Global Data and Cyber Handbook - Bahrain

DPOs and Notification Requirements

| Contents |
| --- |
| To generate table of contents, right-click here and select **Update Field.** |

# Is the concept of data protection officer (DPO) recognized in the jurisdiction?

*Last review date: 31 December 2024*

Yes

The PDPL establishes the concept of Data Protection Guardians, which are parties accredited by and registered with the PDPA that must be appointed by controllers in certain circumstances. These may be internal (employed) or external (third party) persons meeting specific criteria set out in Executive Order No. 46 of 2022 and enrolled on the register per Executive Order No. 47 of 2022.

# Are there circumstances in which it is mandatory to appoint a DPO or similar position?

*Last review date: 31 December 2024*

Yes

If yes, under what circumstances?

The PDPA may determine specific categories of controller that are required to appoint external or internal data guardians from time to time.

# Where a DPO is appointed, does the DPO have to meet specific requirements?

*Last review date: 31 December 2024*

Yes

# Are there obligations to notify, submit filings to, register with or obtain approval from local data protection authorities to collect and/or process personal data generally?

*Last review date: 31 December 2024*

Yes

In addition to a general notification requirement, the following operations require the prior written authorization of the PDPA:

automatic processing of sensitive personal data;

automatic processing of biometric data necessary for the verification of an individual’s identity;

automatic processing of genetic data , unless carried out by physicians, or a specialist within a licensed medical establishment, and is necessary for preventative medicine, medical diagnosis or the administration of health care or treatment;

automatic processing involving linkage between personal data files, of two or more data controllers, processed for different purposes; and

processing that is done by means of visual recording, and used for surveillance purposes.

Executive Order No. 44 of 2022 provides further guidance on the rules and procedures for submitting the  various notifications and authorization requests to the PDPA as required by the PDPL.

Copyright © 2025 Baker & McKenzie. All rights reserved. **Ownership:** This documentation and content (Content) is a proprietary resource owned exclusively by Baker McKenzie (meaning Baker & McKenzie International and its member firms). The Content is protected under international copyright conventions. Use of this Content does not of itself create a contractual relationship, nor any attorney/client relationship, between Baker McKenzie and any person. **Non-reliance and exclusion:** All Content is for informational purposes only and may not reflect the most current legal and regulatory developments. All summaries of the laws, regulations and practice are subject to change. The Content is not offered as legal or professional advice for any specific matter. It is not intended to be a substitute for reference to (and compliance with) the detailed provisions of applicable laws, rules, regulations or forms. Legal advice should always be sought before taking any action or refraining from taking any action based on any Content. Baker McKenzie and the editors and the contributing authors do not guarantee the accuracy of the Content and expressly disclaim any and all liability to any person in respect of the consequences of anything done or permitted to be done or omitted to be done wholly or partly in reliance upon the whole or any part of the Content. The Content may contain links to external websites and external websites may link to the Content. Baker McKenzie is not responsible for the content or operation of any such external sites and disclaims all liability, howsoever occurring, in respect of the content or operation of any such external websites. **Attorney Advertising:** This Content may qualify as “Attorney Advertising” requiring notice in some jurisdictions. To the extent that this Content may qualify as Attorney Advertising, PRIOR RESULTS DO NOT GUARANTEE A SIMILAR OUTCOME. **Reproduction:** Reproduction of reasonable portions of the Content is permitted provided that (i) such reproductions are made available free of charge and for non-commercial purposes, (ii) such reproductions are properly attributed to Baker McKenzie, (iii) the portion of the Content being reproduced is not altered or made available in a manner that modifies the Content or presents the Content being reproduced in a false light and (iv) notice is made to the disclaimers included on the Content. The permission to re-copy does not allow for incorporation of any substantial portion of the Content in any work or publication, whether in hard copy, electronic or any other form or for commercial purposes.