

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.