



Data Subject Requests (DSRs) Response Time Matrix



	EU Member States (27)	United Arab Emirates (UAE)	DIFC – UAE	Abu Dhabi – UAE	Singapore	Kingdom of Saudi Arabia (KSA)	Bahrain	California
Legal Instrument	General Data Protection Regulation (“GDPR”)	Federal Decree–Law No. 45 of 2021 (“PDPL”) ¹	DIFC Law No 5 of 2020 (“DP Law 2020”)	ADGM Data Protection Regulations 2021	Personal Data Protection Act 2012 (No. 26 of 2012) (‘PDPA’) ²	Saudi Arabia’s Personal Data Protection Law (“PDPL”) ³	Personal Data Protection Law (PDPL) No. (30) of 2018	Consumer Privacy Act of 2018 (“CPRA”) ⁴
Response Time to DSRs	Art. 12(3): At the latest, within one (1) month of receipt of the request *	Further details are expected by the Executive Regulations	Art. 13(7): At the latest, within one (1) month of receipt of the request *	Art. 10(3): Within two (2) months of receipt of the request **	Art. 21(1): As soon as reasonably possible***	Art. 9: Within thirty (30) days of receiving the request****	Art.18: within a period not exceeding fifteen (15) days from receipt of a request *****	Sec.12. 1798.130(2)(A): Within forty–five (45) days of receiving a verifiable consumer request from the consumer

* This can be extended by two (2) further months where necessary, considering the complexity and number of the request. The controller shall inform the data subject of any such extension within one (1) month of receipt of the request, together with the reasons for the delay.

** The two (2) months period can be extended by a further month (giving a total period of three months) when you need extra time due to: the complexity of a particular request; and/or the number of requests received.

*** If your organization is unable to provide access within thirty (30) days, inform the individual as soon as possible of the time your organization will be able to provide access. Generally, this refers to thirty (30) calendar days. This may, however, be extended in accordance with rules on the computation of time under the law.

**** If carrying out the request requires unreasonably extraordinary efforts or the Controller receives multiple requests from the same Personal Data Subject, the Controller may extend the period by not more than thirty (30) additional days, provided the Controller shall notify the Personal Data Subject of such extension and the justifications therefor.

***** Be aware that according to Article 20 of the PDPL, the period for responding to a request for the right to object is ten (10) working days from the date of receipt of a request from the data subject.

¹ This Decree–Law is in accordance with the standards and controls set by the Executive Regulations, which are yet expected to be published. Whilst the PDPL provides for an implementation period of six months from the publication of the Executive Regulations, this date may be extended at the discretion of the Cabinet.

² This table has been made according to Personal Data Protection (Amendment) Act 2020, which amends the Personal Data Protection Act 2012 (PDPA).

³ Please see the draft version of the executive regulations supplementing the PDPL (‘the Executive Regulations’), which were issued on 10 March 2022, for public consultation and adds significant detail to the law. The PDPL will take effect on 17 March 2023, this period, however, may be delayed for a period of up to five years for entities located outside Saudi Arabia, that process the personal data of Saudi residents.

⁴ The CPRA established the California Privacy Protection Agency to implement and enforce the law. CPRA is an initiative that amends the CCPA and includes additional privacy protections for consumers passed in Nov. 2020. The majority of the CPRA’s provisions will enter into force on Jan. 1, 2023.



Data Subject Rights



	EU Member States (27)	United Arab Emirates (UAE)	DIFC – UAE	Abu Dhabi – UAE	Singapore	Kingdom of Saudi Arabia (KSA)	Bahrain	California
Right to be Informed	Art.12,13	Arti.13(2)	Art.29,30 ⁵	Art.11,12	Art.20 ⁶	Art. 4,5	Art. 17	SEC.4. Section 1798.100. / 1798.115.
Right to Access	Art. 15	Art. 13(1)	Art. 33(1a-b)	Art.13	Art. 21	Art. 6	Art. 18 ⁷	SEC.7.Section 1798.110.
Right to Rectification	Art. 16	Art. 15(1)	Art. 33(1)(c)	Art. 14	Art. 22	Art. 7	Art. 23(1)	SEC.6. Section 1798.106.
Right to Erasure (“to be forgotten”)	Art. 17	Art. 15(2)	Art. 33(2)	Art. 15	-	Art. 8	Art. 23(1)	SEC.5. Section 1798.105.
Right to Restrict Processing	Art. 18	Art. 16	Art. 35	Art. 16	-	-	-	SEC.10. Section 1798.121.
Right to Data Portability	Art. 20	Art. 14	Art. 37	Art. 18	Art. 26 (H-J) ⁸	-	-	SEC.12. Section 1798.130. (a)(3)(b)(iii)
Right to Withdraw consent	Art. 7(3)	Art.6 (2)	Art.32	Art. 6(7)	Art. 16	Art. 11(1)	Art. 24(3)	-

⁵ Articles 29 and 30 of the DIFC Law No 5 of 2020 (“DP Law 2020”) are provided under the section of “Information Provision” instead of the section of “Data Subjects Rights”.

⁶ Notification of purpose is very similar to the “right to be informed” under GDPR.

⁷ The PDPL does not explicitly provide for the right to access. Instead, it primarily focuses on the right to be notified of when personal data is being processed upon request and provided with specific information, which is very similar to the right of access by the GDPR.

⁸ Please see Personal Data Protection (Amendment) Act 2020 (No. 40 of 2020) PART VIB.



	EU Member States (27)	United Arab Emirates (UAE)	DIFC - UAE	Abu Dhabi - UAE	Singapore	Kingdom of Saudi Arabia (KSA)	Bahrain	California
Right to Objection/opt-out of Sale or sharing of Personal Information	-	-	-	-	-	-	-	SEC.8. Section 1798.115
Right to Objection/opt-out (profiling, marketing etc.)	Art. 21	Art. 17	Art. 34	Art. 19	-	Art.12, (1)(c)	Art. 19,20,21 ⁹	-
Right to Objection/opt-out of automated decisions	Art. 22	Art. 18	Art. 38	Art. 20	-	Art. 15(3)	Art. 22 ¹⁰	SEC 21. Section 1798.185 (16) ¹¹
Right to Non-discrimination	-	-	Art. 39	-	-	-	-	SEC.11. Section 1798.125.
Right to Lodge a complaint to Data Protection Authority	Art. 77	Art. 24(1)	Art. 60(1)	Art. 57	Art. 48G ¹²	Art. 38(1)	Art. 25	SEC.24. Section 1798.199.45.

⁹ The data subjects have the right to object to the processing of their personal data under certain cases.

¹⁰ When the decision is solely based on the automated processing of personal data intended to assess the Data Subject regarding his performance at work, financial standing, creditworthiness, reliability, or conduct, then the Data Subject shall have the right to request processing in a manner that is not solely automated.

¹¹ "Opt-out rights with respect to businesses" use of automated decision-making technology, including profiling" [to be further defined in regulations].

¹² Please see Personal Data Protection (Amendment) Act 2020 (No. 40 of 2020) PART IXC.



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