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Egypt's Personal Data Protection Law: the grace period ended on 31 October 2026 – is your business compliant?

1. Introduction

Egypt's Personal Data Protection Law (Law 151/2020, "**PDPL**") is now fully enforceable.

The PDPL's Executive Regulations (Ministerial Decision No. 816/2025, "**ER**") were published in the Official Gazette on 1 November 2025. The PDPL gave businesses **1 year from the issuance of the ER** to bring their processing activities into line with the law, so the grace period ended on 31 October 2026. The designated supervisory authority – the Personal Data Protection Center ("**PDPC**") – is operational and has issued practical guidelines on licensing, privacy notices, records of processing and data protection officers ("**DPOs**").

Now that the grace period has ended, this newsletter summarises the practical steps that businesses operating in Egypt need to take to comply, and what businesses that have not yet done so should do now.

2. Who does the law apply to?

The PDPL applies to personal data processed electronically, whether in whole or in part. In practice, it covers:

- controllers (who decide why and how personal data is processed) and processors (who process data on their behalf) operating in Egypt;
- foreign entities – whether based in Egypt or abroad – that process the personal data of Egyptians or of residents in Egypt; and
- foreign controllers and processors without an Egyptian branch or representative office, which must appoint a PDPC-approved representative in Egypt.

3. What must businesses do?

- **Obtain a PDPC licence or permit.** Businesses must obtain a basic licence or permit as a controller, processor or combined controller/processor. Licences are issued only to legal entities and are valid for 3 years; permits can also be issued to individuals and are valid for up to 1 year. Both are renewable.
- **Obtain supplementary licences where applicable.** These require a basic licence first and cover: (a) cross-border transfers; (b) CCTV/visual surveillance in public places; and (c) direct electronic marketing.
- **Appoint and register a DPO.** Every legal entity acting as a controller or processor **must appoint a DPO** and register the DPO with the

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PDPC, regardless of processing volume. DPOs fall into category A (over 2 million records), B (up to 2 million) or C (up to 100,000), and each category requires a PDPC exam. The DPO must ensure and monitor compliance with the PDPL within the entity and act as the point of contact between the entity and the PDPC.

- **Keep a record of processing.** Controllers must record the categories of data, recipients, retention periods, cross-border transfers and security measures. Processors must keep a record of their processing activities.
- **Identify a legal basis and issue privacy notices.** Businesses must document the legal basis (consent, contract, legal obligation, legitimate interest, legal claims, or a court or investigative order) before processing. They must also give privacy notices at collection or as soon as possible afterwards (within 30 days at most).
- **Report breaches.** Controllers and processors must notify the PDPC within 72 hours of becoming aware of a breach (immediately if the breach relates to national security), notify affected individuals within 3 working days of notifying the PDPC, and keep a breach register.
- **Set up cross-border transfer arrangements.** Transfers abroad are generally prohibited unless the destination offers a level of protection no lower than Egypt's and a PDPC licence or permit is held. The ER also requires the data subject's consent.
- **Update contracts.** Contracts with processors, service providers and group companies should include data processing clauses.

4. Licence fees

Fees for legal entities depend mainly on the number of personal data records processed. Combined controller/processor licences covering 1 to 100,000 records are exempt from fees, as are permits covering up to 25,000 records. At the top end, the annual fee is capped at EGP 666,666 for more than 5 million records.

5. Key considerations for foreign investors and multinational groups

- **Cloud and group data flows.** Hosting data on servers outside Egypt or sharing it with group companies abroad is a cross-border transfer requiring a supplementary licence. Intra-group sharing with a controller or processor abroad also requires the entities' activities to be common or integrated.
- **Local representative.** Foreign controllers and processors must appoint a PDPC-approved representative in Egypt.
- **Group DPO.** One DPO may be registered for structurally related group entities, with notice to the PDPC; shared DPOs are permitted with PDPC approval.

6. Penalties under the PDPL

Businesses that did not apply for the required licences or permits within the grace period are in violation of the PDPL and exposed to penalties, including:

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- unlawful processing: EGP 100,000–1 million;
- breach of controller/processor obligations: EGP 300,000–3 million;
- failure to appoint a DPO: EGP 200,000–2 million;
- licensing violations: EGP 500,000–5 million;
- sensitive data processed without consent, or cross-border transfer violations: at least 3 months' imprisonment and/or a fine of EGP 500,000–5 million; and
- e-marketing violations: EGP 200,000–2 million.

Penalties double for repeat offences, and managers can be personally liable if they knew of the violation. The PDPC may also issue warnings, suspend or revoke licences, and publish violations at the violator's cost.

7. Practical timeline and next steps

- **Apply now.** Businesses that have not yet applied should submit their applications without further delay**.** The PDPC has 90 days to decide once it receives a complete application, and **no response counts as rejection**. Applications are submitted through the PDPC's online portal.
- **Expect bottlenecks.** Many businesses are likely to have applied close to the deadline, so processing times may be longer and late applications should be submitted as soon as possible.
- **Do not assume an extension.** No extension of the grace period has been announced, so businesses should treat the statutory deadline of 31 October 2026 as having passed.

8. Conclusion

The PDPL grace period ended on 31 October 2026. Businesses processing personal data in Egypt without a licence, a registered DPO and the core compliance documents are now exposed to significant fines, administrative measures and reputational risk. We strongly recommend that businesses that have not yet completed these steps act without further delay.

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