

Multi-Jurisdiction Data Deletion Compliance Analysis

Scenario Overview

ShopGhana is a Ghanaian e-commerce platform selling African fashion and crafts globally. The company serves customers in Ghana, the European Union, and the United States. On the same day, three customers from different jurisdictions submitted data deletion requests. This document evaluates the applicable legal frameworks and outlines ShopGhana's compliance obligations.

Customer A – Abena (Ghana | Data Protection Act 843)

Under Ghana's Data Protection Act (Act 843), data subjects have the right to request the deletion of personal data where it is no longer necessary for the purpose for which it was collected. Abena has no outstanding transactions or disputes, and her last purchase occurred eight months ago, making her deletion request valid.

ShopGhana is required to delete Abena's account data and associate personal information.

However, transaction records must be retained where required by tax or financial regulations. These retained records must be restricted and not used for marketing or analytics.

Although Act 843 does not specify a strict deadline, ShopGhana should respond within a reasonable time, commonly interpreted as 30 days.

Customer B – Lukas (Germany | GDPR)

Lukas has exercised his right to erasure under Article 17 of the GDPR. Because his transaction has been completed and there are no outstanding obligations, ShopGhana must erase his personal data across all systems and notify any third-party processors.

An exemption applies for data that must be retained to comply with legal obligations such as tax and accounting laws. Failure to comply with the GDPR timeline may expose ShopGhana to regulatory enforcement and administrative fines.

ShopGhana must respond within one month of receiving the request. If the request is complex, the response period may be extended by up to two additional months with notice.

Customer C – Maria (California | CCPA / CPRA)

Under the CCPA and CPRA, Maria has the right to request deletion of her personal data and the right to opt out of the sale or sharing of her personal information. However, her active return dispute qualifies as an ongoing transaction, allowing ShopGhana to temporarily retain relevant data.

The opt-out request must be honored immediately. Deletion may only be completed once the dispute has been resolved.

ShopGhana must respond within 45 days and disclose the categories of data retained, the purpose for retention, and the expected deletion timeline.

Compliance Response Matrix (Comparison Table)

Element	Ghana DPA	GDPR	CCPA / CPRA
Right to Deletion	Yes (Conditional)	Yes – Article 17	Yes
Key Exemptions	Legal tax obligations	Legal obligation, claims	Active transactions, disputes
Response Deadline	Reasonable time (30 days)	1 month	45 days
Penalties	Administrative sanctions	Up to €20M or 4% turnover	Civil penalties
Consent Requirements	Lawful basis required	Consent or lawful basis	Opt-out mandatory

Action Steps and Timelines

ShopGhana must verify the identity of each requester, assess applicable legal exemptions, execute data deletion or restriction, notify third-party processors where required, and document all actions for audit and regulatory accountability.

Draft Customer Responses (Summary)

Response to Abena (Ghana)

Subject: Confirmation of Your Data Deletion Request

Dear Abena,

We have received your request to delete your ShopGhana account and personal information.

Your account has been scheduled for deletion, and all non-essential personal data will be permanently removed from our systems. Please note that limited transaction records will be retained strictly for statutory tax and accounting purposes, as required by Ghanaian law, and will not be used for marketing or profiling.

We expect the deletion process to be completed within 30 days. You will receive confirmation once it is finalized.

Kind regards,
Data Protection Team
ShopGhana

Response to Lukas (Germany)

Subject: GDPR Article 17 – Right to Erasure Request

Dear Lukas,

We confirm receipt of your request for erasure under Article 17 of the GDPR.

Your personal data is currently being erased from our active systems and those of our authorized processors. Certain data must be retained for legal obligations such as tax compliance, in accordance with Article 17(3) GDPR, and will be securely restricted.

Your request will be fully completed within one month. If an extension becomes necessary, we will notify you promptly.

Best regards,

Data Compliance Team
ShopGhana

Response Maria (California)

Subject: Your CCPA/CPRA Privacy Request

Dear Maria,

We have received your request to delete your personal data and to stop the sale or sharing of your information.

Your opt-out request has been processed immediately, and your personal information is no longer sold or shared with third parties.

Because you currently have an active return dispute, we are required to retain certain information until the transaction is fully resolved. Once the dispute is closed, your deletion request will be completed.

Within 45 days, we will provide a final confirmation detailing the data retained, its purpose, and the deletion timeline.

Sincerely,
Privacy Compliance Team
ShopGhana