

UAE Data Protection Authorities: Understanding the Regulatory Landscape

September 2026

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Key Takeaways

- The UAE has three data protection regimes: the federal mainland, the DIFC and the ADGM. Each has its own law, its own regulator and its own level of maturity.
- On the mainland, the PDPL has been in force since January 2022 but has not yet been enforced. Its Executive Regulations have not been issued and the regulator it relies on never became fully operational.
- The UAE has no dedicated AI law. Outside the DIFC's Regulation 10, AI is governed by general data protection law and by non-binding guidance, or soft law, such as the UAE Charter for the Development and Use of Artificial Intelligence.
- The Federal Authority for Artificial Intelligence and Data, announced on 14 June 2026, brings federal data and AI functions under one body. It resolves fragmentation within the federal system, not between the UAE's regimes.
- Organisations should plan for a multi-regime UAE: comply with the free zone rules that are already enforced, and prepare on the mainland before the Executive Regulations start a six-month compliance window.

1. Introduction

Ask three organisations in the UAE which regulator oversees their use of personal data and artificial intelligence (AI), and you may well get three different answers. None of them would necessarily be wrong. The answer depends on where the organisation is licensed and, until very recently, on which federal body it asked.

This is the defining feature of the UAE's data protection landscape. It is fragmented, and on two levels:

- **Between regimes.** The UAE has three data protection regimes rather than one. The federal Personal Data Protection Law (PDPL) applies on the mainland, while the Dubai International Financial Centre (DIFC) and the Abu Dhabi Global Market (ADGM), the country's two financial free zones, each have their own law and their own regulator. The three have developed at very different speeds.
- **Within the federal system.** On the mainland, the regulator the PDPL relies on

never became fully operational, and federal responsibility for data and for AI was split across three separate bodies.

Data protection and AI belong in the same discussion. AI systems are among the most data intensive tools an organisation can deploy, and in the UAE the rules that govern them are, for the most part, data protection rules. The UAE has no dedicated AI law: outside the DIFC, binding obligations for AI systems come from data protection law, while AI-specific expectations are set out in non-binding guidance. The DIFC regulates AI through its data protection regulations, and at federal level a single authority now holds both portfolios. This White Paper therefore treats data protection and AI governance together, and focuses on the point where they meet: the processing of personal data by AI systems.

On 14 June 2026, the UAE announced the Federal Authority for Artificial Intelligence and Data, bringing federal data and AI functions together under one body for the first time. The central argument of this White

Paper is that the new Authority is a direct answer to the second layer of fragmentation, but not to the first. It is likely to give the mainland the regulator, and eventually the detailed rules, that it has lacked. It does not merge the UAE's three regimes, and it does not change the rules in the DIFC or the ADGM. The UAE will remain a multi-regime jurisdiction, and organisations need to plan on that basis.

Written for compliance, legal and business leaders, the paper sets out to answer three questions:

1. How did the UAE's data protection landscape become fragmented, and where does each regime stand today?
2. What does the new Federal Authority change, and what does it leave unchanged?
3. What should organisations do now, depending on where they operate?

Section 2 maps the three regimes and explains how the gap between them opened up. Section 3 examines the new Federal Authority: what it resolves and what it does not. Section 4 shows the resulting fragmentation through a practical example, a single AI-powered chatbot assessed under each of the three regimes. Section 5 sets out practical priorities for organisations, and Section 6 concludes.

2. The UAE Landscape: Three Regimes, One Country

The UAE does not have a single data protection regime, and this is by design. The PDPL expressly does not apply to free zones that have their own data protection legislation, which leaves the DIFC and the ADGM to regulate personal data under their own laws. The PDPL also steps aside for

certain sectors, such as health data and banking and credit data, that are governed by their own federal rules. Working out which rules apply therefore starts with two simple questions: where is the organisation licensed, and what does it do?

2.1 The Federal Mainland

The PDPL, Federal Decree-Law No. 45 of 2021, was issued in September 2021 and entered into force on 2 January 2022. It was the UAE's first economy-wide federal data protection law, and it draws on familiar international concepts: lawful processing, data subject rights, breach notification, data protection officers and controls on cross-border transfers. Supervision was entrusted to the UAE Data Office, set up in parallel by Federal Decree-Law No. 44 of 2021 as the federal data protection regulator.

In the years that followed, the Data Office was formally constituted, but it never became an operating supervisory authority of the kind organisations would recognise from other jurisdictions. Two things were missing:

1. **The Executive Regulations**, which are meant to turn the PDPL's high-level obligations into concrete, operational requirements.
2. **The working machinery of a regulator:** enforcement practice, published guidance and a clear channel for organisations to raise questions.

What the delay has meant in practice

The PDPL is in force, and its obligations are set out in law, but it is not yet being enforced. In addition, the PDPL also gives controllers and processors six months from the issuance of the Executive Regulations to bring their processing into line. Because the Executive Regulations have not yet been issued, that transition period has not started, and without an operational regulator there has been no

enforcement to date. In short, the PDPL is in effect but is not being enforced, and the deadline for bringing processing into line has not yet been set.

The result is a law whose direction is clear but whose timetable is not. This is not a reason to wait. The substance of the PDPL is already known and is unlikely to change fundamentally once the Executive Regulations arrive, and six months is a short window for an organisation starting from scratch. Many mainland organisations also already face comparable expectations through client contracts, group policies or foreign laws such as the EU GDPR.

Federal responsibility for data and AI

Federal responsibility for data and AI was also divided. Alongside the UAE Data Office, the UAE Artificial Intelligence Office led national AI policy, including the UAE National Strategy for Artificial Intelligence 2031. The Telecommunications and Digital Government Regulatory Authority (TDRA) held the digital government portfolio through its Information and Digital Government Sector. TDRA's core mandate is telecommunications licensing and spectrum management, but it also played a supporting role in the wider digital ecosystem, including IoT device registration and the operation of aeCERT, the UAE's national computer emergency response team.

Federal data and AI functions therefore sat in three separate places. None of them administered a binding, AI-specific rulebook: on the mainland, AI governance has so far rested on strategy, principles and guidance rather than legislation.

AI: guidance rather than law

There is no dedicated AI law in the UAE. The only binding AI-specific rules in the country are the DIFC's Regulation 10, discussed in Section 2.2. At federal level, the government

has instead built up a body of soft law: strategies, principles and guidance that set out how AI should be developed and used, without creating directly enforceable obligations or penalties of their own. The main federal instruments are:

- **UAE National Strategy for Artificial Intelligence 2031.** Launched in 2017, it sets the national policy direction for AI adoption and governance.
- **AI Ethics Guide.** Launched in December 2022, it sets out principles and guidance for the ethical design and implementation of AI systems in both the public and private sectors, including fairness, accountability, transparency and explainability.
- **Generative AI guidance.** In 2023, the government published a guide to the use of generative AI across key sectors.
- **UAE Charter for the Development and Use of Artificial Intelligence.** Published in 2024, the Charter sets out twelve principles, including human oversight, privacy, the mitigation of bias, and governance and accountability, as well as compliance with applicable laws and international treaties.
- **Sectoral guidance.** Sector regulators are adding their own expectations. In February 2026, for example, the Central Bank of the UAE published a guidance note on the responsible adoption and use of AI and machine learning by licensed financial institutions.

Individual emirates have also issued their own instruments, such as Dubai's AI ethics principles and the Dubai AI Seal.

None of these instruments is legislation, but they should not be dismissed. They show what the government, and now the new Federal Authority, expects of organisations that use AI; sector regulators are already building on them; and they are the most

likely starting point for any future binding rules. In the meantime, the binding obligations that apply to AI systems on the mainland come from existing laws of general application, above all the PDPL, rather than from an AI law.

2.2 The Financial Free Zones

The picture in the UAE's two financial free zones is very different. Both have their own common law based legal frameworks, their own courts and their own regulators, and both have adopted modern data protection laws closely aligned with the EU GDPR. Each has a dedicated Commissioner of Data Protection who has been issuing guidance, decisions and enforcement actions for several years.

Dubai International Financial Centre

The DIFC Data Protection Law, DIFC Law No. 5 of 2020, came into force on 1 July 2020, replacing the centre's earlier 2007 law. It is supervised by the DIFC Commissioner of Data Protection, who has an established record of guidance, audits and enforcement. The DIFC has also gone further than any other UAE regime on AI. In September 2023 it introduced Regulation 10 of the DIFC Data Protection Regulations, which governs the processing of personal data through autonomous and semi-autonomous systems, including AI. Regulation 10 distinguishes between deployers, treated as controllers,

and operators, treated as processors. It requires clear notices to individuals and registers of system use cases, and for high risk processing it requires additional safeguards such as an Autonomous Systems Officer or certification. Organisations had to comply by 1 January 2026.

Abu Dhabi Global Market

The ADGM Data Protection Regulations 2021 were enacted in February 2021 and are supervised by the ADGM Commissioner of Data Protection through the ADGM Office of Data Protection. The regime closely follows the EU GDPR and has applied in full since its transitional periods ended in 2022. Unlike the DIFC, however, the ADGM has not adopted binding AI-specific rules. AI systems that process personal data are regulated through the general data protection framework: lawful basis, transparency, data protection impact assessments, security and data subject rights.

2.3 A Gap in Maturity

Put side by side, the three regimes reveal a real gap in maturity. While mainland organisations waited for Executive Regulations and a working regulator, organisations in the free zones were dealing with active regulators, and in the DIFC they are now subject to binding AI rules. Figure 1 sets out the key milestones on both tracks.

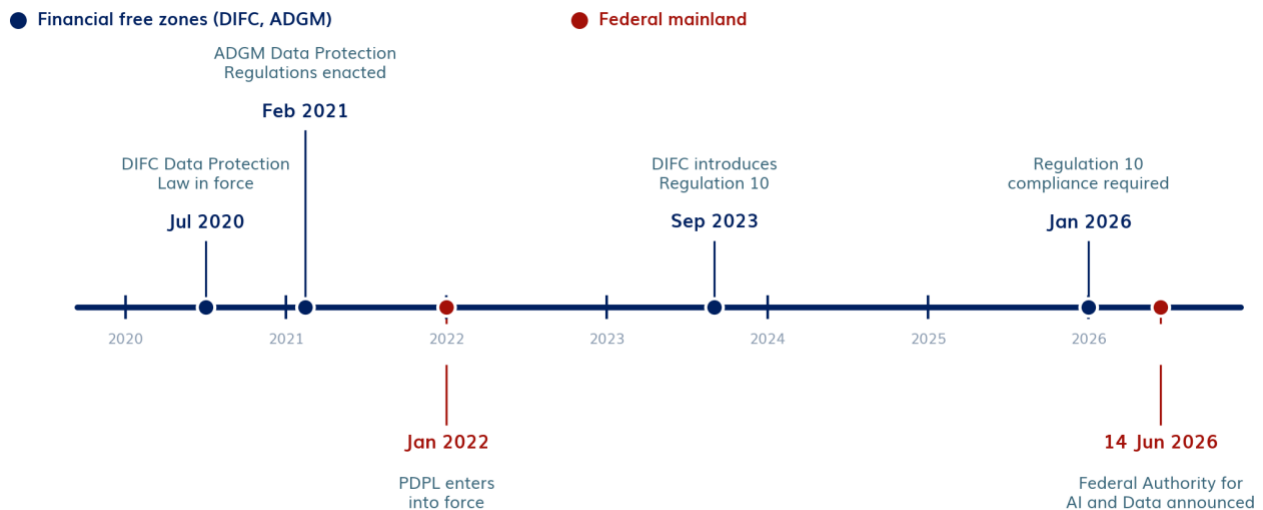


Figure 1: Key milestones in the UAE's data protection and AI governance landscape, 2020 to 2026

3. *The New Federal Authority for Artificial Intelligence and Data*

This uneven picture is the background to the UAE's latest step. On 14 June 2026, the UAE announced the establishment of the Federal Authority for Artificial Intelligence and Data. It brings together three federal functions that previously sat in separate places:

- The UAE Artificial Intelligence Office
- TDRA's Information and Digital Government Sector
- The UAE Data Office (also referred to as the Emirates Data Office)

The result is, for the first time, a single federal body responsible for both data and AI governance. The Authority is led by Omar Sultan Al Olama, Minister of State for Artificial Intelligence, Digital Economy and Remote Work Applications, and reports directly to the Cabinet, a reporting line that signals the priority the UAE leadership attaches to this agenda. Its announced mandate includes setting a unified national direction for AI and data policy, proposing legislation and strategies, aligning federal and local digital initiatives, and establishing standards and guidelines for data and AI management.

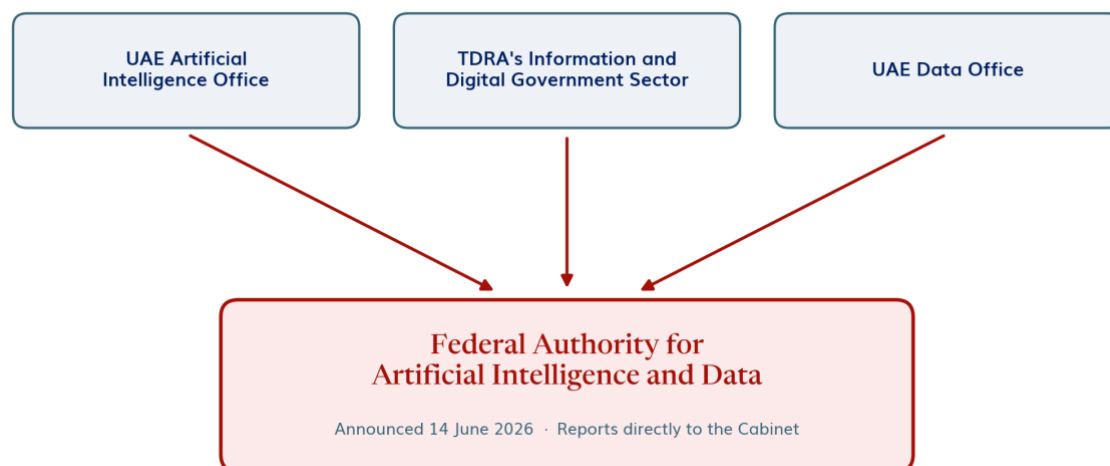


Figure 2: How the new Federal Authority consolidates existing federal functions

3.1 What Changes

A route to PDPL enforcement. The PDPL's Executive Regulations have still not been issued, and their timing remains unclear, but the market widely expects the new Authority to finalise them. When that happens, organisations will receive the detailed requirements they have been waiting for, the six-month transition period will begin to run, and there will be a clear federal point of contact on enforcement. Until then, the PDPL remains in effect but unenforced.

Joined-up data and AI governance. Data protection and AI governance now sit within the same federal body. Organisations can expect a more coherent conversation with the regulator, rather than separate tracks for data and for AI, and any future federal AI rules are more likely to be designed with the PDPL in mind. For now, however, federal AI governance remains guidance-based, and the Authority's mandate to set standards and guidelines suggests that soft law will continue to play a central role. This mirrors an international trend in which regulators increasingly treat AI governance and data protection as two sides of the same coin, an

approach the DIFC has already taken with Regulation 10.

3.2 What Stays Fragmented

The Authority resolves fragmentation within the federal system. It does not resolve fragmentation between the UAE's regimes. The DIFC and the ADGM keep their own laws and their own Commissioners of Data Protection, and nothing in the announcement changes their rules. Regulation 10 remains a DIFC rule, and the ADGM still has no AI-specific rules of its own. The PDPL's sectoral carve-outs, such as those for health data and for banking and credit data, also remain in place.

In other words, the mainland is moving towards the regulatory clarity the free zones already have, but it has not yet arrived, and when it does it will arrive at a different point. For the foreseeable future, the UAE remains a multi-regime environment. Section 4 shows what that means for a single organisation.

4. Fragmentation in Practice: Three Regulators, Three Speeds

The easiest way to see the fragmentation is through an example. Imagine an

organisation licensed in the UAE that runs an AI-powered customer service chatbot, which collects customers' names, contact details and the content of their queries. The activity is identical wherever the organisation is licensed. The compliance picture is not. Table 1 compares the position under each regime today.

Table 1: The same AI chatbot under the UAE's three data protection regimes

	DIFC	ADGM	Federal mainland
Governing law	DIFC Data Protection Law No. 5 of 2020 and the DIFC Data Protection Regulations, including Regulation 10	ADGM Data Protection Regulations 2021	PDPL, Federal Decree-Law No. 45 of 2021
Implementing rules	In force	In force	Executive Regulations not yet issued
Regulator	DIFC Commissioner of Data Protection	ADGM Commissioner of Data Protection	Federal Authority for Artificial Intelligence and Data (announced June 2026); PDPL supervision not yet operational
Enforcement	Active	Active	None to date. The PDPL is in force but not enforced
AI-specific rules	Yes. Regulation 10, with compliance required since 1 January 2026	No binding AI rules. General data protection rules apply	No AI law. General PDPL rules apply, alongside non-binding federal AI guidance
Starting point for the chatbot operator	Regulation 10 compliance on top of general data protection obligations	Full compliance with general data protection obligations	Build PDPL compliance ahead of the Executive Regulations

4.1 DIFC

The DIFC has the most mature regime of the three and the only one with binding AI-specific rules. Because the chatbot processes personal data through an AI system, Regulation 10 applies on top of the general DIFC Data Protection Law. The organisation needs to establish whether it acts as deployer or operator, give users a clear notice explaining how the system works, record the system in its register and assess whether the use case is high risk. In the DIFC, AI

compliance is a current, supervised obligation, not a future item on the to-do list.

4.2 ADGM

In the ADGM, the regime is equally well established and actively supervised, but there are no AI-specific rules. The chatbot is regulated through the general framework: a lawful basis for processing, transparent privacy information, a data protection impact assessment where the processing is high risk, appropriate security, breach response procedures and a working process for data

subject rights requests. The absence of AI-specific rules does not mean a lighter touch. It means the general rules carry the full weight.

4.3 Federal Mainland

On the mainland, the chatbot falls under the PDPL, which already sets out the core obligations: lawful processing, transparency, security, breach notification and data subject rights. What is missing is the operational detail and an active regulator. There is no AI law to apply, but the organisation should still treat the national AI guidance, in particular the UAE AI Charter's principles on transparency, human oversight and privacy, as the benchmark for how the chatbot is designed and explained to users, and check whether sector guidance applies, such as the Central Bank's guidance note for licensed financial institutions. The organisation faces no active enforcement today, but the greatest uncertainty about timing. Once the Executive Regulations are issued, it will have six months to comply.

One activity, three regimes, three different starting points. This is the practical cost of fragmentation, and the new Federal Authority, for all it changes on the mainland, does not remove it.

5. What This Means for Organisations

For organisations operating in or serving the UAE, the practical question is no longer whether these rules apply, but whether the organisation is ready for the regime, or regimes, that apply to it. Four priorities follow from the analysis above.

Map your regulatory footprint. Identify where each UAE entity is licensed, which regime applies to it and whether sectoral rules, such

as those for health or financial data, also apply. Groups with entities in more than one regime should expect more than one set of obligations for the same activity.

Act on the rules that are already enforced. In the DIFC, confirm your Regulation 10 position for every AI system that processes personal data. In the ADGM, make sure the fundamentals of lawful processing, transparency, breach response and data subject rights are in place and documented.

Prepare for the PDPL now. On the mainland, use the time before the Executive Regulations to build a PDPL compliance programme: records of processing, privacy notices, data subject rights procedures, breach response and cross-border transfer mechanisms. The six-month window will be short for organisations starting from zero.

Govern data protection and AI together. With the DIFC and now the federal level treating data and AI as one agenda, a single governance framework covering both will serve organisations better than two parallel programmes. In the absence of an AI law, use the UAE's AI guidance, including the UAE AI Charter and any sector-specific guidance, as the benchmark for your AI governance, so that you are not starting from scratch when binding rules arrive. Follow the new Authority's announcements closely, as its first regulations and guidance will set the tone for the mainland.

5.1 How WLC Can Help

Because the landscape is fragmented, the right approach differs from one organisation to the next. White Label Consultancy (WLC) supports organisations across all three regimes.

Regulatory readiness, wherever you operate. Our team works across the PDPL, the DIFC Data Protection Law and Regulation 10, and

the ADGM Data Protection Regulations. You get one advisor who understands how your obligations differ by jurisdiction, instead of three separate conversations.

AI governance built in, not bolted on. As data protection and AI governance come together at federal level, we help you build one compliance approach that covers both, instead of managing them as separate workstreams.

Regulation 10 certification. WLC is an Accredited Certification Body for DIFC Regulation 10. Whether you need support preparing for Regulation 10, from mapping your obligations to preparing the required notices and registers, or independent certification of your autonomous systems, we can help.

Pritect, our compliance platform. For organisations that want to go beyond one-off advisory work, Pritect provides the infrastructure to manage data mapping, records of processing activities and AI governance in one place. It is already in use with clients in the DIFC and in the UAE healthcare sector.

If you want a clear picture of where your organisation stands today, and what the new Federal Authority is likely to mean for you, get in touch with our team at hello@whitelabelconsultancy.com.

6. Conclusion

Ask three organisations in the UAE which regulator oversees their use of personal data and AI, and you will still get three different answers. The Federal Authority for Artificial Intelligence and Data does not change that, but it does change the federal answer. For the first time, the mainland has a single body responsible for both data and AI, and a realistic prospect of the Executive Regulations and active enforcement that the

PDPL has lacked since 2022. It is one of the most significant developments since the PDPL itself came into force, and it aligns the UAE with a global move towards treating data protection and AI governance as one discipline.

What the Authority does not do is turn three regimes into one. The DIFC and the ADGM will continue on their own paths and at their own speed, while the mainland now starts to catch up. On AI specifically, the mainland continues to rely on guidance rather than legislation, and organisations should not mistake the absence of an AI law for the absence of expectations. For organisations, the message is straightforward: the waiting period on the mainland is coming to an end, and the fragmentation between regimes is here to stay. Organisations that build strong, integrated data protection and AI governance now, calibrated to each regime in which they operate, will be far better placed than those that wait for enforcement to arrive.

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