

FREE RESEARCH PAPER • OCTOBER 2026

The B2B Lead Generation Compliance Atlas 2026

Ten countries. Three channels. One question: can you send that email, make that call or share that lead?

10

COUNTRIES

3

CHANNELS

12

CHECKLIST ITEMS

10

VENDOR QUESTIONS

US

UK

CA

AU

DE

FR

JP

KR

TW

IN

+ GDPR

START HERE

Why this atlas exists

Most B2B teams run campaigns across borders from one CRM. The rules change at every border. A list that is fine in Delhi can bring a cease-and-desist letter in Düsseldorf. This atlas puts the consent rules for ten markets on one page each, in plain words.

Inside

- 03** Five findings in two minutes
- 04** Country matrix at a glance
- 05-09** Ten country playbooks
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How to read the cards

Each country card has a coloured label, a strictness meter, and four blocks.

STRICT OPT-IN

Prior consent is needed even for business recipients.

SPLIT RULE

The rule depends on who you email or how you collected the address.

OPT-OUT REGIME

You may send first if you meet set conditions and honour opt-outs.

NOTICE + CONSENT

Data-protection law drives the rule: notice, consent and withdrawal.

Strictness meter:  lighter
 strictest

The meter is our editorial reading of each regime, not a legal grade.

TWO-MINUTE VERSION

Get consent before you send. Say who you are. Make opting out easy. Keep proof of all three. Then read the country card, because the details differ.

Who it's for

Demand-generation leads, SDR managers, marketing-ops and data-partnership teams who send email, make calls or buy and share leads across borders.

Built by [ARS B2B Social Bridge](#). It pairs with our [B2B Lead Quality Report 2026](#), which covers how to judge lead quality once compliance is settled.

THE HEADLINE

Five findings in two minutes

1 Five of ten markets ask for opt-in, even for B2B email.

Canada, Australia, Germany, Japan and South Korea all lean on consent first. The US and France are the main places where you can send first if you meet conditions.

2 “Business email” is not a loophole.

Germany’s rule reaches generic addresses such as info@. Japan’s rule covers business recipients. CAN-SPAM applies to B2B email. The UK splits by who the recipient is.

3 Phone and email are judged separately.

In Germany, a call that passes the presumed-consent test does not clear the follow-up email. Build separate permission fields.

4 Data law sits on top of marketing law.

Under GDPR Article 83, the top tier is up to €20 million or 4% of worldwide turnover, whichever is higher. The lower tier is €10 million or 2%.

5 Proof wins disputes.

Australia’s regulator says it is up to you to prove consent. Canada’s CRTC puts the burden on the sender. Records are your defence in both.

SO WHAT

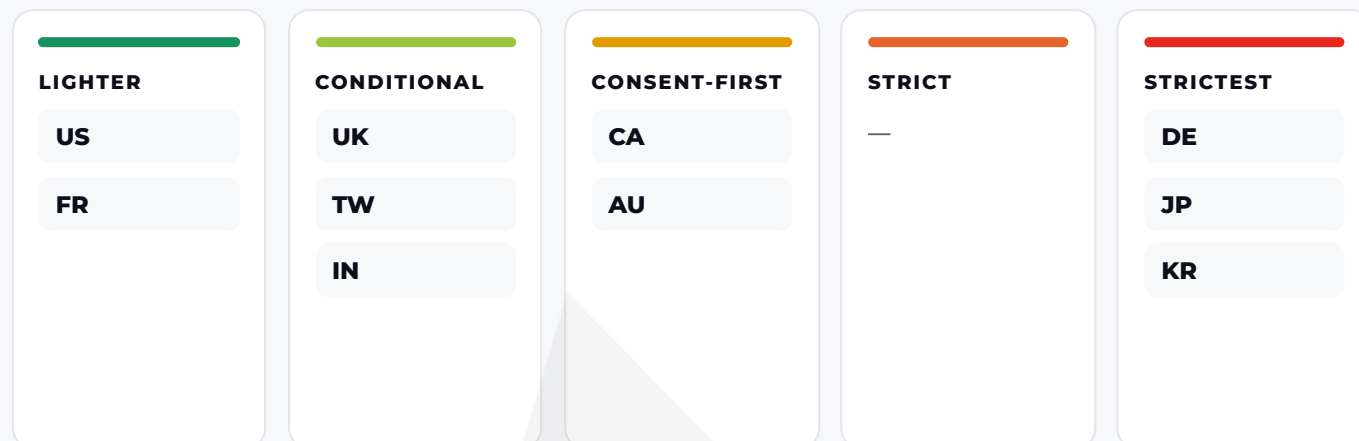
One global “B2B is fine” policy will fail somewhere. Set your default to the strictest market you actually sell into, then relax it country by country with counsel.

Sources: country cards, pages 05–09; GDPR Article 83 text via gdpr-info.eu; ACMA and CRTC guidance pages. Details on page 15.

AT A GLANCE

The consent spectrum

Where each market sits for B2B email, from lightest to strictest. This is our editorial reading.



COUNTRY	REGIME	B2B EMAIL	PHONE
US United States	Opt-out (email)	Opt-out, with postal address	Written consent for autodialed mobile calls
UK United Kingdom	Split rule	Corporate: yes. Individual: consent	TPS / CTPS screening
CA Canada	Opt-in, implied allowed	Express or implied consent	CRTC rules and DNCL
AU Australia	Consent-first	Consent, express or inferred	Do Not Call Register
DE Germany	Strict opt-in	Prior express consent	Presumed consent on concrete facts
FR France	B2B opt-out, conditional	Allowed if notified and relevant	Objection right; Bloctel is consumer-only
JP Japan	Strict opt-in	Prior opt-in	Check with counsel
KR South Korea	Strict opt-in	Advance consent	Check with counsel
TW Taiwan	Notice + opt-out	Notice and opt-out at first contact	PDPA Art. 20 duties
IN India	Consent-led, phasing in	Consent-led (DPDP)	TRAI rules

Read the full card before you act. A table row cannot carry the exceptions.

US United States

CAN-SPAM Act · FTC Telemarketing Sales Rule · TCPA

OPT-OUT (EMAIL)

EMAIL

CAN-SPAM covers business email as well as consumer email. You can send without prior consent, but each message needs honest headers and subject line, a valid postal address and a working opt-out. Honour opt-outs promptly.

IF YOU GET IT WRONG

TCPA statutory damages are \$500 per violation, up to \$1,500 if wilful. Private lawsuits are possible, so exposure multiplies with list size.

PHONE

Autodialled or prerecorded marketing calls and texts to mobile numbers need prior express written consent under the TCPA. Calls to business landlines are generally exempt from those limits.

WATCH OUT

A business mobile number is still a mobile number. Check how a number was collected before any autodialled call or text.

DO THIS

- ☐ Print a postal address and a one-click opt-out in every email
- ☐ Keep a suppression list and sync it across tools
- ☐ Store consent proof before any autodialler touches a mobile

TCPA points: law-firm summary. CAN-SPAM elements: standard statutory summary.

SECONDARY SOURCE

UK United Kingdom

PECR · UK GDPR · Data (Use and Access) Act 2025

SPLIT RULE

EMAIL

PECR lets you email corporate bodies, such as companies, LLPs, Scottish partnerships and government bodies. Sole traders and some partnerships count as individuals. They need specific consent, or the soft opt-in if they are existing customers.

IF YOU GET IT WRONG

From 5 February 2026, PECR fines are aligned with UK GDPR levels, which top out at £17.5 million or 4% of worldwide turnover.

PHONE

Screen call lists against the TPS and, for corporate bodies, the CTPS before live marketing calls.

WATCH OUT

"Corporate" is a legal status, not a mood. A Ltd company is corporate. A plumber trading under his own name is not. Personal work addresses also fall under UK GDPR.

DO THIS

- ☐ Tag every UK contact as corporate or individual in your CRM
- ☐ Keep a "do not email" list of businesses that objected
- ☐ Never use the soft opt-in for prospects or bought lists

Email rules: ICO guidance page. Fine levels: not stated on that page; check the ICO.

REGULATOR SOURCE

CA Canada

CASL (Canada's Anti-Spam Legislation) · CRTC rules

OPT-IN, IMPLIED ALLOWED

EMAIL

You need consent, express or implied, for commercial electronic messages. Implied consent can cover an address someone has conspicuously published with no "do not contact" note, but only if your message relates to their business role. Honour unsubscribes within 10 business days.

IF YOU GET IT WRONG

Penalty amounts were not verified for this edition. Check the Act and CRTC guidance before relying on any figure.

PHONE

Telemarketing sits under separate CRTC rules and the National Do Not Call List. Check B2B exemptions and your own internal do-not-call duties with counsel.

WATCH OUT

The sender carries the burden of proving consent. The CRTC suggests dated records, such as a screenshot showing the address, its URL and the date.

DO THIS

- ☐ Screenshot the page where you found each published address
- ☐ Match every message to the recipient's role
- ☐ Process unsubscribes well inside 10 business days

Consent and unsubscribe: CRTC guidance page. Penalties: not verified.

REGULATOR SOURCE

AU Australia

Spam Act 2003 · Do Not Call Register rules

CONSENT-FIRST

EMAIL

Commercial messages need consent, accurate sender identification and a working unsubscribe. The ACMA says express consent is best practice. Inferred consent may apply where there is an ongoing relationship and the marketing relates to it.

IF YOU GET IT WRONG

Reports quoting the ACMA put repeat-offence penalties at up to A\$2.1 million a day. The ACMA guidance page itself states no amounts.

PHONE

Telemarketing is covered by separate Do Not Call Register rules. Check which numbers can be registered and what exemptions apply.

WATCH OUT

"It's up to you to prove that you have a person's consent." Bought or rented lists do not remove that responsibility. Unsubscribes must be honoured within 5 working days.

DO THIS

- ☐ Record who agreed, when and how
- ☐ Identify your legal business name in every message
- ☐ Keep the unsubscribe working for at least 30 days after sending

Consent, sender ID, unsubscribe: ACMA guidance page. Penalty figure: secondary (Mondaq).

REGULATOR SOURCE

DE Germany

UWG §7 · GDPR

STRICT OPT-IN**EMAIL**

Commercial email needs prior express consent. There is no general B2B exemption, and the rule reaches generic addresses such as info@. The one exception is the existing-customer rule in §7(3), which has four cumulative conditions. A free trial sign-up does not automatically qualify.

IF YOU GET IT WRONG

Mostly competitor cease-and-desist letters (Abmahnung) with legal costs, plus data-protection enforcement and civil claims. There is no single headline fine to plan around.

PHONE

For B2B calls, presumed consent may apply, but only on concrete facts showing the business would welcome the call. Industry fit, an intent score or a website visit alone is not enough.

WATCH OUT

Calls and emails are judged separately. A permissible call does not make the follow-up email permissible. GDPR legitimate interest does not by itself authorise an advertising email.

DO THIS

- ☐ Collect consent before the first email, even for generic inboxes
- ☐ Document the concrete facts behind any presumed-consent call
- ☐ Treat intent signals as a reason to ask, not a licence to send

Secondary sources (industry summaries). The official statute page blocked automated access.

SECONDARY SOURCE**FR France**

Code des postes et des communications électroniques L.34-5 · CNIL · GDPR

B2B OPT-OUT, CONDITIONAL**EMAIL**

B2B email prospecting can proceed without prior consent if people were told at collection that their address would be used for prospecting, can object freely and easily, and the offer relates to their professional role.

IF YOU GET IT WRONG

CNIL sanctions follow the GDPR ceilings: up to €20 million or 4% of worldwide turnover for the most serious breaches.

PHONE

The consumer do-not-call scheme (Bloctel) does not cover B2B. GDPR still gives every person the right to object to direct marketing, and you must act on it.

WATCH OUT

The role-relevance test is real. A payroll offer sent to a head of engineering fails it.

DO THIS

- ☐ Show the prospecting notice at the point you collect the address
- ☐ Segment messages by job function
- ☐ Make objecting as easy as signing up

Secondary sources (CCI Paris, Leto Legal). The CNIL page failed to load.

SECONDARY SOURCE

JP Japan

Act on Regulation of Transmission of Specified Electronic Mail

STRICT OPT-IN**EMAIL**

Advertising email needs the recipient's prior opt-in consent, and the rule applies to business recipients too. Narrow exceptions exist, for example addresses given on business cards or published for business use. Read them closely before relying on them.

PHONE

Telemarketing was not researched in depth for this edition. Check Japanese rules with local counsel before calling.

IF YOU GET IT WRONG

A secondary source puts the corporate fine at up to ¥30 million. Confirm against the statute.

WATCH OUT

Keep records of how and when consent was given. Show the sender's name and an opt-out route in every message.

DO THIS

- ☐ Ask for opt-in before the first send
- ☐ Log consent date, source and wording
- ☐ Treat the business-card exception as narrow

Secondary source (Monolith). Statute not read.

SECONDARY SOURCE**KR South Korea**

Act on Promotion of Information and Communications Network Utilization, Article 50

STRICT OPT-IN**EMAIL**

Commercial electronic messages need the recipient's advance consent. Article 50 also carries extra rules for sending at night. Messages must identify the sender and give an opt-out route.

PHONE

Telemarketing falls under separate rules. Check with local counsel.

IF YOU GET IT WRONG

Penalty amounts could not be verified for this edition. Check with local counsel.

WATCH OUT

Do not schedule campaigns by your own time zone. Check the night-time limits for Korea before launch.

DO THIS

- ☐ Get advance consent and store it
- ☐ Set send windows for Korean local time
- ☐ Ask local counsel for current penalty levels

Secondary summary (nepla.ai). Official text returned navigation only.

SECONDARY SOURCE

TW Taiwan

Personal Data Protection Act (PDPA), Article 20

NOTICE + OPT-OUT

EMAIL

Using personal data for marketing outside the purpose it was collected for needs consent. At your first marketing contact, give the person a way to opt out, and stop when they ask.

PHONE

The same Article 20 duties apply to phone marketing that uses personal data. Check any sector rules with local counsel.

IF YOU GET IT WRONG

Penalty figures were not verified for this edition.

WATCH OUT

Opting out must be easy to find in the first message. The sender bears the cost of the opt-out route.

DO THIS

- ☐ Put the opt-out in the very first contact
- ☐ Stop on request and log it
- ☐ Check the original collection purpose before reuse

Secondary summary. Statute not read.

SECONDARY SOURCE

IN India

Digital Personal Data Protection (DPDP) Act 2023 · DPDP Rules 2025 · TRAI rules for calls and SMS

CONSENT-LED, PHASING IN

EMAIL

The DPDP Act is consent-led. It asks for plain-language notice and lets people withdraw consent. A named person's work email address is personal data.

PHONE

TRAI's telemarketing rules govern commercial calls and SMS through the do-not-disturb registry. Check registration and consent duties.

IF YOU GET IT WRONG

The Act lets the Board impose financial penalties. Check the schedule for current ceilings.

WATCH OUT

The Rules phase in. Consent-manager provisions follow in about November 2026, and the main obligations in about May 2027. Dates are at month level, so confirm with the official notification.

DO THIS

- ☐ Write consent notices in plain language
- ☐ Build withdrawal into every channel
- ☐ Plan your 2027 audit now

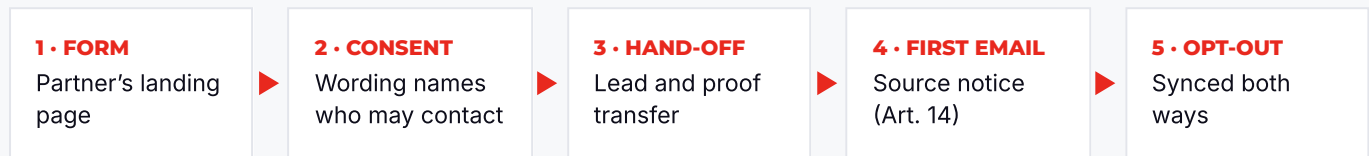
Secondary summaries. Phase dates at month level.

SECONDARY SOURCE

CHANNEL FOCUS

Content syndication and lead sharing

Syndication means a partner collects the lead and you receive it. Compliance now depends on what the person agreed to at the partner's form, which you did not build.



01 Name who will contact the person.

Consent that says “partners” is weak. Name the company, or list the named sponsors on the form. This is practical guidance, not a statutory quote.

02 Keep proof for every lead.

Store the timestamp, form version and consent text. Australia's ACMA and Canada's CRTC both put the burden of proof on the sender.

03 A bought list does not move the risk.

The ACMA says purchased or rented lists do not remove your responsibility. You still need consent for every address.

04 Tell people where you got their data.

Under GDPR Article 14, when you did not collect the data from the person, you must inform them within a reasonable period, and at the latest within one month.

05 Respect the objection right.

GDPR Article 21(2)–(3) gives people the right to object to direct marketing at any time, and you must then stop.

06 A download is not consent to email.

In Germany, intent signals such as a website visit or data-provider alert do not replace prior express consent.

07 Make partners pass opt-outs back.

Put a duty in the contract, with a clear timeline. An opt-out that never reaches you is still your breach. This is practical guidance.

Use it with our quality lens

Compliant is the floor. Once a lead is clean, judge how good it is with the [B2B Lead Quality Report 2026](#).

Sources: GDPR Articles 14 and 21 (standard text); ACMA guidance; CRTC guidance; Overloop Germany summary. Rules 1 and 7 are practical guidance.

REALITY CHECK

Six myths that cost money

"B2B email is exempt."

FACT

CAN-SPAM covers business email. Germany's rule reaches info@. Japan's applies to business recipients.

"Their address is on their website, so it is fair game."

FACT

In Canada it needs no "do not contact" note and a role-relevant message. Germany asks for prior consent.

"Legitimate interest covers outreach everywhere."

FACT

In Germany it is not automatic and does not by itself authorise an advertising email.

"A Ltd company has no rules."

FACT

UK corporate bodies can be emailed, but UK GDPR still covers the personal data in the address.

"A bought list is the vendor's problem."

FACT

The ACMA says purchased lists do not remove your responsibility.

"A business mobile is a business line."

FACT

The TCPA asks for written consent for autodialed marketing to mobiles. The business-line exemption is about landlines.

What changes in 2026 and 2027

Feb 26

UK PECR fines aligned with UK GDPR levels from 5 February 2026.

Nov 26

India DPDP: consent-manager provisions follow, at month level.

May 27

India DPDP: main obligations expected to apply, at month level.

UK date: earlier desk research; the ICO email page does not state fines. India dates: secondary summaries at month level. Confirm both with official notifications.

USE IT MONDAY

Pre-send checklist

- | | |
|--|--|
| ☐ Which country is each contact in, and which card applies? | ☐ Is your postal address printed (US)? |
| ☐ Is the contact a company or an individual (UK, and sole traders)? | ☐ Are suppression lists synced across all tools? |
| ☐ Do you hold consent proof where the market needs it? | ☐ For syndicated leads: does the consent name you or your sponsors? |
| ☐ Does the message name you and your legal business? | ☐ Did you send the source notice within one month (GDPR Art. 14)? |
| ☐ Is there a free, working opt-out in every message? | ☐ Are Korean sends timed for local hours? |
| ☐ Does the message relate to the recipient's job (CA, FR)? | ☐ Are calls screened against the right do-not-call lists? |

Sample consent wording

☐ Yes, I agree that **ARS B2B Social Bridge** and the sponsors named beside this form may email me about B2B marketing research and related offers. I can withdraw this consent at any time with the unsubscribe link in every email.

Our privacy notice explains how we use your data and who receives it.

WHY IT WORKS

It names the sender, names the purpose, names the sponsors, and tells people how to withdraw. The box is unticked.

ADAPT WITH COUNSEL

Wording must match your real partners and the market. Strict markets want a separate box for each purpose.

Sample wording is an editorial illustration, not legal text.

BUYING LEADS OR DATA?

Ten questions for your data vendor

If a vendor cannot answer these, the risk has moved to you. Ask before you sign, then keep the answers on file.

01 How did each contact give consent, and can you show me the record?

02 What exact wording did the person see at collection?

03 Is my company named, or only “partners”?

04 How old is the consent, and how is it refreshed?

05 Which countries are your contacts collected in?

06 Do you tell individuals the source of their data?

07 How fast do opt-outs reach me, and how do I send mine back?

08 Do you scrape published addresses? If so, how do you handle role relevance?

09 Do you separate company contacts from sole traders and individuals?

10 Who is liable in your contract if consent proves invalid?

RED FLAG

“Everything is GDPR-compliant” with no proof of consent or wording is a claim, not an answer.

HONEST LIMITS

Where this atlas stops

What it is not

It is not legal advice. It describes rules as we read them in October 2026. Laws and guidance change, and facts decide cases.

What it leaves out

Consumer marketing, US state laws, messaging apps, social-platform ads and sector rules. It also skips telemarketing detail for Japan and South Korea.

What is editorial

The strictness meter and the spectrum are our judgement. They help you compare. They do not replace the legal text.

What we could not verify

Canadian and Korean penalty amounts, Taiwan's detail, and primary statute text for several markets. Where we could not verify it, we say so on the card.

COUNTERPOINT

Opt-in lists are smaller. Some teams argue that smaller, consented lists convert better and cost less to defend. We found no primary study on this, so we do not quote a number. Test it on your own data.

OUR ADVICE

Treat this atlas as a map, not a verdict. Before a launch in a strict market, have a local lawyer read your consent wording and your list source.

The authors and ARS B2B Social Bridge accept no liability for decisions taken on the basis of this document.

SHOW YOUR WORKING

Method, source quality and sources

We checked each market against regulator pages where we could reach them, and against law-firm and industry summaries where we could not. Every claim on a country card carries a source-quality badge. Fines and dates we could not confirm are left out or flagged.

MARKET	WHAT WE READ	QUALITY
US	TCPA: law-firm summary. CAN-SPAM elements: standard statutory summary.	Secondary
UK	ICO guidance on electronic mail marketing.	Regulator
Canada	CRTC guidance on consent and unsubscribe.	Regulator
Australia	ACMA guidance on avoiding spam. Penalty figure from Mondaq.	Regulator + secondary
Germany	Overloop and Publicare summaries. Official statute page blocked.	Secondary
France	CCI Paris and Leto Legal. CNIL page failed to load.	Secondary
Japan	Monolith summary.	Secondary
South Korea	nepla.ai summary. Official text returned navigation only.	Secondary
Taiwan, India	Secondary summaries.	Secondary
GDPR	Article 83 text via gdpr-info.eu.	Legal-text mirror

Sources and further reading

- ICO, [Electronic mail marketing](#)
- CRTC, [Guidance on CASL](#)
- ACMA, [Avoid sending spam](#)
- GDPR Article 83, [gdpr-info.eu](#)
- Overloop, [B2B cold email in Germany](#)
- Revision Legal, [FCC implements new TCPA restrictions](#)
- Also used: Publicare (UWG §7), CCI Paris and Leto Legal (France), Mondaq quoting the ACMA, Monolith (Japan), nepla.ai (Korea).

Accessed October 2026. Some publisher pages carry no URL here because we could not re-verify them.



NEXT STEP

Compliant leads are the starting line.

ARS B2B Social Bridge helps B2B teams generate and qualify leads across markets. Use this atlas to stay inside the rules, then use the quality lens to decide which leads deserve your sales team's time.

Read: B2B Lead Quality Report 2026 →

Free benchmarks and a lead-quality scorecard · arsb2bsocialbridge.com/b2b-lead-quality-report

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