

Privacy Comparison Table

Topic	General Data Protection Regulation (GDPR)	California Consumer Privacy Act (CCPA)	Personal Information Protection and Electronic Documents Act (PIPEDA)
Applicability	Processing the personal data of data subjects in the EU (1) by entities with a branch established in the EU, regardless of whether processing takes place in the EU; and (2) by entities established outside of the EU where processing is related to either offering goods or services to data subjects in the EU or monitoring their behavior.	Businesses that do business in California, collect personal information of California residents, alone or with others determines the purposes or means of processing of that data, and satisfies one or more of the following: (i) annual revenue exceeds \$25 million, (ii) alone or in combination, annually buys, receives, sells, or shares the personal information of 50,000 or more consumers, households, or devices, or (iii) derives 50% or more of its annual revenues from selling consumers' personal information.	Business that collects, uses, or discloses the personal information of individuals residing in Canada in the course of commercial activities in Canada.
Individual Rights	Right to: be informed, access, request rectification, be forgotten, restrict or object to processing, and portability.	Right to: be informed, access, request deletion, restrict or object to processing, opt-out of the sale, and portability.	Right to: be informed, access, correct.
Response Time	Must respond to consumer request within one month, two months where necessary.	Confirm receipt within 10 days, respond within 45 days, may be extended an additional 90 days where necessary.	Respond to consumer request within 30 days.
Security	Implement technical and organizational measures in order to ensure a level of security for data processing.	N/A, but see Cal Civ. Code § 1798.81.5 and CCPA's private right of action if personal information is subject to unauthorized access, disclosure, or theft due to security breach.	Requires personal information to be protected by security safeguards appropriate to the sensitivity of the information, including physical, organizational, and technological measures.
Notification of Data Breach	Data breach notification to relevant supervisory authority within 72 hours, and notification to data subjects where high risk to rights and freedoms.	N/A, but California Security Breach Information Act requires security breach notification to California residents without unreasonably delay.	Requires notification to the Office of the Privacy Commission and to individuals of any security breaches that create a 'real risk of significant harm' as soon as feasible.
Enforcement	Penalties: Up to €20 million, or 4% of global profits, assessed by National data protection authorities. Right to seek Judicial remedy for data infringements.	Attorney General has enforcement authority; Penalties: Up to \$2,5000 for each violation, \$7,500 for intentional violations. Grants a Private Right of Action.	Office of the Privacy Commissioner oversees compliance. Penalties up to \$100,000 per violation.