Categories		Categories	India				US			UK							
	Framework		Vertical				Vertical				Horizonta	al	Vertical				
	Type of claim or issues covered		Non-Patent; Non-Copyright;	Copyright	Non-IP, Non- Criminal		Copyri	ght		All exc	ept privacy and	data protection	Defamation	Online Copyright Infringment			
Le Imm	Legal Instrument (providing Conditional Immunity or creating Additional Liability for Restriction of Content)		Section 79, Information Technology Act 2008	Ss.52(1)(b) and (c), The Copyright Act 2012 [2]	Section 230, Communications Decency Act 2012	Section 5	12, Digital Millenn	ium Copyright Ac	t 1996		ouncil Directive 2 d in UK legislatio Regulations 20	n as EC Directive	Defamation Act, Section 5(2)+ Schedule attached to Defamation (Operators of Websites) Rules, 2013	Digital Economy Act 2010 [9]			
D	Differentiation between intermediaries		No	No	No	Yes					Yes		No	No			
	Types of intermediaries (based on actions) eligible for exemption from liability		Transmitting, Hosting, Temporarily Storing	ISPs, Cable/DTH Providers, Information intermediaries	Interactive computer services	Transitory Network Communications	Caching	Hosting	Information Location Services	Mere Conduits Caching Hosting		Publisher [8[	Internet Service Providers				
		General Obligation to Monitor	No	No	No	No	No	No	No		No		No	No			
that	visions provide	Immunity from Voluntary Takedown	No	No	Yes	Yes	Yes	Yes	Yes		Not provid	led.	Yes.	N/A			
	litional . nunity	Broad Immunity	No	No [3]	Yes	Yes	No	No	No	No	No	No	No	No			
	-	Notice & Takedown (NTD)	Yes	Yes	No	No	Yes	Yes	Yes	No	Yes	Yes	Yes. In Schedule 1 attached to the Rules	No			
	-	Notice & Notice (NTN)	No	No	No	No	No	No	No	No	No	No	No	No			
Lia (Al	itional bility L) for	Executive Orders (EC)	Yes [1]	No	No	No	No	No	No	No No		No	No	Yes [10]			
of c	riction ontent related munity	Private Complaints (PC)	No	No	No	No	No	No	No	No	No	No	No	Yes [11]			
	Pi	rocedural criteria															
	& NTN z PC	Knowledge interpreted as actual or constructive	Yes. Actual Knowledge by affected person; and self obtained knowledge by intermediary	Yes. Actual Knowledge.	N/A	N/A	Yes. Actual Knowledge of removal of source / originating site	Yes. Actual and Constructive Knowledge (specific and identifiable)	Yes. Actual and Constructive Knowledge (specific and identifiable)	N/A	Yes. Actual Knowledge of removal/disabl ement of initial source	Yes. Constructive knowledge for damages. Actual knowledge for other than damages. (Article 19)	Yes. Actual knowledge	Yes. Actual knowledge.			
NTD 8		Prescribed persons with locus standi to bring forward notice	Yes. Affected person	Yes. Affected Person.	N/A	N/A	Yes. Person authorized to act on behalf of the rightsholder.	Yes. Person authorized to act on behalf of the rightsholder.	Yes. Person authorized to act on behalf of the rightsholder.	N/A	Not provided.	Not provided.	Yes. Affected person.	Yes Rightsholder.			
	& NTN PC	Notices funneled via an executive body	No	No	N/A	N/A	No	No	No	N/A	Not provided.	Not provided.	No	Yes. Secretary of State can seek blocking of access to internet and other technical measures.			
	& NTN z PC	Notices funneled via a judicial body	No	Yes. The complainant needs to produce order from the court.	N/A	N/A	No	No	No	N/A	Not provided.	Not provided.	N/A	Blocking injunction throgh court order and Secy			
	& NTN z PC	Required to take action upon receipt of notice	Yes. Acknowledge receipt within 36 hours.	Yes. Has to take measures to refrain from facilitating such access within 36 hours.	N/A	N/A	Yes. Expeditously.	Yes	Yes	No	No Yes Yes		Yes	Yes			
NTN 8	& NTD	Graduated Response Scheme	N/A	No	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	Yes. 'Initial obligations' and 'obligations to limit Internet access'			
	& NTD	Requirement for termination of user account for violations	Yes	No	N/A	N/A		Yes [4]		N/A	N/A	N/A	N/A	No			
1	NTD Time frame for removal of contested content		No	21 days or order from court, whichever is earlier.	N/A	N/A	N/A Remove expeditiously.		move Remove itiously.		Not provided.  Just expeditiously.  Not provided. Just expeditiously		48 hours after receiving notice, if operator cannot contact poster, if poster gives consent for removal.	N/A			

	Categories	India				US				UK							
NTN & NTD & AL	Time frame for forwarding notice from complainant	NA	Not provided.	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	48 hours after receiving notice. Poster gets a 5 day deadline to respond	1 Month after receiving CIR				
NTD	Prescribed level of proof for takedown	No	No	N/A	N/A	Yes. Only mere identification of the copyrighted work.	Yes. Only mere identification of the copyrighted work.	identification of	N/A	Not provided.	Not provided.	Serious harm threshold, truth, honest opinion and public interest threshold also established.	For denial of access to internet once the minimum threshold of Copyright infringment Reports have been filed, the factors under Section 17(3) must be fulfilled				
NTN & NTD & AL	Requirement to give a reasoned decision	No	Yes	N/A	N/A	No	No	No	N/A	Not provided.	Not provided.	All details of complaint notices are forwarded with all relevant details of complaint to posters prior to takedown.	Yes				
NTN & NTD Requirement to publish content of AL Requirement to publish content of AL Requirement to publish content of the AL Requirement to		Yes	N/A	N/A		No			NA	NA	NA	No	No				
NTD & NTN & PC	Signature of complainant	Yes	Not provided.	N/A	N/A	Yes	Yes	Yes	N/A	Not provided.	Not provided.	Yes	Yes				
NTD & NTN	Requirement to designate agent for handling notices	Yes. Grievance officer.	No	N/A	N/A	No	Yes. Designated Agent.	No	N/A	Not provided.	Not provided.	Not provided.	N/A				
NTD & NTN	Registration of the agent with government	No	No	N/A	N/A	NA	Yes	N/A	N/A	Not provided.	Not provided.	N/A	N/A				
NTD	Inform user of takedown	No	No	N/A	N/A	Yes. After takedown.	Yes. After takedown.	Yes. After takedown.	N/A	Not provided.	Not provided.	Yes. Consent taken or court decides.	User informed of notice, and is given all relevant details, such as details of alleged infringment, evidence gathered				
NTD	Uploader/creator of content is given opportunity to be heard	No	No	N/A	N/A	No	No	No	N/A	Not provided.	Not provided.	Yes. Consent or court decides	Yes, user is given grounds for appeal and also provided legal advice for current and future situations				
NTD	Counter notice and putback procedure including appeal to higher authority	No	In case the complainant fails to produce orders of the competent court having jurisdiction, the content may be restored.	N/A	N/A	Yes	Yes	Yes	N/A	N/A	N/A	N/A	Yes. User is informed of grounds of appeal as per Section 3. Moreover, the "obligations code" must have a due process for grounds of appeal as per section 13				
NTD	Time delay before putback	N/A	21 days	N/A	N/A	Yes. 10 to 14 days	Yes. 10 to 14 days	Yes. 10 to 14 days	N/A	Not provided.	Not provided.	N/A	N/A				
All	Requirement to publicly disclose data of takedowns or terminations	No	No	N/A	N/A	No	No	No	N/A	Not provided.	Not provided.	N/A	N/A				
NTD & PC	Requirement to retain removed/restricted information	Yes. 90 days.	Not provided	N/A	N/A	No	No	No	N/A	Not provided.	Not provided.	N/A	N/A				
NTD & NTN & PC	Mechanism to deal with frivolous complaints	No	No	N/A	N/A	Yes. Damages, including costs and attorneys' fees.	Yes. Damages, including costs and attorneys' fees.	Yes. Damages, including costs and attorneys' fees.	N/A	Not provided. National liability laws will apply.	Not provided. National liability laws will apply.	No	N/A. But, a cetain objective threshold minimum number of CIR's against same subscriber for ISP to be obligated to take action				
Criteria	around user information																
All	Logging of identification details	No	No	N/A	No	No	No	No	N/A	N/A	N/A	No	Yes				
	Logging of information accessed	No	No	N/A	No	No	No	No	N/A	N/A	N/A	No	Yes				
All	Sharing user information with private parties through requests or court orders	No	No	N/A	No	Yes. With copyright owners through subpoenas.	Yes. With individuals via court subpoenas.	Yes. With individuals via court subpoenas.	Yes. With competent public authorities.	Yes. With competent public authorities.	Yes. With competent public authorities.	No, unless consent is given by poster. Yes also Norwich Pharmacal actions.	Yes. See Section 3 i.e. Section 124A (8)(c) of Communications Act, 2003				
All	Sharing user information with law enforcement and or in the interest of national security	Yes with government agencies	No	No	No	No	No	No	Yes. With competent public authorities.	Yes. With competent public authorities.	Yes. With competent public authorities.	N/A	N/A				
All	Co-operation obligations including providing assistance for interception by government or its agents	No	No	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	No				

	Categories						South	ı Korea					Canada		Ch	ile		
Framework							Vei	rtical					Vertical	Vertical				
Type o	f claim or issues covered			Copyright			Non-IP (privacy, defamation, illegal information, etc)	Non-IP (illegal information)	Public Official Election	Obscene information	Child Pornography	IP	Copyright		Copyright			
Immunity or	Legal Instrument (providing Conditional Immunity or creating Additional Liability for Restriction of Content)				, Art.104 (special response), Co		Art.44-2 (NTD) & Art.44-7 (NTD), ICNA (Information and Communications Network Act)	Art.21, KCCA (Korea Communications Commissions Act)	Art.82-4, Public Official Election Act	Art 22-3, Telecommunic ations Business Act	Art 17, Act on the Protection of Children and Juveniles against Sexual Abuse		Section 31.1, Copyright Modernization Act 2012 [5]	Intellectual Property Law No. 17.336 (1970) + Law No. 20.435 (201			20.435 (2010)	
Differentia	ation between intermediaries			Yes			No	No	No	Yes. Only applies to special types of OSPs.	Yes. Special types of OSPs have more obligations.	Yes	Yes	Yes.				
	ermediaries (based on actions) for exemption from liability	Mere Conduits	Caching	Hosting	Information Location tools	Special Types of OSPs (Webhard, P2P)	All intermediaries	N/A	N/A	N/A	All intermediaries	Mail order brokers (e.g. eBay)	ISPs, Hosts, Caching, (Information Location Tools - injunctions only)	Transitory Network Communications	Caching	Hosting	Information Location Services	
	General Obligation to Monitor	No	No	No	No	Yes. Art.104 [12]	Yes. Art.44-2(3).	No	N/A	Yes [15]	Yes [16]	No	No	No	No	No	No	
Provisions that provide Conditional	Immunity from Voluntary Takedown	Not provided.	Not provided.	Not provided.	Not provided.	Not provided.	No. Art.44-3. Voluntary takedown is allowed without immunity.	N/A	N/A	N/A	Yes	Not provided.	N/A	N/A	N/A	N/A	N/A	
Immunity	Broad Immunity	Yes	Yes	Yes	Yes	Yes	No. Subject to court's discretion.	N/A	N/A	N/A	Yes	No. Only damages.	No	No	No	No	No	
	Notice & Takedown (NTD)	N/A	Yes	Yes	Yes	Yes	Yes, Art.44-2	N/A	N/A	N/A	N/A	N/A	N/A	No	No	No	No	
	Notice & Notice (NTN)	No	No	No	No	No	No	N/A	N/A	N/A	N/A	N/A	Yes	Yes	Yes	Yes	Yes	
Additional Liability (AL) for	Executive Orders (EC)	Yes. Art.133-2 and 133-3.	-	-	-	-	Yes. Art.44-7	Yes. Art.21	Yes. Art.82-4	N/A	N/A	N/A	No	No	No	No	No	
restriction of content not related to immunity	Private Complaints (PC)	N/A	N/A	N/A	N/A	Yes. Art.104	No	No	Yes. Art.82-4	N/A	Yes	N/A	No	No	No	No	No	
P	Procedural criteria																	
NTD & NTN & PC	Knowledge interpreted as actual or constructive	N/A	No	Yes. Actual Knowledge.	Yes. Actual Knowledge.	Yes. Actual Knowledge.	Yes. Actual knowledge.	Yes. Actual knowledge.	Yes. Actual knowledge.	N/A	Yes. Actual knowledge.	N/A	Yes. Actual Knowledge.	Yes. Actual Knowledge (specific and identifiable)	Yes. Actual Knowledge (specific and identifiable)	Yes. Actual Knowledge (specific and identifiable)	Yes. Actual Knowledge (specific and identifiable)	
NTD & NTN & PC	Prescribed persons with locus standi to bring forward notice	N/A	Yes. Rightsholder.	Yes. Rightsholder.	Yes. Rightsholder.	Yes. Rightsholder	Rightsholder under Art.44-2. KCC (Korea Communications Commission) & central administrative agencies under Art.44-7.	KCSC (Korea Communications Standards Commission)	Candidate or Election Commission	N/A	N/A	N/A	Yes. Copyright holder	Yes. Person authorised to act on behalf of the rightsholder.	Yes. Person authorised to act on behalf of the rightsholder.	Yes. Person authorised to act on behalf of the rightsholder.	Yes. Person authorised to act on behalf of the rightsholder.	
NTD & NTN & PC	Notices funneled via an executive body	N/A	No	No	No	No	Yes. Art.44-7.	Yes. KCSC (Korea Communications Standards Commission).	Yes. Election Commission.	N/A	N/A	N/A	N/A	No	No	No	No	
NTD & NTN & PC	Notices funneled via a judicial body	N/A	No	No	No	No	No	No	No	N/A	N/A	N/A	N/A	Yes	Yes	Yes	Yes	
NTD & NTN & PC	Required to take action upon receipt of notice	N/A	Yes	Yes	Yes	Yes	Yes	Yes	Yes	N/A	Yes	N/A	Yes	Yes	Yes	Yes	Yes	
NTN & NTD & AL	Graduated Response Scheme		Yes	. Art.133-2 &	133-3.		No	No	Yes. Art.256(3) [14]	N/A	N/A	Yes [17]	N/A	N/A	N/A	N/A	N/A	
NTN & NTD & AL	Requirement for termination of user account for violations		Yes. Subject	to intermedia	ry's policy. [13]		N/A	Breach of sound communication ethics.	Not provided.	N/A	N/A	N/A	No		No [19]		No	
NTD	Time frame for removal of contested content	N/A	"Immediately	"Immediately	"Immediately"	"Immediatel	"Immediately"	"Immediately"	"Immediately"	N/A	"Immediately"	N/A	N/A	Block.	Remove or block expeditiously.	Remove or block expeditiously.	Remove or block expeditiously.	

	Categories			South Korea						Canada	Chile						
NTN & NTD & AL	Time frame for forwarding notice from complainant	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	As soon as feasible	5 days	5 days	5 days	5 days
NTD	Prescribed level of proof for takedown	N/A	Yes. Only mere identification of the copyrighted work.	Yes. Only mere identification of the copyrighted work.	Yes. Only mere identification of the copyrighted work.	Yes. Only mere identificatio n of the copyrighted work.	Review of KCSC (Korea	Breach of sound communication ethics.	Information in violation of the Act.	N/A	Pornogrophy involving children as defined to be below 19 years of age. Art 2, Act on the Protection of Children and Juveniles against Sexual Abuse.	N/A	N/A	infringement,	Identification of infringed rights, rightsholder, form of infringement, infringing material, location	of infringement,	Identification of infringed rights, rightsholder, form of infringement, infringing material, location
NTN & NTD & AL	Requirement to give a reasoned decision	N/A	No	No	No	No	No	No	No	N/A	Child Pornography	N/A	No	No [18]	No	No	No
NTN & NTD & AL	Requirement to publish content policy	N/A	No	No	No	No	Yes, Art.44-2	No	No	N/A	Yes. Only special types of OSPs.	Yes. Must state that they are not sellers.	No	Yes	Yes*	Yes*	No
NTD & NTN & PC	Signature of complainant	N/A	Yes	Yes	Yes	Yes	Not provided by the law, subject to imtermediary's policy.	Not provided.	Yes	N/A	N/A	N/A	Yes	N/A	N/A	N/A	N/A
NTD & NTN	Requirement to designate agent for handling notices	N/A	Yes	Yes	Yes	Yes	Not provided by the law, subject to imtermediary's policy.	Not provided.	No	N/A	N/A	N/A	No	No.	No.	Yes	Yes
NTD & NTN	Registration of the agent with government	N/A	No	No	No	No	Not provided by the law, subject to imtermediary's policy.	Not provided.	No	N/A	N/A	N/A	No	N/A	N/A	No.	No.
NTD	Inform user of takedown	N/A	No	Yes. After takedown.	Yes. After takedown.	Yes. After takedown.	Yes. After takedown.	Not provided.	Not provided.	N/A	N/A	N/A	N/A, but if notice is not forwarded explanation has to be provided to complainant	No [19]	N/A	N/A	N/A
NTD	Uploader/creator of content is given opportunity to be heard	N/A	No	No	No	No	Not provided by the law, subject to intermediary's policy.	Not provided.	Not provided.	N/A	N/A	N/A	N/A	No	No	No	No
NTD	Counter notice and putback procedure including appeal to higher authority	N/A	Yes	Yes	Yes	Yes	Not provided by the law, subject to imtermediary's policy.	Yes	Yes	N/A	N/A	N/A	N/A	Yes	Yes	Yes	Yes
NTD	Time delay before putback	N/A	7 to 14 days	7 to 14 days	7 to 14 days	7 to 14 days	Not provided by the law, subject to imtermediary's policy.	15 days	Not provided.	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
All	Requirement to publicly disclose data of takedowns or terminations	N/A	No	No	No	No	No No	Yes	Not provided.	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
NTD & PC	Requirement to retain removed/restricted information	N/A	No	No	No	No	No	Yes	No	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
NTD & NTN & PC	Mechanism to deal with frivolous complaints	N/A	Yes. Damages.	Yes. Damages.	Yes. Damages.	Yes. Damages.	No	No	No	N/A	N/A	N/A	N/A		Yes [	20]	
Criteria	around user information																
All	Logging of identification details	No	No	No	No	No	No	No	No	No	No	No	6 months extendable to 1 year if proceedings commence. [6]	Yes	No	No	No
	Logging of information accessed	No	No	No	No	No	No	No	No	No	No	No	N/A	No	No	No	No
All	Sharing user information with private parties through requests or court orders	Yes. Art.103-3. Rightsholders may make requests to Minister of Culture, Sports and Tourism.			Minister of	Yes. Art.44-6. Rightsholders may make requests to KCSC (Korea Communications Standards Commission).	No	No	No	No	Yes. Must publish sellers' information.	Under very strict situations and must be determined by courts	No	Yes. With copyright owners through subpoenas.	Yes. With copyright owners through subpoenas.	Yes. With copyright owners through subpoenas.	
All	Sharing user information with law enforcement and or in the interest of national security	No	No	No	No	No	No	No	No	Yes. Art.83	No	No	N/A	N/A	N/A	N/A	N/A
All	Co-operation obligations including providing assistance for interception by government or its agents	No	No	No	No	No	No	No	No	No	No	No	N/A	N/A	N/A	N/A	N/A