

Digital Sovereignty and Data Protection in the 21st Century.

A Comparative Study of Regulatory Frameworks in the European Union and the United States.

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Focus on the "Why" and "What." This research examines the divergent approaches to data privacy between the EU's General Data Protection Regulation (GDPR) and the sector-specific regulatory environment of the US. By comparing legislative intent, enforcement mechanisms, and the definition of "privacy as a right" versus "privacy as a consumer interest," this study highlights the geopolitical implications of digital governance.

Keywords:

digital privacy, data, governance

Published: 16 April 2026

Introduction

- 1. **Context:** The rise of the "Surveillance Economy" and the necessity of state intervention.
- 2. **Problem Statement:** While both regions value privacy, their legal philosophies differ fundamentally, leading to international trade friction and varying levels of citizen protection.
- 3. **Argument:** The EU's "rights-based" approach creates a global gold standard (The Brussels Effect), whereas the US "market-based" approach prioritizes innovation but results in a fragmented legal landscape.

State	Population	m/f ratio
Odisha	1000000	45%
Asam	200000	35%

Research Ques & Method

Research QueStions: 1. How do the legal definitions of "personal data" differ between the EU and the US? 2. To what extent does the GDPR influence American state-level legislation (e.g., California's CCPA)?

- **Methodology:** This study employs a Qualitative Comparative Analysis (QCA), reviewing primary legal texts, judicial rulings (such as the Schrems II case), and policy reports from 2018 to 2024.

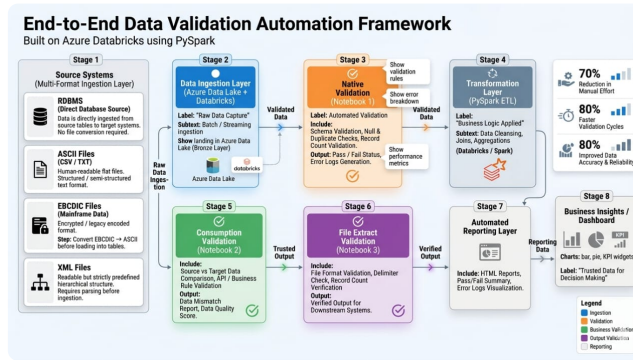


Figure 1

Results & Discussion

Feature	European Union (GDPR)	United States
Philosophical Base	Privacy as a Fundamental Human Right.	Privacy as a Contractual/Consumer Right.
Regulation Style	Comprehensive/Omnibus.	Sectoral (HIPAA, GLBA, etc.).
Consent	Opt-in (Explicit).	Opt-out (Implicit/Varies).
Enforcement	Data Protection Authorities (DPAs).	Federal Trade Commission (FTC) & State AGs.

References

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