

Categories		India		US					UK					
Framework		Vertical		Vertical					Horizontal			Vertical		
Type of claim or issues covered		Non-Patent; Non-Copyright;	Copyright	Non-IP, Non-Criminal	Copyright				All except privacy and data protection			Defamation	Online Copyright Infringement	
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 512, Digital Millennium Copyright Act 1996				Council Directive 2000/31/EC (Enacted in UK legislation as EC Directive Regulations 2002) [7]			Defamation Act, Section 5(2)+ Schedule attached to Defamation (Operators of Websites) Rules, 2013	Digital Economy Act 2010 [9]	
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	
Provisions that provide Conditional Immunity	<i>General Obligation to Monitor</i>	No	No	No	No	No	No	No	No			No	No	
	<i>Immunity from Voluntary Takedown</i>	No	No	Yes	Yes	Yes	Yes	Yes	Not provided.			Yes.	N/A	
	<i>Broad Immunity</i>	No	No [3]	Yes	Yes	No	No	No	No	No	No	No	No	
	<i>Notice & Takedown (NTD)</i>	Yes	Yes	No	No	Yes	Yes	Yes	No	Yes	Yes	Yes. In Schedule 1 attached to the Rules		No
	<i>Notice & Notice (NTN)</i>	No	No	No	No	No	No	No	No	No	No	No	No	
Additional Liability (AL) for restriction of content not related to immunity	<i>Executive Orders (EC)</i>	Yes [1]	No	No	No	No	No	No	No	No	No	No	Yes [10]	
	<i>Private Complaints (PC)</i>	No	No	No	No	No	No	No	No	No	No	No	Yes [11]	
Procedural criteria														
NTD & NTN & 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/disabling of initial source	Yes. Constructive knowledge for damages. Actual knowledge for other than damages. (Article 19)	Yes. Actual knowledge	Yes. Actual knowledge.	
NTD & NTN & PC	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.	
NTD & 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.	
NTD & NTN & 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 through court order and Secy	
NTD & NTN & 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. Exeditiously.	Yes	Yes	No	Yes	Yes	Yes	Yes	
NTN & NTD & AL	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'	
NTN & NTD & AL	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	
NTD	Time frame for removal of contested content	No	21 days or order from court, whichever is earlier.	N/A	N/A	Remove expeditiously.	Remove expeditiously.	Remove expeditiously.	N/A	Not provided. Just expeditiously.	Not provided. Just expeditiously	48 hours after receiving notice, if operator cannot contact poster, if poster gives consent for removal.		

Categories		South Korea										Canada	Chile					
Framework		Vertical										Vertical	Vertical					
Type of 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				
Legal Instrument (providing Conditional Immunity or creating Additional Liability for Restriction of Content)		Art.102 (safe harbor), Art.103 (NTD), Art.104 (special types of OSPs), Articles 133-2 & 133-3 (gradual response), Copyright Act					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, Telecommunications Business Act	Art 17, Act on the Protection of Children and Juveniles against Sexual Abuse	Art 20 and 20-2, Act on Consumer Protection in Electronic Commerce	Section 31.1, Copyright Modernization Act 2012 [5]	Intellectual Property Law No. 17.336 (1970) + Law No. 20.435 (2010)				
Differentiation 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.				
Types of intermediaries (based on actions) eligible 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	
Provisions that provide Conditional Immunity	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	
	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	
	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	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	Yes
Additional Liability (AL) for restriction of content not related to immunity	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	
	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	
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	N/A
NTN & NTD & AL	Requirement for termination of user account for violations	Yes. Subject to intermediary'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"	"Immediately"	"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 identification of the copyrighted work.	Yes. Only mere identification of infringing information for Art.44-2. Review of KCSC (Korea communications Standards Commission) for Art.44-7.	Breach of sound communication ethics.	Information in violation of the Act.	N/A	Pornography 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	Identification of infringed rights, rightsholder, form of infringement, infringing material, location	Identification of infringed rights, rightsholder, form of infringement, infringing material, location	Identification of infringed rights, rightsholder, form of infringement, infringing material, location	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 intermediary'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 intermediary'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 intermediary'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 intermediary'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 intermediary'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	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.					Yes. Art.44-6. Rightsholders may make requests to KCSC (Korea Communications Standards Commission).	No	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	