

Date: **18 April 2021**

To: Registration Authority  
To: All Licensed Persons

## OFFICE OF DATA PROTECTION CIRCULAR NO (1) OF 2021 CLARIFYING THE PROCESING OF PERSONAL DATA FOR ALL ENTITY TYPES

The purpose of this circular is to inform you that the Office of Data Protection (“ODP”) has identified some discrepancies in the records held on file by the ADGM Registration Authority (“RA”) regarding the processing of personal data of registered entities in the ADGM.

The ADGM Data Protection Regulations (“the Regulations”) defines Personal Data as ‘...*any information relating to an identified natural person or identifiable natural person*’. Processing in the Regulations means ‘...*any operation or set of operations which is performed upon Personal Data, whether or not by automatic means, such as collection, recording, organisation, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, blocking, erasure or destruction*’.

Section 145 of the ADGM Companies Regulations 2020 states that ‘*A company must have at least one director who is a natural person*’. Therefore, all registered entities will, at the very least, process personal data of Director(s) or statutory role holders. In particular, process personal data such passports and/or authorized signatures of those Director(s), Shareholders or statutory role holders.

### DECISION

All registered entities must select ‘Yes’ in the Registry Solution for the processing of personal data.

The Registration Authority must challenge all ‘No’ responses. The Registration Authority may refer applicants and ADGM entities to our Office for further clarification and/or a formal decision on the processing of personal data. All referrals to the ODP should be sent to the following email: [Data.Protection@adgm.com](mailto:Data.Protection@adgm.com).

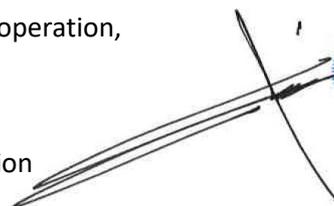
### ABOUT THE OFFICE OF DATA PROTECTION

The ODP is the independent data protection body responsible for promoting data protection within ADGM. The ODP maintains the register of Data Controllers enforces the obligations upon Data Controllers and upholds the privacy rights of individuals (Data Subjects). For more information, please refer to our website: <https://www.adgm.com/operating-in-adgm/office-of-data-protection/overview>

Thank you for your cooperation,

Sincerely,

Office of Data Protection



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REGISTRATION AUTHORITY  
سلطة التسجيل

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