

# Compliance Response Matrix

## Customer A: Abena (Ghana) – Ghana Data Protection Act,

2 0 1 2 (Act 8 4 3 )

### Legal Rights Analysis

- Abena has the right to request deletion of her personal data under Ghana Data Protection principles of data minimization and retention limitation.
- Since she has no outstanding disputes or orders, her request is generally valid.

### ShopGhana Obligations

- Verify her identity.
- Delete or anonymize personal data from operational databases.
- Retain only legally required records.

### Data That Can Be Retained

- Transaction records for tax and financial audit compliance.
- Retention period: Usually 5 - 7 years depending on Ghana Revenue Authority requirements.

### Response Deadline

- Must respond within a reasonable time frame (typically 3 0 days under best practice interpretation of Act 8 4 3 ).

### Action Steps + Timeline

- 1 . Day 1 - 3 : Verify identity and log request.
- 2 . Day 4 - 1 4 : Remove marketing and account data.
- 3 . Day 1 5 - 3 0 : Archive financial records securely.

### Draft Response

"Dear Abena, we have received your account deletion request. We will remove your personal information in accordance with Ghana Data Protection Act requirements while retaining legally required financial records."

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## Customer B: Lukas (Germany) – GDPR

### Legal Rights Analysis

- Lukas has strong right to erasure under GDPR Article 1 7 since no active transactions remain.

## **Exemptions**

- Data may be retained for legal obligations or dispute prevention.

## **ShopGhana Obligations**

- Delete personal identifiers from databases.
- Notify third-party processors.
- Document compliance actions.

## **Response Deadline**

- 1 month (can extend by 2 months with justification).

## **Penalty Risk**

- Up to € 20 million or 4 % of global annual revenue.

## **Action Steps**

- 1 . Confirm identity.
- 2 . Remove marketing, account, and analytics data.
- 3 . Notify partners.

## **Draft Response**

"Dear Lukas, your erasure request is being processed under GDPR Article 1.7 We will complete processing within one month."

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## **Customer C: Maria (USA - California) - CCPA/CPRA**

### **Legal Rights Analysis**

- Maria has right to request deletion and to opt out of data sale.

### **Constraints**

- Deletion may be delayed due to active return dispute (legal defense exemption).

## **ShopGhana Obligations**

- Provide opt-out of sale link.
- Stop sharing her data with third parties.

## **Response Deadline**

- 4 5 days.

## Data Disclosure

- Types of data collected.
- Third parties receiving data.

## Draft Response

"Dear Maria, we acknowledge your request. We will honor your opt-out of data sale and review deletion request, which may be delayed due to your active dispute."

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## Comparison Table

Element	Ghana DPA	GDPR	CCPA/CPRA
Right to Deletion Exists?	Yes	Yes	Yes
Exemptions/ Conditions	Tax, legal compliance	Legal obligations, disputes	Business operations, disputes
Response Deadline	~ 30 days	1 month	45 days
Penalties	Administrative fines	Up to 4 % global revenue	Civil penalties + lawsuits
Consent Requirements	Required for processing	Explicit for sensitive data	Opt-out of sale required