

Global Comprehensive Privacy Law Mapping Chart

Comprehensive data protection laws exist across the globe. While each law is different, there are many commonalities in terms of the rights, obligations, and enforcement provisions. The Westin Research Center has created this chart mapping several comprehensive data protection laws, including the laws in the U.S., to assist our members in understanding how data protection is being approached around the world.

Our intent is to add to this chart and update it as laws are amended and other laws come into force. As always, we appreciate input from our members. If you have comments about the mapping or believe additional information should be included, please share it with [Cathy Cosgrove, ccosgrove@iapp.org](mailto:ccosgrove@iapp.org).

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	Australia	Brazil	Canada	China
Last Updated: Aug. 2021	Privacy Act 1988			
Note: This tool is for informational purposes and is not legal advice. Whether a law includes a particular provision should always be verified via official sources.	Australian Privacy Principles (included in Privacy Act)	Brazilian General Data Protection Law	Personal Information Protection and Electronic Documents Act	Personal Information Protection Law (effective Nov. 1, 2021)
	Australian Privacy Principles Guidelines			
INDIVIDUAL RIGHTS				
Right to Access	APP 12	Articles 6(IV) and 18(II)	Schedule 1, Principle 9	Articles 44–45
Right to Correct	APP 13	Article 18(III)	Schedule 1, Principle 9	Article 46
Right to Delete	APP Guidelines, APP 13 (related to correcting inaccuracy)	Article 18(VI)	Schedule 1, Principle 9 (related to correcting inaccuracy)	Article 47
Right to Portability		Article 18(V)		Article 45
Right to Opt-Out of All or Specific Processing	APP 7		Schedule 1, Principle 3 (4.3.8)	Articles 15 and 44
Right to Opt-In for Sensitive Data Processing	APP 3	Article 11	see OPC Guidance, Principle 3	Article 29
Age-based Opt-in Right		Article 14		Article 31
Right Not to Be Subject to Fully Automated Decisions		Article 20		Articles 24 and 55
BUSINESS OBLIGATIONS				
Notice/Transparency Requirements	APPs 1 and 5	Article 10, Section 2	Schedule 1, Principles 2, 3 and 8	Articles 7, 17, 23 and 30
Legal Basis for Processing		Article 7		Article 13
Purpose Limitation	APP 6	Article 6(I)	Schedule 1, Principle 4	Article 6
Data Minimization	APP 3.1–3.2	Article 6(III)	Schedule 1, Principle 4	Articles 6 and 19
Security Requirements	APP 11	Articles 6(VII) and 46–49	Schedule 1, Principle 7	Articles 9, 51 and 59
Privacy by Design	APP Guidelines, APP 1, 1.3			
Processor/Service Provider Requirements		Articles 37, 39–40		Article 21
Prohibition on Discrimination		Article 6(IX)		Article 16
Records of Processing	APP Guidelines, APP 1, 1.5	Article 37	Schedule 1, Principle 1 and Part 1, Division 1.1, Section 10.3	Article 51
Risk/Impact Assessments	Privacy Act 1988, 33D; APP Guidelines, APP 1, 1.7; Australian Government Agencies Privacy Code*	Article 38		Articles 55–56
Data Breach Notification*	Privacy Act 1988, Part IIIC	Article 48	Part 1, Division 1.1, Sections 10.1–10.3	Article 57
Registration with Authorities				Articles 52–53
Data Protection Officer	Australian Government Agencies Privacy Code*	Article 41	Schedule 1, Principle 1	Article 52
International Data Transfer Restrictions	APP 8	Article 33		Articles 38–43
SCOPE				
Exemption for Employee Data	Privacy Act 1988, 7B(3)		Part 1, Section 4(1)(b)*	
Non-profits Covered	Privacy Act 1988, 6C–6E; OAIC guidance	Article 3	Part 1, Section 4	Article 3
Sectoral Law Carveouts				
State-level Preemption			see OPC Guidance	
ENFORCEMENT				
Independent Enforcement Authority	Office of the Australian Information Commissioner	National Data Protection Authority	Office of the Privacy Commissioner	
Rulemaking Authority	Privacy Act 1988, Part IV	Articles 55-A–55-L	Part 1, Division 2	Article 62
Fining Authority	Privacy Act 1988, Part III, 13G; Part IIIA; Part V, 46, 65–66, etc.	Articles 52–54	Part 1, Division 4, Section 28	Article 66
Criminal Penalties	Privacy Act 1988, Part V, 46, 65–66; Part VIA, 80Q, etc.			Article 71
Personal Liability	Privacy Act 1988, 99A			Article 66
Private Right of Action		Articles 42–45	Part 1, Division 2, Sections 14–17	Articles 50 and 69–70

***Data Breach Notification:** Many countries and all 50 U.S. states have separate data breach notification laws. The term in this chart refers to a provision included in a comprehensive data protection law.

***Australia:** The Australian Government Agencies [Privacy Code](#) requires Australian government agencies subject to the Privacy Act to conduct written privacy impact assessments for “high privacy risk” projects and requires the appointment of a Privacy Officer(s) and a Privacy Champion.

***Canada:** PIPEDA applies to [employee information](#) in organizations engaged in federal works, undertakings or businesses.

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	European Union	Hong Kong	Singapore	South Korea	Turkey		
	General Data Protection Regulation	Personal Data Privacy Ordinance Data Protection Principles (PDPO Schedule 1)	Personal Data Protection Act	Personal Information Protection Act	Law on the Protection of Personal Data		
INDIVIDUAL RIGHTS	Right to Access	Article 15	Part 5, Division 1, Section 18; DPP 6	Section 21	Articles 4 and 35	Chapter 3, Article 11	
	Right to Correct	Article 16	Part 5, Division 2, Section 22	Section 22	Articles 4 and 36	Chapter 3, Article 11	
	Right to Delete	Article 17	DPP 2 (related to correcting inaccuracy)		Articles 4 and 36	Chapter 2, Article 7; Chapter 3, Article 11 (limited)	
	Right to Portability	Article 20		Sections 26F-26J*			
	Right to Opt-Out of All or Specific Processing	Articles 7 and 21	Part 6A, Division 2, Section 35G	Section 16	Articles 4 and 37		
	Right to Opt-In for Sensitive Data Processing	Article 9			Article 23	Chapter 2, Article 6	
	Age-based Opt-in Right	Article 8			Article 22(6)		
	Right Not to Be Subject to Fully Automated Decisions	Article 22				Chapter 3, Article 11(1)(g)	
BUSINESS OBLIGATIONS	Notice/Transparency Requirements	Article 12	DPPs 5 and 6	Section 20	Articles 3, 4 and 30	Chapter 3, Article 10(1)	
	Legal Basis for Processing	Article 6	DPP 1		Articles 3 and 15	Chapter 2, Articles 4-6	
	Purpose Limitation	Article 5(1)(b)	DPPs 1 and 3	Section 18	Articles 3, 15, 18 and 19	Chapter 2, Article 4(2)(c)	
	Data Minimization	Article 5(1)(c)	DPP 1		Article 16(1)	Chapter 2, Article 4(2)(ç) and (d)	
	Security Requirements	Article 32	DPP 4	Section 24	Article 29	Chapter 3, Article 12	
	Privacy by Design	Article 25					
	Processor/Service Provider Requirements	Article 28	DPPs 2(3) and 4(2)		Articles 19 and 26	Chapter 3, Article 12	
	Prohibition on Discrimination	Recital 71					
	Records of Processing	Article 30	Part 5, Division 3, Section 27	Section 22A	Article 29	Chapter 4, Article 16	
	Risk/Impact Assessments	Article 35			Article 33		
	Data Breach Notification*	Article 33 Article 34		Sections 26A-26E	Article 34	Chapter 3, Article 12(5)	
	Registration with Authorities	Article 37(7)	Part 4, Section 15		Article 32	Chapter 4, Article 16	
	Data Protection Officer	Article 37		Section 11	Article 31		
	International Data Transfer Restrictions	Articles 44-50	Part 6, Section 33 (not yet in operation)	Section 26	Articles 14(2), 17(3), 39-12 and 39-13	Chapter 2, Article 9	
	SCOPE	Exemption for Employee Data		Part 8, Sections 53-54	First Schedule, Part 3 Legitimate Interests, Section 9		
		Non-profits Covered	Article 2	Part 1, Section 2	Section 4	Article 58	Chapter 1, Article 2
Sectoral Law Carveouts		Article 6(2)			Article 6	Chapter 7, Article 28	
State-level Preemption		Recital 10				Chapter 7, Article 28	
ENFORCEMENT	Independent Enforcement Authority	EU National Data Protection Authorities Articles 51-59	Office of the Privacy Commissioner for Personal Data Part 2, Section 5	Personal Data Protection Commission Sections 5-10	Personal Information Protection Commission Article 7	Personal Data Protection Authority Chapter 6, Articles 19-20	
	Rulemaking Authority	Articles 64, 65(1)(c) and 92	Part 3, Section 12	Section 65	Articles 7-8 and 7-9	Chapter 6, Article 22	
	Fining Authority	Article 83	Part 7, Sections 35C, 50A, 64, etc.	Sections 48C-48F, 48J-48K, 51-52A and 56	Articles 70-76	Chapter 5, Article 18; Chapter 6, Article 22	
	Criminal Penalties		Numerous Provisions	Sections 48C-48F, 51-52A and 56	Articles 70-73	Chapter 5, Article 17	
	Personal Liability		Director convicted under PDPO	Sections 48C-48F, 48J-48K, 51-52A, 56 and 60	Articles 70-76	Chapter 5, Article 18	
	Private Right of Action	Article 79	Part 9, Section 66	Section 48O	Articles 51-57	Chapter 3, Article 11(1)(g)	

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***Singapore:** Amendments to the PDPA not yet in effect will create a right of portability and increase potential financial penalties.

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	California		Virginia	Colorado	
	California Consumer Privacy Act	California Privacy Rights Act (most provisions operative Jan. 1, 2023)	Virginia's Consumer Data Protection Act	Colorado Privacy Act	
INDIVIDUAL RIGHTS	Right to Access	Section 1798.100	Section 1798.100	Section 6-1-1306(1)(b)	
		Section 1798.110	Section 1798.110		
		Section 1798.115	Section 1798.115		
	Right to Correct		Section 1798.106	Section 59.1-573(A)(2)	Section 6-1-1306(1)(c)
	Right to Delete	Section 1798.105	Section 1798.105	Section 59.1-573(A)(3)	Section 6-1-1306(1)(d)
	Right to Portability	Sections 1798.100(d) and 1798.130(a)(2)	Section 1798.130(a)(3)(B)(iii)	Section 59.1-573(A)(4)	Section 6-1-1306(1)(e)
	Right to Opt-Out of All or Specific Processing	Section 1798.120	Section 1798.120	Section 59.1-573(A)(5)	Section 6-1-1306(1)(a)
	Right to Opt-In for Sensitive Data Processing		Section 1798.121*	Section 59.1-574(A)(5)	Section 6-1-1308(7)
	Age-based Opt-in Right	Section 1798.120(c)	Section 1798.120(c)		Section 6-1-1308(7)
Right Not to Be Subject to Fully Automated Decisions		Section 1798.185(a)(16)*	Section 59.1-574(A)(5)	Section 6-1-1306(1)(a)(I)(C)	
BUSINESS OBLIGATIONS	Notice/Transparency Requirements	Section 1798.100(b)	Section 1798.100(a)	Section 59.1-574	Section 6-1-1308(1)
		Sections 1798.130(a) and 1798.135	Section 1798.130		
	Legal Basis for Processing				
	Purpose Limitation	Section 1798.100(b)	Section 1798.100(c)	Section 59.1-574(A)(2)	Section 6-1-1308(2), (4)
	Data Minimization		Sections 1798.100(c) and 1798.100(a)(d)	Section 59.1-574(A)(1)	Section 6-1-1308(3)
	Security Requirements	Section 1798.150(a)	Sections 1798.100(e) and 1798.150(a)	Section 59.1-574(A)(3)	Section 6-1-1308(5)
	Privacy by Design				
	Processor/Service Provider Requirements	Section 1798.140(v)	Sections 1798.100(d) and 1798.140(ag)(1)	Section 59.1-575	Section 6-1-1305
	Prohibition on Discrimination	Section 1798.125	Section 1798.125	Section 59.1-574(A)(4)	Section 6-1-1308(6)
	Records of Processing	CCPA Regulations, Section 999.317			
	Risk/Impact Assessments		Section 1798.185(a)(15)	Section 59.1-576	Section 6-1-1309
	Data Breach Notification*				
	Registration with Authorities				
	Data Protection Officer				
	International Data Transfer Restrictions				
SCOPE	Exemption for Employee Data	Section 1798.145(m) from CPRA operative immediately until Jan. 1, 2023		Section 59.1-572(C)(14)	Section 6-1-1303(6)(b)
	Non-profits Covered				Section 6-1-1304(1)
	Sectoral Law Carveouts	Sections 1798.145 and 1798.146	Sections 1798.145 and 1798.146	Section 59.1-572	Section 6-1-1304(2)
	State-level Preemption	Section 1798.180	Section 1798.180		Section 6-1-1312
ENFORCEMENT	Independent Enforcement Authority		California Privacy Protection Agency Section 1798.199.10 et seq.		
	Rulemaking Authority	Section 1798.185	Section 1798.185		Section 6-1-1313
	Fining Authority	Section 1798.155	Sections 1798.155, 1798.199.55 and 1798.199.90	Section 59.1-580	Section 6-1-1311
	Criminal Penalties				
	Personal Liability				
	Private Right of Action	Section 1798.150	Section 1798.150		

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***California:** The California Privacy Right Act categorizes sensitive data and allows consumers to limit its use and disclosure, but does not require opt-in consent for use of sensitive data. There is no explicit right against automatic decision making, but the use of automatic decision-making is within the scope of the regulations to be promulgated.