

# CCPA

# VS

# GDPR

## CCPA

## ASPECT

## GDPR

California, United States



Jurisdiction

European Union  
(and EEA countries)

Signed in 2018,  
effective January 1, 2020.



Announced and  
Implemented

Adopted in 2016,  
enforced starting May 25, 2018.

Applies to businesses operating in  
California that meet certain  
thresholds (e.g., revenue, data  
processing).



Scope of  
Application

Applies to all organizations  
processing EU citizens' personal  
data, regardless of location.

Personal Information (PI):  
Identifiable data, such as names,  
IPs, and online behavior.



Protected Data

Personal Data: Identifiable  
information and Sensitive Data  
like health, biometrics, etc.

Transparency, Right to Know, Right  
to Delete, Opt-Out of Sale of  
Personal Information.



Key Principles

Lawfulness, Fairness,  
Transparency, Data Minimization,  
Accountability, and Integrity.

Not strictly required; consumers  
can opt-out of data sales.



Consent

Requires valid, explicit, and  
informed consent for processing  
personal data.

Right to know, delete, and opt-out of  
data sale.



Privacy Rights

Broader rights: access,  
rectification, restriction,  
portability, and erasure.

Consumers can request access to  
personal information collected  
about them.



Right to Access

Individuals can access, correct, or  
receive copies of their data in a  
portable format.

Limited right to deletion (businesses  
must comply only under certain  
conditions).



Right to be  
Forgotten

Explicit right to request data  
erasure under specific conditions.

No mandatory breach notification  
period; governed by California's  
separate data breach law.



Data Breach  
Reporting

Must notify supervisory authority  
within 72 hours of breach  
discovery.

\$2,500 per unintentional violation  
and \$7,500 per intentional violation.



Penalties for  
Non-Compliance

Up to €20 million or 4% of global  
annual turnover, whichever is  
higher.

For-profit businesses that collect,  
process, or sell personal data of  
California residents.



Covered Entities

Any organization handling  
personal data of EU citizens.

Not explicitly required under CCPA.



Data Protection  
Officers

Required for certain  
organizations, especially those  
processing sensitive data at  
scale.

No explicit restrictions on  
international transfers.



Data Transfers

Strict regulations on transfers  
outside the EU (e.g., adequacy  
decisions).

Requires opt-in consent for selling  
data of children under 16.



Children's Data  
Protection

Requires parental consent for  
data processing of children under  
16 (or as low as 13).

Primarily protects consumer rights  
related to data collection, sale, and  
privacy.



Focus

Broad protection for personal data across all  
industries and processing activities.

California Attorney General and  
California Privacy Protection  
Agency (CPPA).



Enforcement  
Authority

Data Protection Authorities  
(DPAs) in each EU country.