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DIGITAL MARKETING STANDARDS AND UAE CONSUMER PROTECTION LAW: ASSESSING COMPLIANCE REQUIREMENTS FOR ONLINE MARKETING CLAIMS

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ABSTRACT

Digital marketing, which has experienced exponential growth in the United Arab Emirates (UAE) through social media, influencer culture, and online shopping platforms, has heightened concerns about regulating these emerging industry segments, with a focus on consumer protection in the online environment. This paper will discuss the scope within which the existing laws of the UAE can be said to control digital advertising activities and protect consumers against false or misleading representations. The study applies the doctrinal approach to legal methods to examine such fundamental legislative sources as the Federal Law No. 15 of 2020 on Consumer Protection, the Cabinet Decision No. 66 of 2020, the UAE Cybercrime Law (the Federal Decree-Law No. 34 of 2021), and the influencer licensing regulations of the Ministry of Culture and Youth. Among the critical compliance functions of businesses and influencers that the paper presents are transparency of promotional materials, compulsory licensing, and factualness of advertisement claims. It also assesses the enforcement environment and identifies issues like the overlap of jurisdiction, digital content across borders, and a low level of awareness among the audience. The analysis of the international best practice in regulation drafts of the UK, EU, and the US shows that the UAE can improve oversight mechanisms and do more to detect manipulations of its regulatory framework. The results indicate a pre-existing gap in regulation, particularly about micro-influencers, AI-generated content, and the division of enforcement powers. The paper ends by making policy recommendations that aim at making the legal thresholds clear, making monitoring technology better, and enhancing education among stakeholders. Overall, the study has added to the literature on legal regulation of digital advertising in the Gulf countries and has provided political implications that policymakers should implement to promote a legal and ethical digital business market that is transparent in the UAE.

KEYWORDS: Digital Marketing, UAE Consumer Protection Law, Cybercrime Law, Advertising Transparency, Legal Enforcement, Social Media Regulation, Ethics.

1. INTRODUCTION

1.1. Background and Context

Digital marketing has experienced exponential growth across various platforms due to the rapid advancement of technology, as well as the increasing popularity of internet use in the United Arab Emirates. The importance of social media in marketing as a dominant channel has increased significantly, and nowadays, social platforms such as Instagram, TikTok, Snapchat, and YouTube have an accumulated number of users and content producers who advertise goods and services (Yas et al., 2025; Dafri et al., 2025). Digital advertisements have also become a necessary means of reaching consumers, particularly with the rise of e-commerce platforms such as Noon, Amazon UAE, and Shein, which have captured a considerable market share (Allouzi, 2024a). The UAE is an emerging nation in terms of utilizing digital campaigns, as opposed to more traditional advertising methods, given that over 99% of the population is connected to the internet and actively participates through internet connections (Ministry of Culture and Youth, 2023).

However, with the rapid development of digital advertising, there have not been any easy tasks. One of the major concerns is the rise of misleading or deceptive marketing approaches. Social media is full of huge claims, unacknowledged sponsorships, and false product data that is frequently laid on consumers. Such an environment is not only detrimental to the consumer's trust but also to healthy competition in the business sector. Since online content is globally distributed, it would be challenging to regulate these practices, particularly when micro-influencers or cross-border parties create the content (Kameel et al., 2022). Consumers are increasingly alarmed and often file complaints about product misrepresentation, concealed advertising, and false claims, which necessitate a robust legal response (Belwal et al., 2021).

1.2. Problem Statement

The research is necessitated by the need to understand how the law addresses these problems in the UAE. The primary concern is whether the consumer protection system in the UAE is sufficient to regulate notorious online marketing systems that rely on deception (Ibrahim et al., 2025a; Aboelazm, 2024a; Khudhair et al., 2021). Although specific laws and ministerial decisions have been enacted to regulate digital marketing, there is still considerable difficulty in maintaining compliance regularly. The issue of juxtaposing legal provisions with the reality

of advertising practices raises concerns about enforcement, rule comprehension, and consumer awareness (Albahar & Thanoon, 2022). Moreover, many ad-generators and opinion leaders may be uninformed about their binding laws and therefore may inadvertently break those laws.

1.3. Research Objectives

This research is aimed at achieving two objectives: on the one hand, to determine the adequacy of the legal and regulatory tools available to the UAE in the context of digital advertising and, in particular, the Consumer Protection Law (Federal Law No. 15 of 2020), the Cabinet Decision No. 66 of 2020, and other media and cyber laws, and on the other hand, to evaluate the compliance requirements of different stakeholders involved in marketing activities, whether it is a business, an influencer or an online platform. The study aims to assess the effectiveness of current enforcement mechanisms and identify areas where the law or institutions may have gaps that require improvement to provide a higher level of protection to consumers in the digital environment.

1.4. Research Questions

In order to attain these objectives, the paper aims to address the following research questions:

- What are the legal criteria that currently control or regulate digital advertising in the UAE?
- What do these standards correlate with regarding the general principles of the UAE Consumer Protection Law?
- Do current enforcement methods and monitoring systems ensure that marketing information provided online is precise, clear, and objective?

2. LITERATURE REVIEW

2.1. Academic and Legal Literature

Consumer Protection and its intersection with digital marketing have gained increasing academic popularity over the last decade. Throughout the world, researchers have examined the impact of the online space on advertising, consumer awareness, and regulation. Digital marketing generates some of the most personalized advertising opportunities, which in many cases blur the line between content and commerce, making it difficult for consumers to distinguish between organic and paid advertising (Masterson et al., 2021). This hybrid complicates the conventional concepts of informed consent, transparency, and fairness, which are fundamental to

any consumer protection practice (Yas et al., 2021; Aboelazm et al., 2025a).

The fundamental principles of consumer rights, as outlined in the Guidelines on Consumer Protection by the United Nations (UNCTAD, 2016), state that the right to correct information, protection against deceptive actions, and access to redress mechanisms confirm the basis of consumer rights. Although these rights have been established in a backdrop of traditional commerce, they have been used in the age of digital commerce (Khudhair et al., 2019a; Khudhair et al., 2021). Digital marketing, however, with its new features, especially the utilization of algorithms, behavior tracking, and influencers, has brought about new issues. Legal experts, such as Ghandour and Woodford (2021), have suggested that developed consumer protection principles may be applied to online platforms. However, these principles should be modified to account for the pace and magnitude of online content distribution. This means that restraints designed to be effective when applied to print or broadcast media cannot be used to control social media postings that can go viral in minutes.

Legally, there is an emerging body of literature on the comparative analysis of online advertisement regulation across various jurisdictions. The Digital Services Act (2022) of the European Union and the Federal Trade Commission (FTC) policies regarding endorsements and testimonials in advertisements have become the topics of interest as some of the first frameworks on the matter (Aboelazm, 2024b). These legislations stipulate the open reporting of paid endorsements and hold each party, including influencers and marketers, accountable for deceptive messages. Other authors, such as Costello (2020), also agreed that co-regulation is a sustainable way of addressing the problem of online advertising without necessarily involving the government. These observations may provide a comparative framework for assessing the legal system of the UAE.

2.2. Regional and UAE-Specific Studies

In the Gulf Cooperation Council (GCC), the literature on regulating digital advertising is starting to emerge, yet remains immature. The UAE is characterized by an active legislative approach, particularly after the introduction of Federal Law No. 15 of 2020 regarding Consumer Protection and subsequent cabinet decisions concerning digital media. Nevertheless, scholarly responses to these changes are still at their fledgling stages. El Refae et al. (2021) conducted a study on the development of various consumer protection laws in the UAE. They

observed that they support e-commerce and digital trades, but not advertising. The research has also examined the UAE as the most developed influencer marketing approach in the Arab region. In 2018, the National Media Council (NMC), which falls under the Ministry of Culture and Youth, introduced a licensing regime requiring influencers involved in paid promotions to obtain permits. This step was interpreted as a counteraction to the rise of social media advertising and the need to ensure accountability. Although researchers like Mushtaq et al. (2025) have surveyed the proposed effect of influencer licensing, not every aspect has been addressed. Since its inception, licensing has brought some sanity to the digital advertising industry; however, issues surrounding compliant surveillance, influencer education, and audience needs need to be addressed (AlKhamaiseh et al., 2025).

Other researchers have examined legal disclosures in advertising in the UAE. As an illustration, Kameel et al. (2023) measured the understandability and approachability of the statute on advertising to small enterprises. They identified that many proprietors were unaware of the legal requirements for transparent advertising. Moreover, publications in legal journals and trade publications have also highlighted the growing interest in the contributions of the Telecommunications and Digital Government Regulatory Authority (TDRA) and the Ministry of Economy to regulating digital advertising industry practices. However, such contributions are rather descriptive and analytical as opposed to the practice and results of such laws (TDRA, 2022).

2.3. Identified Gaps

Although digital consumer protection is becoming an increasingly popular topic of research, significant gaps remain in the body of knowledge, particularly in the UAE. The rest of the body of literature emphasizes the texts of the law and the campaigns run by the government, without critically evaluating their practical applications and successes (Aboelazm & Ramadan, 2023; Allouzi et al., 2024). It is a fact that little empirical or doctrinal research has been conducted on how businesses and influencers perceive and enforce the rules of advertising in practice. Moreover, there has been little emphasis on enforcement methods, including complaint procedures and monitoring mechanisms, as well as sanctions for non-compliance (AlHelali, 2023; Shwedeheh et al., 2024).

Another gap that has been observed is the lack of updated scholarly work that demonstrates the

changes introduced by the law amended after 2020. These reforms were primarily introduced by the passage of Federal Law No. 15 of 2020 and Cabinet Decision No. 66 of 2020; however, there is limited scholarly research on the changes. The majority of the available literature either precedes these laws or discusses the field of e-commerce and digital transformation in a broad sense without exploring the provisions of advertisement (Erdem, 2025; Aboelazm, 2023a; Aboelazm, 2024a). This scholarly disengagement fails to provide answers to questions regarding the effectiveness of the law, particularly in terms of consistency of enforcement, inter-agency collaboration, and cross-border issues.

Overall, although some basic legal and theoretical frameworks can serve as a helpful background, the concept of digital advertising regulation in the UAE in academic discourse requires further development. Definite, keen, and current research is required that focuses on compliance, enforcement, and legality of handling deceptive digital marketing. To fill this research gap, the present paper aims to address a similar question by providing a doctrinal approach to the law of the UAE in the context of modern-day digital advertising trends.

3. METHODOLOGY

A research methodology based on legal doctrine is employed in this paper, a standard method used in legal scholarly research to examine current laws, regulations, and legal interpretations. The doctrinal approach involves investigating written materials that address legal issues, interpreting legal acts, determining principles, and verifying the consistency of a legal system within a specific territorial scope. In this regard, the study examines the regulatory framework for digital advertising in the United Arab Emirates (UAE), with a particular focus on consumer protection aspects. The focus of the analysis is on primary legal sources, such as federal legislation, ministerial orders, official guidelines, and other forms of case law, and the task is to highlight their relevance through a critical analysis of how they can inform the regulation of online marketing activities (Aboelazm, 2025a; Dafri et al., 2025; Ibrahim et al., 2025a).

Federal Law No. 15 of 2020 on Consumer Protection serves as the primary source of the current research, as it forms the core of the legislation governing consumer rights in the UAE. Secondly, Cabinet Decision No. 66 of 2020 concerns e-commerce and digital marketing practices and offers particular interpretive meetings and provisions therein. The paper also takes into account the

corresponding provisions of the UAE Cybercrime Law (Federal Decree-Law No. 34 of 2021), which regulates the dissemination of misinformation and fraudulent information materials on the Internet (Allouzi, 2024b; Aboelazm, 2025b). The additional sources will also include the official communications and guidelines of the Ministry of Economy, the Telecommunications and Digital Government Regulatory Authority (TDRA), and the Ministry of Culture and Youth, particularly those related to the licensing of influencers and practices in digital media. The sources provide a comprehensive legal background for the entire picture, including compliance requirements and regulatory controls for online advertising (Federal Law No. 15 of 2020; Cabinet Decision No. 66 of 2020; Federal Decree-Law No. 34 of 2021).

The doctrine is especially suitable for the given study, as the former technique is highly suitable for performing a thorough systematic analysis of laws and regulatory frameworks that does not presuppose fieldwork or empirical data. As the study will focus on evaluating the adequacy and clarity of the legal standards, rather than assessing the degree of behavior or perception, the empirical method using surveys or interviews will be less appropriate (Iqbal & Kassim, 2024). The demonstrated ability of the doctrinal approach to focus on the internal consistency, logic, and relevance of legal norms provides a systematic and legally authoritative framework for assessing the requirements of compliance with the rule of law as applied to the UAE's legal system.

3.1. Legal and Regulatory Framework

3.1.1. UAE Consumer Protection Law (Federal Law No. 15 of 2020)

Federal Law No. 15 of 2020 on Consumer Protection has been introduced as the primary legal instrument to ensure that consumer rights in the United Arab Emirates are proclaimed and upheld. This law substituted the previous one, Federal Law No. 24 of 2006. This act is part of an emerging trend that recognizes the growing influence of e-commerce and online transactions. The law identifies several important rights of consumers, stating that they have the right to clear and accurate information about services and goods, the right to quality and safety, the right to be treated fairly, and the right to a remedy for a defect or caused damage. Such rights are applicable in both traditional and online market spaces and thus extend to online advertising and digital marketing. The law requires suppliers and service providers to ensure that their advertising is

not misleading, deceptive, or false. Article 4 contains a straightforward description, according to which no advertisement may include misleading statements or representations that could affect the consumer unconscionably. Moreover, there should be no need to create misleading content about the products being advertised by the company. Such protections also apply to online advertising, where customers are increasingly finding product promotions via social media, product influencers, and personalized advertisements. The Ministry of Economy has the power to enforce compliance with the law, address complaints, and penalize violations, which can include fines, shutdown of business activities, and referral of the matter to the courts (Belwal et al., 2021).

3.2. Cabinet Decision No. 66 of 2020

Cabinet Decision No. 66 of 2020 was enacted to operationalize and simplify the general provisions of Federal Law No. 15 of 2020. It is more specific about the obligations associated with suppliers, advertisements, and the rights to be enforced by the consumer, especially in the case of online businesses and electronic websites. Its focus is to provide transparency in claims within advertisements, where there are specific mandates to detail the product description, pricing, guarantee, and return policies (Saeed & Khudhair, 2024). The judgment requires that the pattern of any computer or print advertisement should be easily discernible, and it ought not to tap into the weaknesses of the consumers. It is significant to note that the ruling resolves the issue of online advertising statements and claims, prohibiting suppliers from using exaggeration or failing to disclose or mention essential product features. It also prohibits the use of ambiguous language or language that could confuse the consumer. On the level of social media and influencer marketing, this means that promotional messages should not be mislabeled and presented as if they are endorsed, of high quality, or high performance (Albayati et al., 2025). Procedures to address disputes, lodge complaints, and exercise inspection authority are also enforced by Cabinet Decision No. 66, thereby introducing a transparent system to regulate activities in the digital marketing sphere (Kameel et al., 2022).

3.3. Cybercrime Law (Federal Decree-Law No. 34 of 2021)

The preferences for digital advertising regulation in the UAE are outlined in the Cybercrime Law, issued by Federal Decree-Law No. 34 of 2021, and

occupy an increasingly significant role in the cyber-regulatory environment. Although the focus of this Act is primarily to combat crimes in the cyber world through hacking, theft, and defamation, some of its articles also directly apply to misleading advertising and fraudulent digital materials. A notable example is Article 48, which penalizes the dissemination of misleading or false information in online forms, even though it may potentially harm the general good or economic balance. This also involves posting misleading advertisements, false product descriptions, or testimonials that mislead consumers. The law also empowers authorities to block websites, deactivate online accounts, and file lawsuits against organizations or individuals who indulge in digital fraud. When applied to advertising, this structure acts as a deterrent against the exploitation of consumer confidence by employing fraudulent sponsorship or doctored product reports. The law against cybercrime, therefore, supplements consumer protection laws, providing the means of criminal enforcement in situations where online advertising has crossed the line into intentional fraud or economic deception (Albahar & Thanoon, 2022).

3.4. Influencer and Media Licensing Regulations

As a countermeasure to the increased role of social media influencers on consumer behavior, in 2018, the government of the UAE passed the influencer licensing regulation, currently the responsibility of the National Media Council (NMC) (recently renamed to the Ministry of Culture and Youth). Such regulations stipulate that any individual or organization undertaking paid promotional activities using digital platforms must obtain a media license. The type of licensing should help professionalize influencer marketing, bring order to advertisements, and boost responsibility among digital content initiators (Yas et al., 2024c; Allouzi & Yas, 2024). The most important aspect of the licensing regime is that influencers and marketers are required to be transparent and disclose all promotional materials. In the guidelines, the requirement to label material that has been sponsored, paid for, or given in exchange for compensation is clear. The use of special hashtags, such as #ad or #paidpartnership, or any other type of marking of this kind is appreciated, so that viewers and users can easily understand that the content is an advertisement and not a personal statement (Elyat et al., 2024; Aboelazm, 2025b). The fact that it is not disclosed to pay for promotions could lead to the suspension of a license, financial penalties, and even legal lawsuits (Mushtaq et al., 2025).

Table 1: Key UAE Laws Regulating Digital Advertising.

Law/Regulation	Year	Scope	Relevant Provisions for Advertising
Federal Law No. 15 on Consumer Protection	2020	All consumer transactions (digital and traditional)	Prohibits misleading advertisements, ensures the right to clear information
Cabinet Decision No. 66	2020	Executive regulation for Law No. 15	Defines supplier obligations for ad content, transparency, and e-commerce disclosures
Cybercrime Law (Federal Decree-Law No. 34)	2021	Digital crimes and online content regulation	Penalizes fake promotions and the dissemination of false digital info
Influencer Licensing Guidelines	2018–23	Social media and digital media influencers	Requires licensing for paid promotions and transparency in ads

All this is within the context of consumer protection as a whole, as digital advertising plays a crucial role in eliminating the aspect of undisclosed commercial intent that can deceive consumers. The situation in practice is somewhat different, but here again, problems arise with micro-influencers and foreign-based advertisers who promote to audiences in the UAE but are not licensed in their home country. Implementation has been complex; however, the regulatory framework is taking a proactive approach to promoting accountability and transparency in the online advertising culture.

4. ANALYSIS AND DISCUSSION

4.1. Compliance Requirements in Online Marketing

Transparency, truthfulness, and respect for consumer rights are the primary forms of compliance with laws and regulations within the digital advertising landscape in the UAE. The most notable one is the necessity to reveal any sponsored content or paid collaboration. Digital marketers and influencers should make it obvious when the content belongs to a promotional offer, a label that is easily visible is usually “ad,” “sponsored,” or “paid partnership with [brand name]. Such disclosures should be conspicuous in the post or caption to avoid misinformed consumers thinking that the endorsements are sincere personalizations. As stipulated by the Ministry of Culture and Youth (2023), undisclosed advertising is considered a violation of media rules and a breach of consumer protection law, resulting in either fines or the suspension of licenses. Most influencers, particularly micro-influencers, do not add these disclosures even after the regulation was introduced, or resort to ambiguous wording that makes these disclosures less effective and dilutes consumer confidence (Allouzi et al., 2024; Yas et al., 2024c).

Besides transparency, honesty in advertising

claims forms one of the fundamentals of legal digital marketing. The UAE Consumer Protection Law explicitly prohibits the use of exaggerated claims (those that might interfere with consumer purchasing decisions), ambiguous, or false claims. This includes anything deceptive regarding the effectiveness of a product, its origin, price, or even its limited supply. Advertisements should not be misleading in presenting the specifications of the products, and also avoid using misleading pictures that contradict health or performance claims (Mushtaq et al., 2025). This necessity is strengthened by the fact that Cabinet Decision No. 66 of 2020 stipulates that promotional content should not exploit consumer ignorance, fears, or deceive by omitting critical information. For example, an advertisement for a dietary supplement claiming it cures a condition, even though there is no scientific evidence to support this, would be classified as such.

Table 2: Summary of Influencer Disclosure Obligations in the UAE.

Requirement	Mandatory?	Applicable Platforms	Enforcing Body
Clear disclosure of paid partnerships	Yes	Instagram, TikTok, YouTube, etc.	Ministry of Culture and Youth
Media license for promotional content	Yes	All digital platforms	Ministry of Culture and Youth
Content accuracy and non-deceptive claims	Yes	All	Ministry of Economy, TDRA
Labeling of AI-generated advertising	Not yet	Emerging platforms (chatbots, virtual)	Currently unregulated

As facilitators of online advertising, e-commerce platforms must also meet the standards of consumer protection regarding returns and warranties, as well as delivery details requirements. According to Federal Law No. 15 of 2020, online retailers are required to provide complete and transparent

information regarding product features, prices, shipping policies, return policies, and warranty terms (Allouzi et al., 2024; Yas et al., 2024c). Such disclosures should be made available before confirmation of purchase to enable consumers to make informed decisions. Additionally, any advertisement related to sales must accurately reflect the real terms and conditions (Nuseir et al., 2023). For example, a promotion or sale should be followed up at the counter without any fine print. Noncompliance, such as delivering items not as instructed or denying the right to receive a refund, will result in complaints and subsequent actions by authorities.

4.2. Enforcement Mechanisms

Regulation of digital advertising in the UAE is overseen by several government agencies, each serving a specific purpose. The main body responsible for protecting consumers is the Ministry of Economy, which investigates complaints, issues warnings, conducts examinations, and imposes penalties. The Ministry can also refer severe cases of disrespect to the jurisdiction authorities for prosecution. These areas require the observation of digital content, and this task is fulfilled by another important body, the Telecommunications and Digital Government Regulatory Authority (TDRA). It liaises with other organizations to determine and eliminate non-compliant advertisements and make warnings to service providers (Yas et al., 2024a; Yas et al., 2020a). The enforcement is also supported by the judicial system, which adjudicates the violations under related legislation such as the Consumer Protection Law, Cybercrime Law, and the Civil or Commercial Codes. Courts can, in extreme cases, take measures that include financial punishment, loss of licenses, or even imprisonment, especially when it has been proven that fraud has occurred. The UAE has also introduced consumer-facing tools to

facilitate reporting, including the Dubai Consumer App and hotline services offered by municipal and economic departments in every emirate. The series of enforcement operations over the past few years demonstrates the government's efforts to regulate digital advertising. For example, an influencer was fined AED 10,000 in 2021 for sharing a cosmetic product without a license, and she did not disclose that the share was paid (Erdem, 2025). In another case, an online retailer based in the UAE was fined for advertising electronics with discounted prices that were not available or replaced with inferior quality products. The Ministry of Economy also introduced inspection campaigns during promotional sales, such as White Friday, to ensure that the advertisements were equal to the offers. These examples represent aggressive measures in terms of enforcement of compliance; however, in many instances, enforcement is reactive, typically in response to consumer complaints, rather than through systematic regulation (Costello, 2020).

4.3. Challenges in Implementation

Although the legal framework has been well-developed, there are a few obstacles that hinder the successful application of digital advertising rules in the UAE. The first reason is that digital commerce is international. In the present-day global market, international businesses and foreign-based influencers need to effortlessly market to consumers in the UAE, bypassing local regulations, as they have the opportunity to do through global platforms (Aboelazm, 2024c; Yas et al., 2020b). It is also challenging to enforce when an advertiser or content creator is not based in the UAE, as it will prove almost impossible to impose a penalty or compliance. This gives a competitive advantage to licensed local influencers compared to unlicensed foreign entities, which are not subject to any regulatory framework (Ghandour & Woodford, 2021).



Figure 1: Compliance challenges in UAE digital advertising.

The other challenge is that it is hard to prove who leaked the information through the advertisement,

even if the advertisers can be anonymous or decentralized, especially in the case of peer-to-peer

marketplaces or with the creation of accounts that any other user cannot identify. Although TDRA and other authorities are attempting to track such content using AI and other digital tools, they have not been able to do much unless a complaint is filed against it (Yas et al., 2023; Shwedeheh et al., 2024). The fact that digital content can spread almost instantaneously also implies that it can take only a few deceptive advertisements to reach thousands of people before the problem is identified and addressed, making it impossible to engage in corrective action and, therefore, eliminate potentially harmful effects (Montinaro, 2021). Another twist is that consumers are not well-informed about the rights granted to them by UAE law. Consumers are often unaware of instances of deceptive advertising, and they may not be aware that they can formally report such cases. The same applies to smaller enterprises and newcomers seeking to make an impact; they may not be aware of the laws of disclosure or the concept that a casual post on the Internet falls outside the scope of any law. This scenario requires informing a larger number of individuals by adopting a more comprehensive educational approach and training for the entire industry.

4.4. Comparative Perspective

To gain a clearer picture of the regulation in the UAE, it is practical to compare it with international standards, such as those of the United Kingdom (UK), the European Union (EU), and the United States (U.S.). In the UK and Ireland, the CAP Code is enforced by the Advertising Standards Authority (ASA), which requires all marketing communications to be legal, decent, honest, and truthful. Influencers are required to disclose paid relationships, and non-compliance results in naming and shaming by the community, as well as collaboration with trading standards to obtain additional sanctions (Shaik & Poojasree, 2021; Aboelazm, 2023c).

Table 3: Comparison of Disclosure Rules (UAE vs. UK vs. US).

Requirement	UAE	UK (ASA/CAP Code)	US (FTC Guidelines)
Paid content disclosure	Mandatory	Mandatory	Mandatory
Hashtag #ad required	Strongly Advised	Strongly Advised	Strongly Advised
Licensing for influencers	Yes	No	No
Enforcement agency power	Moderate	Strong	Strong
AI-generated ad rules	Not defined	Emerging guidance	Under consideration

In Europe, the European Union, under the Digital

Services Act (DSA), the Unfair Commercial Practices Directive, and the General Data Protection Regulation (GDPR), requires that advertising be recognizable and that personalized advertising obtain user consent. The EU regulation also presents platform-level obligations that require intermediaries to delete illegal content once it is identified, thereby directly enforcing the advertisement rules (El Refae et al., 2021). In the United States, the Federal Trade Commission (FTC) has documented specific guidelines on the use of endorsements and testimonials in advertising. A material connection between an influencer and a brand must be made visible in a distracting manner, and both the influencer and the sponsoring firm can be held liable for deceptive activities. The FTC further revises these guidelines in response to changes in the platform features on which they are offered and shifts in consumer behavior. In comparison to these jurisdictions, the framework applied in the UAE is comparatively rounded yet not as developed as enforcement congruency and participation of the general population. Although the UAE has already developed some solid legal measures, the enforcement itself is not centralized, and the level of awareness is relatively low. Moreover, when compared to the EU or the U.S., the cross-border enforcement mechanisms in the UAE are not yet fully established, and as such, present a regulatory gap whenever foreign advertisers are deemed to target the domestic audience.

5. GAPS AND RECOMMENDATIONS

5.1. Legal and Institutional Gaps

Although the UAE is well on its way to ensuring compliance with digital advertising laws, as outlined in Federal Law No. 15 of 2020 and Cabinet Decision No. 66 of 2020, among other media laws, some gaps still exist in laws, legal frameworks, and institutional frameworks that undermine successful deployment and adherence to implementation. Among other loopholes is the lack of definition and clarity regarding what micro-influencers are and how they are supposed to adhere to licensing and disclosure rules (Aboelazm et al., 2025a; AlKhamaiseh et al., 2025). Where famous influencers, who have a substantial number of followers, are usually regulated and licensed, micro-influencers, who have a smaller base but a very active one, are often not on the regulatory radar. This has led to much promotion by such individuals going undisclosed, thus leaving followers with a false impression that paid promotions are individual recommendations. The existing rules are unclear regarding the set values

and the obligations of influencers concerning reach, engagement, and content type, and there is a lack of clarity in the enforcement and compliance roles (Allouzi et al., 2024; Aboelazm, 2025b).

Another upcoming issue is that AI-generated content is not currently protected by law. Along with the rise of marketing automation software powered by AI, the development of chatbots and virtual influencers raises concerns about the application of advertising law rules to non-human creators of advertising content. The process of targeting with AI-generated promotional messages, product reviews, or social media posts may not necessarily align with existing rules, especially in cases where it is unclear who the author of such communication is, the publisher, or who participated in creating the advertisement. Such a flaw in regulatory oversight is an opportunity that can be exploited by companies interested in promoting products without responsibility or disclosure, posing a significant threat to consumer confidence. There are also institutional uncertainties related to the power to enforce, particularly at the interface between the Ministry of Economy, the Ministry of Culture and Youth, and the Telecommunications and Digital Government Regulatory Authority (TDRA). The operator of every institution controls consumer protection, media content, and the use of digital platforms, though the lines defining the areas of jurisdiction are not thoroughly delineated. This segmentation is liable to produce disparities in implementation, regulatory overlaps, or inadequacies in policing. There should be a well-organized and well-defined system of regulations to guarantee unity in the application of policies (Yas et al., 2020b; Yas et al., 2023).

5.2. Policy Recommendations

To eliminate these threats, several policies could be implemented to enhance regulatory capacity in the UAE and create a more transparent and consumer-friendly digital advertising environment. To begin with, more explicit rules regarding influencers and platforms should be formulated, particularly for micro-influencers and AI-generated content. These guidelines aim to establish disclosure threshold levels based on audience reach, engagement, or community content. They are also expected to provide guidelines on the requirements for labelling AI-generated advertising and who bears liability for such content. Enforcement agencies can seal the available loopholes by widening the net and making the scope of who an advertiser is in the eyes of the law more perceivable. Second, the UAE can

invest in better monitoring technology or technology powered by AI that enables the automatic identification of undisclosed promotional material, the tracking of influencer activity, and the marking of potentially misleading advertising. The tools enable regulatory organizations to identify violations more efficiently, allowing them to address issues before consumers become aware of them through compliance claims. Real-time enforcement may also be facilitated by auto-monitored content analysis, as it helps identify misrepresentations of products, airbrushed images, or aggressive marketing techniques intended to deceive con-artists buyers.

Third, awareness campaigns or training should be implemented to transform the culture of compliance in businesses. The laws governing advertising are often misunderstood or unfamiliar to small companies, start-ups, and first-time influencers. This knowledge gap can be bridged with the help of government-administered workshops, funded by the government, online training systems, and multilingual teaching tools (Masterson et al., 2021). Similarly, it is also the responsibility of consumers to conduct awareness programs on how to decipher fraudulent marketing techniques, their rights, and where they can raise grievances. In general, although the UAE has already developed a robust set of laws to regulate digital advertising, gaps still exist due to the fast-moving nature of technology and the lack of consistency in enforcement, which should be mitigated. The combination of a more precise legal definition, more advanced monitoring techniques, education, and outreach will help enforce better compliance with current laws and protect the increasingly online world more effectively.

6. CONCLUSION

The paper has examined both the regulatory and legal frameworks governing online advertising in the United Arab Emirates, with a focus on consumer protection, as outlined in Federal Law No. 15 of 2020 on Consumer Protection, Cabinet Decision No. 66 of 2020, the UAE Cybercrime Law, and the licensing requirements for influencers. The analysis reveals that the UAE has established an elaborate legal framework designed to protect consumers from false online marketing schemes. Major clauses focus on honesty, the accuracy of advertising claims, and the need for clear disclosures in the context of influencer and platform-based advertisements. Even with these attempts, implementation remains problematic, particularly regarding non-compliant actors, transnational content, and new technologies such as AI-generated advertising. Paying attention to the

observance of advertising laws cannot be overestimated. In the age of consumer decision-making dominated by digital marketing, noncompliance with regulatory standards may lead to a loss of credibility among the masses, misrepresenting the nature of competition within an industry sector, and subjecting consumers to financial losses. A responsible digital economy requires that businesses, influencers, online platforms, and other players work within the confines of the law to ensure a level playing field and transparency. The police should be aggressive, and

regulatory agencies should be well-equipped in both legal and technological terms. Moving forward, the further development of digital marketing will necessitate the evolution of the regulatory system. To remain abreast of the shift to digital, policymakers in the UAE must anticipate emerging trends, review existing legislation, and invest in educating the community. The UAE has the opportunity to set an example in the region by constructing a safe, compliant, and innovation-promoting digital advertising platform through targeted reform and increased inter-agency coordination.

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