

Multi-Jurisdiction Compliance Challenge – Compliance Response Matrix

Company: ShopGhana

Scope: Customer deletion and privacy rights requests across **Ghana, EU, and California**

1. Customer-Specific Compliance Analysis

Customer A – Abena (Accra, Ghana)

Applicable Law: Ghana Data Protection Act, 2012

Legal Rights Analysis

- Abena **has the right to request deletion** of her personal data when it is no longer necessary for the purpose collected.
- No ongoing transactions, disputes, or legal claims exist.

ShopGhana's Obligations

- Assess whether data is still required for business or legal purposes.
- Delete personal data that is no longer necessary.
- Retain only data required by law (e.g., tax or audit records).

Data Retention

- **Can retain:**
 - Transaction records (invoices, payments) for statutory/tax purposes
- **Retention period:**
 - As required by Ghanaian tax and commercial laws (typically 5–7 years)
- **Must delete/anonymize:**
 - Account profile, contact details, browsing history

Response Deadline

- Act **within a reasonable time** (best practice: **30 days**).

Action Steps

1. Verify Abena's identity.

2. Delete or anonymize all non-essential personal data.
3. Retain only legally required financial records.
4. Log the request and completion.

Draft Response

“Your request has been processed. All personal data no longer required has been deleted. Certain transaction records are retained solely to meet legal obligations under Ghanaian law.”

Customer B – Lukas (Berlin, Germany)

Applicable Law: EU General Data Protection Regulation

Legal Rights Analysis

- Lukas has a **right to erasure (Article 17)**.
- Recent purchase does **not automatically block deletion**.

Exemptions

- Data may be retained if necessary for:
 - Legal obligations (e.g., accounting, fraud prevention)
 - Establishment or defense of legal claims

ShopGhana’s Obligations

- Erase personal data **without undue delay**.
- Restrict processing of retained data.
- Inform downstream processors.

Response Deadline

- **1 month** from request receipt (can extend to 2 months with justification).

Penalties for Missing Deadline

- Fines up to **€20 million or 4% of global annual turnover**.

Action Steps

1. Confirm identity.

2. Delete account and personal profile data.
3. Retain minimal transactional data for legal compliance.
4. Notify third-party processors of erasure.
5. Confirm completion to the customer.

Draft Response

“We have erased your personal data in accordance with GDPR Article 17. Limited transaction data is retained solely to comply with legal obligations. This data is restricted and no longer actively processed.”

Customer C – Maria (Los Angeles, California)

Applicable Law: California Consumer Privacy Act / California Privacy Rights Act

Legal Rights Analysis

- Right to **delete personal information**.
- Right to **opt-out of sale or sharing** of personal data.

Deletion Eligibility

- **Cannot fully delete immediately** due to:
 - Active return dispute (legal/business necessity exemption)

“Stop Selling” Request

- Must be honored **immediately**, regardless of dispute.

ShopGhana’s Obligations

- Suspend sale/sharing of Maria’s personal data.
- Process deletion **after dispute resolution**.
- Disclose what data is retained and why.

Response Deadline

- **45 days**, extendable once by another 45 days.

Action Steps

1. Acknowledge request within statutory period.

2. Immediately opt Maria out of data sale/sharing.
3. Flag account for deletion once dispute closes.
4. Provide transparency notice.

Draft Response

“We have stopped the sale or sharing of your personal information. Due to an active return dispute, certain data must be temporarily retained. Once resolved, we will complete your deletion request and notify you.”

2. Regulatory Comparison Table

Element	Ghana DPA	GDPR	CCPA / CPRA
Right to Deletion Exists?	Yes (conditional)	Yes (Article 17)	Yes
Exemptions / Conditions	Legal, tax, contractual obligations	Legal claims, compliance, public interest	Active disputes, security, legal obligations
Response Deadline	Reasonable time (~30 days best practice)	1 month	45 days
Penalties for Non-Compliance	Fines, enforcement actions	Up to €20M or 4% turnover	Civil penalties, statutory damages
Consent Requirements	Required for processing	Explicit, revocable consent	Opt-out of sale/sharing required

3. Implementation & Practical Challenges

- Coordinating **different timelines** across jurisdictions
 - Ensuring **consistent deletion across systems and vendors**
 - Distinguishing between **deletion vs. retention for legal necessity**
 - Managing **cross-border compliance risk**
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Final Summary

ShopGhana must apply **jurisdiction-specific privacy rules** while maintaining a consistent internal process.

All three customers have valid rights, but **scope, timing, and exemptions differ significantly** under Ghana DPA, GDPR, and CCPA/CPRA. Proper identity verification, documentation, and transparent communication are critical to compliance and risk reduction.

If you want, I can:

- Turn this into a **policy playbook**
- Create a **workflow diagram**
- Adapt it for an **interview or compliance assessment**