



AML Data Governance Checklist: Minimise Information Privacy Abuse, Maximise Compliance

1. Introduction

As an AML professional, your routine takes the same route: a new file for Know Your Customer (KYC), a Customer Due Diligence or Enhanced Due Diligence (CDD/EDD) review, a Sanctions Match to disambiguate, Transaction Monitoring (TM) alerts to close, and, if needed, a report through goAML to the UAE Financial Intelligence Unit (FIU). All of this runs on a single fuel, which is customers data or customers information.

This checklist enables clean, efficient, and audit ready execution of AML/CFT Compliance Obligations, under safeguards aligned with UAE's Personal Data Protection Law (PDPL). Collect only what KYC requires, apply Role Based Access Control (RBAC), encrypt data in transit and at rest, record decisions clearly, and disclose what is necessary to regulators. It also sets Data Protection Impact Assessment (DPIA) triggers for new tools, keeps vendors and cross border transfers under control, aligns information retention and deletion with law, and keeps goAML submissions data minimised. The built in Responsible, Accountable, Consulted, and Informed (RACI) clarifies ownership across AML Compliance Personnel, the AML Compliance Officer, IT and Security, and Privacy.

Also known as: Information privacy abuse, unauthorised disclosure, data leakage, purpose creep in AML systems, data misuse in financial systems.

Used for: Identifying and mitigating risks from unauthorised or inappropriate access, sharing, or use of personal or financial data across KYC, sanctions screening, transaction monitoring, investigations, and regulatory reporting.

Abuse in Money Laundering, Terrorism Financing, and Proliferation Financing (ML, TF, PF): Criminals exploit weak data governance to impersonate clients, create mule or synthetic identities, manipulate Know Your Customer (KYC) outcomes, bypass screening with look-alike names, harvest data from test environments, or misuse privileged access to alter or exfiltrate case information.

2. Applicability in UAE

Financial Institutions (FIs)

- Banks and bank branches
- Exchange houses, and money remittance or currency exchange businesses
- Finance and leasing companies
- Insurers and insurance intermediaries for life and investment-linked products
- Securities and capital markets firms, including brokers, dealers, asset managers, custodians, and fund administrators (supervised by SCA, DFSA, or ADGM FSRA)
- Payment service providers and stored-value or e-wallet operators
- Virtual Asset Service Providers (VASPs) licensed by VARA, SCA, DFSA, or FSRA.

Designated Non-Financial Businesses and Professions (DNFBPs)

- Auditors and accountants
- Lawyers, notaries, and other legal professionals when conducting specified activities for clients
- Company or corporate service providers, including trust and company service providers
- Real estate brokers and agents involved in property transactions
- Dealers in precious metals and precious stones (DPMS), including gold, jewellery and bullion traders.

Board Confidence, Zero Guesswork

A single assessment covering AML controls and PDPL obligations, with evidence you can show.

[Start the Health Check](#)

3. How to Use This Checklist for AML Data Governance

Use this in daily AML Compliance operations. Assign an owner, set a due date, and record evidence.

- ▶ **Front line teams (KYC and onboarding):** Share only the minimum data, follow internal handling rules and PDPL, keep notes clear, and avoid unsanctioned tools for files or screenshots.
- ▶ **Compliance officers:** Map data flows across KYC, screening, TM, investigations, and goAML; review RBAC; run DPIA checks for new tools; assess vendors and cross border transfers; align retention and deletion with the law.
- ▶ **Transaction monitoring units:** Ensure alerts and cases display only the fields required for investigation, mask or redact sensitive details in free text, avoid bulk exports without justification, and escalate anomalies.
- ▶ **AML Compliance Officers/MLROs:** Oversee data use in investigations and regulatory reporting, approve data minimised goAML submissions to the FIU, and keep the RACI current so ownership is clear.

Glossary in context

PDPL: UAE Personal Data Protection Law

KYC: Know Your Customer

CDD or EDD: Customer Due Diligence or Enhanced Due Diligence

TM: Transaction Monitoring

RBAC: Role Based Access Control

DPIA: Data Protection Impact Assessment

MLRO: Money Laundering Reporting Officer

goAML: UAE portal for regulatory reports to the FIU

FIU: Financial Intelligence Unit

4. Checklist AML Data Governance (Yes/No)

A. Data Collection and Minimization

Is only the minimum necessary customer data being collected for AML Compliance and Risk Mitigation purposes?

Yes

No

Are customers informed about what data is collected and why?

Is consent documented and stored?

B. Data Storage and Access Control

Are data storage locations secure and access-controlled?

Yes

No

Are only authorized users allowed to access sensitive AML-related data?

Are access logs maintained and reviewed regularly?

C. Third-Party Data Sharing

Are third-party processors assessed for privacy risk?

Yes

No

Are contracts in place to limit misuse of shared data?

Is data shared with third parties on a need-to-know basis only?

D. Data Usage and Processing

Are data usage activities aligned with stated AML compliance purposes?

Yes

No

Is personal data anonymized or pseudonymized where possible?

Are profiling and decision-making systems subject to privacy impact assessments?

E. Data Breach Management

Is there an incident response plan for data breaches?

Yes

No

Are breaches reported to regulators and affected individuals in a timely manner?

Are root cause analyses conducted for privacy-related breaches?

F. Training and Awareness

Are staff trained on data privacy obligations in the AML context?

Yes

No

Is privacy training conducted regularly and documented?

Are red flags for data misuse communicated to all AML personnel?

Your Controls, Your Context

Turn this framework into a working, role-based checklist for your environment.

[Start My Custom Build](#)

5. How a RACI Matrix Enables Task Delegation and Role Clarity

What RACI is, and why it helps:

RACI means Responsible, Accountable, Consulted, and Informed. It is a simple role map that says who does the work, who signs off, who advises, and who is kept in the loop. In AML and privacy operations, it removes gaps and overlaps, speeds handoffs, and makes audit expectations explicit.

- Puts Senior Management and the Board as Accountable for AML and privacy policies, risk appetite, key appointments, attestations, and cross-border approvals, with clear delegation to control owners
- Makes the MLRO/CO Accountable and Responsible for the AML programme and filings (STR, CNMR, PNMR via goAML), and the DPO Accountable and Responsible for PDPL governance, including maintaining the Records of Processing Activities (RoPA) and the Data Bill of Materials (DBoM), managing data-subject rights, and overseeing breach notification
- Assigns IT and Security as Responsible for AML data controls (RBAC, encryption, logging, retention) and technical incident containment; sets Legal as Responsible for vendor due diligence, data processing agreements, and contractual audit and transfer terms
- Defines ownership for risk assessments: the DPO is Responsible for Data Protection Impact Assessments (DPIAs) and Transfer Impact Assessments (TIAs) on new tools and cross-border transfers, with IT and Security and Legal Consulted, and the Board Accountable for high-risk approvals
- Clarifies KYC and TM Operations as Consulted on data minimisation, case evidence, and escalations, and Informed on policy, transfer, and model-governance decisions.
- Enforces segregation of duties, and dual control, for high-risk actions, including role grants, bulk exports, cross-border transfers, and goAML submissions
- Requires documented proof of control performance, clear acceptance criteria, and routine reporting to Senior Management, improving assurance, and audit readiness.

Mini RACI for AML and PDPL Governance

AML Governance and PDPL Compliance Tasks	Senior Management & Board	MLRO/CO	KYC & TM Ops	DPO	IT & Security	Legal
Approve AML and privacy policies, and risk appetite	A	C	I	C	C	C
Run AML programme and filings (STR, CNMR, PNMR on goAML)	I	A/R	C	I	I	C
AML data controls (RBAC, encryption, retention, minimised goAML)	A	R	C	C	R	I
PDPL records and rights (RoPA/DBoM, notices, rights handling)	I	C	I	A/R	C	C
DPIA and TIA for new tools and transfers	I	C	I	R	C	C
Cross-border transfer approvals and safeguards	A	C	I	R	C	C
Vendor due diligence, DPAs, and audit rights	I	C	I	C	C	R
Incidents and breaches (contain, assess, notify)	I	C	I	A/R	R	C
Training and awareness (AML and PDPL)	A	R	I	R	C	C
Recordkeeping and audit evidence (AML files, RoPA, DPIA/TIA, breaches)	A	R	I	R	C	C

From Policy to Practice

Turn your AML and PDPL obligations into named owners, due dates, and audit-ready proof.

[Request RACI Template](#)

6. How the RACI Framework Helps

- Makes accountability explicit: the Board is Accountable, MLRO/CO runs the AML programme, and the DPO owns PDPL controls, with clear Responsible, Consulted, and Informed roles across IT and Security, Legal, and KYC and TM Ops
- Speeds decisions and escalations for sanctions matches, privacy incidents, and filings (STR, CNMR, PNMR), with service levels and evidence defined
- Enforces segregation of duties for high-risk actions, strengthens oversight of vendor and cross-border activity, and improves audit readiness through routine reporting and stored proof of control performance.

7. Action Items to Safeguard Against Information-Privacy Abuse

In-house setup

- Confirm MLRO/CO and DPO mandates; approve AML and PDPL policies, risk appetite, and Board reporting cadence
- Stand up the Board dashboard for AML and PDPL metrics; refresh the mini-RACI quarterly.

Data governance

- Map AML data flows; maintain Records of Processing Activities (RoPA) and a Data Bill of Materials (DBoM)
- Apply Role Based Access Control (RBAC), encryption in transit and at rest, logging, and anomaly alerts
- Keep goAML submissions data-minimised; align retention and deletion to law.

Risk assessments and vendors

- Run Data Protection Impact Assessments (DPIAs) for high-risk processing, and Transfer Impact Assessments (TIAs) for cross-border transfers
- Complete vendor due diligence; sign Data Processing Agreements with audit and security terms.

Personnel Training and Simulations

- Deliver role-specific AML and PDPL training; test with short assessments
- Table-top incident exercises covering sanctions escalations and PDPL breach notification.

Make Accountability Stick

Implement RoPA, DBoM, RBAC, DPIA and TIA, with named owners and dates.

Launch Implementation

8. Best Practices: RACI-Driven Implementation

- Collect only what KYC, CDD, and TM require; minimise free-text personal data
- Use approved systems; apply RBAC, encryption, logging, and weekly access-log reviews
- Keep RoPA and the DBoM current; maintain a lawful-basis and notice register
- Complete DPIAs before new tools, and TIAs before transfers; record Board approvals where high risk
- Limit case exports; redact non-essential fields; standardise data-minimised goAML templates
- Require vendor DPAs with security, audit, and cross-border clauses; review high-risk vendors annually
- Align retention and deletion to statutory periods; evidence deletions for closed cases
- Refresh the mini-RACI every quarter, and present AML and PDPL metrics to the Board each month.

Quarterly RACI Tune Up

Review logs, retention and deletion, vendor terms, and refresh the mini-RACI with owners and dates.

[Book the Tune Up](#)

AML Compliance Simplified!

AML UAE is an Anti-Money Laundering (AML) consulting firm with decades of experience supporting businesses across the UAE.

We have expertise in providing various AML services to DNFBPs, such as Lawyers, Real Estate Agents, Accountants and Auditors, Dealers in Precious Metals and Stones, and Company Service Providers. We also provide AML consultancy services to Virtual Asset Service Providers.

We are equipped to help you register on the goAML portal. We conduct Enterprise-Wide Risk Assessments and align your AML/CFT policies and procedures in line with them. We design customized forms and templates for carrying out KYC, Customer Risk Assessment, and Enhanced Due Diligence for your customers. We help you prepare and submit reports like SAR, STR, CNMR, PNMR, HRC, HRCA, DPMSR, etc. We ensure that your employees are well-trained from an AML perspective.

Not just this, we assist regulated entities with decoding the Remedial Action Plan and effectively implementing the authority's recommendations around the AML program.

AML UAE is your go-to partner for handling all your compliance-related requirements.

Once we enter the picture, AML compliance is ensured. With that, you can continue to be a highly reputed business, actively striving to counter money laundering, terrorist financing, and proliferation financing.

Our Team



Pathik Shah

Founder

CAMS, FCA, CISA, CS, DISA (ICAI), FAFP (ICAI)

Pathik is a Chartered Accountant with proven experience in governance, risk, and compliance. He helps companies with end-to-end AML compliance services, from conducting Enterprise-Wide Risk Assessments to implementing robust AML compliance frameworks. He has played a pivotal role as a functional expert in developing and implementing RegTech solutions for streamlined compliance.



Jyoti Maheshwari

Partner

CAMS, ACA

Jyoti is a Chartered Accountant and Certified Anti-Money Laundering Specialist (CAMS), with extensive hands-on experience in regulatory compliance, legal advisory, policy-making, tax consultation, and technology project implementation. Jyoti holds experience with Anti-Money Laundering regulations prevalent across various countries. She helps companies with risk assessment, designing and deploying adequate mitigation measures, and implementing the best international practices to combat money laundering and other financial crimes.

Our Team



Dipali Vora

Partner

CAMS, ACS

Dipali is an Associate member of ICSI and a Certified Anti-Money Laundering Specialist (CAMS). She has a strong background in the compliance domain, including Anti-Money Laundering, due diligence, secretarial audit, and managing scrutiniser functions. She currently assists clients by advising and helping them navigate through all the legal and regulatory challenges of Anti-Money Laundering Law. She helps companies to develop, implement, and maintain effective AML/CFT and sanctions programs.



Purva Buch

Senior Consultant

CAMS, LLB

Purva is a Certified Anti-Money Laundering Specialist (CAMS) and a Lawyer. She has substantial knowledge of Anti-Money Laundering Laws, Rules, Regulations, and AML Compliance Processes. Purva has been instrumental in drafting RegTech processes, corporate policymaking, and fulfilling various legal research and drafting requirements arising from AML laws and regulatory technology.

Service Matrix

Service	Common Drivers							Value Proposition
	Ensure legal compliance	Save time and costs	Need expert support	Automate compliance processes	Implement best practices	Crisis management	Change AML/CFT consultant	
goAML Registration	✓		✓					Streamlines the process of registering with the UAE FIU goAML portal. Ensures compliance and reduces administrative burden.
Enterprise-Wide Risk Assessment	✓	✓	✓		✓		✓	Identifies risk factors, gross risk, controls deployed and their effectiveness, residual risk, and need for additional controls.
AML/CFT Policy Drafting	✓	✓	✓		✓		✓	Provides tailored AML/CFT policy frameworks that are up-to-date with current laws, enhancing regulatory compliance.
In-house Compliance Department Set-up	✓		✓		✓		✓	Establishes a robust internal compliance structure, helps recruit the right resources and ensures ongoing compliance efficiency.
KYC Managed Services	✓	✓	✓		✓	✓		Outsourced KYC processes that speed up customer onboarding and maintain high compliance standards.
Ongoing AML/CFT Consulting	✓	✓	✓	✓	✓	✓	✓	Continuous expert advice tailored to address specific challenges, enhancing overall compliance strategies.
AML/CFT Health Check	✓		✓		✓	✓	✓	Conducts comprehensive reviews and assessments to pinpoint vulnerabilities and recommend improvements.
AML Training	✓	✓	✓		✓		✓	Offers comprehensive training programs that enhance the compliance skills of employees at all levels.
AML Software Selection	✓	✓	✓	✓	✓			Helps choose the best AML software that fits the company's needs, improving efficiency and cost-effectiveness.
Screening Software Validation	✓		✓	✓	✓			Tests and validates screening tools to ensure they meet regulatory requirements and operational needs.
Regulatory Reporting	✓	✓	✓		✓		✓	Streamlines the process of creating and submitting SAR, STR, PNMR, CNMR, DPMSR, REAR, HRC, and HRCA reports accurately and on time.

AMLVerse

<p>aml singapore</p> <p>AML/CFT compliance ensured with precision and expertise. Safeguarding your business at every step</p> <p>amsingapore.com</p>	<p>AML Consultants.uk</p> <p>UK's first choice for AML, CFT, and CPF compliance and consulting.</p> <p>amlconsultants.uk</p>	<p>aml india</p> <p>Enjoy peace of mind as AML/CFT compliance is ensured with professional guidance and proven solutions</p> <p>amlindia.in</p>	<p>aml australia</p> <p>Protecting Australia's financial landscape with trusted AML compliance solutions</p> <p>amlaustralia.com</p>
<p>AML Consultants.us</p> <p>Your trusted partner in simplifying AML compliance, ensuring regulatory adherence and protecting your business.</p> <p>amlconsultants.us</p>	<p>aml ksa</p> <p>At the core of our business is ensuring AML/CFT compliance for yours.</p> <p>amlksa.com</p>	<p>aml bahrain</p> <p>Our priority is your peace of mind – ensuring AML/CFT compliance is how we deliver it</p> <p>amlbahrain.com</p>	<p>aml muscat</p> <p>Timely service, flawless compliance, and peace of mind – your AML/CFT partner you can trust</p> <p>amlmuscat.com</p>
<p>PRO AML</p> <p>Guiding budding AML/CFT professionals to ignite their potential and excel in compliance leadership</p> <p>proamltraining.com</p>	<p>aml job</p> <p>Connecting AML talent with global opportunities for financial integrity</p> <p>recruit.amljob.com</p>	<p>aml faqs</p> <p>Ask, Answer, Comply: Your one-stop hub for AML/CFT compliance knowledge</p> <p>amlfaqs.com</p>	<p>Technovisors</p> <p>IT Consultants & Digital Marketing Consultants to help you focus on your business</p> <p>technovisors.com</p>
<p>NIYEAHMA</p> <p>We help regulated entities with End-to-End AML Compliance</p> <p>niyehma.com</p>			



Follow us on



 www.amluae.com

 info@amluae.com