protection. Purpose should not be decided only by whether money changes hands because a non-commercial use can still cause serious privacy or reputational harm.

Question 4: Is There Deception or Likely Confusion?

A strong indicator of unlawful appropriation is whether viewers or listeners are likely to believe that the person actually spoke, performed or endorsed the content. A clearly labelled parody is less likely to deceive than an advertisement presented as an authentic celebrity endorsement. A synthetic voice used in a scam is particularly serious because the technology is being used to create false trust.

Question 5: What Harm Has Occurred or Is Likely?

The court should identify the harm instead of assuming that every unauthorised use causes the same injury. Harm may include lost endorsement opportunities, dilution of goodwill, reputational

damage, privacy intrusion, consumer deception or other recognised injury. The nature and seriousness of the harm should influence both liability and remedy.

Question 6: What Is the Least Restrictive Effective Remedy?

Finally, the court should choose a remedy that is proportionate to the conduct. A blanket injunction against every use of a person's voice may be unnecessarily broad. A targeted order removing a fraudulent advertisement, disabling a particular unauthorised voice model or preventing a false endorsement may protect the claimant while preserving lawful expression. Where damages are appropriate, the court can consider commercial benefit, loss, reputational impact and the seriousness of the conduct.

XVI. LIMITATIONS AND UNRESOLVED QUESTIONS

The proposed framework cannot solve every difficult case. Voice distinctiveness can sometimes be subjective, and people may sound similar without deliberately copying one another. AI systems can also be trained on large datasets containing material from many sources, which can make it difficult to identify exactly which recordings contributed to an output. Crossborder platforms may create additional problems for enforcement.

Another unresolved issue is what happens to AI-generated voice models after a performer's death. Older contracts may not have anticipated synthetic replicas capable of speaking new words. Estates may have commercial interests, while the public may have legitimate reasons to discuss or recreate historical figures. Future legislation will need to consider duration, inheritance and the limits of post-mortem protection.

A further issue is non-commercial malicious use. A cloned voice used privately to harass or deceive can cause serious harm even when there is no commercial benefit. Personality rights should therefore not be expected to solve every AI-related problem. Privacy law, criminal law, cyber law and other relevant legal rules may also have a role depending on the facts.

Finally, the proposed framework is still a developing model. Its application will depend on evidence, the nature of the claimant, the purpose of the use and the particular harm shown.

Courts may need to balance several competing interests rather than apply one automatic rule.

XVII. CONCLUSION

The growth of AI voice cloning shows a gap between traditional intellectual property categories and the modern value of personal identity. A voice can be part of a copyrighted sound recording, part of a protected performance and, at the same time, a distinctive attribute through which the public identifies a person. These interests can overlap, but they are not the same.

Indian law already provides several parts of the answer. Copyright protects sound recordings and other works. Performers' rights protect specified interests in performances. Judicial decisions have increasingly recognised personality and publicity interests in names, images, likenesses and voices. Recent cases involving Arijit Singh, Karan Johar and Kumar Sanu show that courts are willing to apply these principles to AI-related identity exploitation.[20]

The answer, however, should not be an unlimited monopoly over voice. A rule that prevents every imitation could interfere with parody, criticism, artistic experimentation and technological development. The central distinction should be between copying protected works and appropriating identity in a harmful, deceptive or commercially exploitative context.

The Consent–Context–Harm framework proposed in this article offers one possible route. Courts can first ask whether the use was authorised, then examine the purpose and context, and finally consider actual or likely harm before selecting a proportionate remedy. This approach can protect personal and commercial interests without treating every recognisable voice as private property.

The question “Who owns an AI-generated voice?” may therefore not be the best starting point. A better question is: “What legal interest is being appropriated when an AI-generated voice is made to sound like a real person?” A clear answer to that question can help Indian law protect identity while still leaving room for people to create, criticise, parody and innovate in an increasingly synthetic media environment.