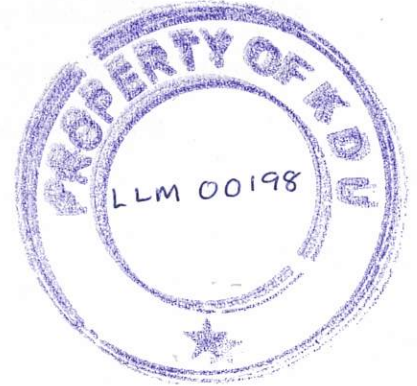


Faculty of Graduate Studies

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**COMPARATIVE ANALYSIS OF THE DATA
PROTECTION LAWS IN SRI LANKA AND THE UK
AND EU: KEY ANALYTICAL DIFFERENCES AND
SIMILARITIES**

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ABSTRACT

This research examines and contrasts the data protection laws in Sri Lanka, the United Kingdom (UK), and the European Union (EU). The study aims to identify key differences and similarities in the legal frameworks governing data protection in these regions. By analyzing legislative texts, regulatory practices, and enforcement mechanisms, the research highlights how each jurisdiction addresses privacy rights, data processing, and data subject rights. The analysis reveals that while the EU's General Data Protection Regulation (GDPR) sets a high standard for data protection with its comprehensive and stringent measures, the UK's post-Brexit data protection regime largely mirrors the GDPR with some modifications. In contrast, Sri Lanka's data protection legislation is relatively nascent and evolving, influenced by both international standards and local needs. This comparative analysis provides insights into the effectiveness, adaptability, and challenges of data protection laws across different legal and cultural contexts, offering recommendations for harmonizing and enhancing data protection practices globally.