



01_KSA_Regulatory_Position

KSA Regulatory Position

HISN — Financial Crime Decision Operating System Version: 3.0 | Date: October 2026 Owner: Legal & Compliance Classification: Confidential | Status: Framework

Document Control

Field

Value

Document Title

KSA Regulatory Position

Version

3.0

Date

October 2026



Owner

Legal & Compliance

Classification

Confidential

Status

Framework

Basis of Preparation

SAMA, CMA, IA, NCA, SDAIA official sources

Limitations

No formal regulatory engagement. No certification obtained.

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1. Regulatory Landscape

Authority

Scope

Relevance

SAMA

Banks, PSPs, Exchange

Direct

CMA

Capital markets

Direct

Insurance Authority

Insurance

Direct

SDAIA

Data protection (PDPL)

Direct

NCA

Cybersecurity (ECC)

Direct

ZATCA

Tax

Operational

MISA

Investment

Corporate

Classification: EXTERNAL FACT — Tier 1 sources.

2. HISN's Regulatory Position

HISN IS: - A technology provider - Designed for alignment with SAMA/CMA/NCA/PDPL - Audit-grade evidence and decision lineage - Vendor-neutral

HISN IS NOT: - SAMA-certified - CMA-approved - A licensed financial institution - A regulator

No regulatory approval or certification has been obtained or claimed.

3. Key Regulations

3.1 SAMA Cyber Security Framework (SAMA CSF)

Mandatory for SAMA-supervised entities

Uses 0-5 maturity model

Requires auditable technology controls

HISN Status: Designed for alignment; no certification

3.2 Personal Data Protection Law (PDPL)

Governs personal data processing

Requires data classification, consent, breach notification

Data residency and cross-border transfer restrictions

HISN Status: Designed for alignment; KSA residency option available

3.3 NCA Essential Cybersecurity Controls (ECC)

Baseline cybersecurity requirements

HISN Status: Control mapping available; no certification

3.4 AML/CFT Rules

10-year record retention

Risk-based approach

SAR/STR workflow

HISN Status: Platform supports; customer remains responsible

4. Compliance Gaps

Item

Priority

Owner

No formal regulatory engagement

HIGH

CEO

No SAMA CSF certification

HIGH

CISO

No independent compliance review

HIGH

MLRO

No formal sandbox application

MEDIUM

CEO

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5. Recommended Next Steps

Engage with SAMA Regulatory Sandbox (feasibility assessment)

Conduct independent compliance review



Complete SAMA CSF control mapping

Obtain PDPL data residency documentation

6. Disclaimer

This KSA Regulatory Position reflects HISN's understanding of the Saudi regulatory landscape as of October 2026. It does not constitute legal advice. **No regulatory approval, certification, or license has been obtained.**

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