DATAEXOS REGULATORY BRIEF · 2026 EDITION

Navigating the Legal Landscape

Key laws and regulations governing artificial intelligence & data — a sourced, defensible reading of eight anchor jurisdictions, and an honest map of the wider field.

Edition	Anchor jurisdictions	Sourced cells
2 · August 2026	**8 · four dimensions**	**30 of 32 verified**

DATAEXOS™ · EDITION 2 (2026.08)
VERIFIED THROUGH 2026-08-28 · SUPERSEDES THE 23 JUL 2026 EDITION
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HOW TO READ THIS BRIEF

Smaller on purpose — and built to be checked.

This is a smaller report than it could be — deliberately. We publish only what survived verification against identified primary, official, or expressly flagged secondary sources; we say plainly where we stopped, and we flag the claims most likely to move. Where we could not verify, we published a gap instead of a guess — and where an earlier edition was wrong, the revision record says so. Even then, treat any cell as a starting point, not a conclusion.

Two layers, by design

Layer 1 — the anchor jurisdictions. Eight jurisdictions × four dimensions, each cell carrying a controlled-vocabulary status, the governing instrument, an as-of date, and a footnote to the cited source. This is the source-anchored core: 14 of its 30 sourced cells were read to the instrument itself (T0), 10 rest on official or institutional sources (T1), and six on identified secondary authorities, flagged in place (T2).

Layer 2 — the wider landscape. Directional narrative only. It gives the report breadth without asserting a checkable specific — no penalty, no "country X requires Y", and a commencement date only where individually verified and dated — about any jurisdiction outside the anchor set. That precision is exactly what a paid per-jurisdiction tracker exists to sell; here we trade it for verified range — fewer claims, each one anchored.

The discipline behind each cell

Four dates, never blended. "Enacted", "in force", "rules effective / application", and "as-of access" are four different dates. Conflating them is the most common way a regulatory claim goes quietly wrong, so each instrument carries them separately.

No figure travels between statutes. A penalty belongs to its own instrument and nowhere else — a rule we enforce because the prior edition imported one law's fine into another's text.

A negative is a claim. "There is no such law" needs a source. Where we could not source a "none", we publish a *gap*, not a clean finding.

Not all-inclusive — and not legal advice or a compliance determination.

Like the edition it replaces, this is *a list of some key legislation, not an all-inclusive list.* The law moves faster than any single document; sector-specific rules, sub-national regimes, and jurisdictions outside the anchor set are not comprehensively surveyed — selected instances (state statutes, provincial duties, targeted federal restrictions) appear only where load-bearing — and are otherwise out of scope here. Treat every row as a starting point for your own verification with qualified counsel — not as a compliance determination.

"Not AI. AI for Humans."

Automated verification finds our own errors and holds the vocabulary steady; it does not make the legal judgment. Every high-stakes reading in this brief is written to be handed to a human — your counsel — who makes the call. The machine narrows the search; the person decides.

THE STATUS VOCABULARY

One controlled state-space, held without drift.

Every cell in Layer 1 wears exactly one of these statuses. They are not interchangeable, and we never let one section blur a boundary another section holds. Where an in-force law has a future tranche that is not yet operative, that tranche is flagged separately rather than by softening the headline status.

- **IN FORCE** — **Operative law today.** Enacted, commenced, and applying now — obligations are legally live.
- **ENACTED — NOT IN FORCE** — **Law on the books, not yet biting.** Passed and dated, but its application date is in the future (or awaits publication).
- **RULES PENDING** — **Framework set, detail to come.** The parent instrument exists; operative rules or thresholds are not yet commenced.
- **PROPOSED** — **A bill, not a law.** Before a legislature or in consultation. It imposes, mandates, and prohibits nothing.
- **WITHDRAWN** — **Died without commencing.** A comprehensive attempt that lapsed or was abandoned and never became operative.
- **PUBLISHED GAP** — **Honestly unresolved.** We could not source a defensible finding, so we show the gap rather than assert a "none".

Source tiers

Each cell records the tier of its load-bearing source. No cell rests on anything weaker than a named legal tracker, and tracker-sourced cells are capped at medium confidence.

- **T0** Primary — statute, gazette, Federal Register, or the regulator's own instrument text.
- **T1** Official — regulator guidance, the European Commission adequacy page, a national portal, or a library-of-record monitor.
- **T2** Named tier-one legal tracker (DLA Piper, Chambers, Baker McKenzie, IAPP). Flagged, and never HIGH confidence.

Coverage at a glance

SOURCED CELLS

30 / 32

anchor × dimension records verified

STATUS SPLIT

26 in force

+ 1 proposed · 2 withdrawn · 1 enacted-not-in-force

PUBLISHED GAPS

2

EU & South Korea localization

TIER PROFILE

14 To

10 T1 · 6 T2

The sourced matrix.

Eight anchor jurisdictions × four dimensions. Each cell shows the current status, the governing instrument, and the date this reading was taken. The governing provision — quoted where we read the instrument itself, paraphrased where we rely on an identified secondary authority — and each cell's source footnote follow in the jurisdiction profiles.

JURISDICTION	DATA PROTECTION	AI REGULATION	CROSS-BORDER TRANSFER	DATA LOCALIZATION
European Union EU · EEA	● IN FORCE GDPR (Reg (EU) 2016/679) as of 2026-08-27	● IN FORCE · PHASED AI Act (Reg (EU) 2024/1689) as of 2026-08-27	● IN FORCE GDPR Ch. V; EU–US DPF as of 2026-08-27	◌ GAP No general mandate sourced published as gap
United Kingdom UK	● IN FORCE UK GDPR + DPA 2018, am. DUAA 2025 as of 2026-08-27	● WITHDRAWN No statute; AI (Reg.) Bill fell at prorogation as of 2026-08-27	● IN FORCE UK GDPR transfer regime; IDTA as of 2026-08-27	● IN FORCE No localization mandate as of 2026-08-27
United States US · federal + state	● IN FORCE Sectoral federal + state patchwork as of 2026-08-27	● IN FORCE · STATE EOs + TX/CA/CO statutes as of 2026-08-27	● IN FORCE No omnibus regime; targeted DOJ DSP; EU–US DPF as of 2026-08-27	● IN FORCE No general mandate; gov. sectoral as of 2026-08-27
China CN · PRC mainland	● IN FORCE PIPL + DSL + CSL (three pillars) as of 2026-08-27	● IN FORCE Stacked CAC measures as of 2026-08-27	● IN FORCE Authorization- & threshold-based regime (CAC) as of 2026-08-27	● IN FORCE PIPL Art. 40 + Network Data Reg. as of 2026-08-27
Canada CA · federal	● IN FORCE PIPEDA (S.C. 2000, c. 5) as of 2026-08-27	● WITHDRAWN AIDA died; ON hiring rule in force as of 2026-08-27	● IN FORCE PIPEDA accountability model as of 2026-08-27	● IN FORCE No federal private-sector mandate as of 2026-08-27
Brazil BR	● IN FORCE LGPD (Lei nº 13.709/2018) as of 2026-08-27	○ PROPOSED PL nº 2338/2023 (in Chamber) as of 2026-08-27	● IN FORCE LGPD Ch. V; EU–Brazil adequacy as of 2026-08-27	● IN FORCE No general mandate as of 2026-08-27
India IN	● IN FORCE · CORE PENDING DPDP Act 2023 + Rules 2025 (substantive core ≈May 2027) as of 2026-08-27	● IN FORCE No statute; binding SGI rules as of 2026-08-27	● ENACTED · NOT IN FORCE DPDP s.16 + Rule 15 (≈18-mo tranche) as of 2026-08-27	● IN FORCE Sectoral (RBI · CERT-In) as of 2026-08-27
South Korea KR · ROK	● IN FORCE PIPA (2026 am. pending 11 Sep) as of 2026-08-27	● IN FORCE AI Basic Act (Act No. 20676) as of 2026-08-27	● IN FORCE PIPA outbound regime as of 2026-08-27	◌ GAP Position genuinely unknown published as gap

LEGEND ● IN FORCE ● ENACTED — NOT IN FORCE ○ PROPOSED ● WITHDRAWN ◌ PUBLISHED GAP

Several in-force AI and data regimes carry a distinct future tranche that is *enacted — not in force* (EU high-risk obligations; India's substantive DPDP rules and Rule 15; Colorado developer duties; Korea's PIPA 2026 amendment). Those are noted on each jurisdiction's profile rather than by changing the headline status above.

SOURCE: DATAEXOS LAYER-1 VERIFIED ANCHOR DATASET, EDITION 2, VERIFIED THROUGH 28 AUG 2026 · PER-CELL SOURCE CITATIONS IN THE PROFILES THAT FOLLOW

What changes next — regulatory milestones.

Verified dates only, drawn from the Layer-1 dataset: each event, what it changes, and its status. Undated developments are watched, not scheduled. Orientation, not legal advice.

Dated events, in order

2026-09-11	**South Korea** — the 2026 PIPA amendment applies: a new aggravated tier of up to 10% of total turnover (Art. 64-2(2)) — the existing 3% tier is already turnover-based — plus representative-director (CEO) accountability. Confirmed against the PIPC's official release.
≈2026-11-13/14	**India** — the Consent Manager tranche commences (DPDP Rule 4, one year from gazette publication).
2026-12-02	**European Union** — the amended Art. 113(3)(a) prohibition on AI-generated CSAM and non-consensual intimate imagery applies (AI Omnibus, Reg. (EU) 2026/1744).
2027-01-01	**United States (Colorado)** — the Colorado AI Act's deferred developer and deployer duties take effect.
≈2027-05-13/14	**India** — the DPDP substantive tranche commences (ss.3–17; Rules 3, 5–16, 22, 23): fiduciary obligations, data-principal rights, the s.16 + Rule 15 transfer mechanism, and the ₹250 crore penalty ceiling become operative law.
2027-07-01	**South Korea** — mandatory ISMS-P certification commences for covered entities.
2027-12-02	**European Union** — AI Act high-risk obligations apply for Annex III standalone systems (deferred date set by the Omnibus).
2028-08-02	**European Union** — AI Act high-risk obligations apply for product-embedded systems.

Watched, not scheduled

CoE AI Convention entry into force (Art. 30 threshold not yet met) · CJEU appeal in *Latombe* (EU–US DPF) · Brazil PL 2338/2023, pending in the Chamber · Canada Bill C-36 · further CAC-prescribed transfer conditions in China. Undated items carry no asserted timetable — see the watchlist page for triggers and re-check points.

What the milestones mean

• **The EU high-risk runway is real but dated.** Annex III duties land 2 Dec 2027; product-embedded 2 Aug 2028. The general-applicability layer (including Art. 50 transparency) already applies.

• **Korea is the near-term compliance event.** A comprehensive AI statute is already operative, and on 11 Sep 2026 qualifying aggravated violations become subject to a new 10% penalty tier, alongside strengthened executive accountability.

• **The US has no omnibus regime — and a real export rule.** The DOJ Data Security Program restricts covered transactions in bulk sensitive personal data (and US government-related data at any volume); "no GDPR here" is not "no exposure."

• **India's DPDP substantive core is runway, not obligation — until ≈May 2027.** Already-operative duties (synthetic-media labeling, RBI payment-data, CERT-In logging) continue to apply; the DPDP fiduciary core, including transfers, is enacted but not in force.

Edition 2 — revision record

Following an independent verification pass (checked through 27 Aug 2026):

- **4 cells materially corrected** — UK AI status (bill fell at prorogation), US transfer (DOJ DSP added), China transfer (threshold basis and routes), India transfer (s.16 + Rule 15 enacted-not-in-force).
- **11 cells qualified or re-attributed**; 2 treaty-layer statements corrected (CoE entry into force; Pax Silica signatories).
- **Sourcing representation corrected**: 30 of 32 cells sourced and 2 published gaps (11 T0 · 10 T1 · 9 T2 at the 27 Aug verification pass; primary retrievals on 28 Aug lifted this to 14 T0 · 10 T1 · 6 T2); the prior "every claim traces to a primary source" line was inaccurate and is withdrawn.

Edition 1 (as of 23 Jul 2026) is superseded and withdrawn from distribution. Corrections are recorded in the underlying dataset, not silently overwritten.

01 European Union

ANCHOR · EU & EEA

DATA PROTECTION · ● IN FORCE · T1

General Data Protection Regulation — Regulation (EU) 2016/679

GDPR has applied since 25 May 2018. Enforcement is decentralized: GDPR Art. 51 requires each Member State to provide for one or more independent supervisory authorities (Germany has several), coordinated through the European Data Protection Board — there is no single EU-wide regulator for private-sector processing.[1]

Enacted 2016-04-27 | **In force** 2016-05-24 | **Applies** 2018-05-25 | as of 2026-08-27

A contested "Digital Omnibus" GDPR-reform proposal (published 19 Nov 2025) remains **proposed** and is not part of this record; the EDPB/EDPS objected in Joint Opinion 2/2026. Nothing in that strand is operative.

AI REGULATION · ● IN FORCE · PHASED · T1

Artificial Intelligence Act — Regulation (EU) 2024/1689

The first comprehensive horizontal AI statute: risk-tiered (prohibited / high-risk / limited-risk transparency / minimal) with a separate layer for general-purpose AI. Obligations phase in over several years — **prohibited practices and AI-literacy duties in force since 2 Feb 2025**; **GPAI and governance since 2 Aug 2025**; general applicability (incl. Art. 50 transparency) from 2 Aug 2026.[2]

In force 2024-08-01 | **Prohibitions** 2025-02-02 | **GPAI** 2025-08-02 | as of 2026-08-27

The central **high-risk** obligation dates now cited by the Commission — **2 Dec 2027** (Annex III) and **2 Aug 2028** (product-embedded) — are the *deferred* dates set by the "AI Omnibus" amendment — now **in force**: Regulation (EU) 2026/1744 was published in the Official Journal on 24 July 2026 and consolidated into the AI Act from 27 July 2026. Transitional rule: providers of relevant synthetic-content-generating systems placed on the market before 2 Aug 2026 have until 2 Dec 2026 to comply with Art. 50(2) — a specific transitional provision, not a blanket postponement of Art. 50. (Edition 1 recorded the amendment as agreed-but-unpublished on 23 July; it published the next day.) The Omnibus prohibition on AI-generated CSAM / non-consensual intimate imagery applies from 2 Dec 2026 (amended Art. 113(3)(a)).

CROSS-BORDER TRANSFER · ● IN FORCE · T1

GDPR Chapter V (Arts. 44–50)

Transfers to third countries are permitted via an adequacy decision, appropriate safeguards (SCCs, BCRs), or Art. 49 derogations. For US transfers the EU–US Data Privacy Framework (Implementing Decision (EU) 2023/1795) is in force and has not been repealed or annulled — live-confirmed on the Commission's adequacy page on 23 July 2026. A pending appeal (*Latombe*, C-703/25 P) is reported, but the framework is valid unless repealed or annulled.[3]

In force 2018-05-25 | **EU–US DPF** 2023-07-10 | as of 2026-08-27

DATA LOCALIZATION · ◌ PUBLISHED GAP

Honestly unresolved. We did not affirmatively verify any general EU-level personal-data localization mandate — under GDPR, cross-border movement is regulated through the Chapter V transfer regime rather than a storage-location rule. But we could not *affirmatively source* a "none" this pass, and a negative finding requires positive evidence, not inference from the existence of transfer mechanisms. Published as a gap rather than asserted as a clean "no requirement".

SOURCES AND AUTHORITIES — EUROPEAN UNION

1. General Data Protection Regulation, Regulation (EU) 2016/679, art. 3 (applied 25 May 2018). European Commission, *International dimension of data protection / adequacy decisions*. https://commission.europa.eu/law/law-topic/data-protection/international-dimension-data-protection/adequacy-decisions_en (as of 20 July 2026).
2. Artificial Intelligence Act, Regulation (EU) 2024/1689, arts. 5, 50, 113 & ch. V (in force 1 Aug 2024; phased application). European Commission, *Regulatory framework for AI*. https://digital-strategy.ec.europa.eu/en/policies/regulatory-framework-ai (live-reverified 23 July 2026).
3. GDPR ch. V, arts. 44–50; Commission Implementing Decision (EU) 2023/1795 (EU–US Data Privacy Framework, adequacy adopted 10 July 2023). European Commission, *Adequacy decisions*. https://commission.europa.eu/law/law-topic/data-protection/international-dimension-data-protection/adequacy-decisions_en (live-reverified 23 July 2026).

LAYER 1.5 · OPERATIONAL ORIENTATION — WHO SHOULD LOOK, NOT LEGAL ADVICE

APPLIES TO Controllers/processors worldwide offering goods or services to, or monitoring, people in the EU; AI providers and deployers whose systems or outputs reach the EU market · REGULATORS National supervisory authorities (one or more per Member State) · EDPB · European AI Office · NEXT 2026-12-02 — amended Art. 113(3)(a) prohibition applies · Active

02 United Kingdom

DATA PROTECTION · IN FORCE · T0

UK GDPR + Data Protection Act 2018, as amended by the Data (Use and Access) Act 2025

UK GDPR and the DPA 2018 remain the regime; the DUAA 2025 (2025 c.18) substantially amended it. Principal data-protection reforms **commenced 5 February 2026** — replacing the Art. 22 prohibition on solely-automated decision-making with a permission-plus-safeguards model, and adding "recognised legitimate interests" that require no balancing test. Higher-tier penalty ceiling: up to £17.5m or 4% of global turnover.[4]

Royal Assent 2025-06-19 | **Reforms commenced** 2026-02-05 | **Complaints limb** 2026-06-19 | as of 2026-08-27

AI REGULATION · WITHDRAWN · T0

No comprehensive AI statute · Artificial Intelligence (Regulation) Bill [HL] fell at prorogation

There is no comprehensive horizontal AI statute in force. AI is governed at the point of use through existing regimes and five non-statutory cross-sectoral principles applied by existing regulators (ICO, FCA, PRA, Ofcom, MHRA, CMA). The Artificial Intelligence (Regulation) Bill [HL] (Lord Holmes, Private Member's Bill) **fell at prorogation of the 2024–26 parliamentary session and was not a pending bill as of 20 July 2026**; Parliament's own page records that it would make no further progress. It was also not the session's only AI-related bill — a bill on public-authority algorithmic and automated decision-making likewise fell.[5]

Comprehensive statute none (sourced negative) | **Bill** fell at prorogation | as of 2026-08-27

CROSS-BORDER TRANSFER · IN FORCE · T1

UK GDPR transfer regime (adequacy regs, IDTA, UK Addendum to EU SCCs, BCRs, Art. 49); DUAA "data protection test"

Multi-route outbound transfers are permitted; the DUAA introduced a "data protection test" (safeguards "not materially lower than" the UK standard). Inbound flow from the EU rests on EU adequacy: the Commission **renewed the two UK adequacy decisions (GDPR and LED) in December 2025** — live-confirmed on the Commission adequacy page.[6]

EU adequacy renewal 2025-12-19 · expires 2031-12-27 | confidence: high | as of 2026-08-28

Verified against the decision text (Implementing Decision (EU) 2025/2574, OJ L 23 Dec 2025; on file): adopted 19 Dec 2025; “This Decision shall expire on 27 December 2031” (Art. 2, replacing Art. 4 of Decision 2021/1772); and the 2021 immigration-control exclusion is repealed (Art. 1; recital 37 — DPA 2018 Sch. 2 ¶¶4A–4B safeguards), extending the adequacy’s scope to immigration data.

DATA LOCALIZATION · IN FORCE · T2

UK GDPR — no localization mandate

No explicit data-localization requirement under UK GDPR. Cross-border movement is regulated through the transfer regime rather than by a storage-location mandate. This is a sourced negative (DLA Piper, 24 Feb 2026), not confirmed against primary text; sector-specific residency rules were not surveyed.[7]

confidence: medium | as of 2026-08-27

SOURCES AND AUTHORITIES — UNITED KINGDOM

4. Data (Use and Access) Act 2025 (2025 c.18), Part 5; new UK GDPR arts. 22A–22D. Commencement by SI 2026/82 (made 29 Jan 2026, appointing 5 Feb 2026 and 19 Jun 2026). https://www.legislation.gov.uk/uksi/2026/82/made (as of 20 July 2026). Penalty ceiling figures: DLA Piper (T2, 24 Feb 2026).
5. Artificial Intelligence (Regulation) Bill [HL], Bill 3942 — fell at prorogation of the 2024–26 session; Parliament's page records it will make no further progress. UK Parliament. https://bills.parliament.uk/bills/3942/news (as of 27 Aug 2026). Negative corroborated by DSIT government response (6 Feb 2024).
6. UK GDPR ch. V as amended by DUAA 2025 Part 5; EU adequacy renewal (GDPR + LED), December 2025. European Commission, *Adequacy decisions*. https://commission.europa.eu/law/law-topic/data-protection/international-dimension-data-protection/adequacy-decisions_en (live-reverified 23 July 2026).
7. UK GDPR (no localization mandate). DLA Piper, *Data Protection Laws of the World — United Kingdom* (24 Feb 2026). https://www.dlapiperdataprotection.com/index.html?t=law&c=GB (as of 20 July 2026).

LAYER 1.5 · OPERATIONAL ORIENTATION — WHO SHOULD LOOK, NOT LEGAL ADVICE

APPLIES TO Controllers/processors targeting or monitoring people in the UK; AI duties applied at the point of use through existing regulators · REGULATORS ICO · sectoral regulators (FCA · PRA · Ofcom · MHRA · CMA) · NEXT none dated verified — DUAA commencement phasing continues · Active

03 United States

DATA PROTECTION ● IN FORCE T2

No comprehensive federal privacy statute — sectoral federal laws + a state patchwork

There is no comprehensive national privacy law. A sectoral federal regime — HIPAA (health), GLBA / FCRA (financial), COPPA (children), and FTC Act §5 (general enforcement) — operates alongside a growing state patchwork of **about 20 states** with enacted comprehensive privacy legislation. The FTC acts as de facto general enforcer; there is no single national data-protection authority.[8]

Comprehensive federal statute none (sourced negative) | as of 2026-08-27

AI REGULATION ● IN FORCE · STATE-LED T0

No comprehensive federal AI statute — federal executive orders + state statutes

No comprehensive federal AI statute. The federal layer is executive-order / agency policy: EO 14179 ("Removing Barriers to American Leadership in AI", signed 23 Jan 2025) and EO 14365 ("Ensuring a National Policy Framework for AI", signed 11 Dec 2025), which seeks to preempt and litigate against state AI laws. Binding AI law exists at **state level**: Texas TRAIGA (HB 149) took effect 1 Jan 2026; California TFAIA (SB 53) frontier-model transparency is operative; Colorado's ADMT regime (SB 26-189, signed 14 May 2026) defers developer obligations to 1 Jan 2027.[9]

TX HB 149 2026-01-01 | **CO developer duties** 2027-01-01 | as of 2026-08-27

Direction genuinely two-signed. The federal executive is deregulatory and seeks to preempt state law while several state laws tighten — this jurisdiction is best described as *in flux*, not simply tightening or loosening. State penalty figures (TX $10k–$200k tiers; CA up to $1m/violation) each belong to that statute's own text and are not cross-imported. Colorado developer obligations are **enacted — not in force** until 1 Jan 2027.

CROSS-BORDER TRANSFER ● IN FORCE T2

No omnibus outbound regime · targeted DOJ Data Security Program · inbound EU–US DPF

No omnibus GDPR-style outbound regime — but not no export restriction: the DOJ **Data Security Program** (28 C.F.R. Part 202, eff. 8 Apr 2025) prohibits or restricts covered transactions in bulk US sensitive personal data — or US government-related data regardless of volume — with countries of concern or covered persons. Inbound from the EU/EEA, the operative mechanism is the EU–US Data Privacy Framework, upheld by the EU General Court on 3 September 2025 in *Latombe*; an appeal to the CJEU is reported pending. SCCs and BCRs remain available.[10]

DOJ DSP effective 2025-04-08 | **DPF upheld (Gen. Court)** 2025-09-03 | confidence: medium | as of 2026-08-27

DATA LOCALIZATION ● IN FORCE T2

No general commercial localization mandate · sectoral government contexts only

No general commercial data-localization mandate. Geographic or personnel constraints arise only in particular defense, government, export-control, procurement, or contractual contexts — US-persons / US-soil arrangements for federal workloads, such as GovCloud. FedRAMP itself is a federal cloud-security assessment and authorization framework, not a US-soil or US-persons localization law.[11]

confidence: medium | as of 2026-08-27

SOURCES AND AUTHORITIES — UNITED STATES

8. No comprehensive federal privacy statute; HIPAA, GLBA, FCRA, COPPA, FTC Act §5 (15 U.S.C. §45); state comprehensive laws (e.g., CA CCPA/CPRA). DLA Piper, *Data Protection Laws of the World — United States* (31 Mar 2026). https://www.dlapiperdataprotection.com/index.html?t=law&c=US (as of 20 July 2026). State count ("about 20") is DLA Piper's.
9. Exec. Order 14179 (23 Jan 2025); Exec. Order 14365 (11 Dec 2025), 90 Fed. Reg. (FR-2025-12-16); Tex. HB 149 (TRAIGA, eff. 1 Jan 2026); Cal. SB 53 (TFAIA, Ch. 138 of 2025); Colo. SB 26-189 (ADMT, signed 14 May 2026, developer duties 1 Jan 2027). https://www.govinfo.gov/content/pkg/FR-2025-12-16/pdf/2025-23092.pdf (as of 20 July 2026).
10. No general US export restriction; Commission Implementing Decision (EU) 2023/1795 (EU–US DPF); EU General Court, *Latombe*, upheld 3 Sep 2025 (appeal C-703/25 P reported pending). European Commission, *Adequacy decisions*. https://commission.europa.eu/law/law-topic/data-protection/international-dimension-data-protection/adequacy-decisions_en (live-reverified 23 July 2026). DOJ Data Security Program: 28 C.F.R. Part 202 (eff. 8 Apr 2025); justice.gov announcement (as of 28 Aug 2026).
11. No general commercial localization mandate; sectoral government context (FedRAMP / GovCloud). DLA Piper, *Data Protection Laws of the World — United States* (31 Mar 2026). https://www.dlapiperdataprotection.com/index.html?t=law&c=US (as of 20 July 2026).

LAYER 1.5 · OPERATIONAL ORIENTATION — WHO SHOULD LOOK, NOT LEGAL ADVICE

APPLIES TO Determined state-by-state (residency and threshold tests) plus sectoral federal law; DOJ DSP covered transactions (bulk sensitive personal data; government-related data at any volume) · REGULATORS FTC · state attorneys general · DOJ (Data Security Program) · sectoral agencies · NEXT 2027-01-01 — Colorado AI Act duties take effect · Active

04 China

ANCHOR · PRC MAINLAND

DATA PROTECTION · IN FORCE · T1

Three-pillar framework — Cybersecurity Law (CSL), Data Security Law (DSL), Personal Information Protection Law (PIPL)

PIPL has been operative since 1 Nov 2021; DSL since 1 Sep 2021; CSL since 1 Jun 2017, with its **first amendment in force 1 Jan 2026** (removing the "warning first" step, broadening extraterritorial reach, adding an AI-governance article). Supervision is led by the Cyberspace Administration of China with concurrent MPS/MIIT/SAMR competences; there is no single independent DPA.[12]

PIPL 2021-11-01 | **DSL** 2021-09-01 | **CSL am.** 2026-01-01 | as of 2026-08-27

Penalty separation held. Specified fixed-amount CSL penalties reach **RMB 10 million** (Arts. 61(3), 69(2)); other CSL penalties are multiples of unlawful income or procurement amounts (Arts. 63, 67) — and there is **no turnover-percentage penalty in the CSL**. PIPL Art. 66's ceiling (up to CNY 50m or 5% of prior-year turnover) is correct for *PIPL* and cited only to PIPL; it must never be attributed to the CSL.

AI REGULATION · IN FORCE · T0

Stacked binding CAC administrative measures (no omnibus AI statute)

No omnibus AI statute — instead a stack of binding, service-specific CAC-led measures, each in force on a single commencement date: Algorithmic Recommendation (1 Mar 2022), Deep Synthesis (10 Jan 2023), Generative AI Interim Measures (15 Aug 2023), AI-Generated Content Labeling Measures + mandatory standard GB 45438-2025 (1 Sep 2025), and Anthropomorphic AI Interaction Services Interim Measures (15 Jul 2026). Control mechanism: for generative-AI services with public-opinion attributes or social-mobilization capability, Art. 17 requires both security assessment and algorithm filing (备案) — a gate for those services, not universal, and not EU-style risk-tiering.[13]

Generative AI 2023-08-15 | **Labeling + GB 45438** 2025-09-01 | **Comprehensive statute** none / at research stage | as of 2026-08-27

CROSS-BORDER TRANSFER · IN FORCE · T1

Authorization- and threshold-based outbound regime (CAC)

An authorization- and threshold-based regime — not a closed list of three routes: depending on the data, processor, and annual export volume, compliance may require a CAC security assessment, certification (from 1 Jan 2026, CAC/SAMR Measures of 17 Oct 2025), a filed China Standard Contract, an applicable treaty, or another CAC-prescribed condition. The 2024 thresholds turn on **cumulative annual exports**, not population handled: assessment is required for CIIOs exporting PI or important data, and for non-CIIOs exporting important data, ≥1m individuals' non-sensitive PI, or ≥10k individuals' sensitive PI; the intermediate band (100k to <1m individuals' non-sensitive PI, with the separate <10k sensitive-PI threshold, subject to the 2024 Provisions' exemptions) generally falls to the standard-contract or certification routes.[14]

Certification route 2026-01-01 | **2024 Provisions** 2024-03-22 | as of 2026-08-27

DATA LOCALIZATION · IN FORCE · T2

PIPL Art. 40 + Network Data Security Management Regulation

PIPL Art. 40 requires CIIOs and above-threshold PI handlers to store in-mainland the *personal information* they collect or generate in China (export conditional on CAC security assessment); *important-data* localization arises from the CSL, DSL, and the Network Data Security Management Regulation (in force 1 Jan 2025), not PIPL Art. 40 — broad in effect though formally sectoral.[15]

Network Data Reg. 2025-01-01 | confidence: medium | as of 2026-08-27

SOURCES AND AUTHORITIES — CHINA

12. PIPL (2021); DSL (2021); CSL (2017, first amendment in force 1 Jan 2026), arts. 61¶3, 69¶2 (penalties). Consolidated amended CSL: CAC republication, cac.gov.cn/2025-12/29/c_1768735112911946.htm (read 28 Aug 2026; print on file); amendment decision, gov.cn/yaowen/liebiao/202510/content_7046194.htm; NPC English announcement via Internet Archive capture of 22 Jan 2026. ¥10m ceiling verified against the consolidated text; no turnover-based fine in the CSL.
13. Provisions on Algorithmic Recommendation (in force 1 Mar 2022); Deep Synthesis Provisions (10 Jan 2023); Generative AI Interim Measures (15 Aug 2023); AI-Generated Content Labeling Measures + GB 45438-2025 (1 Sep 2025); Anthropomorphic AI Interaction Services Interim Measures, CAC Order No. 21, art. 32 (15 Jul 2026). CAC. cac.gov.cn/2026-04/10/c_1777558395078289.htm (20 Jul 2026).
14. PIPL cross-border chapter; 2024 Provisions on Promoting and Regulating Cross-border Data Flows (22 Mar 2024); Certification Measures (CAC/SAMR, issued 17 Oct 2025, certification route from 1 Jan 2026). Library of Congress, Global Legal Monitor (19 Feb 2026). loc.gov/item/global-legal-monitor/2026-02-19/china-certification-measures (20 Jul 2026).
15. PIPL art. 40; Network Data Security Management Regulation (in force 1 Jan 2025). Baker McKenzie, *Global Data & Cyber Handbook — China: Data Localization*. resourcehub.bakermckenzie.com/en/resources/global-data-and-cyber-handbook (China · data localization; as of 20 Jul 2026).

LAYER 1.5 · OPERATIONAL ORIENTATION — WHO SHOULD LOOK, NOT LEGAL ADVICE

APPLIES TO Processors of personal information collected or generated in mainland China; CIIOs; generative-AI services with public-opinion attributes or social-mobilization capability · REGULATORS CAC · SAMR (certification) · NEXT none dated — further CAC-prescribed conditions possible · Active

05 Canada

ANCHOR · FEDERAL

DATA PROTECTION ● IN FORCE T0

Personal Information Protection and Electronic Documents Act (PIPEDA), S.C. 2000, c. 5

PIPEDA applies to organizations handling personal information in the course of commercial activities. Enforcement is by the Office of the Privacy Commissioner on an ombuds model. Penalties: a summary-conviction fine up to CAD 10,000; an indictable offense up to CAD 100,000 (s. 28). There is no administrative-monetary-penalty regime.[16]

Consolidation current to 2026-05-26 | as of 2026-08-27

Anti-import guard. The CAD 10,000,000 / 3%-of-global-revenue ceiling belongs to the **proposed** Bill C-36, not to PIPEDA — never attach it to PIPEDA. C-36 is principally federal privacy reform; do not present it as a replacement comprehensive AI bill. A PIPEDA data-mobility amendment (Division 1.2, Bill C-15, Royal Assent 26 Mar 2026) is **enacted — not in force**: the consolidated Act current to 26 May 2026 contains no Division 1.2.

AI REGULATION ● WITHDRAWN T0

No comprehensive federal AI statute · AIDA withdrawn · Ontario ESA AI hiring disclosure in force

No comprehensive federal AI statute. The Artificial Intelligence and Data Act (AIDA), carried in Bill C-27, **died on the Order Paper** when the 44th Parliament's first session ended on 6 Jan 2025 and was never enacted. Sectoral duties arrive first provincially: Ontario's Employment Standards Act requires job postings by employers with 25+ employees to disclose whether AI is used to screen, assess, or select applicants — **in force 1 Jan 2026**. Bill C-36 (first reading 15 Jun 2026) is proposed and imposes nothing.[17]

AIDA died 2025-01-06 | **ON hiring disclosure** 2026-01-01 | as of 2026-08-27

CROSS-BORDER TRANSFER ● IN FORCE T1

PIPEDA accountability-based transfer model · inbound partial EU adequacy

Permissive-default and accountability-based: PIPEDA does not prohibit transborder transfers, requires no adequacy assessment; per OPC guidance no additional consent is needed where data is transferred to a service provider for processing on the organization's behalf for the original purpose (the OPC distinguishes such transfers from disclosures); the transferring organization remains accountable and uses contracts to require "generally equivalent" protection. Inbound from the EU rests on Canada's **partial** EU adequacy decision, limited to PIPEDA-covered commercial organizations — live-confirmed on the Commission adequacy page.[18]

OPC guidelines 2009-01-27 | EU adequacy: commercial orgs only | as of 2026-08-27

DATA LOCALIZATION ● IN FORCE T2

No federal private-sector localization mandate

No data-localization requirement at the federal private-sector level. Canada treats traditional localization as generally ineffective and is instead exploring risk-based transfer assessments and targeted sectoral approaches. Scoped to the federal private sector — provincial public-sector storage rules (notably BC and Nova Scotia) were not verified and the negative is not extended beyond that scope.[19]

scope: federal private sector | confidence: medium | as of 2026-08-27

SOURCES AND AUTHORITIES — CANADA

16. Personal Information Protection and Electronic Documents Act, S.C. 2000, c. 5, ss. 4, 16, 28 (consolidation current to 26 May 2026). Justice Laws Website. https://laws-lois.justice.gc.ca/eng/acts/P-8.6/FullText.html (as of 20 July 2026).
17. Bill C-27 (AIDA — died on the Order Paper, 6 Jan 2025); Ontario Employment Standards Act, 2000 (AI job-posting disclosure, in force 1 Jan 2026); Bill C-36 (1st reading 15 Jun 2026, proposed). Parliament of Canada, LEGISinfo. https://www.parl.ca/legisinfo/en/bill/44-1/c-27 (as of 20 July 2026). Ontario disclosure duty: ESA 2000 + O. Reg. 476/24, ontario.ca (≥25 employees; in force 1 Jan 2026).
18. PIPEDA accountability principle; OPC, *Guidelines for processing personal data across borders* (27 Jan 2009); Canada partial EU adequacy (commercial organizations). Office of the Privacy Commissioner of Canada. https://www.priv.gc.ca/en/privacy-topics/personal-information-transferred-across-borders/gl_dab_090127/ (as of 23 July 2026).
19. No federal private-sector localization mandate. Osler, *Canada's 2026 Privacy Priorities* (4 Dec 2025). https://www.osler.com/en/insights/reports/2025-legal-outlook/canadas-2026-privacy-priorities-data-sovereignty-open-banking-and-ai/ (as of 20 July 2026).

LAYER 1.5 · OPERATIONAL ORIENTATION — WHO SHOULD LOOK, NOT LEGAL ADVICE

APPLIES TO Organizations processing personal information in commercial activity (PIPEDA); Ontario employers with ≥25 employees (job-posting AI disclosure) · REGULATORS Office of the Privacy Commissioner · provincial regulators (ON ESA) · NEXT none dated — Bill C-36 pending · Active

06 Brazil

DATA PROTECTION · ● IN FORCE · T0

Lei Geral de Proteção de Dados Pessoais (LGPD), Lei nº 13.709/2018

The LGPD is in force. Its territorial scope (Art. 3) has **three limbs**: (I) processing carried out in national territory; (II) processing whose purpose is offering or supplying goods or services to, or processing data of, individuals located in Brazil; and (III) personal data collected in Brazil. The supervisory authority is the ANPD, upgraded to a full regulatory agency by Lei nº 15.352/2026.[20]

In force 2020-09-18 · **Sanctions** 2021-08-01 · as of 2026-08-27

Correction held. Art. 3 contains **no** "monitoring of behavior" trigger — that limb is GDPR Art. 3(2)(b), a different statute, and is not part of the LGPD reading here.

AI REGULATION · ○ PROPOSED · T0

PL nº 2338/2023 (Marco Legal da Inteligência Artificial)

No comprehensive AI statute in force. PL 2338/2023 — a risk-tiered bill (excessive / high / non-high risk) modelled on the EU AI Act — was approved by the Federal Senate plenary on 10 Dec 2024 and transmitted to the Chamber of Deputies on 17 Mar 2025, where it remains before a Special Commission awaiting the rapporteur's opinion (latest movement 17 Jun 2026). Because it is proposed, it **imposes, mandates, and prohibits nothing**. The ANPD has issued no binding AI-specific normative act.[21]

Senate approval 2024-12-10 · **Comprehensive statute** none (sourced negative) · as of 2026-08-27

CROSS-BORDER TRANSFER · ● IN FORCE · T1

LGPD Chapter V + Resolução CD/ANPD nº 19/2024 · EU–Brazil mutual adequacy

LGPD Arts. 33–36, implemented by Resolução CD/ANPD nº 19/2024, operationalize five transfer mechanisms (adequacy; ANPD standard contractual clauses; equivalent foreign clauses; specific clauses with prior ANPD approval; global corporate rules) — not an exhaustive statement of LGPD Art. 33, which also includes grounds such as international legal cooperation, protection of life or physical safety, ANPD authorization, public-policy grounds, and specific consent. **EU–Brazil mutual adequacy was adopted 26 Jan 2026** (Commission Implementing Decision (EU) 2026/179, published OJ L 28 Jan 2026, read from the OJ text; ANPD Resolução nº 32/2026 recognizing the EU) — Brazil is now inside a reciprocal free-flow area with the EU.[22]

EU adequacy adopted 2026-01-26 · **SCC grace ended** 2025-08-23 · as of 2026-08-27

DATA LOCALIZATION · ● IN FORCE · T1

No general localization mandate (transfer-regime model)

No broad or general personal-data localization mandate. Brazil regulates outbound flows through the LGPD Chapter V transfer-mechanism regime rather than by requiring in-country storage. This covers the general regime only — sector overlays (notably Banco Central cloud / outsourcing rules) were not verified.[23]

scope: general regime · confidence: medium · as of 2026-08-27

SOURCES AND AUTHORITIES — BRAZIL

20. Lei Geral de Proteção de Dados Pessoais, Lei nº 13.709/2018, arts. 3, 52–54 (in force 18 Sep 2020; sanctions from 1 Aug 2021). Presidência da República, Planalto. https://www.planalto.gov.br/ccivil_03/_ato2015-2018/2018/lei/l13709.htm (as of 20 July 2026).
21. PL nº 2338/2023 (Marco Legal da IA), approved by the Federal Senate 10 Dec 2024, before the Chamber of Deputies (Special Commission). Câmara dos Deputados, tramitação. https://www.camara.leg.br/proposicoesWeb/fichadetramitacao?idProposicao=2487262 (as of 20 July 2026).
22. LGPD arts. 33–36; Resolução CD/ANPD nº 19/2024; Commission Implementing Decision (EU) 2026/179 (adopted 26 Jan 2026); Resolução CD/ANPD nº 32/2026. European Commission, *Adequacy decisions*. https://commission.europa.eu/law/law-topic/data-protection/international-dimension-data-protection/adequacy-decisions_en (live-reverified 23 July 2026).
23. No general localization mandate; LGPD ch. V (arts. 33–36) transfer regime. ANPD, *Transferência Internacional de Dados*. https://www.gov.br/anpd/pt-br/assuntos/assuntos-internacionais/transferencia-internacional-de-dados (as of 20 July 2026).

LAYER 1.5 · OPERATIONAL ORIENTATION — WHO SHOULD LOOK, NOT LEGAL ADVICE

APPLIES TO Processing carried out in Brazil or targeting individuals in Brazil (LGPD territorial scope) · REGULATORS ANPD · NEXT none dated — PL 2338/2023 pending in the Chamber · Active

07 India

ANCHOR · IN

DATA PROTECTION — ● IN FORCE · PHASED — T0

Digital Personal Data Protection Act, 2023 (No. 22 of 2023) + DPDP Rules, 2025 (G.S.R. 846(E))

The Act received assent on 11 Aug 2023 but commences section-by-section by notification (s.1(2)) — it had no operative provisions on assent. The DPDP Rules 2025 phase in: rules 1, 2, 17–21 on publication (gazette dated 13 Nov 2025); rule 4 (Consent Managers) one year later; and rules 3, 5–16, 22, 23 (notice, consent, security, breach notification, children's data, SDF duties, data-principal rights, cross-border transfer) eighteen months later. Extraterritorial (s.3(b)); penalties up to ₹250 crore (Schedule) — enacted, not yet operational.[24]

Assent 2023-08-11 | **Rules phase I** 2025-11-13 | as of 2026-08-27

Enacted — not in force (substantive core). The compliance core is enacted-not-in-force until **~13 May 2027**. Assent (11 Aug 2023) is not entry into force. The G.S.R. 843(E) gazette on file carries both dates (notified 13 Nov 2025; e-published 14 Nov 2025), shifting downstream phase dates by a day — we publish the range (Consent Manager ~13/14 Nov 2026; substantive core ~13/14 May 2027) until counsel selects the controlling publication date.

AI REGULATION — ● IN FORCE — T0

No comprehensive AI statute · AI Governance Guidelines (soft-law) + binding synthetic-media rules in IT Rules 2021

No comprehensive, cross-sector AI statute — MeitY's framework places new AI laws in the long-term column; its voluntary measures are "not legally binding." The India AI Governance Guidelines (seven "sutras") are soft law. But **binding** synthetic-media obligations exist at the intermediary layer: IT Rules 2021 r. 3(3), inserted by G.S.R. 120(E) dated 10 Feb 2026, requires covered intermediaries to deploy reasonable and appropriate technical measures against unlawful SGI and to prominently label other covered SGI and, to the extent technically feasible, embed permanent metadata or another appropriate technical provenance mechanism.[25]

SGI amendment notified 2026-02-10 | **Comprehensive statute** none (sourced negative) | as of 2026-08-27

CROSS-BORDER TRANSFER — ● ENACTED · NOT IN FORCE — T0

DPDP Act s.16 + DPDP Rule 15 (permissive-default / blacklist model — not yet operative)

Neither s.16 nor Rule 15 is in force: G.S.R. 843(E) places ss.3–17 — s.16 included — and Rule 15 in the eighteen-month tranche, commencing ≈13/14 May 2027 (controlling date with counsel); until then, not operative law. Once live: permissive-default (negative-list), not adequacy or SCC — s.16(1) lets the Central Government restrict transfer to notified countries.[26]

ss.3–17 + Rule 15 ≈2027-05-13/14 (enacted-not-in-force) | confidence: high | as of 2026-08-28

DATA LOCALIZATION — ● IN FORCE — T0

Sectoral — RBI payments-data directive; CERT-In log-retention; prospective DPDP Rule 13(4)

Sectoral localization, with no economy-wide personal-data mandate. **Payments:** the RBI directive of 6 Apr 2018 requires "the entire data relating to payment systems … stored in a system only in India." **Cybersecurity logs:** CERT-In directions (28 Apr 2022) require ICT system logs to be maintained for a rolling 180 days "within the Indian jurisdiction." **Prospective:** DPDP Rule 13(4) will let the Central Government bar specified Significant-Data-Fiduciary data from leaving India — but Rule 13 is in the 18-month tranche (effective ~13 May 2027) with no specifying notification yet.[27]

RBI directive 2018-04-06 | **CERT-In** 2022-04-28 | as of 2026-08-27

SOURCES AND AUTHORITIES — INDIA

24. Digital Personal Data Protection Act, 2023 (No. 22 of 2023), ss. 1(2), 3, Schedule; DPDP Rules, 2025 (G.S.R. 846(E)), rr. 1–4, 15. Ministry of Electronics & IT (MeitY). https://www.meity.gov.in/static/uploads/2024/06/2bf1f0e9f04e6fb4f8fef35e82c42aa5.pdf (as of 20 July 2026).
25. India AI Governance Guidelines (MeitY, non-binding); IT (Intermediary Guidelines) Rules 2021, rr. 2(1)(wa), 3(3), inserted by G.S.R. 120(E) (10 Feb 2026). MeitY. https://www.meity.gov.in/static/uploads/2026/02/550681ab908f8afb135b0ad42816a1c9.pdf (as of 20 July 2026). Notification date (10 Feb 2026) is the solid anchor; a reported 20 Feb 2026 in-force date is unconfirmed.
26. G.S.R. 843(E), Gazette of India Extraordinary, Pt. II §3(i), serial 7592 (notified 13 Nov 2025; e-published 14 Nov 2025) — the 18-month tranche names ss.11–17, s.16 included; read from the gazette, on file. DPDP Rules, 2025, r. 15 (same tranche), Gazette serial 7596 (as of 28 Aug 2026).
27. RBI Directive DPSS.CO.OD No. 2785 (6 Apr 2018); CERT-In Directions No. 20(3)/2022, dir. (iv) (28 Apr 2022); DPDP Rules, 2025, r. 13(4). Reserve Bank of India. https://www.rbi.org.in/Scripts/NotificationUser.aspx?Id=11244&Mode=0 (as of 20 July 2026).

LAYER 1.5 · OPERATIONAL ORIENTATION — WHO SHOULD LOOK, NOT LEGAL ADVICE

APPLIES TO Digital personal data processing with extraterritorial reach (s.3(b)); substantive fiduciary obligations arrive with the ≈May 2027 tranche · REGULATORS MeitY (Rules) · Data Protection Board (under the Act) · NEXT ≈2027-05-13/14 — substantive tranche (ss.3–17, Rules 3, 5–16, 22, 23) · Active

08 South Korea

ANCHOR · REPUBLIC OF KOREA

DATA PROTECTION · IN FORCE · T0

Personal Information Protection Act (PIPA), as amended 2026

Base PIPA is in force. A 2026 amendment (promulgated 10 Mar 2026, applies from 11 Sep 2026, with mandatory ISMS-P certification deferred to 1 Jul 2027) adds an aggravated penalty tier of up to 10% of total turnover (Art. 64-2(2)) atop the existing 3% tier — both subject to the statutory turnover-calculation and deduction rules — plus express representative-director (CEO) accountability. Enforced by the Personal Information Protection Commission (PIPC).[28]

Promulgated 2026-03-10 | **Applies from** 2026-09-11 | confidence: high | as of 2026-08-28

Enacted — not in force (amendment). Promulgation (10 Mar 2026) is not application (11 Sep 2026). Amendment dates and the Art. 64-2 penalty structure are verified against the Korean statutory text (official law.go.kr PDF, retrieved 28 Aug 2026): the 10% aggravated tier is tagged ‹신설 2026. 3. 10.›, effective 2026-09-11. PIPA penalty ceilings belong to PIPA and are not conflated with the AI Basic Act's KRW 30m fines.

AI REGULATION · IN FORCE · T1

Framework Act on the Development of AI and Establishment of Trust (AI Basic Act), Act No. 20676

A comprehensive horizontal AI statute — alongside the EU AI Act, one of the comprehensive regimes examined in this brief. **In force since 22 Jan 2026** (one year after promulgation on 21 Jan 2025), together with its Enforcement Decree. Its risk model covers "high-impact AI" (healthcare, hiring, biometrics, and more), generative-AI transparency and labeling, and "high-performance AI" — triggered not by compute alone: the Decree requires >10^{26} FLOPs training compute, state-of-the-art technology, *and* broad, significant fundamental-rights risk, together. It reaches extraterritorially over foreign operators affecting Korean users, with a domestic-representative duty above defined thresholds. Administrative fines up to KRW 30 million.[29]

In force 2026-01-22 | **Promulgated** 2025-01-21 | as of 2026-08-27

Enforcement grace, not suspension. MSIT is operating a ≥1-year enforcement grace period through 2026 — forbearance, not suspension; the obligations are legally live. Certain deferred provisions (Act No. 21311 Addendum) commence 21 Jul 2026; the core in-force date is unaffected.

CROSS-BORDER TRANSFER · IN FORCE · T0

PIPA outbound-transfer regime (consent · adequacy · certification · statutory grounds)

Outbound transfer is permitted where (i) the data subject gives separate specific consent, (ii) the PIPC recognizes the destination as ensuring an equivalent level of protection (adequacy), (iii) the recipient holds PIPC-recognized certification (ISMS-P), or (iv) other statutory grounds apply (law; treaty; certain contract-performance or storage arrangements) — so "consent-default" would overstate consent's role. The PIPC issued its **first adequacy recognition — covering the EU/EEA — on 3 Sep 2025**. Korea also holds inbound EU adequacy (live-confirmed on the Commission adequacy page). SCCs and BCRs are only *proposed* under Korean law and are not yet available mechanisms.[30]

PIPC EU adequacy recognition 2025-09-03 | confidence: high | as of 2026-08-28

DATA LOCALIZATION · PUBLISHED GAP

Genuinely unknown. DLA Piper finds no explicit general PIPA localization mandate, but the sector position — financial-sector data residency, the CSAP cloud-security assurance program for public procurement, and high-precision geospatial / mapping export restrictions — was not verified this pass; an unsourced "none" is published as a gap, not asserted.

SOURCES AND AUTHORITIES — SOUTH KOREA

28. Personal Information Protection Act (PIPA), art. 64-2 (as amended; 2026 amendment promulgated 10 Mar 2026, applies 11 Sep 2026). DLA Piper, *Data Protection Laws of the World — Republic of Korea*. https://www.dlapiperdataprotection.com/index.html?t=law&c=KR (as of 20 July 2026). Penalty structure verified against the Korean statutory text 28 Aug 2026 (law.go.kr PDF on file: 3%-of-total base; aggravated 10%-of-total tier ‹신설 2026-03-10›, eff. 2026-09-11).
29. Framework Act on the Development of Artificial Intelligence and Establishment of Trust (AI Basic Act), Act No. 20676, Addenda art. 1, arts. 30–35 (promulgated 21 Jan 2025; in force 22 Jan 2026). Korea Law Information Center, law.go.kr (as of 20 Jul 2026); in-force date confirmed by MSIT and US ITA.
30. PIPA cross-border provisions; PIPC first adequacy recognition (EU/EEA, 3 Sep 2025); inbound EU adequacy (Republic of Korea). DLA Piper, *Data Protection Laws of the World — Republic of Korea*. https://www.dlapiperdataprotection.com/index.html?t=law&c=KR (as of 23 July 2026). SCC/BCR mechanisms are proposed only.

LAYER 1.5 · OPERATIONAL ORIENTATION — WHO SHOULD LOOK, NOT LEGAL ADVICE

APPLIES TO PIPA-covered processors; the AI Basic Act reaches foreign operators affecting Korean users (domestic-representative duty above thresholds) · REGULATORS PIPC · MSIT · NEXT 2026-09-11 — PIPA amendment applies (10% total-turnover tier, CEO accountability) · Imminent

READ THESE WITH CARE

Regulatory watchlist — five claims tracked to resolution; one still open.

The load-bearing readings most exposed to a moving instrument or a source we could not take all the way to primary text — published, not buried: what we say, what could change it, when we re-check. Four of the five have since been tracked to resolution — each by going to the primary. Verify against the primary at the moment of reliance.

1 The EU AI Act's high-risk deferral — flagged here in edition 1; resolved one day after its cutoff.

Edition 1 flagged that the 2 Dec 2027 / 2 Aug 2028 high-risk dates rested on an amendment agreed but unpublished. **That resolved one day after the edition-1 cutoff**: Reg. (EU) 2026/1744, OJ 24 Jul, consolidated into the AI Act from 27 Jul 2026 — the deferred dates are operative. Kept as the proof case.

HEDGE CLOSED — in force (OJ L 24 Jul 2026); the profile now states it.

2 China CSL vs PIPL penalty separation — flagged in edition 1; read from the consolidated statute on 28 Aug 2026.

Specified fixed-amount penalties under CSL Arts. 61(3) and 69(2) reach RMB 10 million (other CSL penalties are multiples of unlawful income or procurement amounts); PIPL's up-to-CNY-50m / 5%-of-turnover ceiling belongs to PIPL alone.

RESOLVED — from the consolidated CSL (on file): fixed-amount penalties reach ¥10m (Arts. 61(3), 69(2)); other penalties are multiples of unlawful income or procurement amounts (Arts. 63, 67); no turnover-percentage penalty. The ¥50m / 5% ceiling is PIPL Art. 66 alone.

CHANGE TRIGGER consolidated CSL read 28 Aug 2026 — done **EXPECTED** — **RE-CHECK** next CSL amendment

3 India DPDP Rules publication date — 13 vs 14 November 2025.

The gazette carries both dates (notified 13 Nov; e-published 14 Nov 2025) — a one-day gap shifting both phase dates (~13/14 Nov 2026; ~13/14 May 2027).

EVIDENCE COMPLETE; DECISION WITH COUNSEL — gazette on file; the dataset holds the range until counsel picks the controlling date.

CHANGE TRIGGER counsel selecting the controlling Official Gazette date

EXPECTED before the ≈May 2027 tranche

RE-CHECK before edition 3

4 South Korea PIPA 2026 penalty tiers — tracker-sourced in edition 1; read from the statute on 28 Aug 2026.

The 10%-of-turnover PIPA tier (Art. 64-2(2), applying 11 Sep 2026 — the application date, CEO accountability, Jul-2027 ISMS-P since confirmed vs the PIPC release) and the AI Basic Act's KRW 30m fine were not read against Korean statutory text.

RESOLVED (PIPA) — the official law.go.kr statute PDF (retrieved 28 Aug 2026, on file) shows the 3%-of-total base, the unrelated-revenue deduction (the mechanism secondary summaries render as "relevant turnover"), and the aggravated ≤10%-of-total tier inserted 2026-03-10, effective 2026-09-11. AI-Act ceilings held separate; KRW 30m stays MSIT-sourced.

CHANGE TRIGGER PIPC enforcement practice once the tier applies

EXPECTED 2026-09-11

RE-CHECK after 11 Sep 2026 (statutory text verified 2026-08-28)

5 UK EU-adequacy specifics — flagged in edition 1; read from the decision text on 28 Aug 2026.

Edition 1 tracker-sourced (T2) the 2031 sunset and the immigration-scope extension. **Both now read from Decision (EU) 2025/2574 itself** (OJ L 23 Dec 2025, on file): expiry 27 Dec 2031 (Art. 2); immigration exclusion repealed (Art. 1). (Brazil likewise closed: Decision 2026/179, OJ 28 Jan 2026; no sunset.)

RESOLVED — decisions on file (_sources), quoted from the operative articles; re-check at the 2031 review or on CJEU challenge.

One question, eight answers — where each transfer regime sits.

The matrix compresses eight very different regimes into one transfer column and one localization column. This page decompresses them: a posture spectrum, one hedged placement per anchor, and the ten questions that decide any cross-border movement.

	Permissive / accountability	Contractual safeguards	Adequacy / recognition	Filing / certification	Government assessment	Local-storage elements
United States	No omnibus outbound regime — with targeted DOJ Data Security Program restrictions on covered transactions in bulk sensitive personal data and government-related data.					
Canada	Accountability-based: the transferring organization remains responsible; no adequacy gate.					
India	Permissive-default negative list (s.16 + Rule 15) — **enacted, not in force until ≈May 2027**; no restricted-country notification located.					
Brazil	Res. 19 mechanisms (adequacy · clauses · corporate rules) plus further LGPD Art. 33 grounds; EU–Brazil mutual adequacy since Jan 2026.					
United Kingdom	Transfer-test regime (IDTA / addendum) with EU adequacy renewed Dec 2025.					
European Union	Chapter V: adequacy decisions, SCCs, BCRs, derogations — the reference model for the adequacy web.					
South Korea	Consent · adequacy recognition · certification · statutory grounds; first adequacy recognition (EU/EEA) Sep 2025.					
China	Authorization- and threshold-based: CAC security assessment / standard contract / certification by cumulative annual export volume — plus PI localization for CIIOs and above-threshold handlers.					

Ten questions before any cross-border movement

1. Is personal, sensitive, important, government, or sector-regulated data involved?
2. Is the movement legally a *transfer*, remote access, onward transfer, or merely storage?
3. Is the destination adequate or otherwise recognized?
4. Is a contract (SCCs / standard contract / clauses) sufficient?
5. Is certification available — and recognized by the relevant regulator?
6. Is an impact or security assessment required first?
7. Is regulator filing or approval required?
8. Does an exemption or derogation apply?
9. Must a copy remain locally even if transfer is permitted?
10. Do procurement or customer-contract restrictions exceed the legal minimum?

Descriptive orientation — the placements compress regimes the profile pages state precisely; the questions are jurisdiction-neutral. Verify against the profile and its cited authority at the moment of reliance.

DIRECTIONAL — LOWER EVIDENTIARY BAR, STILL CHECKABLE

The world broadly agrees on data protection and is still arguing about AI.

This layer gives breadth without the tail risk. This layer avoids detailed legal requirements, penalties, and sanctions for named jurisdictions outside the anchor set. Limited instrument-status and commencement facts appear only where individually verified, sourced, and dated; otherwise the discussion remains deliberately qualitative.

The shape of the field

Data-protection and privacy legislation is now the global norm rather than the exception: UNCTAD's Global Cyberlaw Tracker records data-protection and privacy legislation in force in **79% of the 195 economies it tracks** (155 of 195; 2.6% draft, 16.9% none — UN Trade and Development, Global Cyberlaw Tracker, unctad.org, updated 24 June 2026; verified against the tracker's own dataset), and the count is still rising. Regional spread runs from 98% of developed economies to 57% of least-developed countries.

Against that mature baseline, **binding AI-specific law is early and uneven.** As of mid-2026 only a small number of jurisdictions have a comprehensive, horizontal AI statute actually in force — defining that narrowly as national or supranational, cross-sector AI legislation currently operative — and the European Union (phased) and South Korea are the two clearest examples verified in Layer 1. The cohort is growing beyond the anchors: Vietnam's Law No. 134/2025/QH15 — a comprehensive, risk-tiered statute — passed 10 Dec 2025 and entered into force 1 Mar 2026 (official government instrument record for a National Assembly law; individually verified for this edition, 29 Aug 2026). Most economies, though, still sit in one of three postures.

Three postures on AI

● GOVERN VIA EXISTING LAW

The majority posture — no comprehensive AI statute; AI is governed at the point of use through data-protection, consumer, sectoral and content rules. Includes the UK, the US (federal), China (a stack of binding but service-specific measures), India, Canada and, today, Brazil.

○ BILL IN PASSAGE

A comprehensive AI bill in passage or stalled — e.g. Brazil's PL 2338/2023 (passed the Senate, pending in the Chamber). These create no obligations until and unless enacted.

● FAILED / WITHDRAWN

A failed or withdrawn comprehensive attempt — e.g. Canada, where the AI and Data Act died with Bill C-27, and the UK, where the Private Member's AI (Regulation) Bill fell at prorogation of the 2024–26 session.

Directions of travel — characterized, not scored

Data protection is still tightening.

New or amended comprehensive laws, higher penalty ceilings, and expanded regulator powers keep appearing — South Korea's move toward a 10%-of-turnover tier; India's phased DPDP rollout; Brazil elevating its regulator to full agency status. The baseline moves upward almost everywhere.

AI regulation is genuinely two-signed.

The EU built the first comprehensive AI statute, then deferred its central high-risk obligations by roughly sixteen months; the US federal executive is deregulatory and seeks to preempt state AI laws while those state laws tighten. Tightening and loosening often run at once in one jurisdiction — the calendar loosens while the substantive baseline tightens.

Cross-border flow is consolidating.

Adequacy / free-flow blocs widen on one axis (the EU–Brazil mutual adequacy of January 2026 joins the UK, US-via-DPF, Korea, Canada-commercial and others) while jurisdictions such as China run an authorization- and threshold-based outbound-data regime. The picture is not "open vs closed" but a patchwork of interoperating adequacy areas alongside authorization regimes.

Three instruments worth naming — as events, not alignments.

Named here at the directional level as events and memberships only. We characterize neither bloc's purpose, and we do not assert any specific state's membership that was not primary-verified. Per-country signature or membership status is a checkable fact that must be confirmed against the treaty office or the issuing release before a country is named.

Council of Europe Framework Convention on AI (CETS No. 225)

OPENED FOR SIGNATURE 5 SEP 2024 · EU RATIFIED 15 MAY 2026 · NOT YET IN FORCE (AS OF 27 AUG 2026)

Category treaty **Binding** after ratification + entry into force — not yet met

Corporate obligations none direct; runs to states **Depends on** Art. 30 threshold, then domestic implementation

Read as rights-based treaty framework

The first legally binding international treaty on AI — a description of the instrument's nature, not proof it is operative. **As of 27 Aug 2026 it had not entered into force**: Art. 30 requires consent from five signatories including at least three Council of Europe member states, and the CoE's treaty roster lists the European Union as the sole Party. It is open to non-member states as well as Council of Europe members. This brief names no individual country's signature or ratification status: that is a checkable fact, and the CoE Treaty Office chart is the place to check it at the moment of reliance.

World AI Cooperation Organization (WAICO)

ESTABLISHED 16 JUL 2026 · HEADQUARTERED IN SHANGHAI

Category intergovernmental organization (founding agreement)

Binding founding agreement signed; entry-into-force mechanics not assessed in this brief

Corporate obligations none direct **Depends on** organizational build-out **Read as** membership-based cooperation body

An intergovernmental body established by a group of signatory states, headquartered in Shanghai. Membership is reported via state media and wire services; this brief records the founding event and date only and names no individual members — confirm any membership claim against official announcements.

US-led Joint Statement on AI Opportunity

SIGNED AT THE SECOND PAX SILICA SUMMIT, WASHINGTON, D.C., JUNE 2026

Category joint statement / coalition declaration **Binding** no **Corporate obligations** none **Depends on** —

Read as non-binding joint statement

Signed by the United States and a group of economies. The authoritative roster is the US State Department's release — which lists the European Union itself among the signatories, alongside several European states individually; this brief names no further individual signatories.

Why memberships only

Signature and ratification rosters are exactly the per-country specifics that go stale and that a motivated reader audits first. We name the instrument, its founding event, and its date — all verifiable — and stop there. The dot on the map for any single country belongs only where that membership has been read against the source.

READING AIDS

Terms that do the work — and how the anchors were chosen.

The vocabulary this field routinely blends, separated — because most of the errors this report exists to prevent begin as a confusion between two of these terms.

Enacted · in force · applies · as-of. Four different dates, never blended — the discipline behind every cell (see "One controlled state-space").

Provider vs deployer (AI). The party that develops or places an AI system on the market vs the party using it under its own authority — obligations differ sharply.

High-risk · high-impact · high-performance. Regime-specific terms of art: EU AI Act risk tiers; Korea's high-impact domains; Korea's three-condition high-performance trigger. Not interchangeable.

Adequacy decision. A jurisdiction's formal recognition that another's protection is essentially equivalent, permitting transfers without further safeguards.

Transfer vs residency vs localization vs sovereignty. Moving data across a border; where it is stored as a matter of practice or contract; a legal duty to store it in-country; and jurisdiction-control claims over it. A lawful transfer can coexist with a customer contract, procurement rule, or architecture decision that still keeps data in-region.

Extraterritorial application. A regime reaching actors outside its territory — by targeting, monitoring, effects, or (Korea's AI Act) affecting local users.

Controller / processor / fiduciary. The party deciding purposes and means; the party processing on its behalf; India's term for the controller role (data fiduciary).

Automated decision-making. Decisions producing legal or similarly significant effects made without meaningful human involvement; several regimes attach notice, explanation, or review rights.

GPAI / foundation model. General-purpose AI — models serving many downstream uses; the EU regulates them as a separate horizontal layer.

SCCs / BCRs. Standard contractual clauses between parties; binding corporate rules inside a group — contractual transfer safeguards.

Soft law vs mandatory standard. Guidance and voluntary frameworks bind no one directly; a mandatory technical standard (e.g. China's GB 45438 labeling standard) binds like regulation.

Instrument hierarchy. Statute → implementing regulation / rules → binding administrative measure → regulator decision → official guidance → voluntary framework. Executive orders and mandatory technical standards sit beside this ladder and bind differently — which is why "in force" alone never says who is bound, or how hard.

Why these eight jurisdictions

The anchors were chosen at commissioning as major commercial markets spanning distinct regulatory models — the EU's comprehensive tiering, the US patchwork, China's authorization regime, common-law accountability models, and both mature and newly operative AI statutes — subject to one hard constraint: availability of source material we could verify to this report's standard. They are *not* a ranking of the eight most regulated or most important jurisdictions, and the set is expected to widen only as fast as verification capacity allows.

What we verified, what we excluded, and where we stopped.

How the dataset was built

The Layer-1 core was built by filtering and correcting a prior verified corpus, anchoring each cell to the strongest source we could read — the primary instrument for T0 cells, official or institutional sources for T1, identified secondary authorities for T2 — and re-confirming six load-bearing facts live against the primary or regulator source on the build date (23 July 2026). An independent verification pass re-checked the full matrix through 27 August 2026, and primary-source retrievals on 28 August 2026 lifted further cells to T0; the corrections are recorded in the revision record. Anything that could not clear the bar was demoted to Layer-2 directional narrative or published as a gap.

Of 32 anchor × dimension records, **30 survived Layer-1 verification** (14 at T0, 10 at T1, 6 at T2). Status split: 26 in force · 1 proposed · 2 withdrawn · 1 enacted-not-in-force (plus the 2 published gaps). Five in-force records additionally carry a distinct future tranche flagged as *enacted — not in force*.

What we excluded from scope

The public edition is built on the four dimensions that *are* the subject and *are* sourceable: data protection, AI-specific regulation, cross-border transfer, and localization. Sanctions, export controls, anti-bribery, IP, tax, employment, cloud regions, rule-of-law and corruption were not comprehensively surveyed — they are not the subject of an AI-and-data report, are the least sourceable, and are where a compliance review concentrates its blocking flags.

Only the eight anchor jurisdictions are carried at Layer 1. Every other jurisdiction appears — if at all — only in the Layer-2 directional narrative, never as a per-jurisdiction legal claim.

The two published gaps

EU — localization. There is no general EU-level personal-data localization mandate under GDPR, but this was not affirmatively sourced this pass, and a "none" finding requires positive evidence rather than inference from the existence of transfer mechanisms. Published as a gap.

South Korea — localization. Genuinely unknown. No explicit general PIPA localization mandate was found, but the sector position (financial residency, the CSAP cloud program, geospatial export rules) was unverified. An unsourced "none" is a gap, not a claim.

Standing discipline

- Four separate date fields on every instrument — a blank field means not-applicable or not-separately-verified, never a conflation.
- Controlled status vocabulary held without drift; "no comprehensive statute" carried as a separate sourced-negative field, not blurred into status.
- No cross-instrument figure import — every penalty stays with its own statute.
- Negative claims carry a source or become a published gap.
- Unreachable ≠ nonexistent — a source blocked on the build date is recorded as a reachability artifact, not evidence of absence.
- Tracker-sourced (T2) claims are flagged and capped at medium confidence.

One reachability note, published honestly

On the original build date, India's PIB portal (pib.gov.in, press release PRID 2190655) returned an HTTP 403 to automated retrieval — an automation artifact, not a gap in the law. For edition 2 the releases and the underlying Gazette texts were retrieved by hand (28 Aug 2026) and preserved in the dataset's source archive. The distinction the note existed to hold — *unreachable is not nonexistent* — held: the sources were there.

BIBLIOGRAPHY

Sources and authorities.

Every Layer-1 cell traces to a source below — primary instruments where we read them (T0), official or institutional sources (T1), and identified secondary authorities, flagged (T2). Legal instruments are cited in simplified Bluebook form; each carries the as-of access date on which it was read. Full per-cell footnotes appear on each jurisdiction profile.

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2. Regulation (EU) 2024/1689 (AI Act), arts. 5, 50, 113, ch. V. EC, Regulatory framework for AI. digital-strategy.ec.europa.eu (23 Jul 2026). Am. Regulation (EU) 2026/1744, OJ L 24 Jul 2026 (EUR-Lex).
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China

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ANNEX · CANDIDATE JURISDICTIONS

On the radar — jurisdictions not in this edition.

Eight anchors is a verification budget, not a worldview. The jurisdictions below are candidates for future editions: each fact here is individually verified, sourced, and dated — but none of these countries has been through full Layer-1 primary verification, so no profile, matrix row, or per-cell claim exists for them yet. Source materials for the first five sit in the DataExos research archive, retrieved July 2026; Vietnam rests on the official government instrument record cited in Layer 2.

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Promotion to anchor status requires what the anchors received: primary-instrument verification, the four-date discipline, per-cell sourcing, and an independent check. Until then these remain directional facts — accurate, dated, and deliberately shallow.

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