

Office of Data Protection

How to complete the

Data Protection Registration in ADGM Online Registry Solution

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1. INTRODUCTION

Abu Dhabi Global Market (ADGM) is a broad-based international financial centre, established pursuant to Abu Dhabi Law No. 4 of 2013 in the Emirate of Abu Dhabi. With its own civil and commercial laws based on the English common law, ADGM offers the local, regional, and international business community a world-class legal system and regulatory regime.

The Office of Data Protection (ODP) is the ADGM's independent data protection authority responsible for regulating and enforcing the ADGM Data Protection Regulations 2021 (DPR 2021).

The ODP is responsible for promoting data protection within ADGM, maintaining the register of Data Controllers, enforcing the obligations upon Data Controllers, Data Processors and upholding the rights of individuals.

Pursuant to Section 24, Data Controllers must provide information to the ODP regarding their processing activities and pay an annual data protection fee.

For more information, please refer to our website: <https://www.adgm.com/operating-in-adgm/office-of-data-protection/overview>.

2. PURPOSE

This document is intended to:

- Explain how Data Controllers should fill out the data protection section in the Registry Solution when registering a company in ADGM.
- Explain the steps to follow to renew the Annual Data Protection registration in the Registry Solution.

This guide is not intended to provide legal advice for Data Controllers in relation to the personal data processing activities that they carry out. It rather seeks to explain the information requirements of the Data Protection section when filling out the company registration form in the Registry Solution.

3. DATA PROTECTION REGISTRATION

The data protection section is divided into 6 key steps as listed below:

- Data Protection (Data Protection Officer and Data Protection Contact Person)
- Data Processors
- Data Protection – Personal Data
- Data Protection – Sensitive Personal Data
- Data Transfers
- Data Protection Declaration

Step 1 – Data Protection (Data Protection Officer and Data Protection Contact Person)

Some ADGM entities are required to appoint a 'Data Protection Officer' ("DPO")¹. The role of the DPO can be fulfilled by a third-party service provider or internally.

To help entities assess whether they are required under the DPR 2021 to appoint a 'Data Protection Officer' ("DPO"), the ADGM Office of Data Protection ("ODP") has made available an assessment [tool](#).

- ✓ If your answer to the DPO requirement is 'Yes', select whether the DPO function will be covered by internal staff or outsourced to a service provider.

Complete the information and upload the supporting documents. No templates are provided for the **Appointment Letter** and/or the **contract** (a contract should be uploaded when the DPO service is outsourced). A DPO Competency Statement² template is provided by the ODP under 'Templates' at the following link: <https://www.adgm.com/operating-in-adgm/office-of-data-protection/guidance>.

- ✓ If your answer to the DPO requirement is 'No', the Data Protection Contact Person form is displayed. You don't need to upload any supporting documents for the appointment of a Data Protection Contact Person.

The information you will provide at this stage may be edited post-registration.

Either the Data Protection Officer or the Data Protection Contact Person do not need to be resident within ADGM.

Step 2 – Data Processors

Upon entry into force of the DPR 2021, it is no longer mandatory to notify the ADGM Office of Data Protection when using a Data Processor (another company which you contract to process personal data on your behalf). However, you can maintain that information in your company's page for your ease of reference/internal records.

- i Upload of supporting documents is voluntary.

Step 3- Data Protection – Personal Data

This section requires you to provide information on the types of personal data that you process. **All companies registered in ADGM process personal data regardless of the amount or type of personal data.** The Office of Data Protection has issued [Circular No\(1\)](#)

¹ For more information on Data Protection Officers according the DPR 2021, you may consult Part 3 of the Guidance published by the ODP available [here](#).

² Data Controllers should attest a specific competency statement/declaration to comply with DPO obligations. Article 35(3) of the DPR 2021 states that a DPO must be appointed on the basis of professional qualities and, in particular, expert knowledge of data protection law and practices and the ability to fulfil the tasks referred to in section 37 of the DPR 2021.

of 2021, which clarifies that all entity types established in ADGM are processing personal data³.

Choose one or more legal basis for using personal data within your organisation.

! At least one legal basis must be selected.

Reasons for Processing of Personal Data

Personal Data may only be processed in accordance with section 2 of the ADGM Data Protection Regulations 2021.

Please choose which of the below types of Personal Data you will need.

The Data Subject has given his written consent to the Processing of that Personal Data *

Yes No

Processing is necessary for the performance of a contract to which the Data Subject is party or in order to take steps at the request of the Data Subject prior to entering into a contract *

Yes No

Processing is necessary for compliance with any regulatory or legal obligation to which the Data Controller is subject *

Yes No

Processing is necessary in order to protect the vital interests of the Data Subject *

Yes No

Processing is necessary for the performance of a task carried out in the interests of the Abu Dhabi Global Market or in the exercise of the Board's, the Courts, the Regulators or the Regulatory Functions or powers vested in the Data Controller or in a Third Party to whom the Personal Data are disclosed *

Yes No

Processing is necessary for the purposes of the legitimate interests pursued by the Data Controller or by the Third Party to whom the Personal Data are disclosed, except where such interests are overridden by overriding legitimate interests of the Data Subject relating to the Data Subject's particular situation *

Yes No

Type of Data

Please choose which of the below Personal Data you will use.

Name *

Yes No

Address *

Yes No

Date of Birth *

Yes No

Email *

Yes No

Staff ID Number *

Yes No

Others *

Yes No

At the "Type of Data" section, select one or more types of personal data that you will use.

! At least one type of data must be selected.

³ All entities are minimally required to process, store and use the personal data of shareholders, directors, former employees, and statutory role holders. This includes maintaining passports and/or other documents to comply with ADGM Laws.

All the information you will provide at this stage may be edited at any time post-registration. Changes can be made through filing a “ **Maintain Data Protection Details** ” Service Request.

Step 4 – Data Protection – Sensitive Personal Data

If responding ‘yes’ to the question ‘Do you intend to obtain UAE residence visas?’, you will, by default, process sensitive personal data. Click the help icon for more information on the definition of sensitive personal data under the DPR 2021.

Data Protection – Sensitive Personal Data

Sensitive Personal Data is Personal Data revealing or concerning directly or indirectly racial or ethnic origin, political opinions, religious or philosophical beliefs, trade-union membership and health or sex life.

Do you entity intend to obtain UAE residence visas? *

Yes No

Will you be Processing any Sensitive Personal Data as defined in the Data Protection Regulations 2021? *

Yes No

Reasons for Processing of Sensitive Personal Data

Sensitive Personal Data shall be processed in accordance with section 2 of the Data Protection Regulations 2021.

Please select which of the following reasons apply to Processing of the Sensitive Personal Data.



Sensitive Personal Data is Personal Data revealing or concerning directly or indirectly racial or ethnic origin, political opinions, religious or philosophical beliefs, trade-union membership and health or sex life. If you plan to recruit staff or intend to obtain a visa, you will be processing information relating to the health of individuals. To obtain a visa, UAE Law requires prospective staff to be screened for certain health conditions.

You must select the type of sensitive personal data that you will use and the appropriate relevant legal basis (one or more)⁴.

Note that some entities may process sensitive personal data other than those intended for UAE residence visa application. In this case, you must also provide information on the sensitive personal data which your entity will use for its business purposes. Select one or more types of sensitive personal data and one or more applicable legal basis.

Step 5 – Data Transfers

If your company intends to obtain UAE residence visa(s), an international data transfer will occur by default. The reason being that the application process requires the transfer of personal data to onshore UAE, which is a distinct jurisdiction. In addition to being a distinct jurisdiction, note also that onshore UAE is **not** a jurisdiction that provides an adequate level of data protection in accordance with the ADGM Data Protection Regulations 2021. UAE will be automatically selected on the next tab.

⁴ A company may process sensitive data other than for visa purposes, as part of their business activity. In such case, you need to include those in your responses along with the relevant legal basis.

Will you be transferring data to other jurisdictions? *

Yes No

Will you be transferring Personal Data outside the jurisdiction of the ADGM that provides an adequate level of protection? *

Yes No

Transfer of Personal Data out of the jurisdiction of the ADGM that does not have an adequate level of protection

Transfer or a set of transfer of Personal Data to a Recipient which is not subject to laws which ensure an adequate level of protection in accordance with the Data Protection Regulations 2021 may only take place on conditions as stated in section 5 of the Data Protection Regulations 2021.

Will you be transferring Personal Data outside the jurisdiction of the ADGM that does not provide an adequate level of protection? *

Yes No

Please list the name of country (ies) where the Personal Data will be transferred out of the ADGM (Global Market) *

Available		Chosen
Afghanistan	>	United Arab Emirates
Åland Islands	<	
Albania		

If your company transfers personal data to other 'non-adequate'⁵ jurisdictions for its business purposes, you should add one or more such jurisdictions from the drop-down list as shown below.

Transfer or a set of transfer of Personal Data to a Recipient which is not subject to laws which ensure an adequate level of protection in accordance with the Data Protection Regulations 2021 may only take place on conditions as stated in section 5 of the Data Protection Regulations 2021.

Will you be transferring Personal Data outside the jurisdiction of the ADGM that does not provide an adequate level of protection? *

Yes No

Please list the name of country (ies) where the Personal Data will be transferred out of the ADGM (Global Market) *

Available		Chosen
Pakistan	>	United Arab Emirates
Philippines	<	Egypt
Republic of Korea		
Others		



Select the relevant legal basis for the transfer to non-adequate jurisdiction/s:



Choose the relevant safeguard/s that you will use for the transfer to non-adequate jurisdiction/s (you must select one mechanism) and upload the supporting document.



If your company transfers personal data to 'adequate' jurisdictions for its business purposes, you only need to answer 'yes' to the relevant question and select the country/ies from the drop-down list of recognised jurisdictions. No additional information or documentation is required for transfers to 'adequate' jurisdictions.

⁵ For more information on international transfers, including the definition of 'adequate' or 'non-adequate' jurisdictions, you may consult Part 6 of the Guidance published by the ODP on DPR 2021 available [here](#). Summarised information is also available in the brochures published by the ODP [here](#).

Data Transfers

Will you be transferring data to other jurisdictions? *

Yes No

Will you be transferring Personal Data outside the jurisdiction of the ADGM that provides an adequate level of protection? *

Yes No

Please list jurisdiction/s *

<p>Available</p> <div style="border: 1px solid #ccc; padding: 5px; min-height: 100px;"> <p>Andorra</p> <p>Cyprus</p> <p>Croatia</p> </div>	<p>></p> <p><</p>	<p>Chosen</p> <div style="border: 1px solid #ccc; padding: 5px; min-height: 100px;"> <p>Bahrain</p> </div>
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Step 6 – Data Protection Declaration

Upon accepting the declaration, you've reached the final step of the data protection section in the application.

4. DATA PROTECTION RENEWAL

- 1** **Step 1.** Log in to your portal user account for the relevant company here: <https://newreg.adgm.com/s/login/>
- 2** **Step 2:** Select your company by clicking 'Entity Profile(s)' and **selecting your company**.
- 3** **Step 3:** Click '**Maintain Company**' and select '**Data Protection Annual Renewal**'.
- 4** **Step 4:** Follow the instructions on each page of the Service Request and confirm the accuracy of the data protection filing(s) for your company. Complete the declaration, the payment, and submit the application.
- 5** **Step 5:** Check the date of your company's register. The date must be a future date. If it is still not up to date (i.e., multiple years), you must repeat Step 3.

i **Note:** You may have missed one or more Annual Renewal payments. Ensure that the Data Protection Registration is valid (i.e. indicating a future date). If the date is not showing a future date, repeat the renewal process as explained above in **Step 3**.

📄 **Example:** Today is 01.02.2024. You are renewing your Data Protection Registration, which expired on 01.01.2023. After successful renewal and payment, your Data Protection Registration expiration date now states 01.01.2024. This indicates that you have missed previous Data Protection Renewal payment/s, as **the Data Protection Registration should show instead a future date, in this case 01.01.2025**.

⁵ For more information on international transfers, including the definition of 'adequate' or 'non-adequate' jurisdictions, you may consult Part 6 of the Guidance published by the ODP on DPR 2021 available [here](#). Summarised information is also available in the brochures published by the ODP [here](#).

5. POST-REGISTRATION CHANGES

After completing your initial data protection filing, you may update certain information at any time to keep your details accurate. Changes can be submitted through the Registry Solution by filing “**Maintain Data Protection Details**”, “**Appointment and cessation of data processor**”, “**Appointment and Cessation of Data Protection Contact Person/Data Protection Officer**” Service Requests.

Common post-registration changes include:

- Data Protection Officer (DPO) details (internal or outsourced), including updated appointment letter/contract and any other supporting documents, where applicable.
- Data Protection Contact Person details (where a DPO is not required).
- Data Processor information (for internal records), including adding/removing processors and updating any voluntarily uploaded documents.
- Types of Personal Data and Sensitive Personal Data processed, and the selected legal basis.
- International transfer details, including adding/removing destination jurisdictions, updating the transfer legal basis and safeguard/mechanism, and uploading updated supporting documents for transfers to non-adequate jurisdictions.
- Any other data protection information fields made available within the “Maintain Data Protection Details” Service Request.



Note: Post-registration changes are separate from the **Data Protection Annual Renewal**. Updating details does not replace the requirement to complete annual renewal and payment.

6. FAQ

This section provides responses to frequently asked questions about the Data Protection filing and Annual Renewal process in the ADGM Online Registry Solution.

Q1

Q1. Do all ADGM entities need to appoint a Data Protection Officer (DPO)?

Not necessarily. Some entities are required to appoint a DPO under the DPR 2021, depending on their processing activities. If you are unsure, use the ODP’s DPO requirement assessment tool referenced in Step 1 of this guide.

Q2

Q2. What is the difference between a DPO and a Data Protection Contact Person?

A DPO is a formal role required for certain entities under the DPR 2021. Where a DPO is not required, the Registry Solution instead requests details of a Data Protection Contact Person. Supporting documents are typically required for a DPO appointment (internal appointment letter and/or outsourced contract), but not for a Contact Person.

- Q3 Does the DPO (or Contact Person) need to be resident in ADGM?** No. As noted in Step 1 of this guide, the DPO or Data Protection Contact Person does not need to be resident within ADGM.
- Q4 Do I have to notify the ODP about my Data Processors?** Under the DPR 2021, it is no longer mandatory to notify the ODP when using a Data Processor. The Registry Solution allows you to record processor details for your internal reference. The relevant service request that you can raise is “Appointment and Cessation of Data Processor”, and approval of this service is a formality.
- Q5 The system will not let me proceed unless I select a legal basis/type of data. What should I do?** The Registry Solution requires you to select at least one legal basis and at least one type of personal data. If you are unsure which options apply, consult the ODP Guidance (DPR 2021) and/or obtain independent advice appropriate to your circumstances.
- Q6 My company is very small and has no customers yet. Do we still process personal data?** Yes. As noted in Step 3 of this guide (and the referenced ODP circular), all ADGM entities process personal data at a minimum (e.g., shareholders, directors, employees, statutory role holders).
- Q7 Why does selecting “Yes” for UAE residence visas trigger Sensitive Personal Data?** The visa application process typically involves processing categories of data that may be treated as sensitive personal data under the DPR 2021. Use the help icon in the Registry Solution for definitions and ensure you select the applicable sensitive data categories and legal basis.
- Q8 Why is “UAE” automatically selected under international transfers?** If you intend to obtain UAE residence visas, an international transfer to onshore UAE occurs as part of the process. Onshore UAE is treated as a distinct jurisdiction and is not listed as “adequate” under the DPR 2021 for the purposes described in this guide.
- Q9 Do I need to upload documents for every international transfer?** Not always. For transfers to “adequate” jurisdictions, the Registry Solution generally requires you to select the jurisdiction only. For transfers to “non-adequate” jurisdictions, you must select a legal basis and a safeguard/mechanism and upload the relevant supporting document(s).
- Q10 What does “safeguard/mechanism” mean for transfers to non-adequate jurisdictions?** It refers to the transfer tool relied on under the DPR 2021 to provide protection for the transferred personal data. For more information, consult Part 6 of the ODP Guidance on DPR 2021.
- Q11 I renewed and paid, but the expiry date is still not a future date. Is something wrong?** This usually indicates that one or more previous Annual Renewal payments were missed. Repeat the renewal process until the Data Protection Registration shows a future date, as described in Section 4 of this guide.
- Q12 Who receives renewal reminders/notifications, and how do I update the email address?** An entity may have several portal users. Renewal reminders/notifications are sent through the Registry Solution to the **portal-authorized user(s)** linked to the entity profile (i.e., the authorized individual(s) on the portal account for that entity). If you have updated your personal email address, ensure that the email address associated with the relevant portal user account and/or the entity profile is also updated (as applicable). Keeping portal access and contact details up to date helps ensure renewal notifications are received and reduces the risk of late renewal penalties.

Q13

I filed “Maintain Data Protection Details” but I did not pay the USD 300 fee. Why am I still receiving renewal reminders?

“Maintain Data Protection Details” is used to update your data protection information (for example, DPO/DPCP details or transfers). It is not the Data Protection Annual Renewal, and it does not renew your registration. To renew and stop renewal reminders, you must file “Data Protection Annual Renewal” under Maintain Company, complete the declaration, and pay the applicable annual fee (USD 300).

Q14

If an entity is in liquidation/deregistration/strike-off, does it still need to renew and pay the annual fee?

In general, yes. The annual renewal obligation applies from incorporation and may continue to apply to entities under liquidation or in the process of deregistering/dissolving. If the renewal date has not passed and the entity is no longer “Established” (for example, following approval of de-registration and the entity becomes inactive), the obligations under the DPR 2021 (including fee provisions) would no longer apply. The ODP has also approved a limited policy position to exempt some entities from Annual Renewal and related monetary penalties where an entity’s registration is inactive following approval of de-registration, and the entity’s data protection registration has not expired yet.

Q15

I replaced my Data Protection Contact Person (DPCP) before renewal, but the change is not showing when I file the Data Protection Annual Renewal. What should I do?

File the Data Protection Annual Renewal to ensure your registration remains valid and to avoid late renewal penalties. If the DPCP change was approved, it will be reflected on your company page in the Registry Solution after the system updates. You do not need to delay the renewal submission because the updated DPCP details are not yet visible during the renewal workflow. This is a display/timing issue and does not affect the validity of the approved SR.

Q16

Can I change my data protection filing after registration?

Yes. You can update relevant data protection details by filing a “Maintain Data Protection Details” Service Request (see Section 5 of this guide). Annual renewal is a separate process.

Q17

Who should I contact if I have a technical issue with the Data Protection section in Registry Solution or questions about my filing?

Contact the Office of Data Protection using the contact details at the end of this document.

Q18

Can the ODP tell me which legal basis, sensitive data category, or transfer mechanism I should choose?

This guide explains information requirements in the Registry Solution and is not intended to provide legal advice. For further information, consult the ODP Guidance on DPR 2021 and consider obtaining independent advice appropriate to your circumstances.

For more information, you may contact the Office of Data Protection at:



Telephone No.: 00 971 2 3338888



Email: Data.Protection@adgm.com



Address: ADGM Building, Abu Dhabi Global Market Square,
Al Maryah Island, Abu Dhabi, United Arab Emirates.



Website: <https://www.adgm.com/operating-in-adgm/office-of-data-protection/overview>