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# MISTAKES AND SUCCESSES IN THE IMPLEMENTATION OF BRAZIL'S GENERAL DATA PROTECTION LAW (LGPD): A STRUCTURED NARRATIVE REVIEW OF THE LITERATURE (2018-2026)

# ERROS E ACERTOS NA IMPLEMENTAÇÃO DA LEI GERAL DE PROTEÇÃO DE DADOS PESSOAIS (LGPD): UMA REVISÃO NARRATIVA ESTRUTURADA DA LITERATURA (2018-2026)

# ERRORES Y ACIERTOS EN LA IMPLEMENTACIÓN DE LA LEY GENERAL DE PROTECCIÓN DE DATOS PERSONALES (LGPD): UNA REVISIÓN NARRATIVA ESTRUCTURADA DE LA LITERATURA (2018-2026)

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**ABSTRACT**
Brazil's General Data Protection Law (LGPD) established a national framework for personal data processing. This article presents a structured narrative review of its implementation and effectiveness in Brazil. The search, conducted on August 27, 2026, used Consensus only as a discovery mechanism: 40 occurrences were consolidated into 26 unique records and, after screening, 21 scientific studies formed the corpus. Evidence was checked in the original publications, without using automated summaries as scientific sources. The studies indicate advances in governance and privacy culture, alongside differences in maturity, training gaps, and Privacy by Design, enforcement, and security challenges. As an interpretive synthesis, the authors propose four implementation stages, without claiming generalizability to all Brazilian organizations.

**KEYWORDS:** LGPD. Personal data protection. Privacy. Data governance. Narrative review.

**RESUMO**
A Lei Geral de Proteção de Dados Pessoais (LGPD) consolidou um marco nacional para o tratamento de dados. Este artigo apresenta revisão narrativa estruturada sobre sua implementação e efetividade no Brasil. A busca, realizada em 27 de agosto de 2026, utilizou a Consensus apenas como mecanismo de descoberta: 40 ocorrências foram consolidadas em 26 registros únicos e, após triagem, 21 estudos científicos compuseram o corpus. As evidências foram conferidas nas publicações originais, sem uso de sínteses automáticas como fonte científica. Os estudos indicam avanços em governança e cultura de privacidade, mas também diferenças de maturidade, lacunas de capacitação e desafios de Privacy by Design, fiscalização e segurança. Como síntese interpretativa, os autores propõem quatro estágios de implementação, sem pretensão de generalização para todas as organizações brasileiras.

**PALAVRAS-CHAVE**: LGPD. Proteção de dados pessoais. Privacidade. Governança de dados. Revisão narrativa.

**RESUMEN**
La Ley General de Protección de Datos Personales (LGPD) consolidó un marco nacional para el tratamiento de datos. Este artículo presenta una revisión narrativa estructurada sobre su implementación y efectividad en Brasil. La búsqueda, realizada el 27 de agosto de 2026, utilizó Consensus solo como mecanismo de descubrimiento: 40 ocurrencias se consolidaron en 26 registros únicos y, tras la selección, 21 estudios científicos integraron el corpus. Las evidencias se verificaron en las publicaciones originales, sin utilizar resúmenes automáticos como fuentes científicas. Los estudios muestran avances en gobernanza y cultura de privacidad, junto con diferencias de madurez, limitaciones de capacitación y desafíos de Privacy by Design, fiscalización y seguridad. Como síntesis interpretativa, los autores proponen cuatro etapas de implementación, sin pretensión de generalización a todas las organizaciones brasileñas.

**PALABRAS CLAVE**: LGPD. Protección de datos personales. Privacidad. Gobernanza de datos. Revisión narrativa.

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## INTRODUCTION

The increasing digitalization of economic, social, and institutional relations has transformed personal data into resources of high strategic value. Information systems, digital platforms, financial services, social networks, mobile applications, digital public services, and automated processes increasingly collect and process information related to individuals.

In this context, specific data protection legislation has become an important component of contemporary legal systems. Internationally, the European General Data Protection Regulation (GDPR) has influenced different regulatory models, contributing to the expansion of rules governing the collection, use, storage, sharing, and deletion of personal data.

In Brazil, Law No. 13,709 of August 14, 2018, known as the General Data Protection Law (LGPD), established a national regulatory framework for personal data processing (BRASIL, 2018). Comparative studies recognize similarities between the Brazilian model and international frameworks while also acknowledging institutional and regulatory particularities (ERICKSON, 2019; MAGALHÃES, 2021; KIM, 2022).

The relevance of the LGPD goes beyond the creation of legal obligations. Its implementation affects organizational processes, governance models, information security practices, system development, and relations between organizations and data subjects. Studies produced after the law came into force, however, show that translating regulatory requirements into consistent practices remains a challenge.

**Research problem:** what advances, limitations, successes, and difficulties are identified in the selected scientific literature on the implementation and effectiveness of the LGPD in Brazil between 2018 and 2026?

**General objective:** to critically analyze the selected scientific literature on the implementation and effectiveness of the LGPD in Brazil, identifying advances, limitations, recurring challenges, and research gaps.

**Specific objectives:** to examine the normative and institutional evolution of the LGPD; identify evidence on organizational maturity and governance; analyze implementation, enforcement, security, and Privacy by Design challenges; distinguish results directly reported in the studies from interpretations developed by the authors of this review; and systematize gaps and perspectives for future research.

**Rationale:** the study is justified by the need to distinguish problems in normative design from difficulties in regulation, enforcement, and organizational implementation. This distinction prevents limitations observed in specific contexts from being automatically attributed to the legislation and contributes to a more accurate reading of the maturity stage of data protection in the country.

The review distinguishes four analytical dimensions: normative design; regulation and enforcement; organizational implementation; and development of a data protection culture. In response to the limitations inherent in the search procedure, the study does not claim to map all scientific production on the LGPD exhaustively; instead, it offers a structured, auditable, and explicitly delimited narrative synthesis of the selected literature.


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## 1 - THEORETICAL FRAMEWORK

### 1.1 LGPD AS A SHIFT IN BRAZIL'S DATA PROTECTION PARADIGM

One of the main advances identified in the selected literature lies in the creation of a general data protection regime applicable across Brazilian society. The LGPD consolidated principles, legal bases, data subject rights, and duties of processing agents within a specific national framework.

Erickson (2019) compared the LGPD with the GDPR in its early stages and highlighted both normative similarities and concerns regarding Brazilian enforcement. Magalhães (2021), in a comparative study of different national systems, situates the LGPD within the international movement toward structures of transparency, control, and compliance. Kim (2022) also identifies a significant influence of the GDPR on Brazilian legislation while emphasizing particularities of the national institutional environment.

Legal scholarship increasingly relates data protection to privacy, autonomy, informational self-determination, and human dignity. Basan and Couto (2024) discuss personal data protection as a fundamental right in the context of consumer surveillance, while Bressan and Araujo (2025) analyze constitutional protection in the face of expanding monitoring practices and the economic exploitation of personal information.

These studies support the interpretation that the LGPD increased the legal and institutional centrality of data protection in Brazil. This conclusion, however, concerns the selected literature and does not, by itself, demonstrate uniform effectiveness across all sectors.

### 1.2 GOVERNANCE, COMPLIANCE, AND THE ROLE OF THE DATA PROTECTION OFFICER

LGPD implementation also encouraged the incorporation of data protection into governance and compliance models. Pereira, Gewehr, and Alves (2021) discuss the intersection between compliance programs and privacy, arguing that data protection parameters should be incorporated into organizational policies and projects. Costa and Altoé (2025), in an empirical study with accounting professionals, identified a significant relationship between workplace behavior, governance mechanisms, and LGPD compliance.

Within this process, the person responsible for personal data processing, commonly associated internationally with the Data Protection Officer (DPO) role, gained prominence. Alves and Lima (2021) specifically address the functions and responsibilities related to this activity, reinforcing the understanding of the DPO as a point of interaction among different actors involved in data governance.

This multidisciplinary nature was operationalized in a study comparing the normative competencies required of the DPO with curriculum profiles in Law and Computing. The findings indicated that none of the educational profiles examined covers the full scope of the role in isolation, reinforcing the need for interdisciplinary education and continuing training in data protection (ALVES, 2026).

The consolidation of the DPO role contributes to the professionalization of data protection, but its mere designation is not sufficient evidence of maturity. Performance of the role depends on


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integration with legal, technological, security, compliance, and management areas, as well as responsibilities and organizational mechanisms compatible with processing risks.

Canedo et al. (2021b) proposed a structured LGPD implementation process using Business Process Modeling Notation (BPMN), with emphasis on the Brazilian Federal Public Administration. Dantas, Gusmão, and Gonzaga (2024) developed a multicriteria model to prioritize compliance actions, recognizing that compliance involves technology, infrastructure, training, processes, time, and participation by different actors.

Saraiva, Souza, and Soares (2025), in turn, present MMAI-LGPD, a maturity model integrating legal, organizational, and technological dimensions. The emergence of these instruments shows a shift in the debate: beyond asking what the LGPD requires, the literature increasingly investigates how data protection governance can be operationalized, measured, and improved.

### 1.3 ENFORCEMENT, EFFECTIVENESS, AND THE ROLE OF THE ANPD

The effectiveness of a data protection regime depends on institutional capacity, regulatory guidance, accountability mechanisms, and conditions for data subjects to exercise their rights. In early debates, Erickson (2019) questioned the sufficiency of the Brazilian enforcement design compared with the European model.

Oliveira (2024), in analyzing the formation of administrative case law and the first sanctions applied by the Brazilian National Data Protection Authority (ANPD), identifies sanctioning activity as a relevant element for accountability and the development of a data protection culture. This evolution reinforces the need to consider the temporal dimension when assessing the LGPD.

Ruiz (2025) argues that making data protection effective as a fundamental right depends, in addition to legislation, on technical training, institutional cooperation, social awareness, and integrated policies. From an international perspective, Khan (2025) identifies enforcement limitations, regulatory interoperability, and redress as recurring problems across different jurisdictions.

Thus, the selected literature supports understanding LGPD effectiveness as a multidimensional phenomenon: rules and sanctions are important, but they do not replace technical capacity, governance, security, data-subject participation, and outcome evaluation.

## 2 - METHODOLOGY

### 2.1 STUDY DESIGN AND SEARCH STRATEGY

This research is qualitative, exploratory, and bibliographic and adopts a structured narrative review. The procedure is not intended to reproduce a PRISMA systematic review, but to make the stages of discovery, screening, verification of original sources, and thematic synthesis auditable.

The search was conducted on August 27, 2026. The Consensus platform was used exclusively as a mechanism for discovery and initial record organization. Because the interface accepts natural-language queries, formal Boolean operators were not used.


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Four queries were submitted literally: “LGPD Brazil implementation compliance organizations governance privacy data protection”; “LGPD ANPD enforcement sanctions effectiveness Brazil privacy rights”; “LGPD Brazil challenges small businesses public sector data subjects rights cybersecurity breaches implementation”; and “LGPD GDPR comparison fundamental right data protection Brazil constitutional privacy enforcement”.

Each query returned 10 visible results under the plan used, totaling 40 occurrences. After repeated records were consolidated, 26 unique records were identified. Consensus was not treated as a bibliographic database equivalent to Scopus, Web of Science, SciELO, or other indexing databases, and this article does not assume exhaustive coverage of those sources. This choice limits the scope of the review and is explicitly acknowledged in the limitations section.

Inclusion criteria covered studies published between 2018 and 2026 that were directly related to implementation, compliance, governance, enforcement, data subject rights, information security, incidents, software development, Privacy by Design, liability, regulatory comparison, or the public sector and that presented an identifiable objective and method. Records were excluded for thematic or metadata incompatibility, insufficient relevance to the research problem, a predominantly prospective focus without analysis of LGPD implementation, or analytical overlap without a distinct contribution.

The complementary manual search was limited to locating and checking original publications, metadata, and official pages of journals, publishers, and events. It was not used as a new independent strategy to expand the universe of records. The process resulted in 21 included scientific studies, complemented by Law No. 13,709/2018 and the work by Alves and Lima (2021) on the DPO.

In addition to the primary corpus, four publications directly related to the axes of this article were incorporated as complementary specialized literature: DPO education and practice, organizational awareness, compliance auditing, and incident communication (ALVES, 2026; ALVES; CONCEIÇÃO, 2025a; ALVES; CONCEIÇÃO, 2025b; ALVES et al., 2025). These works were used for contextualization and interpretive triangulation and do not change the count of 21 studies in the primary corpus or the selection flow presented in Table 2.

**Table 1 - Literal search strategies and records retrieved**

| Query | Literal expression | Occurrences |
|---|---|---|
| 1 | LGPD Brazil implementation compliance organizations governance privacy data protection | 10 |
| 2 | LGPD ANPD enforcement sanctions effectiveness Brazil privacy rights | 10 |
| 3 | LGPD Brazil challenges small businesses public sector data subjects rights cybersecurity breaches implementation | 10 |
| 4 | LGPD GDPR comparison fundamental right data protection Brazil constitutional privacy enforcement | 10 |

*Source: prepared by the authors based on the procedure described in this review.*

## 2.2 SCREENING, SOURCE VERIFICATION, AND STUDY APPRAISAL

Screening was conducted by one researcher, first by title and abstract and then by checking the original publication. There was no independent double assessment or arbitration procedure between reviewers; this characteristic is treated as a methodological limitation. Of the 26 unique records, five were excluded: one because of incompatibility between title/metadata and the relevant content; one


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because it broadly addressed privacy without sufficient focus on implementation; one because of an excessively specific sectoral scope for the central axes; one because it was prospective and centered on an artificial-intelligence legislative proposal; and one because it analytically overlapped with an exploratory study already represented in the corpus.

For each included study, authorship, year, publication venue, and the content available on the original journal, publisher, or event page were verified. When full text was accessible, it was consulted; when access was restricted, the synthesis was limited to the original abstract and metadata supplied by the publisher. Answers, abstracts, or automated summaries generated by Consensus were not used as scientific evidence or as substitutes for the original publication.

Because of the heterogeneity of the corpus—which includes legal studies, surveys, reviews, proposed frameworks, decision models, and institutional analyses—a single risk-of-bias tool was not applied. Instead, qualitative adequacy was assessed using four criteria: an identifiable research objective; a described method; an explicit sample, corpus, or unit of analysis when applicable; and correspondence between the reported results and the conclusions used in this review. Claims were kept at the level of evidence offered by each publication, without converting sector-specific findings into national estimates.

Thematic extraction recorded author, year, context, method, unit of analysis, main finding, and relationship to the study axes. The narrative synthesis compared convergences, divergences, and shifts in emphasis over time, explicitly distinguishing results reported by the publications from interpretive inferences proposed by the authors of this article.

**Table 2 - Literature identification and selection process**

| Stage | n | Result/criterion |
|---|---|---|
| Occurrences retrieved | 40 | Four literal queries; 10 visible results per query. |
| Duplicates across queries | 14 | Repeated records across the different queries. |
| Unique records screened | 26 | Screening by title, abstract, and thematic relevance. |
| Records excluded | 5 | Incompatible content/metadata (1); insufficient focus (1); excessively specific scope (1); prospective character (1); analytical overlap (1). |
| Original publications verified | 21 | Verification on journal, publisher, or event pages; full text when accessible or original abstract when access was restricted. |
| Scientific studies included | 21 | Primary corpus of the structured narrative review. |
| Complementary sources | 6 | Law No. 13,709/2018; Alves and Lima (2021); Alves (2026); Alves and Conceição (2025a; 2025b); Alves et al. (2025). |

*Source: prepared by the authors based on the procedure described in this review.*

## 2.3 TRANSPARENCY REGARDING THE USE OF AI TOOLS

The Consensus platform had a restricted role in the initial discovery of literature and organization of search results. Scientific interpretation, evidence selection, and the formulation of claims were grounded in the original publications. Use of the tool was not considered a criterion of study quality or validation.

Generative artificial intelligence tools were also used to support textual organization, drafting, and linguistic review of the manuscript. Content, inclusion and exclusion decisions, citations, correspondence between claims and sources, and analytical interpretations were subjected to human review by the authors, who assume full responsibility for the final text.


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## 3 - RESULTS AND DISCUSSION

### 3.1 THE FIRST STAGE: THE GAP BETWEEN THE LAW AND ORGANIZATIONAL REALITY

Early empirical studies of organizational compliance reveal a gap between normative requirements and practices effectively implemented. Ferrão et al. (2021), drawing on 105 information-technology professionals from public and private organizations, identified gaps across different dimensions of data processing.

Among the results reported by Ferrão et al. (2021), 16.3% of the organizations assessed had not established a procedure or methodology for verifying compliance with LGPD principles from the design stage of services, while 20% did not have a defined process for communicating with data subjects in situations involving possible data breaches. These figures concern the study sample and should not be generalized to all Brazilian organizations.

Canedo et al. (2021a) also identified incomplete compliance among the organizations assessed, with differences in the adoption of practices related to the DPO, data-subject access, sharing, and access logging. The authors concluded that the organizations investigated had not yet achieved full compliance.

In more recent evidence, Saraiva, Souza, and Soares (2025) applied MMAI-LGPD to information-systems institutions and identified maturity gaps in legal, technological, and governance dimensions. Temporal comparison across studies from different contexts does not allow inference of a national trend, but it indicates that maturity problems remain relevant even after the law's first years in force.

### 3.2 TRANSFORMATION OF ORGANIZATIONAL CULTURE AND OPERATIONALIZATION OF PRIVACY

Despite the gaps, the selected literature provides evidence of increasing incorporation of privacy into organizational and technological processes. Canedo et al. (2022) combined a systematic review of 36 primary studies, a survey of technology professionals, and interviews with agile-team members to examine privacy-requirements elicitation practices after LGPD implementation.

The authors found that LGPD principles were known by most of the teams investigated and that organizations showed greater concern for user privacy, although specific elicitation tools remained underused (CANEDO et al., 2022). The finding supports speaking of increased awareness in the context studied, but not of full maturity or generalizable causality.

In a field study with employees from four Brazilian healthcare companies, Alves et al. (2025) observed difficulties in understanding LGPD good practices and reported favorable results from the use of gamification to stimulate learning and adoption of data-protection practices. As complementary literature, the finding reinforces the relevance of training and awareness as operational dimensions of compliance.


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Castro, Silva, and Canedo (2022) identified weaknesses in privacy and security management and proposed a framework to support ICT professionals in LGPD compliance. Dantas, Gusmão, and Gonzaga (2024) addressed the prioritization of compliance actions, while Saraiva, Souza, and Soares (2025) proposed a maturity instrument. Taken together, these studies show that the literature is moving from initial diagnoses toward mechanisms for operationalization and measurement.

Within the governance and monitoring axis, Alves and Conceição (2025a) reviewed applications of artificial intelligence in compliance audits associated with the LGPD, GDPR, and ISO/IEC 27001 and identified potential for greater accuracy, efficiency, and continuity in the audit process. The study is used here as complementary literature on emerging instruments for operationalizing compliance, without replacing studies in the primary corpus.

### 3.3 INTERPRETIVE SYNTHESIS: THE RISK OF CONFUSING COMPLIANCE WITH DOCUMENTATION

The reviewed studies do not uniformly use the expression “documentary compliance” or present this category as a consolidated result. In this review, the hypothesis that compliance may be improperly reduced to document production is an analytical inference by the authors, constructed from recurring operational gaps described in the publications.

Ferrão et al. (2021), Canedo et al. (2022), Castro, Silva, and Canedo (2022), and Saraiva, Souza, and Soares (2025) report challenges in processes, system development, privacy management, incident communication, and institutional maturity. Pereira, Gewehr, and Alves (2021) and Costa and Altoé (2025), in turn, emphasize the incorporation of data protection into compliance structures, policies, and governance mechanisms.

Based on this convergence, the authors interpret that policies, notices, contracts, and records are necessary but not sufficient to demonstrate effectiveness. An organization may have formal instruments while simultaneously presenting gaps in data-flow mapping, incorporation of privacy into system development, incident response, training, or cross-functional integration. This formulation is an interpretive synthesis of the corpus and not a causal conclusion applicable to all Brazilian organizations.

### 3.4 THE CHALLENGE OF PRIVACY BY DESIGN AND TRANSLATING LAW INTO TECHNOLOGY

Integrating privacy into the development of products and services appears as a recurring challenge. Canedo et al. (2022) show that although privacy requirements gained visibility among agile teams, specialized tools remained underused. Castro, Silva, and Canedo (2022) likewise emphasize the need for methodologies capable of translating privacy and security requirements into technical processes.

Rocha and Canedo (2025), in a comparative study of laws and frameworks, identify challenges in implementing Privacy by Design and transforming regulatory requirements into concrete actions in software development. The selected literature therefore supports the existence of a critical interface between legal language and technological execution, in which principles such as purpose, necessity, transparency, and security must be materialized as verifiable requirements.


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### 3.5 PUBLIC SECTOR AND GOVERNANCE FRAGMENTATION

Implementation in the public sector has particular features. Filgueiras et al. (2025) analyzed the institutional grammar of data governance in 27 Brazilian municipalities with more than 500,000 inhabitants and identified regulatory diversity and a tendency toward more restrictive solutions in certain contexts, with the potential to create barriers to digital-transformation projects.

The result directly demonstrated by Filgueiras et al. (2025) is the diversity and restrictiveness of the institutional designs examined. The formulation that data protection should not be confused with indiscriminate prohibition of data use is an interpretation by the authors of this review, derived from the need to reconcile protection, purpose, security, transparency, and legitimate use. The study does not support an inference that the same pattern represents the entire Brazilian public sector.

### 3.6 LIABILITY, SECURITY, AND DATA BREACHES

The persistence of incidents keeps cybersecurity as a relevant dimension of LGPD effectiveness. Dresch and Faleiros Júnior (2025) analyze civil liability under the data-protection regime and argue that accountability mechanisms can serve both reparative and preventive functions by encouraging governance, transparency, and safeguards.

Rodrigues and Silva (2026) discuss corporate liability in data breaches and highlight the challenges of making data protection effective in an increasingly digitalized environment. The occurrence of incidents, by itself, does not permit a conclusion regarding the failure or success of the legislation; more appropriate indicators include prevention, detection, response, communication, and accountability capacity.

Alves and Conceição (2025b) address data-breach reporting through interactions among data subjects, the controller/DPO, and the ANPD, drawing attention to communicational and human aspects present at this stage. Although the study's psychoanalytic focus differs from technical cybersecurity work, its complementary inclusion reinforces that incident response cannot be reduced to technological controls.

This reading is also compatible with Khan (2025), whose international review indicates that comprehensive rules coexist with differences in enforcement, interoperability, and redress mechanisms. Effectiveness therefore depends on coordination among regulation, institutional capacity, and management practices.

### 3.7 SYNTHESIS OF THE MAIN ADVANCES IDENTIFIED

In the selected corpus, advances are concentrated in five areas: consolidation of a regulatory framework aligned with international trends (ERICKSON, 2019; MAGALHÃES, 2021; KIM, 2022); strengthening data protection as a right linked to autonomy and dignity (BASAN; COUTO, 2024; BRESSAN; ARAUJO, 2025); integrating privacy into compliance and governance structures (PEREIRA; GEWEHR; ALVES, 2021; COSTA; ALTOÉ, 2025); developing processes, frameworks, decision models, and maturity models (CANEDO et al., 2021b; CASTRO; SILVA; CANEDO, 2022; DANTAS; GUSMÃO; GONZAGA, 2024; SARAIVA; SOUZA; SOARES, 2025); and gradual consolidation of ANPD


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administrative activity (OLIVEIRA, 2024). These areas constitute a synthesis of the literature analyzed, not a definitive hierarchy of LGPD effects.

### 3.8 SYNTHESIS OF THE MAIN RECURRING LIMITATIONS AND CHALLENGES

Recurring limitations include incomplete organizational maturity in the contexts studied (CANEDO et al., 2021a; FERRÃO et al., 2021; SARAIVA; SOUZA; SOARES, 2025), the need for training and institutional cooperation (DANTAS; GUSMÃO; GONZAGA, 2024; RUIZ, 2025), difficulties translating legal requirements into technical Privacy by Design mechanisms (CANEDO et al., 2022; CASTRO; SILVA; CANEDO, 2022; ROCHA; CANEDO, 2025), public-governance asymmetries (FILGUEIRAS et al., 2025), and persistent security and liability risks (DRESCH; FALEIROS JÚNIOR, 2025; RODRIGUES; SILVA, 2026). The heterogeneity of the corpus prevents these findings from being converted into general estimates for all Brazilian organizations.

### 3.9 INTERPRETIVE PROPOSAL: THE EVOLUTION OF LGPD IMPLEMENTATION IN FOUR STAGES

Based on an interpretive synthesis of the selected studies, the authors propose four stages for organizing the evolution of the debate on LGPD implementation. This periodization is not a classification previously consolidated in the literature; it is an analytical model developed in this article to represent shifts in emphasis observed across the publications.

Earlier studies emphasize institutional design and organizational preparedness (ERICKSON, 2019; FERRÃO et al., 2021), while later works address operationalization, tool development, maturity, governance, and enforcement (CANEDO et al., 2022; DANTAS; GUSMÃO; GONZAGA, 2024; OLIVEIRA, 2024; SARAIVA; SOUZA; SOARES, 2025). Table 3 summarizes the interpretive proposal.

**Table 3 - Four interpretive stages of LGPD implementation**

| Period | Proposed stage | Interpretive emphasis |
|---|---|---|
| 2018-2020 | Normative institutionalization | Creation of the legal framework, international comparison, institutional design, and enforcement expectations. |
| 2020-2022 | Implementation shock | Diagnoses of low compliance, need for processes, responsibilities, systems, and organizational adaptation. |
| 2022-2024 | Operationalization | Privacy by Design, requirements elicitation, frameworks, action prioritization, and consolidation of governance. |
| 2024-2026 | Maturity and effectiveness | Maturity models, administrative case law, public governance, accountability, and outcome measurement. |

*Source: prepared by the authors based on the procedure described in this review.*

### 3.10 GAPS IDENTIFIED IN THE SELECTED LITERATURE

The selected literature still contains a limited number of longitudinal studies capable of following the same organizations over several years. Many studies provide snapshots of specific contexts, making it difficult to measure changes in maturity, the effects of regulatory measures, and differences between sectors.

More standardized metrics are also needed to assess the ease with which data subjects exercise their rights, reductions in unnecessary data collection, incident-response time, the relationship


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between privacy investments and risk exposure, the effects of sanctioning decisions, and maturity differences among organizations of different sizes and sectors.

Another research agenda concerns the DPO role and Artificial Intelligence. Questions remain about which DPO structures produce better outcomes and how algorithmic transparency, automated decisions, and generative systems interact with LGPD principles. These gaps constitute a research agenda rather than evidence of any intrinsic insufficiency in the legislation.

### 3.11 STUDY LIMITATIONS

This review has limitations that condition interpretation of its results. The first is the use of a single literature-discovery tool, Consensus, without running an equivalent parallel strategy in established bibliographic databases such as Scopus, Web of Science, or SciELO. Although included publications were checked in their original sources, the discovery procedure may have failed to retrieve relevant studies.

The corpus of 21 scientific studies remains relatively small and was selected by a single researcher, without independent double screening or arbitration of disagreements. The narrative nature of the review and the absence of a registered systematic protocol increase the possibility of selection bias, even though the queries, criteria, and screening counts have been made explicit to improve auditability.

The included works are methodologically heterogeneous and comprise surveys, legal studies, reviews, maturity models, frameworks, institutional analyses, and different sectoral contexts. This heterogeneity prevents quantitative aggregation and causal inference. Results obtained in municipalities, software teams, accounting firms, or other samples cannot be generalized to all Brazilian organizations.

For these reasons, the conclusions of this article should be understood as a synthesis of the selected literature and as an interpretive proposal by the authors, rather than as an exhaustive estimate or statistically generalizable representation of the state of LGPD compliance in Brazil.

## 4 - FINAL CONSIDERATIONS

The structured narrative review of the selected literature indicates that the LGPD has produced relevant changes in the legal, technological, and organizational contexts examined. Recurring advances include consolidation of a national framework, strengthening data protection as a fundamental-rights issue, incorporation of privacy into governance structures, and development of instruments aimed at operationalizing compliance.

The studies also report persistent limitations: incomplete maturity in certain samples, need for training, Privacy by Design difficulties, institutional asymmetries, and security and enforcement challenges. These findings do not authorize generalization to the entire Brazilian organizational universe because they derive from different methods, sectors, and populations.


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Based on the corpus synthesis, the authors interpret that some of the so-called “LGPD errors” may be associated less with defects in the rule itself and more with how requirements are operationalized. This interpretation is particularly evident in the tension between formal compliance and operational capacity: documents and policies are necessary, but effectiveness depends on processes, technology, governance, security, and organizational behavior.

One of the main contributions identified in the literature analyzed is the progressive incorporation of data protection into organizational governance. As an original contribution of this article, a four-stage interpretive model is proposed—normative institutionalization, implementation shock, operationalization, and maturity/effectiveness—whose usefulness should be tested in future studies and not confused with a periodization already consolidated in the literature.

In summary, the selected literature suggests that the LGPD debate is gradually shifting from initial compliance toward the measurement of effectiveness. Future research should broaden search databases, use more systematic protocols, conduct independent assessments, explore longitudinal designs, and develop comparable indicators capable of examining whether governance and enforcement structures produce greater protection for data subjects.

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