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	GDPR	CCPA
Territorial scope	Art. 3 GDPR provides three bases for jurisdiction: (1) Establishment in the EU (supposing that the processing of data takes place within the activities of such establishment); (2) monitoring behaviour (given that such behaviour takes place within the EU)/offering goods or services (whether there is a payment or not); (3) EU applies by way of public international law.	Businesses that fulfil one or more of the following thresholds: (1) has annual gross revenues in excess of $25,000,000; (2) annually buys, receives for the business' commercial purposes, sells, or shares for commercial purposes, alone or in combination, the personal information of 50,000 or more consumers, households, or devices; (3) derives 50 percent or more of its annual revenues from selling consumers' personal information (§ 1798.140(c) CCPA). Additionally, businesses must do business in California (§ 1798.140(c) CCPA).
Material scope (personal data/information)	Personal data is defined as any information relating to an identified or identifiable natural person, such as name, an identification number, location of data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person (Art. 4(1) GDPR).	According to § 1798.140. (o)(1) CCPA, personal information means information that identifies, relates to, describes, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household. This includes, real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, social security number, driver's license number, passport number, etc. (§ 1798.140. (o)(1)(A) CCPA).
Personal scope (data subject)	According to Art. 4(1) GDPR, a data subject is a natural person. Art. 3(2) GDPR specifically protects data subjects who *are* in the EU.	The CCPA protects consumers (§ 1798.140(g) CCPA), which are defined as Californian residents. According to § 17014 of Title 18 of the California Code of Regulations a resident is (1) every individual who is in the State for other than a temporary or transitory purpose, and; (2) every individual who is domiciled in the State who is outside the State for a temporary or transitory purpose.
Personal scope (addressees)	Both controllers and processors must comply with the GDPR. The controller is the natural or legal person, public authority, agency or other body who determines the purposes and means of the processing of personal data (Art. 4(7) GDPR). The processor is the natural or	Only controllers must comply with the CCPA (§ 1798.140(c)(1) CCPA). The controller is the business, which alone or jointly with others, determines the purposes and means of the processing of consumers' personal information.

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	legal person, public authority, agency or other body who processes personal data on behalf of the controller (Art. 4(8) GDPR).	

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