

Name: Joel Livingstone Kofi Ackah

Multi-Jurisdiction Compliance Response Matrix Report

Organization: ShopGhana

Role: Data Protection & Compliance Lead

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Customer Specific Compliance Analysis

1. Customer A: Abena (Accra, Ghana)

Applicable Law: Ghana Data Protection Act, 2012 (Act 843)

- **Legal Right to Deletion:** Yes. Under Sections 20 and 21 of Act 843, Abena has the right to request deletion since her data is no longer necessary for the original purpose (no open orders or disputes).
- **ShopGhana's Obligations:** The company must verify her identity, cease processing her data, delete non-essential info, and maintain an audit log of the request.
- **Data Retention & Justification:** Transaction records and invoices must be retained for **5–7 years** to comply with financial, tax, and audit regulations.
- **Response Deadline:** The Act does not specify a strict deadline, but **30 days** is considered industry best practice.

2. Customer B: Lukas (Berlin, Germany)

Applicable Law: General Data Protection Regulation (GDPR)

- **Legal Right to Erasure:** Yes. Lukas qualifies under **Article 17 (Right to be Forgotten)** as the processing is no longer necessary.
- **Exemptions:** ShopGhana may retain specific data necessary for **VAT/Tax compliance**, defending legal claims, or fraud prevention.
- **Required Action Steps:** Verify identity, map data across all systems (CRM, backups), notify third-party processors to erase the data, and document the completion.
- **Deadline & Penalties:** The deadline is **1 month** (extendable by 2 months for complexity). Failure to comply can result in fines up to **€20M or 4% of global turnover**.

3. Customer C: Maria (Los Angeles, California)

Applicable Law: CCPA / CPRA

- **Rights Under CCPA/CPRA:** Maria has the right to delete, the right to **opt-out of sale/sharing**, the right to know what data is held, and the right to non-discrimination.
- **Immediate Deletion: No.** Because of the **active return dispute**, ShopGhana is permitted to retain transaction-related data until the dispute is resolved.
- **"Stop Selling" Request:** This must be processed **immediately**. ShopGhana must activate a "Do Not Sell/Share" flag and notify all ad-tech/analytics vendors.
- **Deadline & Disclosure:** The deadline is **45 days** (extendable by another 45 days). Maria must be told exactly **what** data is being kept and **why**.

Compliance Response Matrix (Comparison Table)

| Element | Ghana DPA | GDPR (EU) | CCPA/CPRA (California) |
|---------------------------|---------------------------|--------------------------|-------------------------------|
| Right to Deletion Exists? | Yes | Yes (Art. 17) | Yes |
| Exemptions / Conditions | Legal/tax retention | Legal obligation, claims | Active transactions, disputes |
| Response Deadline | 30 days (Best Practice) | 1 Month (Extendable) | 45 Days (Extendable) |
| Penalties | Fines, enforcement action | Up to €20M or 4% revenue | Up to \$7,500 per violation |
| Consent Model | Lawful & proportionate | Lawful basis required | Opt-out (sale/sharing) |

Draft Customer Responses

- **To Abena (Ghana):** "Dear Abena, your account and personal profile data have been deleted per the Ghana Data Protection Act. Certain transaction records are retained for 7 years solely for tax and audit compliance."
- **To Lukas (Germany):** "Dear Lukas, we confirm your personal data has been erased under Article 17 of the GDPR. Legally required financial records are securely retained for tax purposes, and third-party processors have been notified."
- **To Maria (California):** "Dear Maria, we have immediately opted you out of the sale or sharing of your data. Due to your active return dispute, account deletion is on hold but will be completed once the dispute is resolved."

Practical Implementation Challenges

- **Workflow Automation:** Managing different deadlines (30 vs 45 days) across jurisdictions.
- **Third-Party Syncing:** Ensuring that when a user deletes their account, the request flows to logistics and payment partners.
- **Conflict Resolution:** Balancing a user's "Right to be Forgotten" with the business's legal need to keep financial logs for tax audits.

Conclusion

ShopGhana must implement a jurisdiction-aware deletion workflow that balances individual rights with legal retention obligations. From a DevOps perspective, success depends on integrating identity verification, a robust retention logic engine, and a deadline tracking dashboard to prevent silent failures and regulatory penalties. By standardizing these automated processes, ShopGhana can maintain data integrity and stakeholder trust across Ghana, the EU, and California.