

Data protection brief | Data protection supervisors

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Bahrain's Personal Data Protection Authority (PDPA), established under the auspices of the Ministry of Justice, Islamic Affairs and Awqaf, published three draft executive resolutions on its official website (pdp.gov.bh) on 26 April 2021 in regards to the implementation of Bahrain's personal data protection law (the PDPL). In this brief, we highlight key findings from our analysis of the draft on data protection supervisors:

- The PDPA will establish a register for licensed data protection supervisors (individuals and legal entities):
 - Individuals seeking accreditation must have at least a bachelor's degree in IT and be certified in either cyber security, information security auditing or information security.
 - Legal entities seeking to be licensed should be licensed to work in Bahrain and offer legal advisory, auditing, IT, business administration, accounting, or risk management services.
 - Legal entities should also have at least three professionals who can be licensed as individuals.
- Data protection supervisors are required to:
 1. Require data managers to set a data privacy framework which includes required technical and organisational controls
 2. Monitor levels of PDPL compliance when processing data
 3. Respond to enquiries and comments from the PDPA regarding processing operations performed by data managers
 4. Verify that data managers have informed data owners and the PDPA within 72 hours of discovering a data breach
 5. Independently audit high-risk data processing operations, ensuring that data managers perform all necessary procedures, and report findings to the organisation's board.
 6. Report PDPL violations to the PDPA

Annual report

- At the end of the year, data protection supervisors are required to report data managers' compliance to the PDPA, detailing:
 1. Compliance with and adherence to policies and procedure
 2. Processing operations register
 3. Risk register
 4. Approvals obtained from the PDPA
 5. Number of data owner complaints and responses
 6. Need for enhancement of internal audit controls or training

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Disclaimer: The information in this document is based on an unofficial translation of an executive decision published for consultation on the website of the Personal Data Protection Authority; our analysis of Bahrain's personal data protection law (the PDPL); and general data protection principles. It is provided for information purposes only. Any omissions or errors are inadvertent. This document should not be relied upon when making decisions. You should seek appropriate professional advice from a data protection advisor before making any decision relating to your particular circumstances.