

ShopGhana Multi-Jurisdiction Compliance Response Report

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1. Case-by-Case Legal Analysis

Customer A: Abena (Accra, Ghana)

- **Law:** Ghana Data Protection Act, 2012 (Act 843).
- **Right to Deletion:** Yes, under **Section 33**. Since the account is inactive (8 months) and there are no disputes, the "purpose of collection" has been exhausted.
- **Obligations:** ShopGhana must cease processing and physically delete or de-identify the data.
- **Retention:** Must retain transaction records (invoices/receipts) for **6 years** per Ghana Revenue Authority (GRA) requirements. This data should be "blocked" from marketing use.
- **Deadline: 21 Days** (aligned with administrative "reasonable time" standards in Ghana).

Customer B: Lukas (Berlin, Germany)

- **Law:** EU General Data Protection Regulation (GDPR), **Article 17**.
- **Right to Deletion:** High. As a "Right to be Forgotten" request, ShopGhana must erase all non-essential data.
- **Exemptions: Article 17(3)(b)** applies. ShopGhana must retain financial records for **10 years** to comply with German commercial (HGB) and tax (AO) codes.
- **Specific Steps:** Delete profile/marketing data, notify third-party processors (e.g., DHL, Mailchimp), and archive financial data with restricted access.
- **Deadline: 1 Month** (extendable by 2 months for complexity).
- **Penalty:** Up to **€20M or 4% of global annual turnover**.

Customer C: Maria (Los Angeles, USA)

- **Law:** CCPA / CPRA.

- **Right to Deletion:** Conditional. Under **Civil Code § 1798.105(d)**, ShopGhana can **deny** immediate deletion because the data is necessary to "complete the transaction" (the active return dispute).
- **Stop Selling Request:** This **must** be honored within **15 business days** regardless of the dispute status.
- **Disclosure:** ShopGhana must explain the dispute-related delay to Maria and confirm the "Do Not Sell" opt-out is active.
- **Deadline:** **10 days** to acknowledge; **45 days** for a final response.

2. Compliance Response Matrix

Element	Customer A (Abena)	Customer B (Lukas)	Customer C (Maria)
Legal Basis	Ghana DPA (Sec. 33)	GDPR (Art. 17)	CCPA/CPRA (§1798.105)
Action Step	Full profile deletion.	Erasure + Processor Notification.	Hold deletion (Dispute); Process Opt-Out .
Timeline	21 Days	1 Month	45 Days
Retention	6 Years (Tax)	10 Years (HGB/AO)	Duration of dispute + 7 Years.

3. Comparison Table

Element	Ghana DPA (2012)	EU GDPR	CCPA / CPRA
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Right to Deletion?	Yes (Qualified)	Yes (Broad)	Yes (Conditional)
Key Exemptions	Legal duty, Lawful purpose	Legal obligation, Legal claims	Active transactions, Security
Response Deadline	~21 Days	1 Month	45 Days
Penalties	Fines / Civil liability	4% Global Turnover	\$2,500 - \$7,500 per violation
Consent Model	Opt-in for processing	Strict Opt-in	Opt-out for sale of data

4. Final Draft Response Templates

Draft for Lukas (GDPR - Full Erasure)

Subject: Confirmation of Data Erasure Request (Ref: GDPR Art. 17)

"Dear Lukas, we have processed your request for erasure. Your profile, marketing preferences, and browsing history have been permanently deleted. Please note we are legally required by German tax law (HGB) to retain transaction invoices for 10 years in a secure archive. We have also notified our third-party service providers to erase your data from their systems."

Draft for Maria (CCPA - Partial/Hold)

Subject: Update on Your Privacy Request

"Dear Maria, we have received your request. We have successfully processed your '**Do Not Sell or Share**' request, effective immediately. Regarding your **deletion** request: because you have an active return dispute, we must retain your data to resolve this claim per CCPA §1798.105(d). Once the dispute is closed, we will finalize the deletion of your account."