

# Global Comprehensive Privacy Law Mapping Chart

Comprehensive data protection laws exist across the globe. While each law is different, there are many commonalities in terms of the rights, obligations and enforcement provisions. The Westin Research Center has created this chart mapping several comprehensive data protection laws, including the laws in the U.S., to assist our members in understanding how data protection is being approached around the world.

Our intent is to add to this chart and update it as laws are amended and other laws come into force. As always, we appreciate input from

our members. If you have comments about the mapping or believe additional information should be included, please share it with [Cathy Cosgrove](#) at [ccosgrove@iapp.org](mailto:ccosgrove@iapp.org).

Special thanks to Perry Cruz, Amit Gadhia, Dr. Julien C. Hounkpe, [Anna Johnston](#), Louisa Meliqsetyan, Selin Ozbek Cittone, Yechiel Steinmetz, [Kezia Talbot](#), [Daimhin Warner](#), and former IAPP legal externs, including [Seth Azubuik](#)e, Brynne Duvall, [Sean Kellogg](#), [Eduardo Monteverde](#), and [Cheryl Saniuk-Heinig](#), for their contributions.

	<b>Last updated:</b> April 2022 <b>Note:</b> This tool is for informational purposes and is not legal advice. Whether a law includes a particular provision should always be verified via official sources.	<b>Argentina</b>	<b>Armenia</b>	<b>Australia</b>	<b>Benin Republic</b>
		<a href="#">Personal Data Protection Act*</a>	<a href="#">Law On Personal Data Protection</a>	<a href="#">Privacy Act 1988</a>	<a href="#">Digital Code</a>
				<a href="#">Australian Privacy Principles (included in Privacy Act)</a>	
INDIVIDUAL RIGHTS				<a href="#">Australian Privacy Principles Guidelines</a>	
	Right to access	Articles 4(6) and 14	Articles 15, 18(1 and 4) and 20(1 and 2)	APP 12	Article 437
	Right to correct	Article 16	Articles 6, 15(2) and 21(2)	APP 13	Article 441
	Right to delete	Articles 4(5) and 16	Article 15(2)	<a href="#">APP Guidelines, APP 13 (related to correcting inaccuracy)</a>	Articles 441, 443 and 444
	Right to portability				Article 438
	Right to opt out of all or specific processing		Articles 9(3), 11(2), 12(2) and 21(6)	APP 7	Articles 390 and 440
	Right to opt in for sensitive data processing	Articles 2 and 7*	Articles 12 and 13*	APP 3	Article 394
BUSINESS OBLIGATIONS	Age-based opt-in right		Article 9(9)		Article 446
	Right not to be subject to fully automated decisions				Articles 401, 415 and 439
	Notice/transparency requirements	Articles 6 and 13	Articles 9(5-8) and 10	APPs 1 and 5	Articles 384, 403, 415, 416 and 418
	Legal basis for processing		Article 8		Articles 383 and 389
	Purpose limitation	Article 4(3)	Articles 4(2), 16, 18(2) and 19(1)	APP 6	Articles 383(3) and 424
	Data minimization	Article 4(1), (7)	Articles 5, 18(2) and 19(1)	APP 3.1–3.2	Articles 383(4) and 424
	Security requirements	Article 9	Article 19 and Government Decision on Biometric Personal Data*	APP 11	Articles 383 and 426
	Privacy by design			<a href="#">APP Guidelines, APP 1, 1.3</a>	Article 424
	Processor/service provider requirements	Article 9 (security)	Article 14		Article 386
	Prohibition on discrimination				Articles 393 and 401
	Record keeping	Chapter IV (Articles 21–28) (for data files, registers, banks, etc.)		<a href="#">APP Guidelines, APP 1, 1.5</a>	Article 435
	Risk/impact assessments			Privacy Act 1988, 33D; APP Guidelines, APP 1, 1.7; Australian Government Agencies Privacy Code*	Article 428
	Data breach notification*		Article 21(3 and 4)	Privacy Act 1988, Part IIIC	Article 427
	Registration with authorities	Chapter IV (Articles 21–28) (for data files, registers, banks, etc.)	Article 23		Articles 405 and 406 (reporting obligation)
	Data protection officer			Australian Government Agencies Privacy Code*	Articles 430–432
SCOPE	International data transfer restrictions	Article 12	Articles 26 and 27	APP 8	Articles 391 and 392
	Exemption for employee data		<a href="#">Section 16 of Labour Code</a>	Privacy Act 1988, 7B(3)	
	Nonprofits covered	Articles 1 and 2	Article 1(1)	Privacy Act 1988, 6C–6E	Article 380
	Sectoral law carveouts		Article 1(2)	<a href="#">OAIC guidance</a>	
ENFORCEMENT	State-level preemption				
	Independent enforcement authority	<a href="#">Agencia de Acceso a la Información Pública</a>	<a href="#">Personal Data Protection Agency</a>	<a href="#">Office of the Australian Information Commissioner</a>	<a href="#">Autorité de Protection des Données à caractère Personnel</a>
		Chapter V (Articles 29 and 30)	Articles 24 and 25	Privacy Act 1988, Part IV	Articles 462–490
	Rulemaking authority	Chapter V (Articles 29 and 30)	National Assembly, RA Government, Personal Data Protection Agency	Privacy Act 1988, 100	Article 483
	Fining authority	Article 31	Article 24; Article 189.17, <a href="#">Administrative Violations Code</a>	Privacy Act 1988, Part III, 13G; Part IIIA; Part V, 46, 65–66, etc.	Articles 452-455, 459 and 483
	Criminal penalties	Articles 31 and 32	<a href="#">Article 145, Criminal Code (medical privacy)</a>	Privacy Act 1988, Part V, 46, 65 and 66; Part VIA, 80Q, etc.	Articles 460 and 461
	Personal liability	Articles 31 and 32		Privacy Act 1988, 99A	Article 460
	Private right of action	Articles 33–39	Articles 17 and 21		Articles 449–451

**\*Data breach notification:** Many countries and all 50 U.S. states have separate data breach notification laws. The term in this chart refers to a provision included in a comprehensive data protection law.

**\*Argentina:** Morrison Foerster’s privacy library has an English version of the [PDPA](#). The law provides no person can be compelled to provide sensitive data, subject to certain exceptions.

**\*Armenia:** The Law on Personal Data Protection has different categories of personal data, including “special category” personal data, “personal life data” and “biometric personal data.” Armenia also has a decision regarding biometric personal data, [RA Government Decision N 1175-N](#) dated 15 October 2015 “On Defining Requirements for Material Carriers of Biometric Personal Data and Technologies for Storage of Such Data outside of Information Systems.” [The Armenian Constitution](#) includes a right to privacy in Article 31.

**\*Australia:** The Australian Government Agencies [Privacy Code](#) requires Australian government agencies subject to the Privacy Act to conduct written privacy impact assessments for “high privacy risk” projects and requires the appointment of a privacy officer(s) and privacy champion.

# Global Comprehensive Privacy Law Mapping Chart

<div><div>Last updated: April 2022</div><div><b>Note:</b> This tool is for informational purposes and is not legal advice. Whether a law includes a particular provision should always be verified via official sources.</div></div>		Brazil	Canada	China	Colombia
INDIVIDUAL RIGHTS		General Data Protection Law	Personal Information Protection and Electronic Documents Act	Personal Information Protection Law	Law 1581/2012*
					Law 1266/2008
	Right to access	Articles 6(IV) and 18(II)	Schedule 1, Principle 9	Articles 44 and 45	Articles 8 and 18, Law 1581; Article 7, Law 1266; Article 21, Decree 1377
	Right to correct	Article 18(III)	Schedule 1, Principle 9	Article 46	Articles 8 and 18, Law 1581; Article 7, Law 1266; Article 22, Decree 1377
	Right to delete	Article 18(VI)	Schedule 1, Principle 9 (related to correcting inaccuracy)	Article 47	Articles 8 and 18, Law 1581; Article 7, Law 1266; Article 22, Decree 1377
	Right to portability	Article 18(V)		Article 45	
	Right to opt out of all or specific processing		Schedule 1, Principle 3 (4.3.8)	Articles 15 and 44	Article 8(e), Law 1581
	Right to opt in for sensitive data processing	Article 11	See OPC Guidance, Principle 3	Article 29	Articles 5 and 6, Law 1581; Article 6, Decree 1377
BUSINESS OBLIGATIONS	Age-based opt-in right	Article 14		Article 31	Article 7, Law 1581*; Article 12, Decree 1377
	Right not to be subject to fully automated decisions	Article 20		Articles 24 and 55	
	Notice/transparency requirements	Article 10, Section 2	Schedule 1, Principles 2, 3 and 8	Articles 7, 17, 23 and 30	Articles 4(e) and 12, Law 1581; Articles 14–18, Decree 1377
	Legal basis for processing	Article 7	Schedule 1, Principle 4.3 (consent required)	Article 13	Article 9, Law 1281; Article 5, Decree 1377 (consent based)
	Purpose limitation	Article 6(I)	Schedule 1, Principle 4	Article 6	Article 4(b), Law 1581
	Data minimization	Article 6(III)	Schedule 1, Principle 4	Articles 6 and 19	Articles 4 and 11, Decree 1377
	Security requirements	Articles 6(VII) and 46–49	Schedule 1, Principle 7	Articles 9, 51 and 59	Articles 4(g), 17 and 18, Law 1581; Article 19, Decree 1377
	Privacy by design				
	Processor/service provider requirements	Articles 37, 39 and 40		Article 21	Articles 8, 12, 17 and 18, Law 1581
	Prohibition on discrimination	Article 6(IX)		Article 16	
	Record keeping	Article 37	Part 1, Division 1.1, Section 10.3	Articles 54–56	Articles 8, 17 and 18, Law 1581; Articles 8 and 26, Decree 1377
	Risk/impact assessments	Article 38		Articles 55 and 56	Articles 17, 18 and 25, Law 1581
SCOPE	Data breach notification*	Article 48	Part 1, Division 1.1, Sections 10.1–10.3	Article 57	Articles 17 and 18, Law 1581
	Registration with authorities			Articles 52 and 53	Article 25, Law 1581 (databases)
	Data protection officer	Article 41	Schedule 1, Principle 1	Article 52	Article 23, Decree 1377 (person or area designated to assume the function of personal data protection)
	International data transfer restrictions	Article 33		Articles 38–43	Article 26, Law 1581; Articles 24 and 25, Decree 1377
ENFORCEMENT	Exemption for employee data		Part 1, Section 4(1)(b)*		
	Nonprofits covered	Article 3	Part 1, Section 4	Article 3	Article 2, Law 1581
	Sectoral law carveouts				
	State-level preemption		See OPC Guidance		
	Independent enforcement authority	National Data Protection Authority	Office of the Privacy Commissioner	*	Superintendency of Industry and Commerce
		Articles 55-A–55-L	Part 1, Division 2		Articles 19–24, Law 1581
	Rulemaking authority	Article 55-J	Part 1, Division 4, Section 26	Article 62	Article 21, Law 1581
	Fining authority	Articles 52–54	Part 1, Division 4, Section 28	Article 66	Articles 23 and 24, Law 1581; Title VII, Law 1266
	Criminal penalties			Article 71	
	Personal liability			Article 66	Articles 23 and 24, Law 1581; Articles 18 and 19, Law 1266
	Private right of action	Articles 42–45	Part 1, Division 2, Sections 14–17	Articles 50, 69 and 70	Article 16, Law 1266; Decree 2591

**\*Data breach notification:** Many countries and all 50 U.S. states have separate data breach notification laws. The term in this chart refers to a provision included in a comprehensive data protection law.

**\*Canada:** PIPEDA applies to [employee information](#) in organizations engaged in federal works, undertakings or businesses.

**\*China:** Several government departments are responsible for enforcement, including the Cyberspace Administration of China, Ministry of Industry and Information Technology, and Ministry of Public Security.

**\*Colombia:** In addition to the data protection laws, there are decrees and other documents with relevant data protection provisions, including Decree 1377/2013 and Decree 2591/1991. Law 1581/2012 prohibits the processing of personal data of children and adolescents.

# Global Comprehensive Privacy Law Mapping Chart

<div>Last updated: April 2022</div> <div>Note: This tool is for informational purposes and is not legal advice. Whether a law includes a particular provision should always be verified via official sources.</div>	European Union	Hong Kong	Israel	Kenya	
	General Data Protection Regulation	Personal Data Privacy Ordinance*	Protection of Privacy Law	The Data Protection Act, 2019	
		Data Protection Principles (PDPO Schedule 1)	Privacy Protection (Data Security) Regulations	The Data Protection Regulations, 2021*	
INDIVIDUAL RIGHTS	Right to access	Article 15	Part 5, Division 1, Section 18; DPP 6	Article 13	Section 26(b)
	Right to correct	Article 16	Part 5, Division 2, Section 22	Article 14	Sections 26(d) and 40
	Right to delete	Article 17	DPP 2 (related to correcting inaccuracy)	Articles 14 (related to correcting inaccuracy) and 17F(b) (direct mailing)	Section 26(e) (if false or misleading data) and 40 (limited)
	Right to portability	Article 20			Section 38
	Right to opt out of all or specific processing	Articles 7 and 21	Part 6A, Division 2, Section 35G		Sections 26(c), 32, 34 and 36
	Right to opt in for sensitive data processing	Article 9			*
	Age-based opt-in right	Article 8			Section 33
	Right not to be subject to fully automated decisions	Article 22			Section 35
BUSINESS OBLIGATIONS	Notice/transparency requirements	Article 12	DPPs 5 and 6	Article 11	Sections 25(b), (e) and 29
	Legal basis for processing	Article 6	DPP 1	Article 1	Section 30
	Purpose limitation	Article 5(1)(b)	DPPs 1 and 3	Articles 2(9) and 8(b)	Section 25(c)
	Data minimization	Article 5(1)(c)	DPP 1	Article 2(c), Privacy Protection (Data Security) Regulations*	Sections 25(d) and 39
	Security requirements	Article 32	DPP 4	Articles 17 and 17B; Privacy Protection (Data Security) Regulations	Sections 19(2)(e), 29(f), 41 and 42
	Privacy by design	Article 25			Section 41
	Processor/service provider requirements	Article 28	DPPs 2(3) and 4(2)	Articles 17 and 17A; Articles 15 and 19, Privacy Protection (Data Security) Regulations	Parts III and IV; Part IV, General Regulations
	Prohibition on discrimination	Recital 71			
	Record keeping	Article 30	Part 5, Division 3, Section 27	Articles 6(b), 10, 11, 15(a)(2)(d), 17, 18, and 19, Privacy Protection (Data Security) Regulations	Section 43(8) (data breach); General Regulation 19
	Risk/impact assessments	Article 35		Article 5(c), Privacy Protection (Data Security) Regulations	Section 31; Part VIII, General Regulations
	Data breach notification*	Article 33		Article 11(d), Privacy Protection (Data Security) Regulations	Section 43; Part VI, General Regulations
		Article 34			
	Registration with authorities	Article 37(7)	Part 4, Section 15	Article 8(a)(1) (databases)	Sections 18-22; Registration of Data Controllers and Data Processors Regulations
	Data protection officer	Article 37		Article 17B (security supervisor)*	Section 24 (optional)
	International data transfer restrictions	Articles 44–50	Part 6, Section 33 (not yet in operation)	Privacy Protection (Transfer of Data to Databases Abroad) Regulations	Sections 25(h) and Part VI; Part VII, General Regulations
	SCOPE	Exemption for employee data		Part 8, Sections 53 and 54	
Nonprofits covered		Article 2	Part 1, Section 2	Article 1; Article 4 of the Interpretation Law	Section 4
Sectoral law carveouts		Article 6(2)		Article 13(c)(3)	
State-level preemption		Recital 10			
ENFORCEMENT	Independent enforcement authority	EU national data protection authorities	Office of the Privacy Commissioner for Personal Data	Privacy Protection Authority	Office of the Data Protection Commissioner
		Articles 51–59	Part 2, Section 5	Articles 9, 10, 10A, and 12 (database registration); Articles 11(d) and 20, Privacy Protection (Data Security) Regulations	Sections 5-17
	Rulemaking authority	Articles 64, 65(1)(c) and 92	Part 3, Section 12	Article 36; the Privacy Protection Authority	Sections 5, 8, 9 and 74
	Fining authority	Article 83	Part 7, Sections 35C, 50A, 64, etc.	Privacy Protection Authority	Sections 9(1)(f) and 63
	Criminal penalties		Numerous provisions	Articles 5, 6, 16, 29A, 30, 31A and 31	Section 73
	Personal liability		Director convicted under PDPO	Articles 4, 17, 17B(b), 30, 31A, 31B and 31	
	Private right of action	Article 79	Part 9, Section 66	Articles 4, 15, 17F(e), 30, 31B and 31	Section 65

**\*Data breach notification:** Many countries and all 50 U.S. states have separate data breach notification laws. The term in this chart refers to a provision included in a comprehensive data protection law.

**\*Hong Kong:** The [Personal Data \(Privacy\) \(Amendment\) Ordinance 2021](#) focused on combating doxxing acts took effect Oct. 8, 2021.

**\*Israel:** As with most countries, there are other laws in Israel that may be relevant to data privacy, including the [Basic Law: Human Dignity and Liberty](#) that provides all persons the right to privacy (Article 7) and Communications Law (Bezeq and Transmissions) (Amendment No. 72), 2018. The PPA has publications on topics like data minimization, cross-border transfers and the appointment of data protection officers.

**\*Kenya:** The Data Protection Regulations include general regulations, regulations regarding complaints handling and enforcement procedures, and regulations regarding registration of data controllers and data processors. Kenya limits the grounds for processing sensitive personal data (Sections 44 and 45) and personal data relating to the health of a data subject (Section 46).



# Global Comprehensive Privacy Law Mapping Chart

<div><div>Last updated: April 2022</div><div><b>Note:</b> This tool is for informational purposes and is not legal advice. Whether a law includes a particular provision should always be verified via official sources.</div></div>		New Zealand	Nigeria	Philippines	Singapore
	INDIVIDUAL RIGHTS	Privacy Act 2020	Nigeria Data Protection Regulation	Data Privacy Act of 2012 (R.A. 10173)*	Personal Data Protection Act
		Information Privacy Principles (Part 3, Subpart 1 of the Privacy Act)	Nigeria Data Protection Regulation Implementation Framework	Implementing Rules and Regulations of the Data Privacy Act of 2012	
		Codes of practice			
Right to access	IPP 6; Part 4, Subpart 1	Paragraph 3.1 (6) and (14)	Section 16(c); IRR, Rule VIII, Section 34(c)	Section 21	
Right to correct	IPP 7; Part 4, Subpart 2	Paragraph 3.1(7)(h)	Section 16(d); IRR, Rule VIII, Section 34(d)	Section 22	
Right to delete	IPP 7; Section 7(1); Part 4, Subpart 2 (related to correcting inaccuracy)	Paragraph 3.1(9)	Section 16(e); IRR, Rule VIII, Section 34(e) (certain circumstances)	Section 25 (obligation limiting retention)	
Right to portability		Paragraph 3.1(14) and (15)	Section 18; IRR, Rule VIII, Section 36	Sections 26F–26J*	
Right to opt out of all or specific processing		Paragraphs 2.3(c) and 3.1(11)	IRR, Rule VIII, Section 34(b)	Section 16	
Right to opt in for sensitive data processing		NDPR Framework, Articles 5.3.2 and 5.4*	Section 13; IRR, Rule V, Section 22		
Age-based opt-in right		NDPR Framework, Articles 5.3.1(d), 5.4 and 5.5*	*	*	
Right not to be subject to fully automated decisions		Paragraph 3.1(7)(L); NDPR Framework, Articles 3.2 (xvi) and 5.3.1(f)	Section 16(c)(6); IRR, Rule VIII, Section 34(b)		
BUSINESS OBLIGATIONS	Notice/transparency requirements	IPP 3	Paragraphs 2.5, 3.1(1) and (7); NDPR Framework, Annex B (Privacy Policy Template)	Sections 11 and 16(a) and (b); IRR, Rule IV, Section 18(a) and Rule VIII, Section 34(a)	Sections 12(d) and 20
	Legal basis for processing	IPPs 10 and 11 (post-collection)	Paragraph 2.2	Section 12; IRR, Rule V	Section 13 (consent required)
	Purpose limitation	IPP 10	Paragraphs 2.1(1)(a) and 3.1(7)(m); NDPR Framework, Article 4.1	Sections 11 and 12; IRR, Rule IV, Sections 18 and 19.	Sections 18 and 20
	Data minimization	IPPs 1 and 9 (storage limitation)	NDPR Framework, Annex A (Audit Template), No. 4.6	Sections 11(d) and (e); IRR, Rule IV, Section 19(d) and Rule VI, Section 26(e)	Section 14(2)(a)
	Security requirements	IPP 5	Paragraphs 2.1(1)(d) and 2.6; NDPR Framework, Article 3.2(v)	Chapters V and VII; IRR, Rules VI and VII	Section 24
	Privacy by design				
	Processor/service provider requirements	IPP 5; Section 11	Paragraph 2.7; NDPR Framework, Article 3.2	Sections 14, 20(d) and 21; IRR, Rule VI, Section 26(f) and Rule X	Section 4(2)
	Prohibition on discrimination				
	Record keeping		NDPR Framework, Annex A (Audit Template), No. 3.1	IRR, Rule VI, Section 26(c)	Section 22A
	Risk/impact assessments		Paragraph 4.1(5)-(7) (audit requirement); NDPR Framework, Articles 3.2(viii) and 4.2 (data protection impact assessment)	Section 20(c); IRR, Rule VI, Section 29; NPC Advisory No. 2017-03, Guidelines on Privacy Impact Assessments	*
	Data breach notification*	Part 6, Subpart 1	NDPR Framework, Articles 3.2(ix) and 9	Section 20(f); IRR, Rule IX	Sections 26A–26E
	Registration with authorities			IRR, Rule XI; NPC Circular 17-01	Section 11(5)*
	Data protection officer	Section 201	Paragraph 4.1(2); NDPR Article 3.4-3.7	Section 21(b); IRR, Rule VI, Section 26(a) and Rule XII, Section 50(b)	Section 11
	International data transfer restrictions	IPP 12; Part 8	Paragraphs 2.11-12 and 3.1(8); NDPR Framework, Articles 7 and 14	Section 21; IRR, Rule XII	Section 26
SCOPE	Exemption for employee data			Section 4 (limited to government officers, employees and contractors)	First Schedule, Part 3 Legitimate Interests, Section 10
	Nonprofits covered	Section 8	Paragraph 1.2; NDPR Framework, Article 2.1	Section 4	Section 4
	Sectoral law carveouts	Sections 24 and 28		Section 4	Section 4(6)(b)
	State-level preemption				
ENFORCEMENT	Independent enforcement authority	Office of the Privacy Commissioner	Nigeria Data Protection Bureau*	National Privacy Commission	Personal Data Protection Commission
		Part 2	Paragraph 4.2; NDPR Framework, Article 10	Chapter II; IRR, Rule III	Sections 5–10
	Rulemaking authority	Part 3, Subpart 2	Preamble to NDPR	Chapter II; IRR, Rule III	Section 65
	Fining authority		Paragraph 2.10; NDPR Framework, Article 10.1.4	Sections 7(i); IRR, Rule III, Section 9(f)	Sections 48C–48F, 48J–48K, 51–52A and 56
	Criminal penalties	Sections 104, 118, 197 and 212	Paragraph 2.10; NDPR Framework, Article 10.1.5	Chapter VIII; IRR, Rule XII, Section 51 and Rule XIII	Sections 48C–48F, 51–52A and 56
	Personal liability	Sections 12, 27, 119, 120, and 211		Chapter VIII; IRR, Rule XII, Section 51 and Rule XIII	Sections 48C–48F, 48J–48K, 51–52A, 56 and 60
	Private right of action	Section 31		Section 16(f); IRR, Rule VIII, Section 34(f) and Rule XII, Section 51	Section 48O

**\*Data breach notification:** Many countries and all 50 U.S. states have separate data breach notification laws. The term in this chart refers to a provision included in a comprehensive data protection law.

**\*Nigeria:** Explicit consent is required for the processing of sensitive personal data. Consent is required for the processing of the personal data of a minor. A child is defined as any person under 13. The [National Information Technology Development Agency](#) issued the NDPR and was the main regulator. In February 2022, the government of Nigeria created the NDPB to oversee implementation of the NDPR.

**\*Philippines:** The NPC has issued a number of guidance documents regarding the interpretation of the DPA and the IRR that may be informative. For example, in [Advisory Opinion](#) No. 2017-49, the NPC stated “a minor cannot validly provide the consent as defined under the DPA.”

**\*Singapore:** [Amendments](#) to the [PDPA](#) not yet in effect will create a right of portability and increase potential financial penalties. The PDPC has issued [Advisory Guidelines](#) on various topics, including [data activities related to minors](#) and [data protection impact assessments](#). There is no DPO registration requirement but the law does require DPO contact details be [made public](#).

# Global Comprehensive Privacy Law Mapping Chart

	<b>Last updated:</b> April 2022 <b>Note:</b> This tool is for informational purposes and is not legal advice. Whether a law includes a particular provision should always be verified via official sources.	South Africa	South Korea	Turkey
		Protection of Personal Information Act	Personal Information Protection Act	Law on the Protection of Personal Data
		Regulations Relating to the Protection of Personal Information		
INDIVIDUAL RIGHTS	Right to access	Sections 5(b), 23 and 25*	Articles 4 and 35	Chapter 3, Article 11
	Right to correct	Sections 5(c) and 24; Regulation 3	Articles 4 and 36	Chapter 3, Article 11
	Right to delete	Sections 5(c) and 24; Regulation 3	Articles 4 and 36	Chapter 2, Article 7; Chapter 3, Article 11 (limited)
	Right to portability			
	Right to opt out of all or specific processing	Sections 5(d)-(e) and 11(3)-(4)	Articles 4 and 37	
	Right to opt in for sensitive data processing	Sections 26–33 (“special personal information”)	Article 23	Chapter 2, Article 6
	Age-based opt-in right	Sections 34 and 35	Article 22(6)	
	Right not to be subject to fully automated decisions	Sections 5(g) and 71		Chapter 3, Article 11(1)(g)
BUSINESS OBLIGATIONS	Notice/transparency requirements	Sections 5(a) and 18	Articles 3, 4 and 30	Chapter 3, Article 10(1)
	Legal basis for processing	Sections 4, 9 and 11	Articles 3 and 15	Chapter 2, Articles 4–6
	Purpose limitation	Sections 13 and 15	Articles 3, 15, 18 and 19	Chapter 2, Article 4(2)(c)
	Data minimization	Sections 10, 14 and 16	Article 16(1)	Chapter 2, Article 4(2)(ç) and (d)
	Security requirements	Sections 19–21	Article 29	Chapter 3, Article 12
	Privacy by design			
	Processor/service provider requirements	Sections 20 and 21 (security)	Articles 19 and 26	Chapter 3, Article 12
	Prohibition on discrimination			
	Record keeping	Sections 14 and 17	Article 29	Chapter 4, Article 16
	Risk/impact assessments	Regulation 4(b)	Article 33	
	Data breach notification*	Section 22	Article 34	Chapter 3, Article 12(5)
	Registration with authorities	Sections 55 (for Information Officers) and 58 (certain processing); Guidance Note on Application for Prior Authorisation*	Article 32	Chapter 4, Article 16
	Data protection officer	Sections 55 and 56; Regulation 4; Guidance Note on Information Officers and Deputy Information Officers*	Article 31	
	International data transfer restrictions	Section 57(1),(d) and 72	Articles 14(2), 17(3), 39-12 and 39-13	Chapter 2, Article 9
	Exemption for employee data	Section 32(1)(f)		
SCOPE	Nonprofits covered	Section 3	Article 58	Chapter 1, Article 2
	Sectoral law carveouts		Article 6	Chapter 7, Article 28
	State-level preemption			Chapter 7, Article 28
ENFORCEMENT	Independent enforcement authority	Information Regulator	Personal Information Protection Commission	Personal Data Protection Authority
		Sections 39–54	Article 7	Chapter 6, Articles 19 and 20
	Rulemaking authority	Sections 40(1)(f), 60-68 and 112(2)	Articles 7-8 and 7-9	Chapter 6, Article 22
	Fining authority	Section 109	Articles 70–76	Chapter 5, Article 18; Chapter 6, Article 22
	Criminal penalties	Section 107	Articles 70–73	Chapter 5, Article 17
	Personal liability	Section 93(b)(ii) (Information Officers); Guidance Note on Information Officers and Deputy Information Officers*	Articles 70–76	Chapter 5, Article 18
	Private right of action	Section 99	Articles 51–57	Chapter 3, Article 11(1)(ğ)

**\*Data breach notification:** Many countries and all 50 U.S. states have separate data breach notification laws. The term in this chart refers to a provision included in a comprehensive data protection law.

**\*South Africa:** Access to personal information is further regulated by the [Promotion of Access to Information Act No. 2](#) of 2000. Guidelines, guidance notes and notices from the Information Regulator can be found [here](#).

# Global Comprehensive Privacy Law Mapping Chart

<div><div>Last updated: April 2022</div><div>Note: This tool is for informational purposes and is not legal advice. Whether a law includes a particular provision should always be verified via official sources.</div></div>		United States				
		California		Colorado	Utah	Virginia
		California Consumer Privacy Act	California Privacy Rights Act (fully operative Jan. 1, 2023)	Colorado Privacy Act* (effective July 1, 2023)	Utah Consumer Privacy Act (effective Dec. 31, 2023)	Virginia's Consumer Data Protection Act (effective Jan. 1, 2023)
California Consumer Privacy Act Regulations						
INDIVIDUAL RIGHTS	Right to access	Section 1798.100	Section 1798.100	Section 6-1-1306(1)(b)	Section 13-61-201(1)	Section 59.1-577(A)(1)
		Section 1798.110	Section 1798.110			
		Section 1798.115	Section 1798.115			
	Right to correct		Section 1798.106	Section 6-1-1306(1)(c)		Section 59.1-577(A)(2)
	Right to delete	Section 1798.105	Section 1798.105	Section 6-1-1306(1)(d)	Section 13-61-201(2)	Section 59.1-577(A)(3)
	Right to portability	Sections 1798.100(d) and 1798.130(a)(2)	Section 1798.130(a)(3)(B)(iii)	Section 6-1-1306(1)(e)	Section 13-61-201(3)	Section 59.1-577(A)(4)
	Right to opt out of all or specific processing	Section 1798.120	Section 1798.120	Section 6-1-1306(1)(a)	Section 13-61-201(4)	Section 59.1-577(A)(5)
	Right to opt in for sensitive data processing		Section 1798.121*	Section 6-1-1308(7)	Section 16-61-302(3)(a) (notice and opportunity to opt-out)	Section 59.1-578(A)(5)
	Age-based opt-in right	Section 1798.120(c)	Section 1798.120(c)	Section 6-1-1308(7)	Section 13-61-302(3)(b) (process in accordance with the Children's Online Privacy Protection Act))	Section 59.1-578(A)(5) (process in accordance with the Children's Online Privacy Protection Act)
Right not to be subject to fully automated decisions		Section 1798.185(a)(16)*	Section 6-1-1306(1)(a)(I)(C)		Section 59.1-577(A)(5)	
BUSINESS OBLIGATIONS	Notice/transparency requirements	Section 1798.100(b)	Section 1798.100(a)	Section 6-1-1308(1)	Section 13-61-302(1)	Section 59.1-578(C)-(E)
		Sections 1798.130(a) and 1798.135	Section 1798.130			
	Legal basis for processing					
	Purpose limitation	Section 1798.100(b)	Section 1798.100(c)	Section 6-1-1308(2), (4)		Section 59.1-578(A)(2)
	Data minimization		Sections 1798.100(c) and 1798.100(a)(d)	Section 6-1-1308(3)		Section 59.1-578(A)(1)
	Security requirements	Section 1798.150(a)	Sections 1798.100(e) and 1798.150(a)	Section 6-1-1308(5)	Section 13-61-302(2)	Section 59.1-578(A)(3)
	Privacy by design					
	Processor/service provider requirements	Section 1798.140(v)	Sections 1798.100(d) and 1798.140(ag)(1)	Section 6-1-1305	Section 13-61-301	Section 59.1-579
	Prohibition on discrimination	Section 1798.125	Section 1798.125	Section 6-1-1308(6)	Section 13-61-302(4)	Section 59.1-578(A)(4)
	Record keeping	CCPA Regulations, Section 999.317				
	Risk/impact assessments		Section 1798.185(a)(15)	Section 6-1-1309		Section 59.1-580
	Data breach notification*					
	Registration with authorities					
	Data protection officer					
	International data transfer restrictions					
	SCOPE	Exemption for employee data	Section 1798.145(m) from CPRA operative immediately until Jan. 1, 2023		Section 6-1-1304(2)(k) (employment records)*	Section 13-61-102(2)(o)*
Nonprofits covered				Section 6-1-1304		
Sectoral law carveouts		Sections 1798.145 and 1798.146	Sections 1798.145 and 1798.146	Section 6-1-1304(2)	Section 13-61-102(2)	Section 59.1-576
Preemption		Section 1798.180	Section 1798.180	Section 6-1-1312	Section 13-61-103(1)	
ENFORCEMENT	Independent enforcement authority		California Privacy Protection Agency*			
			Section 1798.199.10 et seq.			
	Rulemaking authority	Section 1798.185	Section 1798.185	Section 6-1-1313		
	Fining authority	Section 1798.155	Sections 1798.155, 1798.199.55 and 1798.199.90	Section 6-1-1311	Section 13-61-402	Section 59.1-584
	Criminal penalties					
	Personal liability					
Private right of action	Section 1798.150	Section 1798.150				

**\*Data breach notification:** Many countries and all 50 U.S. states have separate data breach notification laws. The term in this chart refers to a provision included in a comprehensive data protection law.

**\*California:** The CPRA categorizes sensitive data and allows consumers to limit its use and disclosure but does not require opt-in consent for use of sensitive data. There is no explicit right against automatic decision-making but the use of automatic decision-making is within the scope of the regulations to be promulgated. The CPPA has administrative authority to implement and enforce the CPRA. The California attorney general's office retains civil enforcement authority.

**\*Colorado:** The CPA is now codified in the [Colorado Revised Statutes](#). The definition of “consumer” in Section 6-1-1303(6)(b) “does not include an individual acting in a commercial or employment context, as a job applicant, or as a beneficiary of someone acting in an employment context.”

**\*Utah:** In addition to the exemption for data processed in the employment context, the definition of “consumer” in Section 13-61-101(10)(b) “does not include an individual acting in an employment or commercial context.”

**\*Virginia:** The definition of “consumer” in Section 59.1-575 “does not include a natural person acting in a commercial or employment context.”