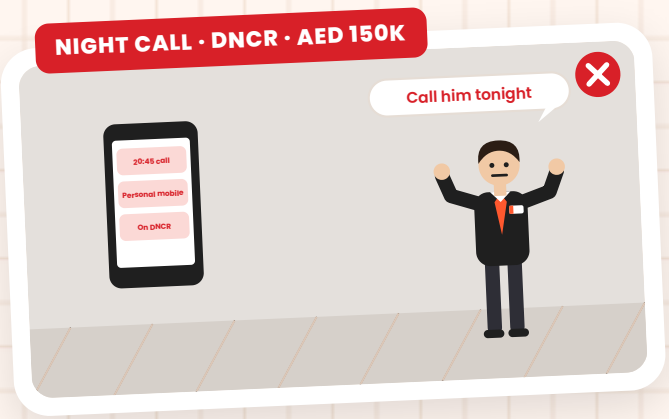
autosmart

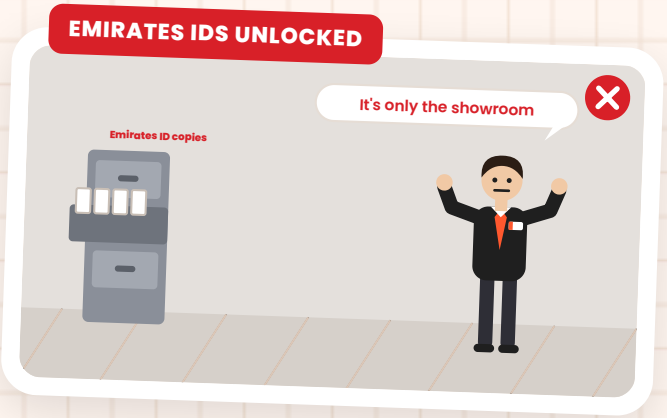
Edition 1 · United Arab Emirates · 2026

• AED 150,000 TELEMARKETING FINES Sales calls, CRM, deal files & group entities

Data Protection Compliance Guidebook for Automotive Companies

Telemarketing, consent, customer rights, security and free-zone laws: what's already enforced, **and what to prepare before the PDPL's 6-month clock starts.**





AED 150K
maximum **telemarketing** fine (in force since Aug 2024).

9am–6pm
only permitted hours for marketing calls.

6 months
to comply once PDPL regulations are issued.

5 standards | 14 checkpoints | PDPL · CR 56/2024 | Right way / wrong way | Ideal fix time

2021 PDPL issued → **Aug 2024** Telemarketing rules → **Pending** PDPL regulations → **Prepare now, before the clock starts.**

WHY THIS GUIDEBOOK EXISTS

Telemarketing is fined now. Data protection is coming.

The **telemarketing rules** (Aug 2024) are already enforced: calls only 9am–6pm, registered numbers, the Do Not Call Register, and fines up to **AED 150,000**. The **PDPL** is law, but its fines await executive regulations, after which businesses get just **6 months** to comply.

This guidebook covers the 5 data standards to act on now.

WHERE THE DATA RISK SITS

Calls
Telemarketing rules
DP-01

Consent
Lawful basis
DP-02

Rights
Customer requests
DP-03

Security
IDs and deal files
DP-04

Free zones
DIFC / ADGM
DP-05

Next
PDPL regulations
Watch

WHO ENFORCES IT

UAE Data Office
PDPL regulator
Once regulations are issued

MoET / TDRA
Telemarketing
Fines up to AED 150K

DIFC / ADGM
Commissioners
Free-zone data laws

Courts
Civil claims
Customer compensation

WHO IT'S FOR

Owners & MDs
Plan for the PDPL window.

Sales & call centre
Follow the call rules now.

DPOs & auditors
Map data and test requests.

FINED NOW, AND MORE COMING

A sales call at 8:45pm. Up to AED 150,000.

Telemarketing rules are already in force: fines up to **AED 150,000**, suspension and licence revocation. PDPL fines will follow once executive regulations are issued.

THE PENALTY LADDER

LEVEL 1
Warning
First step for telemarketing breaches.

LEVEL 2
AED 150K
Maximum telemarketing fine.

LEVEL 3
Suspension
Telemarketing stopped, licence revoked.

LEVEL 4
PDPL
Fines pending Cabinet decision.

REAL CASES FROM US AUTOMOTIVE BUSINESSES

WHO	RESULT	WHAT HAPPENED
Telemarketing rules CR 56/2024 · Aug 2024	**AED 150K** max fine	Calls 9am–6pm; DNCR; registered numbers; recordings.
PDPL FDL 45/2021	**Pending** regulations	6-month compliance window once issued.
Free zones DIFC / ADGM	**In force** own laws	Separate regimes with active commissioners.

TODAY
AED 150K
Telemarketing fines.

SOON
6 months
To meet the PDPL once regulations drop.

AND THEN
Claims
Customers can **claim damages**.

HOW TO USE THIS GUIDE

One page per standard. Prepare now.

1. **Header**: code, area, owner and the maximum penalty
2. **The law**: which regulator and which regulation
3. **The cost**: fine, what else can happen and a real case
4. **Right / wrong**: illustrated pass and fail, plus how to audit

THE 5 STANDARDS

DP-01	Telemarketing Rules Followed	CR 56/2024	SEVERE	AED 150K	72 hours	5
DP-02	Consent & Lawful Basis	PDPL Art. 4–6	LINKED	Pending / AED 150K	30 days	6
DP-03	Customer Rights	PDPL Art. 13–18	LINKED	Pending / AED 150K	30 days	7
DP-04	Security & Breach Reporting	PDPL Art. 9	LINKED	Pending / AED 150K	24 hours	8
DP-05	Free-Zone Data Laws	DIFC · ADGM	HIGH	In force (DIFC/ADGM)	30 days	9

IDEAL FIX TIME · COUNTED FROM AUDIT SUBMISSION

24 hours	Fix within 1 working day	1 standard
72 hours	Fix within 3 working days	1 standard
30 days	Plan and close within 1 month · policies and systems	3 standards

SCORING EACH CHECKPOINT

PASS

Every criterion met at the time of audit, with evidence captured.

FAIL

Any criterion not met at the time of audit. Record what you saw and who owns the fix.

N/A

Only where "Applies when" rules it out. Record why.

Note. PDPL fines will be set by Cabinet decision. This guide will need updating once the executive regulations are issued.

DP-01 DATA PROTECTION · UAE DATA OFFICE · STANDARD 01 OF 05

Telemarketing Rules Followed

Area **Sales · Call centre** | Person in charge **Sales Manager** | Regulator **MoET · TDRA**

MAXIMUM PENALTY

150,000

maximum fine · Cabinet Resolution 56/2024

Plus **suspension** of telemarketing or **licence revocation**

• SEVERE

THE LAW

PDPL

Federal Decree-Law No. 45 of 2021 (PDPL) · **Cabinet Resolution No. 56 of 2024** (Telemarketing) · **Cabinet Resolution 56/2024** telemarketing: approved numbers, 9am–6pm, Do Not Call Register, recorded calls

WHAT WE CHECK

Sales and service marketing calls are made only between 9am and 6pm, from registered local numbers, never to numbers on the Do Not Call Register, and calls are recorded.

CHECKPOINTS IN THE AUDIT

- Q1 Are marketing calls made only between 9am and 6pm?
- Q2 Are numbers checked against the Do Not Call Register (DNCR)?
- Q3 Are calls made from registered company numbers and recorded?

WHAT NON-COMPLIANCE COSTS YOU

THE FINE

Telemarketing breaches are fined up to **AED 150,000**.

BEYOND THE FINE

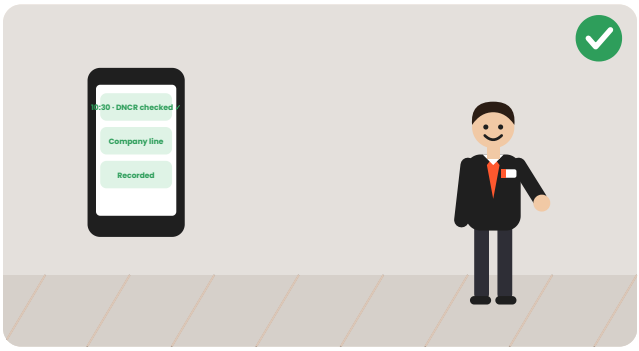
Authorities can **suspend telemarketing**, revoke the licence and cut communication services.

REAL ENFORCEMENT

AED 150K

maximum fine under the **2024 telemarketing rules**, plus suspension of telemarketing and licence revocation.

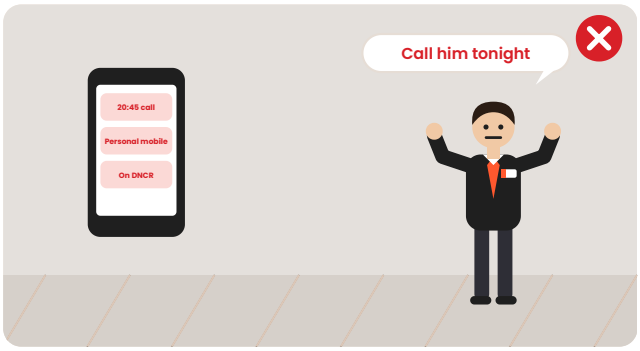
✔ RIGHT WAY



Call at 10:30 from a company line, DNCR checked.

✖ WRONG WAY

AED 150K



Evening call from a personal mobile to a DNCR number.

PURPOSE

Salespeople calling leads from personal phones at night is a common dealer practice, and now a finable one.

FIX IT WITHIN

◷ 72 hours

AUDIT CRITERIA · PASS WHEN

- 9am–6pm only
- DNCR checked
- Registered numbers
- Calls recorded

IDEAL WAY OF AUDITING

1. Review call logs
2. Check DNCR process
3. Ask salespeople which phone they use

Evidence: Call logs.

WORST CASE Up to **AED 150,000**, plus **suspension** of marketing activity.

DP-02 DATA PROTECTION · UAE DATA OFFICE · STANDARD 02 OF 05

Consent & Lawful Basis

Area **Sales · Marketing** | Person in charge **Marketing Manager · DPO**

Regulator **UAE Data Office · MoET · TDRA**

MAXIMUM PENALTY

Pending

PDPL fines to be set by Cabinet decision

Compliance required within **6 months** of executive regulations

• LINKED

THE LAW

PDPL

Federal Decree-Law No. 45 of 2021 (PDPL) · **Cabinet Resolution No. 56 of 2024** (Telemarketing) · **PDPL** consent and lawful processing

WHAT WE CHECK

Customer data is collected with clear consent or another lawful basis, and customers are told what's collected, why, and who it's shared with (agent, lenders, insurers).

CHECKPOINTS IN THE AUDIT

- Q1 Is consent collected clearly and separately for marketing?
- Q2 Are customers told who their data is shared with?
- Q3 Is there a record of processing activities?

WHAT NON-COMPLIANCE COSTS YOU

THE FINE

The PDPL is law, but its **executive regulations and fine amounts haven't been issued** yet (as of Sep 2026). Businesses get 6 months to comply once they are.

BEYOND THE FINE

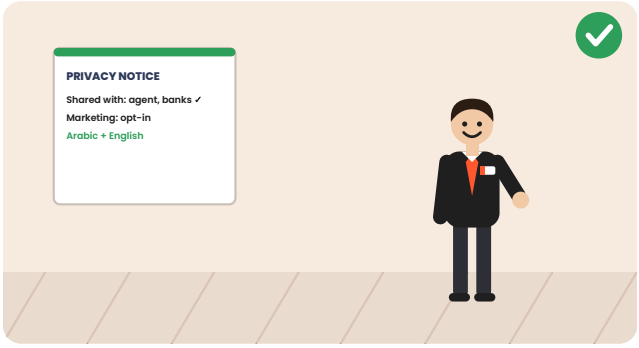
Customer data misuse can already bring **telemarketing fines up to AED 150,000**, consumer complaints and civil claims. DIFC and ADGM have their own data laws, with fines already in force.

REAL ENFORCEMENT

6 months

grace period to comply once the PDPL **executive regulations** are issued. They haven't been published yet (Sep 2026).

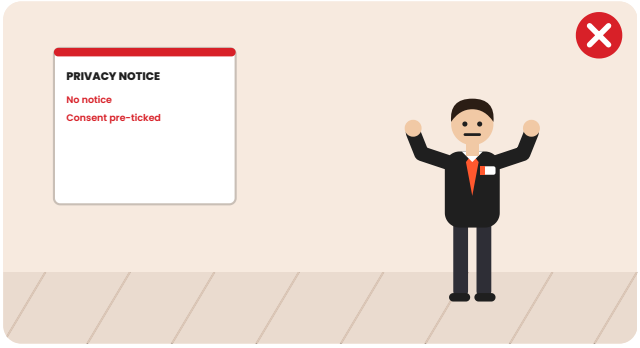
✔ RIGHT WAY



Clear notice and opt-in consent.

✖ WRONG WAY

PREPARE NOW



No notice and pre-ticked consent.

PURPOSE

Preparing now avoids a rush when the 6-month window starts.

FIX IT WITHIN

◷ 30 days

AUDIT CRITERIA · PASS WHEN

- Clear consent
- Notice at collection
- Processing record

IDEAL WAY OF AUDITING

1. Review forms
2. Map data flows

Evidence: Forms + processing record.

WORST CASE Fines will be set by Cabinet decision. Poor consent also drives **telemarketing fines** today.

DP-03 DATA PROTECTION · UAE DATA OFFICE · STANDARD 03 OF 05

Customer Rights

Area **Customer relations** | Person in charge **DPO** | Regulator **UAE Data Office · MoET · TDRA**

MAXIMUM PENALTY

Pending

PDPL fines to be set by Cabinet decision

Compliance required within **6 months** of executive regulations

• LINKED

THE LAW

PDPL

Federal Decree-Law No. 45 of 2021 (PDPL) · **Cabinet Resolution No. 56 of 2024** (Telemarketing) · **PDPL** rights of access, correction, deletion and objection

WHAT WE CHECK

Customers can ask for their data, have it corrected or deleted, and object to marketing, and the dealer responds promptly.

CHECKPOINTS IN THE AUDIT

- Q1 Is there a process to receive and log data requests?
- Q2 Are requests answered promptly?
- Q3 Can data be found across DMS, CRM and call recordings?

WHAT NON-COMPLIANCE COSTS YOU

THE FINE

The PDPL is law, but its **executive regulations and fine amounts haven't been issued** yet (as of Sep 2026). Businesses get 6 months to comply once they are.

BEYOND THE FINE

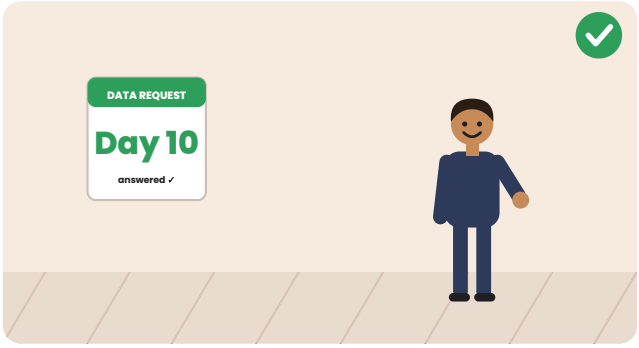
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REAL ENFORCEMENT

6 months

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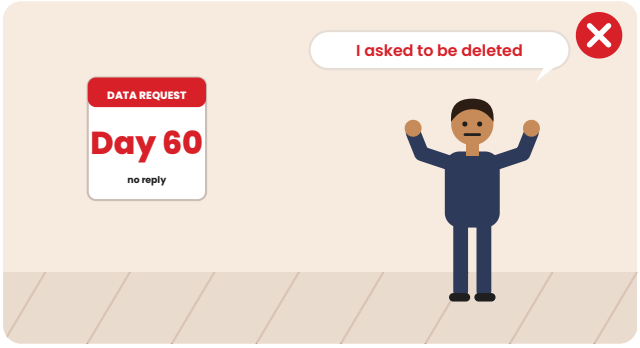
✔ RIGHT WAY



Answered in 10 days.

✖ WRONG WAY

PREPARE NOW



No reply after 60 days.

PURPOSE

Customer rights will be one of the first things tested.

FIX IT WITHIN

30 days

AUDIT CRITERIA · PASS WHEN

- Request log
- Prompt answers
- Data mapped

IDEAL WAY OF AUDITING

1. Test a request

Evidence: Request log.

WORST CASE Unanswered requests become **complaints** to the Data Office.

DP-04 DATA PROTECTION · UAE DATA OFFICE · STANDARD 04 OF 05

Security & Breach Reporting

Area **Showroom · IT** | Person in charge **IT Manager**

Regulator **UAE Data Office · MoET · TDRA**

MAXIMUM PENALTY

Pending

PDPL fines to be set by Cabinet decision

Compliance required within **6 months** of executive regulations

• LINKED

THE LAW

PDPL

Federal Decree-Law No. 45 of 2021 (PDPL) · **Cabinet Resolution No. 56 of 2024** (Telemarketing) · **PDPL** data security and breach notification

WHAT WE CHECK

Customer data (Emirates IDs, licences, bank details) is protected by access control and secure storage, and breaches are reported to the Data Office and affected customers.

CHECKPOINTS IN THE AUDIT

- Q1 Are Emirates ID and licence copies stored securely with limited access?
- Q2 Is multi-factor authentication used on DMS and CRM?
- Q3 Is there a breach response and notification procedure?

WHAT NON-COMPLIANCE COSTS YOU

THE FINE

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BEYOND THE FINE

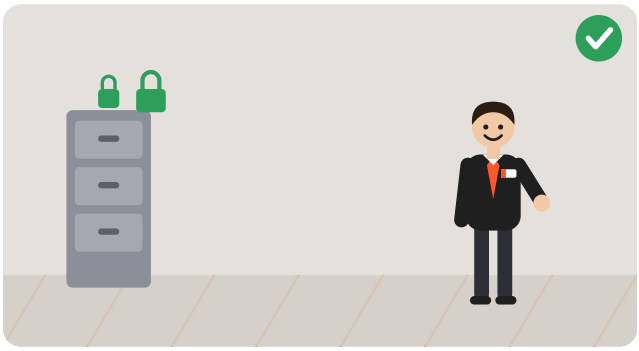
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REAL ENFORCEMENT

6 months

grace period to comply once the PDPL **executive regulations** are issued. They haven't been published yet (Sep 2026).

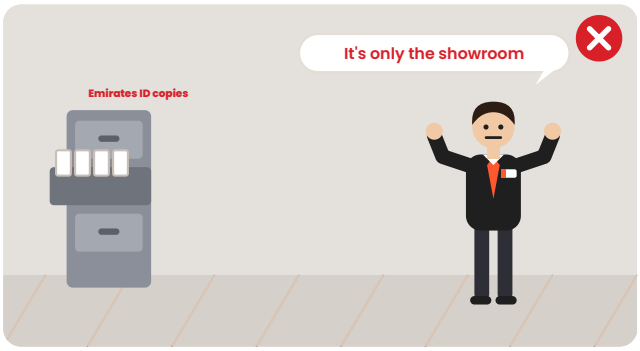
✔ RIGHT WAY



Files locked, MFA on.

✖ WRONG WAY

PREPARE NOW



Open cabinet of Emirates ID copies.

PURPOSE

Deal files contain exactly what identity thieves want.

FIX IT WITHIN

◷ 24 hours

AUDIT CRITERIA · PASS WHEN

- Secure storage
- MFA
- Breach procedure

IDEAL WAY OF AUDITING

1. Walk the showroom
2. Check MFA

Evidence: Photos + settings.

WORST CASE A breach will bring **Data Office action** and customer claims.

DP-05 DATA PROTECTION · UAE DATA OFFICE · STANDARD 05 OF 05

Free-Zone Data Laws

Area **Head office** | Person in charge **Legal Counsel**

Regulator **UAE Data Office · MoET · TDRA**

MAXIMUM PENALTY

Varies

under DIFC / ADGM law

Commissioners can fine **now**

• HIGH

THE LAW

PDPL

Federal Decree-Law No. 45 of 2021 (PDPL) · **Cabinet Resolution No. 56 of 2024** (Telemarketing) · **DIFC Data Protection Law 2020** · **ADGM Data Protection Regulations 2021** (fines already in force)

WHAT WE CHECK

Any entity in DIFC or ADGM (e.g., a regional office or finance arm) follows the free zone's own data law, including registration and fees.

Applies when: Groups with entities in DIFC or ADGM.

CHECKPOINTS IN THE AUDIT

Q1 Are any group entities in DIFC or ADGM?

Q2 If so, are they registered with the Commissioner and compliant?

WHAT NON-COMPLIANCE COSTS YOU

THE FINE

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BEYOND THE FINE

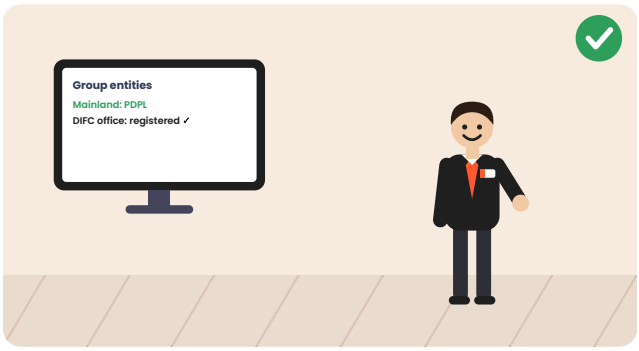
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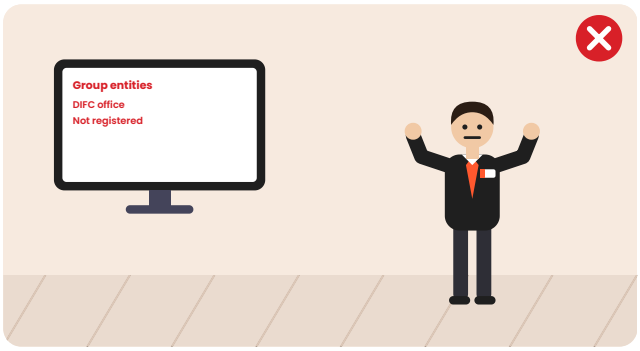
✔ RIGHT WAY



Free-zone entity registered.

✖ WRONG WAY

IN FORCE



DIFC office never registered.

PURPOSE

Free-zone data laws are already actively enforced.

FIX IT WITHIN

◷ 30 days

AUDIT CRITERIA · PASS WHEN

- Entities mapped
- Registered
- Compliant

IDEAL WAY OF AUDITING

1 List entities by zone

Evidence: Entity map.

WORST CASE DIFC and ADGM fines apply now, without waiting for the federal regulations.

FIX THE CALLS TODAY

Your 30-day data action plan.

Today

- [ ] **DP-04** Security & Breach Reporting
  ◷ 24 hours

This week

- [ ] **DP-01** Telemarketing Rules Followed
  ◷ 72 hours

This month

- [ ] **DP-02** Consent & Lawful Basis
  ◷ 30 days
- [ ] **DP-03** Customer Rights
  ◷ 30 days
- [ ] **DP-05** Free-Zone Data Laws
  ◷ 30 days

?/5 Count your passes. Telemarketing fails are finable **today**. PDPL fails will be soon.

SOURCES

- ITSEC: UAE PDPL executive regulations status (Sep 2026) · itsecnow.com
- Pinsent Masons: New UAE telemarketing rules · pinsentmasons.com
- Federal Decree-Law No. 45 of 2021; Cabinet Resolution No. 56 of 2024 · uaelegislation.gov.ae

Disclaimer. For compliance-audit guidance only; not legal advice. PDPL penalties are pending; check for updates.

AUDIT SIGN-OFF

DEALERSHIP / SITE	AUDITOR	DATE	SCORE __ / 5

BRANCH / DEALER PRINCIPAL SIGNATURE	COMPLIANCE LEAD SIGNATURE