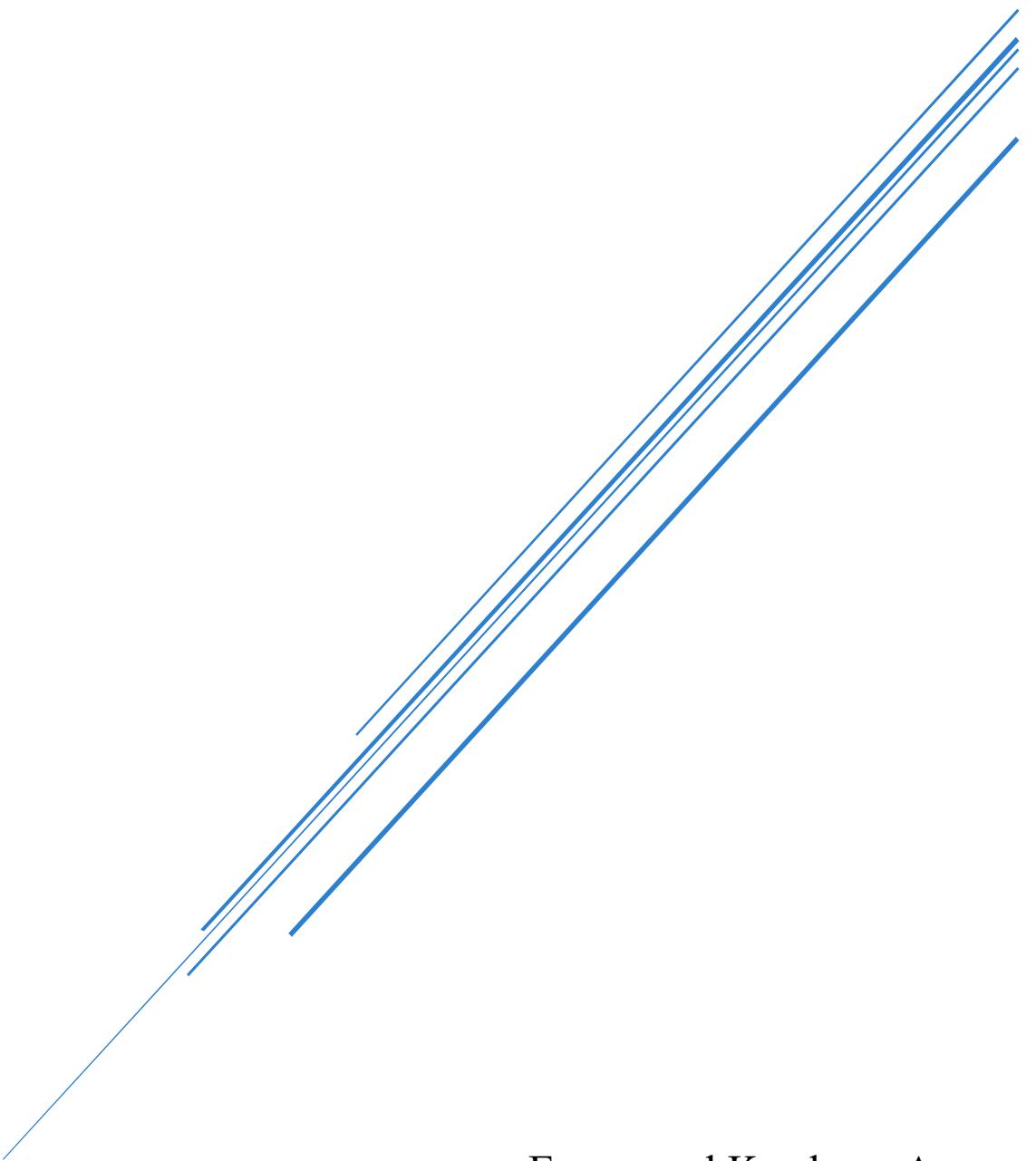


MULTI-JURISDICTION COMPLIANCE CHALLENGE

COMPLIANCE RESPONSE MATRIX FOR SHOPGHANA



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Table 1: Side-by-side comparison of deletion rights, exemptions, deadlines, penalties, and consent requirements under Ghana DPA, GDPR, and CCPA/CPRA. 3

EXECUTIVE SUMMARY

This report assesses three simultaneous data deletion requests received by Shop Ghana from customers in Ghana, Germany and California, each governed by a different privacy regime.

While all three requests seek “deletion”, the analysis demonstrates that identical actions would create regulatory non-compliance across jurisdictions.

KEY DECISION

Decision rights exist in all three cases; however, only one request can be fully executed immediately without legal risk. The remaining requests require lawful retention, conditional processing, or phased deletion based on statutory exemptions.

Primary Findings:

- Ghana (Act 843): Deletion is permitted where processing purpose is exhausted, with limited retention for tax and audit compliance.
- EU (GDPR): Erasure is a strict and enforceable right with the highest regulatory exposure, requiring action within 30 days and documented processor coordination.
- California (CCPA/CPRA): Deletion rights are temporarily overridden by active dispute resolution but opt-out of data selling must be honoured immediately.

Table 1: Side-by-side comparison of deletion rights, exemptions, deadlines, penalties, and consent requirements under Ghana DPA, GDPR, and CCPA/CPRA.

Element	Ghana DPA (Act 843)	GDPR(EU)	CCPA/ CPRA(California)
Right to Deletion Exists?	Yes (Conditional)- Data subject may request deletion where purpose is exhausted	Yes (Explicit & Strong)- Article 17” Right to Erasure”	Yes (With Exceptions)- Consumer right to delete
Exemptions/ Conditions	Retention allowed for legal obligations (tax, accounting), public interest or lawful purpose	Legal obligation, public interest, establishment or defence of legal claims	Data may be retained to complete transactions, prevent fraud, comply with law
Response Deadline	Within a reasonable time (best practice: approximately 21 days)	1 month (30 days), extension allowed with notice	45 days, one extension of 45 days allowed
Penalties for Non-Compliance	Administrative fines, enforcement notices by Data Protection Commission	Fines up to €20M or 4% of global annual turnover	Civil penalties, regulatory enforcement by CA AG / CCPA
Consent Requirements	Consent required unless another lawful basis applies	Processing must have a lawful basis (consent is one of several)	Opt-out model; consent mainly required for minors

DETAILED ANALYSIS AND RECOMMENDED ACTIONS

Customer A – Abena (Ghana) Act 843

Legal Position: Abena has a clear right under Section 33 of the DPA to request correction or deletion of personal data that is inaccurate, irrelevant, excessive, out of date, incomplete, misleading, or unlawfully obtained, or where the controller no longer has authorization to retain it. Given the inactivity and her stated reason, deletion is appropriate.

Obligations & Actions

- i. Verify identity and request authenticity promptly.
- ii. Delete or de-identify personal data (account details, purchase history, contact information) unless retention is required by law.
- iii. Notify any third-party processors if data was shared.
- iv. Retain only: anonymized/de-identified data for analytics (permitted under purpose limitation principles) and financial/tax records for up to 6 years if mandated by Ghanaian tax law.
- v. Timeline: Comply within 40 days of receipt (Section 33(10)); aim for 20–30 business days internally for efficiency.

Recommended Response

Dear Abena,

Thank you for contacting ShopGhana regarding the deletion of your account and personal information. Pursuant to Section 33 of the Data Protection Act, 2012 (Act 843), we confirm your entitlement to request deletion where the data is no longer necessary for the purposes for which it was collected. Following verification and review, we will proceed to delete your personal data within the statutory timeframe, except for any de-identified records retained solely for internal analytics or legally mandated financial records (retained for up to 6 years in accordance with applicable tax requirements). We will confirm completion of these actions within 40 days. Should you require further assistance, please contact our Privacy Team at privacy@shopghana.com.

Yours sincerely,

ShopGhana Privacy & Compliance Team

Customer B – Lukas (Germany | GDPR)

Legal Position: Lukas exercises a valid right to erasure under Article 17 GDPR, as processing is no longer necessary for the original purpose, and no overriding exemptions apply in this case.

Obligations & Actions

- i. Erase personal data without undue delay.
- ii. Inform recipients/third parties (e.g., payment processors) to erase copies/links.
- iii. Retain only: anonymized data for statistical purposes (with Article 89 safeguards) and legally required records (e.g., invoices for up to 10 years under applicable tax law).
- iv. Timeline: Respond and action within 1 month (extendable to 3 months if justified; notify customer of extension).

Recommended Response:

Dear Lukas,

We acknowledge receipt of your request for erasure of your personal data pursuant to Article 17 of the General Data Protection Regulation (GDPR). Having verified your identity and confirmed that no exemptions under Article 17(3) apply, we will erase your personal data from our systems and direct any relevant third parties to do the same. This process will be completed within one month of receipt. We may retain limited anonymized data for statistical purposes or transaction records required for legal compliance (e.g., up to 10 years under tax obligations). We will provide confirmation upon completion. For any questions, please reach out to privacy@shopghana.com.

Best regards,

ShopGhana Privacy & Compliance Team

Customer C – Maria (Los Angeles, California)

Legal Position: Maria holds rights to deletion and opt-out of sale/sharing under CCPA/CPRA.

However, an exemption applies to data necessary for resolving the ongoing dispute (legal claims/transaction completion).

Obligations & Actions

- i. Immediately cease any sale or sharing of her personal information.
- ii. Delete non-exempt data; retain dispute-related records until resolution.
- iii. Disclose categories of personal information collected, actions taken, and reasons for any partial denial.
- iv. Timeline: Acknowledge within 10 business days; full response within 45 days (extendable to 90 days if complex).

Recommended Response

Dear Maria,

Thank you for submitting your request under the California Consumer Privacy Act (CCPA), as amended by the California Privacy Rights Act (CPRA), to delete your personal information and opt out of the sale or sharing of such information. We have immediately ceased any sale or sharing of your personal information. Regarding deletion: while we will delete the majority of your personal data within 45 days, we are required to retain information directly related to your active return dispute until resolution, pursuant to exemptions for completing transactions and defending legal claims (Cal. Civ. Code § 1798.105(d) and § 1798.145). Upon closure of the dispute, we will delete the remaining data and notify you.

Disclosures: *In the past 12 months, we have not sold your personal information. Categories collected include identifiers (name, email, address), commercial information (purchase history), and internet activity data.*

For questions or to appeal any aspect of this response, please contact privacy@shopghana.com.

Sincerely,

ShopGhana Privacy & Compliance Team

Practical Implementation Notes

- i. Unified Intake Process: Route all requests through a centralized privacy inbox/ticket system to track deadlines and ensure consistent verification.
- ii. Cross-Border Prioritization: GDPR's shorter timeline warrants highest priority; log extensions where justified.
- iii. Audit Readiness: Document all decisions, verifications, and partial retentions with clear legal justifications to support potential regulator inquiries.
- iv. Training & Tools: Refresh team training on jurisdictional nuances; consider privacy management software for automated tracking.

This structured approach positions ShopGhana to handle these requests compliantly, professionally, and efficiently demonstrating strong privacy governance to leadership and regulators alike.