

# Multi-Jurisdiction Compliance Challenge – Complete Compliance Response Matrix

**Company:** ShopGhana | **Role:** Compliance Officer

## Customer A – Abena (Ghana Data Protection Act, 2012)

- **Legal Rights Analysis:** Under the Ghana Data Protection Act (Act 843), individuals have the right to prevent processing and request correction or deletion of personal data where it is no longer necessary or where consent has been withdrawn. However, deletion is not absolute and may be limited by statutory retention requirements.
- **ShopGhana's Obligations:** The company must verify Abena's identity, assess whether any legal obligations require continued retention (e.g., tax laws), and ensure that non-essential personal data is erased securely.
- **Data That Can/Must Be Retained:** Financial transaction records, tax documentation, and audit logs may be retained for statutory compliance (commonly up to 6 years under tax law). Retained data must be archived securely and not used for marketing.
- **Response Deadline:** Ghana DPA does not specify a strict statutory deadline. Best practice is to respond within 30 days.
- **Action Steps with Timeline:** Within 7 days verify identity; within 14 days assess retention obligations; within 30 days complete deletion of profile and marketing data; archive required financial records; document compliance actions.
- **Draft Response:** We confirm receipt of your deletion request. Your account profile and associated personal data not required for statutory compliance have been deleted. Certain financial records are retained solely to meet legal tax obligations and are securely archived.

## Customer B – Lukas (GDPR Article 17 – Right to Erasure)

- **Legal Rights Analysis:** GDPR Article 17 grants individuals the right to erasure where personal data is no longer necessary, consent is withdrawn, or processing lacks lawful basis. This is one of the strongest deletion rights globally.
- **Exemptions:** Data may be retained where processing is required for compliance with legal obligations (tax/accounting laws), establishment or defense of legal claims, or public interest obligations.
- **ShopGhana's Obligations:** Confirm lawful basis review, erase non-essential personal data, notify third-party processors, and ensure deletion across all systems including backups where feasible.
- **Data That Can/Must Be Retained:** Limited financial transaction records required under EU accounting laws may be retained for statutory periods. Such data must be restricted from operational use.
- **Response Deadline:** 1 month (30 days). May extend by 2 additional months for complex cases, but customer must be notified.

- **Penalties for Non-Compliance:** Up to €20 million or 4% of global annual turnover, whichever is higher.
- **Action Steps with Timeline:** Within 5 days verify identity; within 10 days review lawful basis; within 30 days erase profile and notify processors; document compliance; confirm completion in writing.
- **Draft Response:** Your request under Article 17 GDPR has been processed. Personal data has been erased except for minimal records retained for legal compliance. All relevant third-party processors have been notified.

## Customer C – Maria (CCPA/CPRA – California)

- **Legal Rights Analysis:** Under CCPA/CPRA, consumers have the right to request deletion of personal data and the right to opt-out of the sale of personal information.
- **Exemptions/Conditions:** Businesses may deny or delay deletion if data is required to complete transactions, resolve disputes, detect fraud, or comply with legal obligations.
- **Current Limitation:** An active return dispute prevents immediate deletion until resolution.
- **Stop Selling Requirement:** ShopGhana must cease selling personal information within 15 days and notify third parties to do the same.
- **Data That Can/Must Be Retained:** Data necessary to resolve the dispute and comply with financial regulations may be retained temporarily until the dispute is closed.
- **Response Deadline:** 45 days, extendable by an additional 45 days with notice.
- **Action Steps with Timeline:** Within 10 days verify identity; immediately apply 'Do Not Sell' flag; within 15 days notify third parties; after dispute resolution, complete deletion within 45-day window; document actions.
- **Draft Response:** We acknowledge your deletion and opt-out request. Due to an active return dispute, deletion will be completed once the dispute is resolved. Your request to stop the sale of personal information has been implemented immediately.

## Compliance Response Matrix – Comparison Table (Required)

Element	Ghana DPA	GDPR	CCPA/CPRA
Right to Deletion Exists?	Yes, subject to statutory retention requirements.	Yes – Strong Right under Article 17.	Yes, with business exemptions.
Exemptions/Conditions	Tax laws, statutory record retention, legal defense.	Legal obligations, public interest, legal claims.	Active disputes, fraud detection, legal compliance.
Response Deadline	Best practice: 30 days.	1 month (extendable by 2 months).	45 days (extendable by 45 days).
Penalties for Non-Compliance	Regulatory enforcement and fines by Data Protection Commission.	Up to €20M or 4% of global annual turnover.	Civil penalties and statutory fines by California regulators.

Consent Requirements	Processing must have lawful basis under Act 843.	Strict lawful basis and explicit consent standards.	Notice at collection and opt-out rights required.
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## Practical Implementation Challenges

- Verifying identity before processing deletion requests to prevent fraud.
- Ensuring deletion across backup systems and archived environments.
- Coordinating with third-party processors and vendors globally.
- Managing cross-border data transfer compliance obligations.
- Maintaining accurate data mapping to identify all stored personal data.