

## **ShopGhana Customer Data Deletion Compliance Response Matrix**

### **Customer A: Abena (Ghana DPA)**

Abena has a right to request deletion. According to Ghana's Data Protection Act if data is no longer necessary or authorization to retain it has ended, given no outstanding issues and last purchase 8 months ago. ShopGhana must comply promptly or provide evidence justifying retention (e.g., legal requirements), delete/de-identify data securely at retention expiry, and retain only what's legally required like transaction records. No fixed response deadline exists, but action should be reasonable; confirm deletion and provide evidence if partial retention applies.

### **Customer B: Lukas (GDPR)**

Lukas qualifies for erasure under GDPR Article 17 if data is no longer necessary for original purposes (recent purchase may not block this absent other grounds), but exemptions apply for legal obligations, public tasks, or archiving. ShopGhana must erase without undue delay (typically one month), notify recipients/processors, and take reasonable steps if data was public; verify identity first. Respond within one month (extendable to three); fines up to €20M or 4% global turnover for non-compliance.

### **Customer C: Maria (CCPA/CPRA)**

Maria has a right to deletion under CCPA/CPRA §1798.105, but exemptions apply for completing transactions, security, or legal disputes, like her active return (20 days old). ShopGhana cannot delete immediately but should resolve dispute first, then delete; for "stop selling," issue opt-out confirmation (CPRA right to limit use/sale). Confirm receipt within 10 business days, delete within 45 days (extendable 45 more with notice); disclose reasons if refused.

## Compliance Response Matrix

Element	Ghana DPA	GDPR	CCPA/CPRA
Right to Deletion Exists?	Yes, qualified (Sec 33: if no longer authorized/no need).	Yes (Art 17: if unnecessary/unlawful processing).	Yes (Sec 1798.105: broad, with exemptions).
Exemptions/Conditions	Legal retention, contracts, consent; data no longer needed.	Legal obligations, public interest, archiving.	Disputes, transactions, security, internal ops.
Response Deadline	Reasonable time (no fixed; comply or justify).	1 month (extend to 3).	45 days (extend 45; confirm in 10 biz days).
Penalties for Non-Compliance	Fines/enforcement by Data Protection Commission.	Up to €20M/4% turnover.	\$2,500-\$7,500 per violation (AG enforcement).
Consent Requirements	<b>For further retention; withdrawal triggers delete.</b>	<b>Basis for processing; withdrawal may enable erase.</b>	<b>Not primary; opt-out for sales/sharing.</b>

## **Action Steps and Retention**

- Abena: Verify request, delete account/profile data immediately; retain transaction records per tax law (e.g., 7 years). Timeline: Respond/confirm within 7 days, delete in 30.
- Lukas: Assess necessity (retain recent order data briefly), erase rest, notify processors. Timeline: Respond in 30 days.
- Maria: Pause for dispute resolution (notify), confirm opt-out, delete post-resolution. Retain dispute data until closed. Timeline: 10-day confirm, 45-day delete.

Challenges: Cross-border verification, system-wide deletion, dispute linkage.

## **Draft Responses**

To Abena: "Dear Abena, we've processed your deletion request under Ghana DPA. Your account and non-essential data are deleted. Transaction records retained for legal compliance (7 years). Confirmation attached."

To Lukas: "Dear Lukas, per GDPR Art 17, non-essential data erased within 30 days. Recent order data retained briefly for accounting. Recipients notified."

To Maria: "Dear Maria, CCPA deletion on hold pending return dispute resolution (exemption applies). Sales opt-out confirmed—no sharing. Expect update in 45 days."