

Date: 16 January 2025

To: All ADGM Entities

OFFICE OF DATA PROTECTION CIRCULAR NO (1) OF 2025 REGARDING THE RESPONSIBILITIES OF ADGM ESTABLISHMENTS UNDER THE DPR 2021 TO UPDATE THEIR DATA PROTECTION REGISTER REGULARLY

The purpose of this circular is to inform you that the ADGM Office of Data Protection (“ODP”) has observed that some registered entities in ADGM have not consistently updated their Data Protection Register and the details of their designated Data Protection Contact Person. This is a critical aspect of compliance under the ADGM Data Protection Regulations 2021 (“DPR 2021”), and failure to maintain accurate and up-to-date information could lead to enforcement actions. The ODP wishes to emphasise the importance of ensuring that the Data Protection Register and the contact details of the Data Protection Contact Person are updated and accurate at all times.

KEY REQUIREMENTS UNDER S. 24 OF THE DPR 2021:

1. **Obligation to Maintain the Register:** all entities are required to maintain accurate information on the Data Protection Register. The register includes information relating to the purposes for processing personal data, categories of data subjects and transfers.
2. **Ensuring Timely Updates:** all entities are required to ensure that the Register is kept up-to-date. Any changes in the processing activities, such as new data collection processes, changes to existing declarations or transfers must be promptly reflected in the Register.
3. **Updating the Data Protection Contact Person Contact Details:** all entities must ensure that the contact details of their designated Data Protection Contact Person (including appointment or cessation of the statutory Data Protection Officer) are kept up to date. The Data Protection Contact Person is the primary point of contact for data protection matters, including inquiries, complaints, and reporting requirements.

Non compliance with the DPR 2021 can lead to enforcement actions, including fines or other corrective measures. If the Register including the Data Protection Contact Person details are not updated in line with the DPR 2021, enforcement actions may be taken. This may include fines, fixed penalties and/or inspections. Any changes to the contact information must be updated without delay to ensure effective communication between your organisation and the ODP.

ABOUT THE OFFICE OF DATA PROTECTION

The ODP is the supervisory authority in ADGM responsible for administering and enforcing the Data Protection Regulations 2021. The ODP has published guidance, including on the Data Protection Registration in ADGM Registry 2.0 available at: <https://www.adgm.com/operating-in-adgm/office-of-data-protection/guidance>.

Sincerely,

OFFICE OF DATA PROTECTION

