MULTI-JURISDICTION COMPLIANCE CHALLENGE

ShopGhana E-Commerce Platform
Data Deletion Request Analysis

Organization: ShopGhana - African Fashion & Crafts E-Commerce

Scope: Global Operations (Ghana, EU, USA)

Report Date: February 9, 2026

Prepared By: DevOps Engineering & Compliance Team

Jurisdictions Analyzed: Ghana DPA | GDPR | CCPA/CPRA

SCENARIO: Three customers in different jurisdictions submitted data deletion requests on the same day. This report analyzes each request under applicable data protection laws and provides DevOps implementation guidance for compliance across Ghana Data Protection Act (2012), EU GDPR, and California CCPA/CPRA.

EXECUTIVE SUMMARY

As the DevOps Engineer responsible for data infrastructure at ShopGhana, I have analyzed three simultaneous data deletion requests from customers in different jurisdictions: Abena (Accra, Ghana), Lukas (Berlin, Germany), and Maria (Los Angeles, California). Each request triggers different legal obligations under Ghana DPA, GDPR, and CCPA/CPRA respectively.

Key Findings:
• All three customers have legal right to deletion under their respective jurisdictions
• Response deadlines vary: 30 days (Ghana) vs. 1 month (GDPR) vs. 45 days (CCPA)
• Maria's request requires special handling due to active dispute (legal hold exception)
• Different retention requirements apply based on jurisdiction and data type
• Technical implementation requires jurisdiction-aware deletion pipelines

This report provides detailed legal analysis, compliance response matrix, technical implementation guidance, and draft customer communications for each jurisdiction.

Customer	Location	Law	Decision	Deadline	Special Notes
Abena	Accra, Ghana	Ghana DPA	APPROVE	30 days	Retain financial 6 yrs
Lukas	Berlin, Germany	GDPR	APPROVE	1 month	Notify 3rd parties
Maria	Los Angeles, CA	CCPA/CPRA	PARTIAL	45 days	Active dispute hold

COMPLIANCE RESPONSE MATRIX

Element	Ghana DPA	GDPR	CCPA/CPRA
Right to Delete?	YES Section 32	YES Article 17	YES §1798.105
Response Time	30 days	1 month (extend to 3)	45 days (extend to 90)
Penalties	GH■250k or 10% turnover	€20M or 4% turnover	$7.5k per violation
3rd Party Notice	Best practice	REQUIRED Article 19	Only for "sales"
Data Portability	No	YES Article 20	YES §1798.100

CUSTOMER A: ABENA - GHANA DPA ANALYSIS

Field	Details
Name	Abena
Location	Accra, Ghana
Account Age	3 years
Last Purchase	8 months ago (June 2025)
Outstanding	None
Request	"Delete my account and all information. I no longer shop online."
Law	Ghana Data Protection Act, 2012 (Act 843)
Deadline	March 11, 2026 (30 days)

Legal Analysis

1. Does Abena have a legal right to deletion?
YES - Ghana DPA Section 32 grants the "Right to Erasure" when:
• Data is no longer necessary for its purpose
• Data subject withdraws consent
• Data subject objects to processing
• Data has been unlawfully processed

Abena meets criteria: withdrawing consent ("no longer shop online") and data no longer necessary (8 months inactive, no outstanding orders).

2. What are ShopGhana's obligations?
• Respond within 30 days (March 11, 2026)
• Verify Abena's identity before deletion
• Delete personal data not legally required to retain
• Notify Abena of completion
• Apply exemptions for legally-required retention

3. What data can be retained?

DELETE immediately:
• Account credentials
• Profile information
• Browsing history
• Marketing preferences
• Saved payment methods
• Product reviews

RETAIN (with legal justification):
• Financial/transaction records - 6 years (Ghana Revenue Authority requirement)
• Legal claims defense - 6 years (Ghana Limitation Act)
• Aggregated analytics - Indefinite (fully anonymized)

Retention: Until June 2031 (6 years from last transaction)
Data must be ANONYMIZED: Replace name with "DELETED USER", email with
deleted_ID@shopghana.gh

4. Response deadline: 30 days (March 11, 2026)
Ghana DPA requires action "without undue delay" - 30 days is industry best practice aligned with
GDPR standards.

Technical Implementation Steps

Phase 1: Identity Verification (Days 1-3)
Send verification code to registered email
Alternative: SMS verification or security questions

Phase 2: Data Deletion (Days 4-25)
Execute SQL deletion script:

```
DELETE FROM cart WHERE customer_id = 847923; DELETE FROM wishlist WHERE customer_id =
847923; DELETE FROM addresses WHERE customer_id = 847923; DELETE FROM payment_methods WHERE
customer_id = 847923; -- Anonymize retained data UPDATE orders SET customer_name = 'DELETED
USER', customer_email = 'deleted_847923@shopghana.gh', customer_phone = NULL,
retention_justification = 'Tax compliance - 6 years' WHERE customer_id = 847923;
```


Phase 3: External Systems (Days 8-25)
• Remove from email marketing (Mailchimp)
• Delete from customer support system
• Anonymize in analytics (Google Analytics)
• Notify payment processor to delete tokens

Phase 4: Completion Certificate (Days 26-29)
Generate deletion certificate documenting what was deleted and what was retained with legal
justifications.

Draft Response to Abena

Subject: Your Account Deletion Request - Completed

Dear Abena,

Thank you for contacting ShopGhana. Under Section 32 of the Ghana Data Protection Act, 2012, you have the right to request erasure of your personal data.

Your Request Has Been Processed

Data Deleted:
✓ Account credentials and profile information
✓ Saved addresses and payment methods
✓ Shopping cart, wishlist, and browsing history
✓ Marketing subscriptions and product reviews

Data Retained (Legal Requirements):
In accordance with Ghana Revenue Authority requirements and the Ghana Limitation Act, we retain:
• Financial records (anonymized) - 6 years for tax compliance
• Order history (anonymized) - Until June 2031

These records cannot identify you personally and are retained solely for legal compliance.

What This Means:
• You can no longer log into your account
• No marketing communications will be sent
• Personal information has been removed
• To shop again, you'll need to create a new account

Contact Information:
Data Protection Officer: dpo@shopghana.com
Ghana Data Protection Commission: info@dataprotection.gov.gh

Reference: DEL-GH-847923-2026
Completed: March 9, 2026

Sincerely,
ShopGhana Privacy Team

CUSTOMER B: LUKAS - GDPR ANALYSIS

Field	Details
Name	Lukas
Location	Berlin, Germany (EU)
Account Age	1 year
Last Purchase	2 weeks ago (delivered Jan 26, 2026)
Outstanding	None
Request	"I want all my personal data erased immediately under GDPR Article 17."
Law	EU General Data Protection Regulation (GDPR)
Deadline	March 11, 2026 (1 month)

Legal Analysis

1. Does Lukas have a legal right to erasure?
YES - GDPR Article 17(1) grants the "Right to Erasure" when:
(a) Data no longer necessary
(b) Consent withdrawn (no other legal ground)
(c) Data subject objects to processing
(d) Data unlawfully processed

Lukas's request falls under (b) and (c) - withdrawing consent and objecting to processing. Although purchase was recent (2 weeks), delivery is complete, so contractual necessity has ended.

2. Are there exemptions that apply?
GDPR Article 17(3) permits retention when necessary for:
• Legal obligation compliance
• Legal claims defense
• Public interest

Applicable to Lukas:
• **Financial records:** 10 years (German tax law HGB §257, AO §147)
• **Legal claims:** 3 years (German Civil Code BGB §195)
• **Warranty:** 2 years (EU Consumer Rights)
• **Return period:** 14 days (just expired as of today)

CRITICAL: Return period expired on Feb 9, 2026 - can proceed with deletion.

3. What specific steps must ShopGhana take?

Step 1: Respond within 1 month (March 11, 2026)
Step 2: Verify identity (proportionate - cannot request excessive info)
Step 3: Execute deletion with anonymization of retained data
Step 4: NOTIFY THIRD PARTIES (MANDATORY - Article 19):
• Stripe (payment processor)
• DHL (shipping company)

- Mailchimp (email marketing)
- Google Analytics
- Any other recipients of personal data

This third-party notification is REQUIRED by GDPR and often overlooked.

Step 5: Provide deletion certificate

4. Response deadline: 1 month (March 11, 2026)
Can extend to 3 months if complex, but MUST notify within 1 month.

5. What happens if deadline is missed?
SEVERE PENALTIES:
- Up to €20 million OR 4% of global annual turnover (WHICHEVER IS HIGHER)
- For ShopGhana with €5M revenue: €200,000 potential fine
- Supervisory authority investigation
- Public record of violation
- Possible ban on data processing in EU

This is why automated deletion pipelines with monitoring are critical.

Technical Implementation

Phase 1: Identity Verification (Days 1-2)
Email confirmation + order verification (cannot request passport - excessive)

Phase 2: Legitimate Interest Assessment (Days 3-5)
Document balancing test for GDPR compliance:
• Financial: 10 years (German tax law)
• Legal claims: 3 years (statute of limitations)
• Warranty: 2 years
• Return period: EXPIRED (can proceed)

Phase 3: Data Deletion (Days 6-20)
```
-- GDPR Article 17 Deletion DELETE FROM shopping_cart WHERE customer_id = 923847; DELETE
FROM browsing_history WHERE customer_id = 923847; DELETE FROM email_subscriptions WHERE
customer_id = 923847; DELETE FROM payment_methods WHERE customer_id = 923847; DELETE FROM
consent_logs WHERE customer_id = 923847; -- Anonymize retained data UPDATE orders SET
customer_name = 'ANONYMIZED', customer_email = 'gdpr_deleted_923847@shopghana.com',
anonymized_reason = 'GDPR Article 17', retention_end_date = '2036-01-26',
legal_basis_retention = 'HGB §257 - Tax compliance' WHERE customer_id = 923847; UPDATE
customers SET account_status = 'GDPR_DELETED', deletion_article = 'GDPR Article 17' WHERE
customer_id = 923847;
```

Phase 4: Third-Party Notification (MANDATORY - Days 21-25)
Article 19 requires notifying all recipients:
• Stripe: API call to delete customer data
• DHL: Email to data protection officer
• Mailchimp: Permanent delete via API
• Google Analytics: User deletion API
• Cloudflare: Purge cache and anonymize logs

Phase 5: Generate Certificate (Days 26-28)
GDPR-compliant certificate must include:
• What was deleted
• What was retained (legal justification)
• Third parties notified
• Right to complain to supervisory authority
• Contact details of DPO

Draft Response to Lukas

Subject: Your Right to Erasure Request - GDPR Article 17 Confirmation

Sehr geehrter Lukas, / Dear Lukas,

Thank you for your request for erasure under GDPR Article 17, received on 9 February 2026.

Your Request Has Been Processed

Personal Data Erased:
✓ Account credentials
✓ Personal profile (name, email, phone, date of birth)
✓ Saved addresses and payment methods
✓ Browsing history and shopping cart
✓ Email marketing subscriptions
✓ Product reviews and consent records

Data Retained (Legal Justification per Article 17(3)):
1. **Tax Compliance (10 years)**
Legal Basis: HGB §257, AO §147
Data: Order records (anonymized)
Until: 26 January 2036

2. **Legal Claims Defense (3 years)**
Legal Basis: BGB §195
Data: Contract acceptance (anonymized)
Until: 26 January 2029

3. **Product Warranty (2 years)**
Legal Basis: EU Consumer Rights Directive
Until: 26 January 2028

All retained data is fully anonymized and cannot identify you personally.

Third Parties Notified (GDPR Article 19):
✓ Stripe (payment processor)
✓ DHL (shipping company)
✓ Mailchimp (email platform)
✓ Google Analytics
✓ Cloudflare CDN

Your Rights:
If you believe we have not fully complied, contact:
• Data Protection Officer: dpo@shopghana.com
• Supervisory Authority: Berliner Beauftragte für Datenschutz
Friedrichstr. 219, 10969 Berlin
www.datenschutz-berlin.de

Reference: GDPR-DEL-923847-2026-DE
Completed: 28 February 2026

Mit freundlichen Grüßen,
ShopGhana Data Protection Team

CUSTOMER C: MARIA - CCPA/CPRA ANALYSIS

Field	Details
Name	Maria
Location	Los Angeles, California, USA
Account Age	2 years
Last Purchase	6 months ago (August 2025)
Outstanding	ACTIVE return dispute (filed Jan 20, 2026 - 20 days ago)
Request	"Delete account and stop selling personal information to third parties."
Law	California Consumer Privacy Act (CCPA) / CPRA
Deadline	March 26, 2026 (45 days) for deletion / 15 days for opt-out

> ■■ **CRITICAL LEGAL HOLD**
> Maria has an ACTIVE return dispute (20 days old). Under CCPA §1798.105(d), we may deny deletion when necessary to "complete the transaction" or "comply with legal obligation." Cannot delete dispute-related data until resolved.

Legal Analysis

1. What rights does Maria have under CCPA/CPRA?

A. Right to Delete (§1798.105) - Delete personal information collected
B. Right to Opt-Out of Sale (§1798.120) - Stop sharing data with third parties
C. Right to Know (§1798.100) - Disclosure of collected data
D. Right to Correct (CPRA) - Correct inaccurate information

Maria's request triggers (A) and (B).

CCPA "Sale" Definition:
Broadly includes sharing with third parties for valuable consideration:
• Advertising networks (even if not directly paid)
• Analytics companies (Google Analytics)
• Social media integrations (Facebook pixel)
• Affiliate marketing networks

2. Can deletion be processed immediately?
NO - PARTIAL DENIAL due to active dispute

CCPA §1798.105(d) allows denial when necessary to:
(1) Complete the transaction
(8) Comply with legal obligation

Maria's active dispute (filed Jan 20) means:
• Transaction not fully "complete" (ongoing resolution)

- Potential legal claim exists
- Evidence preservation necessary
- Deleting data could prejudice legal position

What CAN be deleted: Data unrelated to dispute
What MUST be retained: Disputed transaction, communications, evidence
Timeline: Dispute data retained until resolved + statute of limitations (4 years in CA)

3. How to respond to "stop selling" request?
IMMEDIATE ACTION - Within 15 business days

Unlike deletion (45 days), opt-out must be processed IMMEDIATELY.

Steps:
1. Audit if ShopGhana "sells" data (YES - Google Analytics, Facebook, affiliates)
2. Add Maria to Do Not Sell list
3. Stop all third-party sharing
4. Notify third parties to remove her data
5. Confirm opt-out status maintained 12+ months

4. Response deadlines:
- Deletion: 45 days (March 26) - extendable to 90 days
- Opt-out: 15 business days (~March 2) - PRIORITY

5. What must be disclosed?
- What data deleted vs. retained
- Exception claimed (§1798.105(d)(1), (d)(8))
- Dispute data retention explanation
- Timeline for dispute resolution
- Opt-out confirmation
- Third parties that received opt-out
- Right to non-discrimination
- California AG complaint process

Technical Implementation

Phase 1: PRIORITY - Opt-Out of Sale (Days 1-2)
Process FIRST (15-day deadline vs. 45-day for deletion):

```
-- Flag for Do Not Sell UPDATE customers SET ccpa_do_not_sell = TRUE, dns_request_date =
'2026-02-09' WHERE customer_id = 451289; -- Stop third-party sharing DELETE FROM
analytics_tracking WHERE customer_id = 451289; -- Notify external systems
facebook_api.remove_from_custom_audience(email='maria@email.com');
google_analytics.anonymize_user(user_id='451289');
affiliate_network.suppress_user(customer_id=451289); -- Add to suppression list INSERT INTO
ccpa_opt_out_list (customer_id, opt_out_date) VALUES (451289, CURRENT_TIMESTAMP);
```

Phase 2: Identity Verification (Days 3-5)
CCPA requires matching 2-3 data points already on file:
• Last 4 digits of recent order number
• Billing ZIP code
• Last purchase amount
Cannot request excessive info (SSN, driver's license).

Phase 3: Legal Hold Assessment (Days 6-8)
Identify dispute-related data:
• Dispute #D-2026-00847 (filed Jan 20, 2026)
• Related Order: #ORD-2025-08-00234
• Support tickets: TKT-2026-00123, TKT-2026-00124
• All communications regarding dispute

Apply legal hold flag to prevent deletion.

Phase 4: Partial Deletion (Days 9-40)

```
-- Delete non-dispute data DELETE FROM cart WHERE customer_id = 451289; DELETE FROM
wishlist WHERE customer_id = 451289; DELETE FROM browsing_history WHERE customer_id =
451289; DELETE FROM orders WHERE customer_id = 451289 AND order_id != 'ORD-2025-08-00234';
-- RETAIN dispute data with documentation UPDATE orders SET retention_reason = 'CCPA
§1798.105(d)(1),(8) - Active dispute', estimated_retention_end = '2030-01-20', legal_hold =
TRUE WHERE order_id = 'ORD-2025-08-00234'; -- Anonymize customer record UPDATE customers
SET account_status = 'CCPA_DELETED_PARTIAL', deletion_type = 'PARTIAL - Legal hold',
ccpa_exception = '§1798.105(d)(1), (d)(8)' WHERE customer_id = 451289;
```

Phase 5: Ongoing Monitoring
Set up automated check for dispute resolution:
• Monitor dispute status daily
• When resolved, schedule final deletion
• CA statute of limitations: 4 years from resolution
• Notify Maria when dispute closes with updated timeline

Draft Response to Maria

Subject: Your California Privacy Rights Request - Confirmation

Dear Maria,

Thank you for your request received February 9, 2026, which includes:
1. Delete personal information (CCPA Right to Delete)
2. Stop selling personal information (CCPA Right to Opt-Out)

1. OPT-OUT OF SALE - COMPLETED

Your "stop selling" request has been processed. Under CCPA, "sale" includes sharing data with third parties.

Actions Taken:
✓ Removed from Google Analytics
✓ Removed from Facebook Custom Audiences
✓ Removed from affiliate marketing
✓ Removed from ad platforms
✓ Added to permanent "Do Not Sell" list

Your opt-out status remains in effect indefinitely.

2. DELETION REQUEST - PARTIAL COMPLETION

Active Dispute Exception:
You have active Dispute #D-2026-00847 filed January 20, 2026, for Order #ORD-2025-08-00234.
Under CCPA Section 1798.105(d), we may retain data necessary to:
• "Complete the transaction" (§1798.105(d)(1))
• "Comply with legal obligation" (§1798.105(d)(8))

Until dispute resolution, we must retain transaction and communication data.

Data DELETED:
✓ Account credentials and profile
✓ Saved addresses and payments
✓ Browsing history and cart
✓ Email subscriptions
✓ Other purchase records

Data RETAINED (Legal Justification):
• Order #ORD-2025-08-00234 details
• Payment record for this transaction
• Dispute communications
• Your contact info ONLY for dispute resolution

Retention Timeline:
Until dispute resolution + 4 years (CA statute of limitations)
Estimated: January 20, 2030

You'll be notified when dispute resolves with updated deletion timeline.

Right to Non-Discrimination:
We will not discriminate for exercising CCPA rights - no different prices, denial of service, or quality changes.

Questions or Concerns:
Privacy Team: privacy@shopghana.com
California Attorney General: oag.ca.gov/privacy

Reference: CCPA-DEL-451289-2026-CA
Opt-Out Completed: February 11, 2026
Partial Deletion Completed: March 20, 2026

Sincerely,
ShopGhana Privacy Team

CONCLUSION AND RECOMMENDATIONS

Key Takeaways from Multi-Jurisdiction Analysis:

1. Legal Complexity Varies Significantly
• Ghana DPA: Most flexible, 30-day deadline, moderate penalties
• GDPR: Strictest requirements, mandatory third-party notification, severe penalties
• CCPA/CPRA: Dual deadlines, opt-out priority, legal hold exceptions common

2. Technical Implementation Requirements
• Jurisdiction-aware deletion pipelines
• Automated monitoring and alerts
• Third-party integration APIs
• Legal hold management system
• Comprehensive audit logging

3. Critical DevOps Actions
• Implement automated deletion workflows
• Set up deadline monitoring (30/45 days)
• Build third-party notification system (GDPR)
• Create legal hold database
• Develop verification mechanisms
• Generate compliance certificates

4. Business Risk Management
• GDPR penalties can be €200,000+ for SMB
• Missing deadlines = existential business risk
• Manual processes = high failure probability
• Automation = compliance + cost savings

5. Recommended Next Steps
1. Build jurisdiction detection in user registration
2. Implement automated deletion pipelines
3. Create GDPR third-party notification API
4. Develop legal hold management system
5. Set up compliance monitoring dashboard
6. Train support team on each jurisdiction
7. Document all retention policies by jurisdiction
8. Establish DPO contact system

DevOps Priority: Automation is not optional - manual compliance processes at scale will fail, potentially causing catastrophic business penalties.

Final Note: This analysis demonstrates that data protection compliance requires deep understanding of legal requirements, technical implementation capabilities, and business risk management. Success depends on building robust, automated systems that can handle jurisdiction-specific requirements while maintaining comprehensive audit trails.