



NDPC
NIGERIA DATA PROTECTION COMMISSION



FEDERAL MINISTRY OF
COMMUNICATIONS, INNOVATION
AND DIGITAL ECONOMY
Leveraging Digital Technology for National Economic Development

Nigeria Data Protection Commission Annual Report 2025



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Nigeria Data Protection Annual Report 2025

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BOLA AHMED TINUBU GCFR
President, Commander-In-Chief of the Armed Forces
Federal Republic of Nigeria



DR. 'BOSUN TIJANI

Honourable Minister of Communications, Innovation
and Digital Economy



ENGR. NADUNGU GAGARE FNIA, FNSE
Permanent Secretary,
Ministry of Communications, Innovation and Digital Economy



DR. VINCENT O. OLATUNJI CPPPS, CDPO, FIIM
National Commissioner/CEO,
Nigeria Data Protection Commission



1. FOREWORD

It is with profound satisfaction that I reflect on the notable progress Nigeria has recorded in strengthening its data protection and privacy landscape. These gains are emblematic, not only of the commendable accomplishments of the Commission over the past year, but also of our nation's steady march toward a secure, trusted, and inclusive digital economy.

Throughout 2025, Nigeria further affirmed its standing as a continental reference point for data governance and digital transformation. The Nigeria Data Protection Commission has played a pivotal role in translating the vision of President Bola Ahmed Tinubu's Renewed Hope Agenda

into tangible outcomes: outcomes that reinforce privacy rights, bolster investor confidence, and expand the frontiers of innovation. Through the effective implementation of the Nigeria Data Protection Act, (NDP Act) 2023, the Commission has deepened digital trust, a foundational pillar of our national digital economy strategy in alignment with the Ministry's objective to leverage digital technology and innovation to diversify and enhance the Nigerian economy.

The period under review was marked by meaningful milestones, including increased compliance across public and private institutions, expanded capacity-building programmes, and the continued maturation of a vibrant data protection ecosystem. This ecosystem is not only strengthening governance but also generating employment opportunities and empowering a new generation of skilled professionals within this fast-evolving sector. The issuance of critical regulatory instruments, sustained engagement with international partners, and heightened public awareness underscore the Commission's commitment to transparency, professionalism, and alignment with global best practices.

As Nigeria navigates the dynamic intersections of artificial intelligence, cybersecurity, and digital trade, data protection remains central to our policy architecture. The Ministry under my leadership will continue to provide strategic support to the Commission in strengthening institutional capacity, fostering collaboration, and ensuring that our digital transformation remains people-centred, rights-based, and innovation-driven.

I commend the leadership of the National Commissioner for his vision, diligence, and steadfast commitment. His stewardship reflects our shared aspiration for a Nigeria in which privacy is safeguarded, innovation flourishes, and the promise of digital prosperity is accessible to all.

The Nigeria Data Protection Commission has played a pivotal role in translating the vision of President Bola Ahmed Tinubu's Renewed Hope Agenda into tangible outcomes: outcomes that reinforce privacy rights, bolster investor confidence, and expand the frontiers of innovation.

Dr. 'Bosun Tijani

Honourable Minister of Communications, Innovation and Digital Economy

2. PREFACE

This year stands as a defining chapter in the evolution of Nigeria's data protection and privacy landscape. It has been a year of purposeful consolidation, bold innovation, and strategic advancement: one that underscores our unwavering commitment to building a trusted digital future for every Nigerian.

Since the enactment and operationalisation of the Nigeria Data Protection Act 2023, the Commission has continued to strengthen the institutional frameworks that anchor our national data protection architecture. In 2025, we deepened our enforcement mechanisms, expanded compliance monitoring across sectors, and enhanced human capital development in the area of public awareness on the value of data privacy as both a fundamental right and an enabler of digital transformation.

A major milestone during the year was the full rollout of the National Data Protection Certification Programme, a home-grown initiative designed to raise a new generation of Certified Data Protection Officers (CDPOs) and compliance professionals. Through this programme, the Commission has built local capacity, promoted indigenous expertise, and empowered organisations to take ownership of their data governance responsibilities.

Also, there is the strengthening of our international partnerships, which positioned Nigeria as an active contributor to global conversations on privacy, trust, and cross-border data flows. We also witnessed significant growth in data protection compliance filings, reflecting the increasing trust and maturity within the ecosystem.

As we look ahead, our focus remains steadfast to sustain the momentum of reform, drive digital trust, and harness data protection as a driver of innovation, economic growth, and citizen empowerment. The future we envision is one where Nigeria stands tall as a global model of responsible data governance: one that balances innovation with integrity, growth with protection, and digital inclusion with human dignity.

I extend my profound appreciation to the Honourable Minister of Communications, Innovation and Digital Economy, Dr 'Bosun Tijani, for his unwavering support. I also want to commend our dedicated staff for their hard work, resilience, and teamwork, and all stakeholders whose support continues to make this mission possible. Together, we are building a data-secured Nigeria where trust fuels transformation.

Dr Vincent O. Olatunji, CPPPS, CDPO, FIIM
National Commissioner/CEO,
Nigeria Data Protection Commission

LIST OF ABBREVIATIONS

AGIS	- Abuja Geographic Information Systems
BPP	- Bureau of Public Procurement
CIPEN	- Chartered Institute of Powered Engineers
CIPMN	- Chartered Institute of Project Managers in Nigeria
DPA	- Data Protection Authority
DPO	- Data Protection Officers
DPCOs	- Data Protection Compliance Organisations
ICPC	- Independent Corrupt Practices and Other Related Offences Commission
NADPA-RAPDP	- Network of African Data Protection Authorities/Reseau African Des Authorities De Protection Des Donnees Personnelles
NDPACT-GAID	- Nigeria Data Protection Act - General Application and Implementation Directive
NUBASS	- National Union of Bauchi State Students
NICRAT	- Nigeria Cancer Research Institute
NOA	- National Orientation Agency
NIA	- Nigeria Insurance Association
NIS	- Nigeria Immigration Service
NIF	- Nigeria INGO Forum
NYSC	- National Youth Service Corps
PEBEC	- Presidential Enabling Business Environment Council
VPA	- Virtual Privacy Academy
YDPAT	- Youth Data Protection Awareness Training

3. NDPC AT A GLANCE

3.1 The NDP Act, 2023

The Nigeria Data Protection Act (NDP Act), 2023 is a landmark legislation that establishes a solid legal foundation for safeguarding personal data and promoting digital trust in Nigeria's fast-growing digital economy. It empowers the Nigeria Data Protection Commission (NDPC) as the country's data protection authority, ensuring accountability, transparency, and fairness in how data is collected, processed, and shared by aligning Nigeria with global best practices.

The NDP Act 2023 not only protects citizens' privacy rights but also fosters innovation, digital trust, and ensures safe cross-border data transfers. In essence, the Act serves as a rulebook for responsible data use in the digital age, protecting privacy and powering progress in the country.

3.2 A Year of Impact: The Commission's Journey

The year 2025 was a landmark period of growth and transformation for the Nigeria Data Protection Commission. Building on the foundation laid by the NDP Act 2023, the Commission recorded significant achievements in strengthening Nigeria's data protection ecosystem and advancing digital trust.

During the year, the Commission expanded its compliance monitoring and enforcement frameworks, leading to a remarkable increase in organisational adherence to data protection standards across both public and private sectors. The Commission also deepened its international collaborations, reinforcing Nigeria's role as a regional hub for data governance excellence. Through robust public enlightenment campaigns, Nigerians have become more aware of their data rights and responsibilities, thus fostering a culture of privacy and accountability.



3.3 Our Mission

We are committed towards making data privacy a cornerstone of sustainable digital economy in Nigeria.



3.4 Our Vision

To be a resilient, world-class institution for the protection of data privacy.



3.5 Our Values

Accountability, Integrity, Fairness and Transparency.



3.6 Our Motto

Championing privacy rights.

3.7 Key Milestones

1. Presidential Recognition of the Commission by President Bola Ahmed Tinubu, GCFR

In a landmark moment for Nigeria's digital governance landscape, His Excellency, President Asiwaju Bola Ahmed Tinubu, GCFR, acknowledged the strategic importance of data protection in national development during the 2025 National Civil Service Day celebration. Recognising the pivotal role of data privacy in public service delivery, economic resilience, and citizen trust, the President issued a directive mandating all Ministries, Extra-Ministerial Departments, and Agencies (MDAs) to ensure full compliance with the Nigeria Data Protection Act, 2023. This reinforces the Federal Government's commitment to safeguarding personal data, promoting responsible data governance, and aligning Nigeria with global best practices.

2. Launch of the Youth Data Protection Awareness Training Program (YDPAT) for 5,000 Youths on Data Protection and Privacy

The Commission, in collaboration with the Ministry of Youth Development, launched the Youth Data Protection Awareness Training Program (YDPAT), targeting the training of 5,000 youths across Nigeria in data protection and privacy. The initiative was designed to equip young Nigerians with the knowledge and skills necessary to understand and apply the principles of data protection in the Nigeria Data Protection Act, 2023. It aimed to foster a culture of privacy consciousness, promote digital literacy, and create career paths in the data governance ecosystem.

3. Hosting of the Network of African Data Protection Authorities (NADPA-RADPA) Conference and AGM

Nigeria's selection to host the 2025 NADPA-RADPA Conference and Annual General Meeting, themed "**Balancing Innovation in Africa: Data Protection and Privacy in Emerging Technologies**", was a testament to NDPC's leadership in data governance on the continent. The three (3) day event, held from the 6th to the 8th of May, 2025, featured a rich lineup of activities, including five (5) keynote addresses, five (5) plenary sessions, two (2) breakout sessions, two (2) masterclasses, two (2) fireside chats, and three (3) side events, attracting over 2,000 participants. The Commission hosted over twenty (20) Data Protection Authorities, as well as African regulators and stakeholders, to address pressing issues in data protection, providing Nigeria with a strategic opportunity to showcase its progress and contribute to shaping the future of digital rights across the region. Following the conference, several Data Protection Authorities visited the Commission to understudy its day-to-day operations, with a view to replicating best practices in their respective countries.

4. Certification of 500 Data Protection Officers

In line with its strategic commitment to human capital development, the NDPC commenced the certification of five hundred (500) Data Protection Officers (DPOs), equipping them with globally benchmarked competencies to uphold the Nigeria Data Protection Act. The initiative was designed to strengthen the bridge between data subjects, data controllers and data processors, promote lawful and ethical data handling across sectors, and position Nigeria as a leader in Africa's digital trust ecosystem.

5. Establishment of More Data Privacy Clubs in Tertiary Institutions

To foster a privacy-conscious generation, the NDPC has expanded the establishment of Data Privacy Clubs (DPC) in tertiary institutions, creating vibrant platforms for student-led advocacy, learning, and engagement while ensuring compliance within the institution. These clubs serve as strategic vehicles for embedding data protection awareness in academic environments and nurturing future champions of privacy rights. In 2025, six (6) new Data Privacy Clubs were established at Afe Babalola University, Ado-Ekiti; Federal University, Oye-Ekiti (FUOYE); Nile University of Nigeria, Abuja, FCT; Lagos State College of Health Technology, Yaba, Lagos State; De-Porter College of Health Technology, Ijebu Igbo, Ogun State; and Confluence University of Science and Technology, Osara, Kogi State: these brings the total number of established clubs to eight (8) nationwide.

6. Translation of the Nigeria Data Protection Act, 2023 into the Three Major Indigenous Languages

The Commission achieved a landmark milestone by translating the Nigeria Data Protection Act (NDP Act), 2023 into Yoruba, Hausa, and Igbo languages. This initiative significantly enhances accessibility and public understanding, empowering millions of Nigerians to comprehend and exercise their data rights. By making the law available in indigenous languages, the Commission reinforced inclusivity, national ownership, and widespread engagement in building a trusted digital ecosystem.

7. PICASSO Award (Most Outstanding DPA)

The Nigeria Data Protection Commission won the “**Most Outstanding Data Protection Authority in Africa**”, a recognition that underscores its exemplary leadership in strengthening data governance, advancing regulatory reforms, and safeguarding the rights and freedoms of millions of data subjects. This achievement reflects the Commission’s sustained commitment to accountability, transparency, and innovation, which is evident in its groundbreaking initiatives such as the National Certification Program for Data Protection Officers, the issuance of the General Application and Implementation Directive (GAID), the extensive nationwide awareness campaigns, the launch of the Virtual Privacy Academy (VPA) and its strategic collaborations with regional and global partners. It also reinforces Nigeria’s growing influence in shaping continental data protection standards, building digital trust, and fostering a resilient ecosystem for lawful and responsible data processing.

3.8 Operational Review of the Nigeria Data Protection Strategic Roadmap and Action Plan (NDP-SRAP) 2023-2027

Introduction:

While the Nigeria Data Protection Strategic Roadmap and Action Plan (NDP-SRAP) was formally launched in 2023, many of its foundational programmes, especially those under the Governance, Ecosystem & Technology, and Human Capital Development pillars had already been initiated since February 2022, following the establishment of the Nigeria Data Protection Bureau (NDPB).

The 2025 General Application and Implementation Directive (GAID) has now sharpened the operational clarity and compliance expectations under the NDP-SRAP. GAID provides updated guidance on implementation thresholds, duties of controllers and processors, technical and organisational safeguards, and reporting obligations, thereby enhancing the Commission's ability to accelerate SRAP outcomes.

The NDP-SRAP remains a comprehensive framework designed to:

- a. Safeguard the fundamental rights and freedoms of data subjects in line with the NDP Act, 2023 and GAID 2025.
- b. Catalyse the lawful and responsible use of personal data for national development.
- c. Sustain long-term initiatives aimed at strengthening human capital development, equipping and resourcing the Commission, deepening a competitive and trustworthy data protection ecosystem and enhancing cooperation with institutions and stakeholders.

Through extensive research, stakeholder consultations, validation workshops and now the harmonising lens of GAID 2025, the Commission's regulatory functions continue to rest on five (5) strategic pillars:

- i. Governance
- ii. Ecosystem and Technology
- iii. Human Capital Development
- iv. Cooperation and Collaboration
- v. Funding and Sustainability

This operational review of the NDP-SRAP through the GAID 2025 implementation perspective focuses on People, Process, and Technology.

1. People

The GAID 2025 re-emphasises a people-centric implementation strategy, requiring risk-based, inclusive, and accessible approaches. Key demographic indicators informing prioritisation include:

- **Numerical Strength of Data Subjects: 230+ Million**
- **Number of Information Languages: 250+**
- **Literacy Rate: 61%**
- **Internet Users: 163.8 Million**

Given this demographic scale, GAID 2025 encourages interventions that maximise reach and inclusiveness. Accordingly, the Commission prioritises:

- a. Data subject rights awareness, amplified through partnerships with civil society organisations, public institutions, community-based organisations and digital platforms. The Commission achieved a landmark milestone by translating the Nigeria Data Protection Act (NDP Act), 2023 into Yoruba, Hausa and Igbo languages. This initiative significantly enhances accessibility and public understanding, empowering millions of Nigerians to comprehend and exercise their data rights.
- b. Expansion of Privacy Clubs in schools, aligning with GAID's emphasis on early-stage digital rights literacy. In 2025, six (6) new Data Privacy Clubs were established at Afe Babalola University, Ado-Ekiti; Federal University, Oye-Ekiti (FUOYE); Nile University of Nigeria, Abuja, FCT; Lagos State College of Health Technology, Yaba, Lagos State; De-Porter College of Health Technology, Ijebu Igbo, Ogun State; and Confluence University of Science and Technology, Osara, Kogi State: these brings the total number of established clubs to eight (8) nationwide.
- c. Strengthening the Data Protection Officer (DPO) ecosystem, the Commission sponsored the training and certification of five hundred (500) DPOs to support compliance, enhance institutional accountability, create jobs in line with the President Bola Ahmed Tinubu's job initiatives and improve responsiveness between data subjects, data controllers and data processors. The Commission launched the Youth Data Protection Awareness Training Program (YDPAT), targeting the training of five thousand (5,000) youths across Nigeria in data protection and privacy.

2. Process

With such broad population coverage, the GAID 2025 reinforces the need for democratic, scalable, and adaptive processes. These procedures must remain consistent with the Constitution of the Federal Republic of Nigeria, 1999 (CFRN), the Nigeria Data Protection Act (NDP Act), 2023, and the interpretive guidance of GAID.

The Commission currently operates nine (9) major regulatory and operational processes:

- a. Complaints Investigation and Resolution.
- b. Filing of NDP Act Compliance Audit Returns (CAR).
- c. Registration of Data Controllers and Processors of Major Importance (DCPMI).
- d. Registration and Monitoring of Data Protection Compliance Organisations (DPCOs).
- e. Human Capital Development and Professional Standards.
- f. Cooperation and Collaboration with Domestic and International Partners.
- g. Sandboxing for Emerging Technologies and Innovative Data Uses.
- h. Data Privacy Impact Assessment (DPIA) Administration.
- i. Rulemaking and Issuance of Directives which birthed the GAID 2025.

These processes evolve continuously as data governance norms shift. GAID 2025 strengthens these processes by clarifying implementation expectations, mandating streamlined reporting formats, strengthening accountability frameworks, and aligning technical standards with global best practices.

3. Technology

The NDP-SRAP places strong emphasis on technology under the Ecosystem and Technology pillar. In accordance with GAID 2025, the Commission continues to adopt technological systems that enhance transparency, efficiency, and accountability.

Current technological enablers include:

- a. Enterprise Resource Planning (ERP) solutions for automating internal workflows, ensuring process integrity, and enabling data-driven decision-making.

- b. Unified Service Portal designed to manage:
 - Complaints submission and tracking.
 - General enquiries.
 - NDP Act Compliance Audit filing by data controllers/ processors.
- c. Additional technology initiatives under consideration consistent with GAID's directives include: enhanced compliance dashboards, risk-rating systems for controllers, improved interoperability tools, and expanded digital literacy resources for data subjects.

4. GOVERNANCE

4.1 Operationalising the NDP Act: The Implementation of the NDP Act – GAID 2025

The year was marked by the issuance and subsequent implementation of the Nigeria Data Protection Act – General Application and Implementation Directive (NDP Act-GAID), 2025. This subsidiary legislation was formally issued on 20th of March, 2025.

In line with the Regulatory Impact Assessment Framework championed by the Presidential Enabling Business Environment Council (PEBEC), the Commission instituted a six (6) month gestation period. This grace period allowed the ecosystem sufficient time to digest the law, amend their systems, and prepare for full compliance. Consequently, the NDP Act-GAID formally came into force on 19th of September, 2025. During this gestation period, the Commission conducted several intensive awareness and capacity-building initiatives to ensure citizen and organisational readiness.

The NDP Act-GAID is a detailed directive expounding on obligations and rights in the NDP Act. It also provides express provisions on emerging technologies such as Artificial Intelligence and the Internet of Things. It has introduced several key features that significantly strengthen Nigeria's data protection framework:

- a. Compliance Audit Returns:** Establishment of a new, detailed template for audit filing (Compliance Audit Returns), enhancing accountability.
- b. Data Privacy Impact Assessment:** Introduction of a comprehensive template for conducting Data Privacy Impact Assessments (DPIAs), ensuring risks are mitigated before technology and/or high-risk processing is deployed.
- c. Data Protection Officers:** Mandating compulsory continuous professional development for Data Protection Officers (DPOs), raising the competency bar across the industry.
- d. Cross-Border Data Transfers:** Provision of further clarity on cross-border data transfers and detailing the acceptable approved mechanisms.
- e. Data Subject Vulnerability Index:** Introduction of a Data Subject Vulnerability Index to mandate heightened protection for vulnerable data subjects.

- f. Amended Guidance Notice on Registration:** Amendment of the Guidance Notice on Registration of Data Controllers and Processors of Major Importance (DCPMIs) and clear definition of new audit filing fees.
- g. Legitimate Interest Assessment:** Introduction of a template for Legitimate Interest Assessment (LIA).
- h. Democratising Redress:** The introduction of the Standard Notice to Address Grievance (SNAG), which formalises and democratises the complaint filing process for data subjects.

To support the implementation of the NDP Act – GAID, the Commission launched the IMPACT initiative, a bi-monthly webinar series focused on demystifying the NDP Act and the NDP Act – GAID, starting with the rights of data subjects and obligations of organisations.

Moving forward, the Commission is now transitioning into a phase of full enforcement of the NDP Act – GAID. This sends a strong, clear signal to the ecosystem, both locally and internationally, that Nigeria is committed to data protection and will actively ensure compliance.

4.2 Investigation and Enforcement Actions

Investigation and enforcement remain central pillars of the Commission’s regulatory mandate. The Commission is currently handling multiple investigations into alleged violations of privacy rights across key sectors, including health, social media, telecommunications, banking/fintech, and hospitality.

Recognising that the obligations established under the NDP Act constitute emerging legal norms in data governance, the Commission has adopted a restorative rather than punitive approach to investigation and enforcement. This orientation is firmly supported by several provisions of the NDP Act, including:

- **Section 46(7):** Allowing the Commission to make representations on behalf of parties.
- **Section 47(2)(a)–(c):** Empowering the Commission to issue warnings and non-penal compliance orders.
- **Section 48(2)(d):** Authorising the issuance of remedial fees in lieu of strict penalties.
- **Section 48(6):** Requiring consideration of extenuating factors—such as minimal privacy impact and cooperation with the Commission—for the purpose of facilitating amicable resolution.

See table below for highlights of major areas of investigation and enforcement:

S/N	Investigation/Enforcements	Remarks
1	Account Opening without Data Subject's Consent	Ostensibly to drive financial inclusion. This appears to be a trend in some financial institutions. Systemic efforts are underway to ensure that appropriate authentication mechanisms are in place before a potential customer may be onboarded as a customer.
2	Inelegant Drafting of Privacy Notices	Notices - Organisations often copy and paste privacy notices without thoroughly aligning same with their data processing activities and other data protection realities. This often led to a violation of Section 27 of the NDP Act. It is noted that the first and easiest way to know a non-conforming entity is through their privacy notices.
3	Behavioural Profiling	This is one of the pitfalls in big data advertising and revenue drive. While it may appear desirable that data subjects only get to see what is of interest to them, it is disturbing to note that in many cases this process notoriously violates the principles of data minimisation. What is more, profiling may lead to socio-political manipulation of a large populace.
4	Unauthorised Access to Personal Data	This type of breach takes many forms, the less sinister being careless viewing by an unauthorised employee of a data controller or processor. The real malicious access comes with criminal intent. Reporting breaches has been a grey area – perhaps due to fear of retribution. Some data controllers believe that they can arbitrarily dismiss reportable breaches as insignificant. However, experience teaches that reporting breaches and informing data subjects timeously helps in disaster recovery.

5	Loss of Personal Data	Nothing demonstrates poor data management more than the loss of personal data. For a data subject, the experience may be traumatic. There was an instance where the data subject required the personal data to resolve a serious financial scandal. In another instance, it was meant to complete a crucial ID. The Commission views personal data loss with grave concern. Apart from the agony of replacing lost data, the financial implication for individuals and businesses is overwhelming. According to a report titled, “2022 study by IBM and Ponemon Institute”, the global average cost of a data breach was a staggering \$4.35 million, or approximately \$164 per data record. However, that research mostly focused on the costs of data breaches, such as theft of personal user data, login information and credit card numbers. ▪ A leading BC/DR provider estimated that a data loss costs U.S. businesses an average of \$7,900 per minute during a data centre outage. A recent report by Verizon found that “small” instances of data loss (around 100 lost or compromised records) cost businesses an average of \$18,120 to \$35,730. ▪ The same study found that large-scale data loss (100+ million records) costs an average of \$5 million to \$15.6 million.
6	Unauthorised Cross-Border Transfer of Personal Data	The anecdotal assertion that Data is the new oil is now settled beyond debate. The quantum of personal data being generated by over 230 million data subjects in Nigeria occupies a central place in the mandate of the Commission. There are cases where data controllers seem oblivious of their obligations in seeking the approval of the Commission before carrying out cross-border transfer of personal data. The Commission intends to leverage both in-country and international accountability mechanisms such as certification to ensure that data controllers and data processors comply with the provisions of Part 8 of the NDP Act whenever they engage in cross-border data transfer. The Commission ensures that businesses in every jurisdiction that may target data subjects in Nigeria are equally and equitably bound by the NDP Act and other regulatory instruments issued thereunder.

7	Data Mining through Cookies	They are called cookies, but they are in most cases distasteful in data processing. This has been the experience of the Commission in dealing with cases where data controllers use unnecessary cookies to collect personal data without the consent of the data subject. Through regulations, the Commission is setting standards on how cookies and other tracking tools may be deployed on online platform.
8	Unlawful Use of CCTV	CCTV helps in many ways, particularly in security. The Commission recognises that a data controller may have a legitimate interest in the deployment of CCTV. However, there are instances where the use of CCTV overreaches the privacy rights of others; for instance, where a person directs his camera to the apartment of his neighbour. Many data controllers deploy CCTV without giving notice to data subjects. While CCTV may capture crime, it may become a tool of insidious surveillance of innocent data subjects.
9	Identity Theft	The boldness of identity thieves in some instances appears to be more of an insult to our collective intelligence. We have instances of individuals purporting to use the identity of a public figure to defraud associates of the public figure. With the use of Emerging Technologies such as AI, the line of distinction between a stolen identity and real identity is becoming more blurred. The Commission is stepping up awareness on identity theft. We are mandating that data controllers who possess high risk data assets put adequate technical and organisational measures in place for data protection. For instance, where two-factor authentication has been a standard, multi-factor authentication may be required. Where possible blockchain technology may be adopted to ensure that identities are not easily compromised or manipulated to gain unauthorised access to consequential assets.
10	Non-Transparent Use of Mobile Apps.	Mobile Apps have become ubiquitous. They tend to make life easy in online transactions. Our experience shows that many mobile apps that are genuine still fail to comply with the provisions of the NDP Act – particularly in disclosing information to data subjects and data minimisation. The Commission is mandating privacy by design and by default in this regard.

11	Automated Decision-Making without Human Intervention	No one can begrudge the need to deploy effective tools in managing a multitude of applications whether for credit, insurance, education and other related pursuits. However, the requirement of the law is that where automated decisions may significantly affect a data subject, the concerned data subject should have opportunity of human intervention or review (See Section 37 of the NDP Act). In practice however, many data controllers seem to dispense with the requirement of a natural person. This is quite notorious in credit scoring. Experience shows also that data subjects hardly know the existence of automated decisions and the implication for their privacy and rating. There is a strong suspicion that many data subjects may have been refused certain benefits without knowing the real rationale for refusal. Credit scoring in some cases may morph adverse commercial surveillance.
12	Lack of Data Privacy Impact Assessment (DPIA)	Data Privacy Impact Assessment is required where the processing of personal data may likely result in high risk to the rights and freedoms of a data subject, by virtue of its nature, scope, context, and purposes (See Section 28 of the NDP Act). Our experience shows that some data controllers and processors do not comply with this requirement of the law. For instance, some algorithm in public space tends to process personal data without regard for the sensitive nature of the data, age of the data subjects and other regulatory restrictions (See Section 45 of 1999 CFRN). Ostensibly, such tools may amplify freedom of expression. This to some extent negates a legal reasoning that: “the most stringent protection of free speech would not protect a man in falsely shouting fire in a theatre and causing a panic” (See <i>Schenck v. U.S.</i>, 249 U.S. 47 (1919) per Justice Wendel Holmes). The Commission is mandating a standardised DPIA where one is required with a view to safeguarding the rights and fundamental freedoms of data subjects in Nigeria.

5. ECOSYSTEM AND TECHNOLOGY

The Data Protection Compliance Organisation (DPCO), licensed by the NDPC, serves as a key institutional partner in the advancement of a resilient, trusted, and innovation-enabling data protection ecosystem.

In close collaboration with the NDPC, the DPCO supports the development, adoption, and effective implementation of robust data protection technologies, regulatory standards, and best practices. Through sustained engagement and partnerships across the public and private sectors, the DPCO contributes to strengthening compliance frameworks, enhancing digital trust, and promoting responsible, secure, and sustainable data-driven growth.

5.1 REGISTRATION OF MORE DCPMI

The Commission recorded a significant increase in the registration of Data Controllers and Processors of Major Importance (DCPMIs), with over 38,000 entities placed under regulatory oversight. This milestone have enhanced accountability and transparency in data processing, particularly in critical sectors, which reflects the growing adoption of data protection standards across Nigeria’s digital economy.

5.2 ANALYSIS OF NDPC ANNUAL AUDITS

Awareness Programmes

2022 – **63**

2023 – **70**

2024 – **121**

2025 – **108**

Compliance Audit Returns

2022 - 2023 (**3,451**)

2023 - 2024 (**4,691**)

2024 - 2025 (**3,327**)

Data Protection Sector Cumulative Revenue

2022 – **5.5 Billion**

2023 – **6.2 Billion**

2024 – **12 Billion**

2025 – **25.5 Billion**

d. Data Protection Sector Job Creation 2022 – 9,577 2023 – 10,123 2024 – 20,000 2025 – 41,425	e. Number of Verified DPOs 2022 – 1,928 2023 – 1,955 2024 – 2,888 2025 – 7,000	f. Number of Investigations 2022 – 117 2023 – 177 2024 – 213 2025 – 146
g. Number of DPCOs 2022 – 138 2023 – 163 2024 – 246 2025 – 306	h. Compliance Revenue 2022 – 94.4M 2023 – 325M 2024 – 1.5B 2025 – 4.99B	i. Registered DCPMI 2024 – 36,052 2025 – 38,661

5.3 SECTORAL ANALYSIS OF NDPC ANNUAL AUDITS



EDUCATION

97



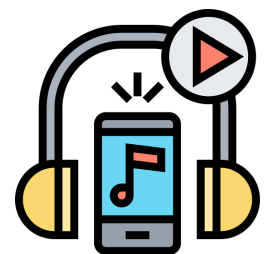
TOURISM

17



NON-PROFIT

11



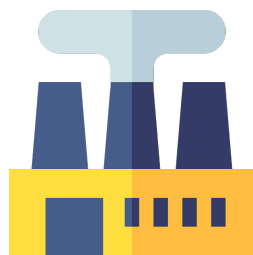
ENTERTAINMENT

22



FINANCE

897



MANUFACTURING

32



COMMERCE

72



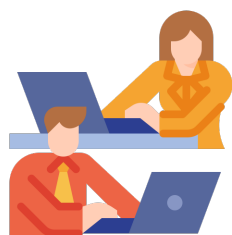
OIL AND GAS

32



LEGAL

57



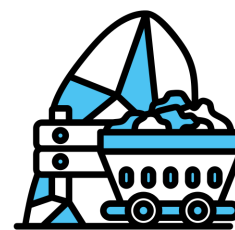
TECHNOLOGY

385



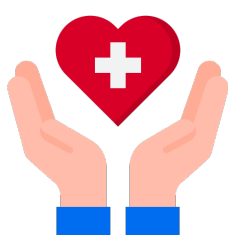
SECURITY SERVICE

11



MINING

9



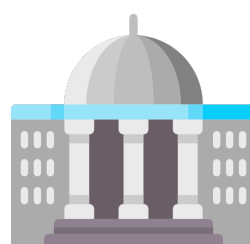
HEALTH

178



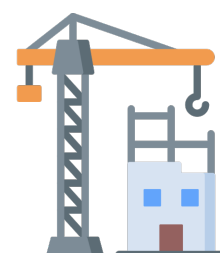
INSURANCE

147



PUBLIC SECTOR

42



CONSTRUCTION

18



TRANSPORTATION
AND LOGISTICS

35



CONSUMER GOODS

27



ADVERTISEMENT

17



COMMUNICATION

32



ENERGY & POWER

14



REAL ESTATE

9



AGRICULTURE

28



MARITIME

18



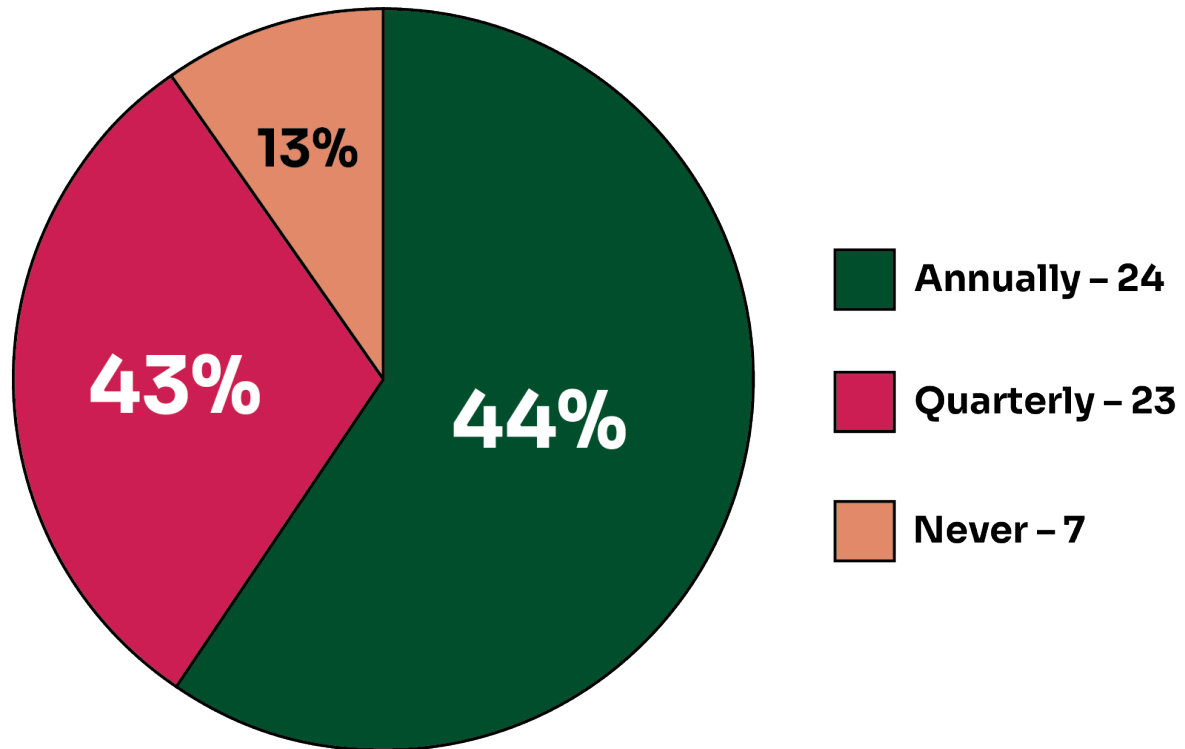
AVIATION

17

TOTAL **2,224**

5.4 DPCOs Survey Data

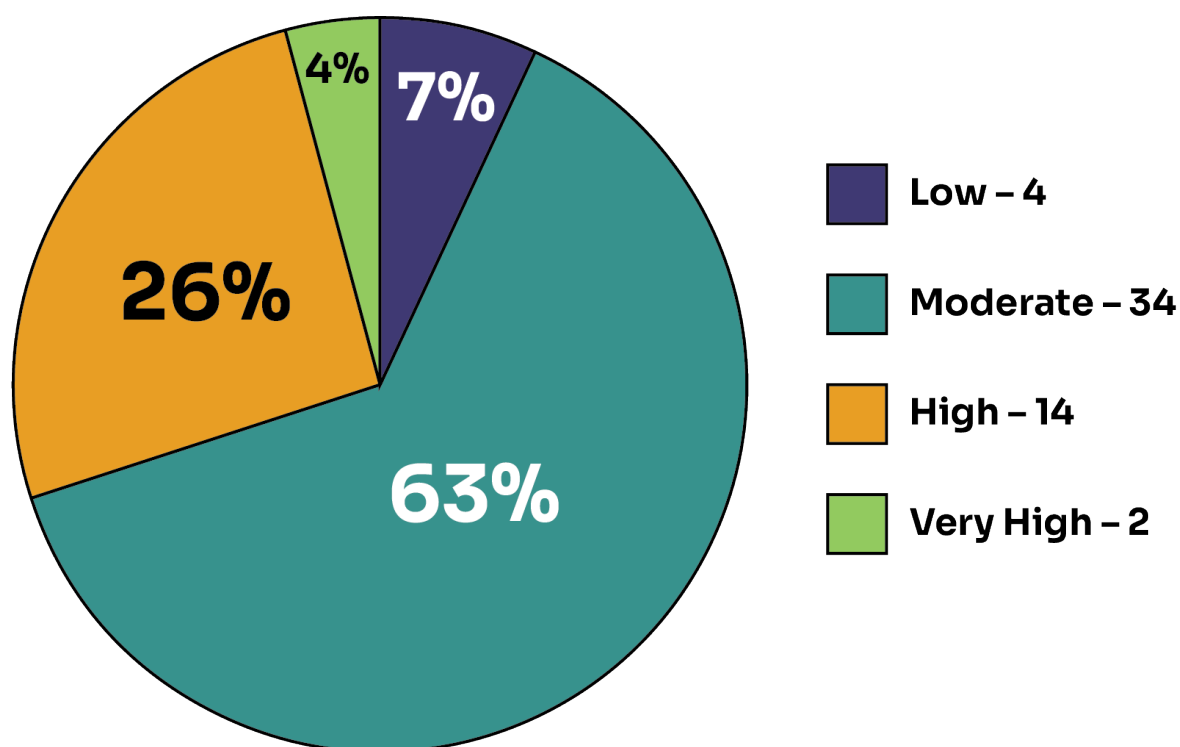
Question 1: How often do DPCOs receive technical training on data protection/privacy?



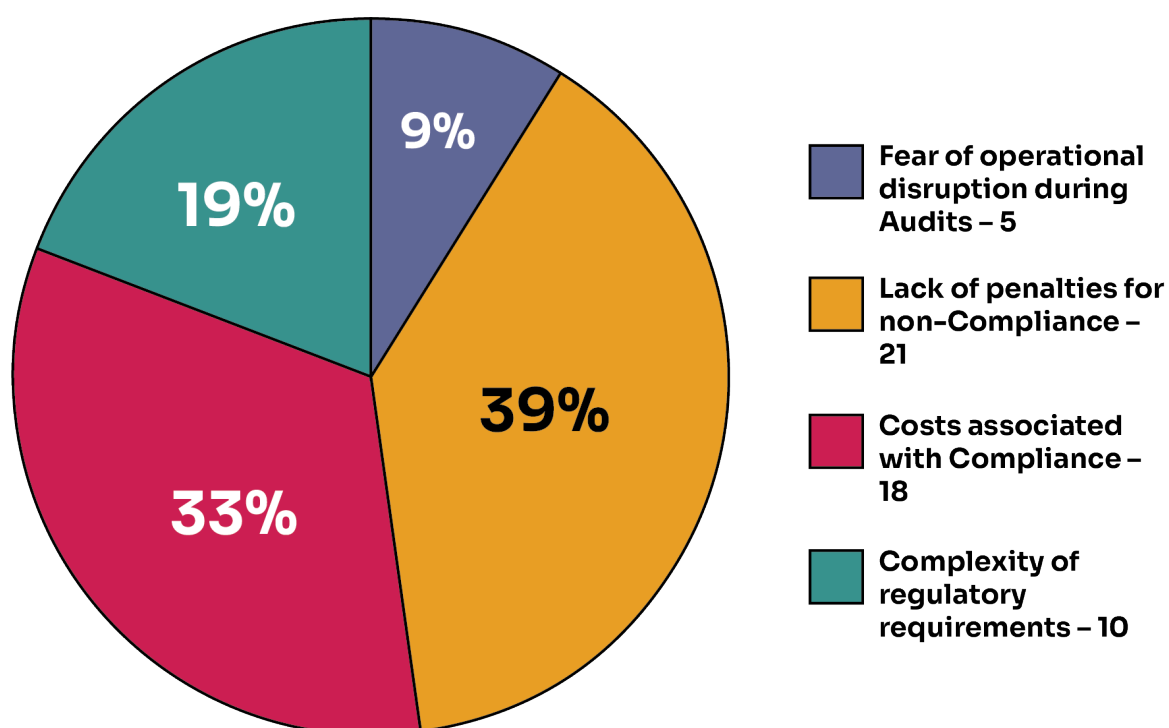
Question 2: What compliance challenges are unique to your sector of operation?

	1st Choice	2nd Choice	3rd Choice	4th Choice
Regulatory complexity	36.6%	36.6%	26.9%	3.8%
Lack of sector-specific guidelines	34.6%	30.8%	29.9%	7.7%
High -volume data processing	30.8%	19.2%	30.8%	19.2%
Data breach vulnerability	0	15.4%	15.4%	69.2%

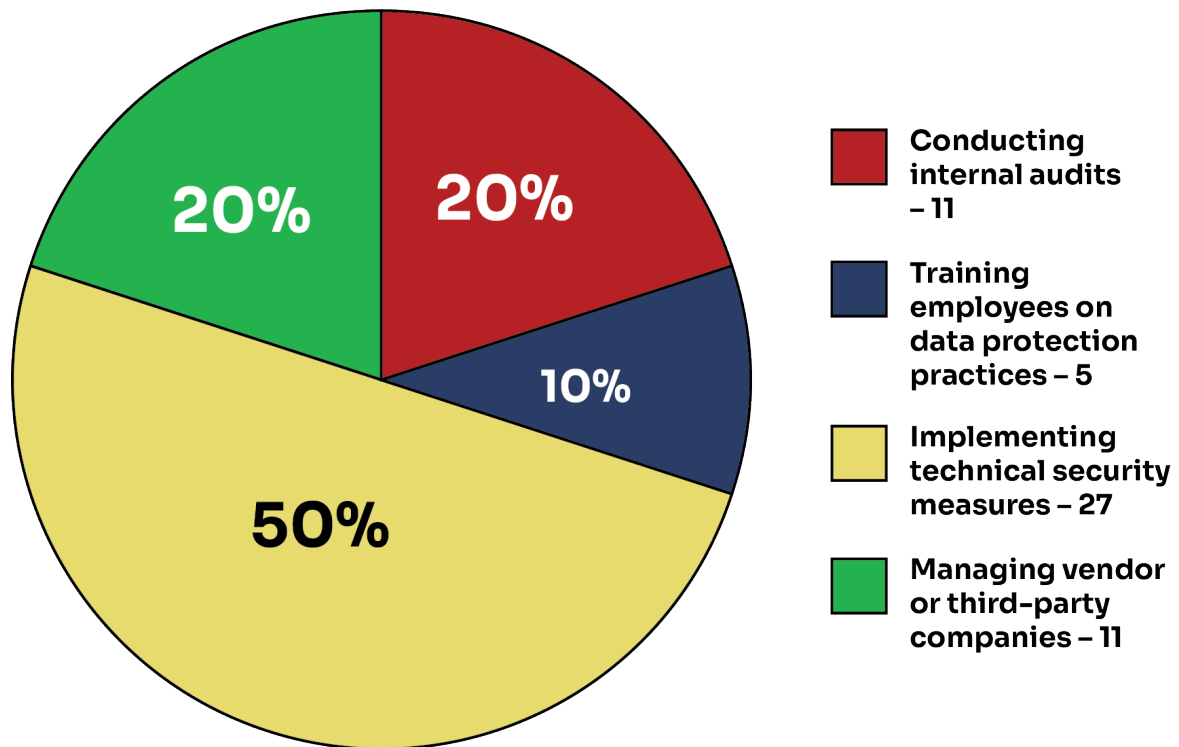
Question 3: How would you rate the level of technical expertise required for organisations to comply with data protection requirements?



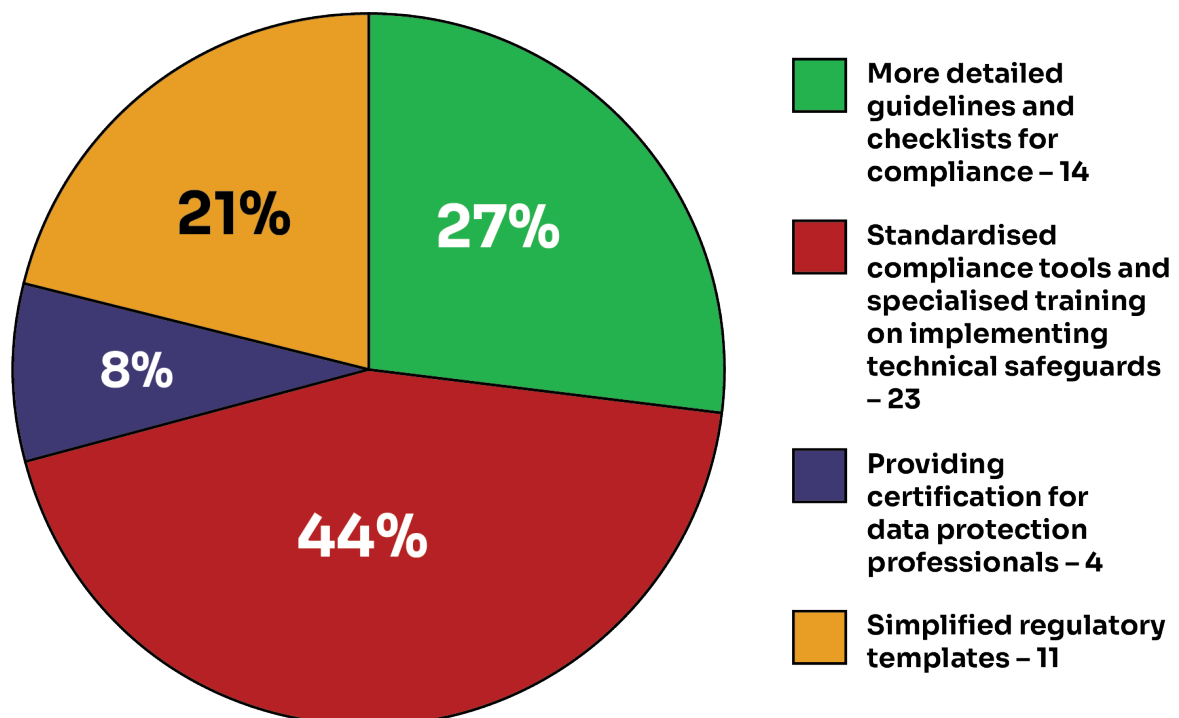
Question 4: What is the biggest obstacle or challenge that prevents organisations from complying with the Nigeria Data Protection Act?



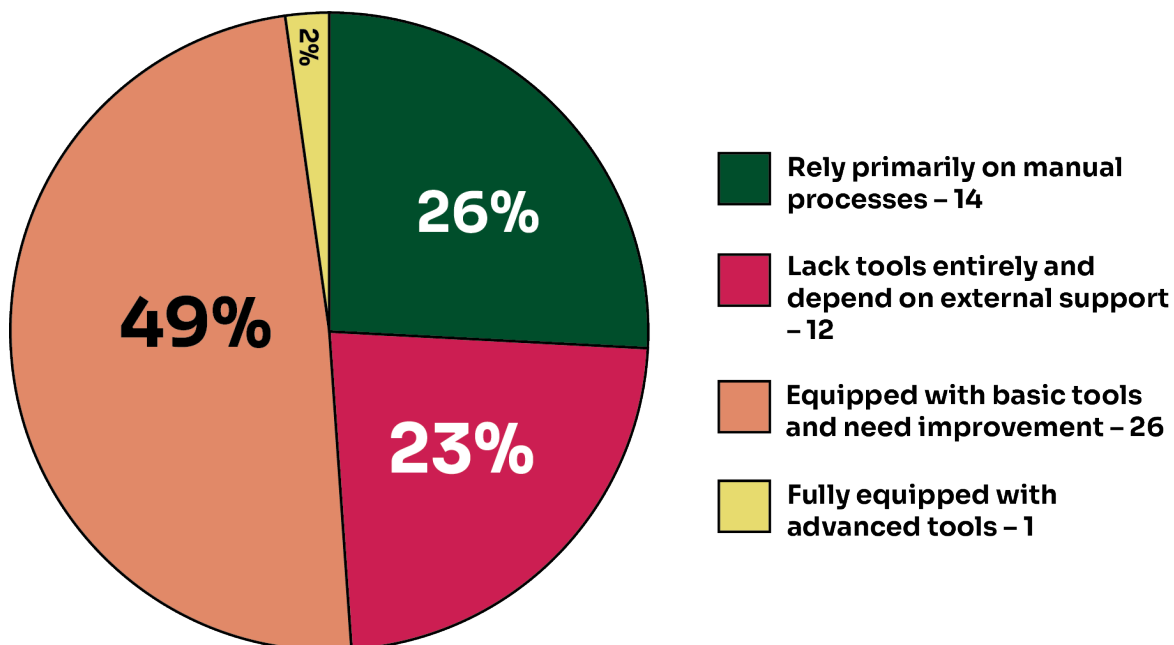
Question 5: Which of the following compliance activities do organisations find most resource-intensive?



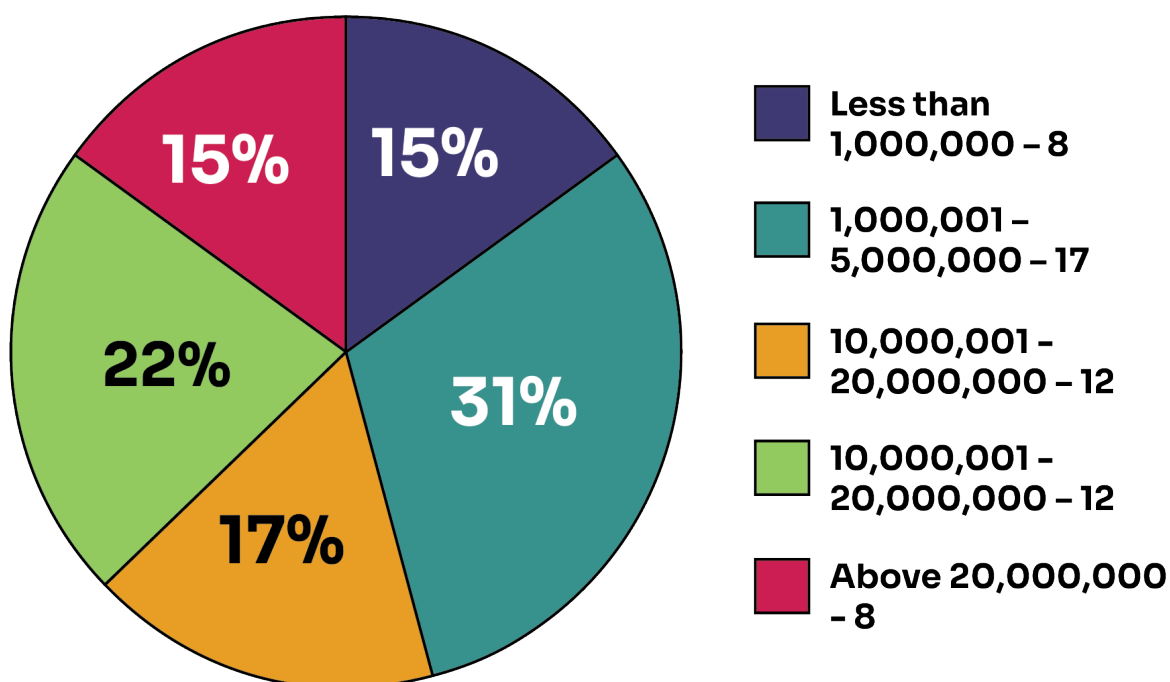
Question 6: What is the biggest obstacle or challenge that prevents organisations from complying with the Nigeria Data Protection Act?



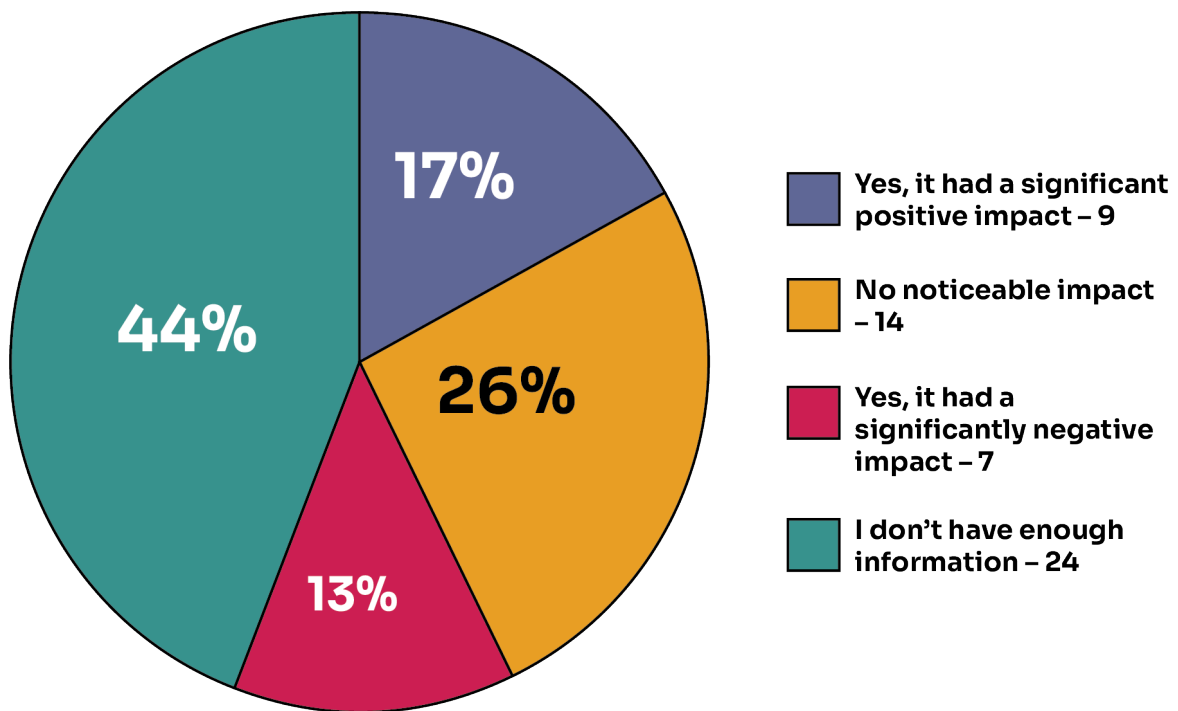
Question 7: How equipped are data controllers/processors with automated tools for managing compliance requirements (e.g. Data Subject Access Requests, consent management)?



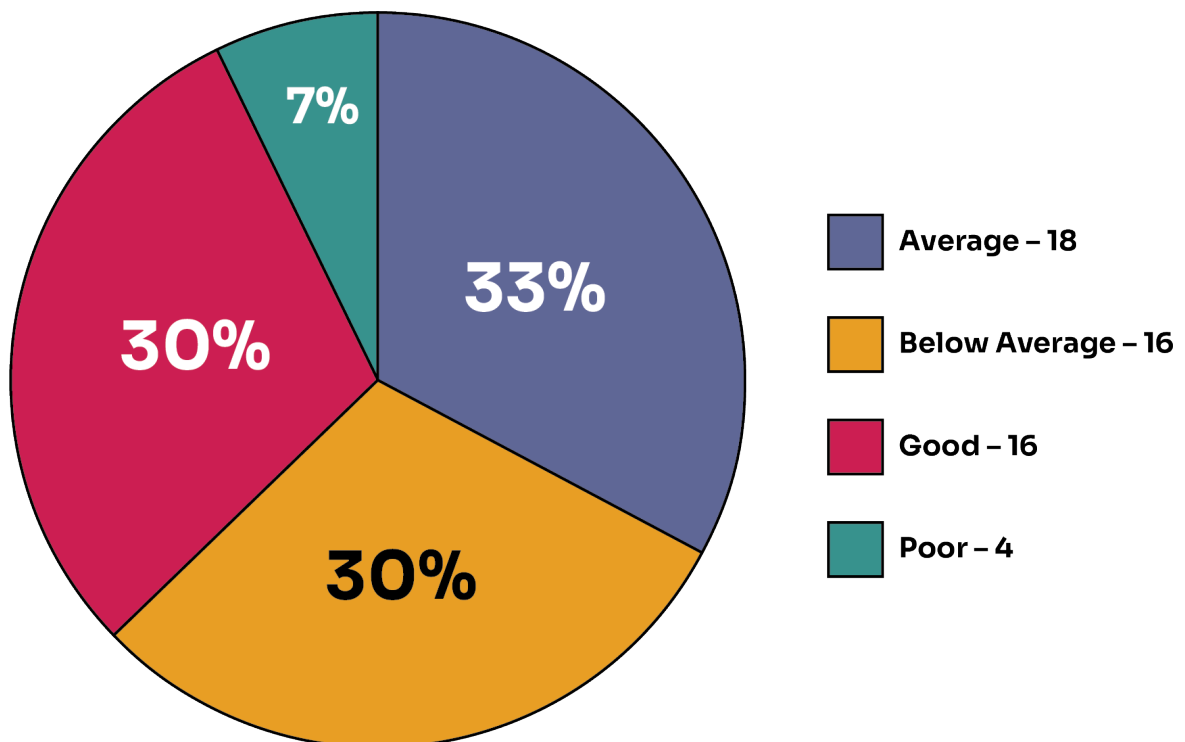
Question 8: Provide an estimate of the annual revenue generated from DPCO services (₦) in 2025.



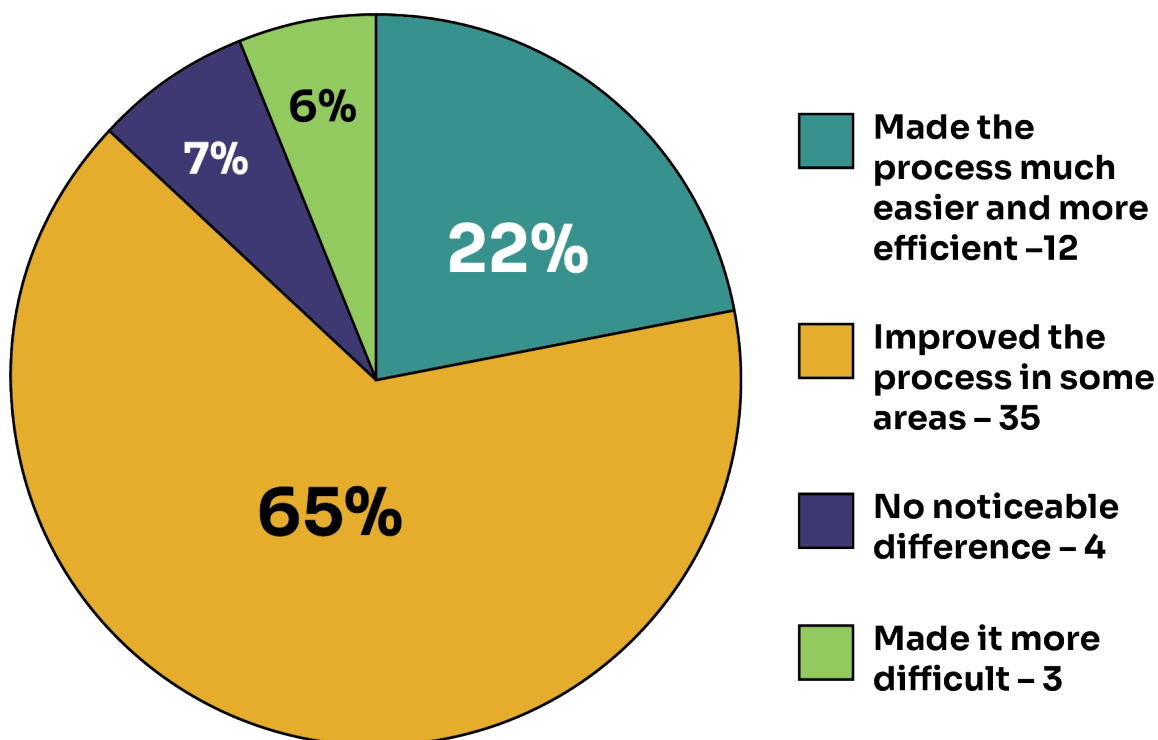
Question 9: Did the increase in numbers of licensed DPCOs have any impact on the ecosystem?



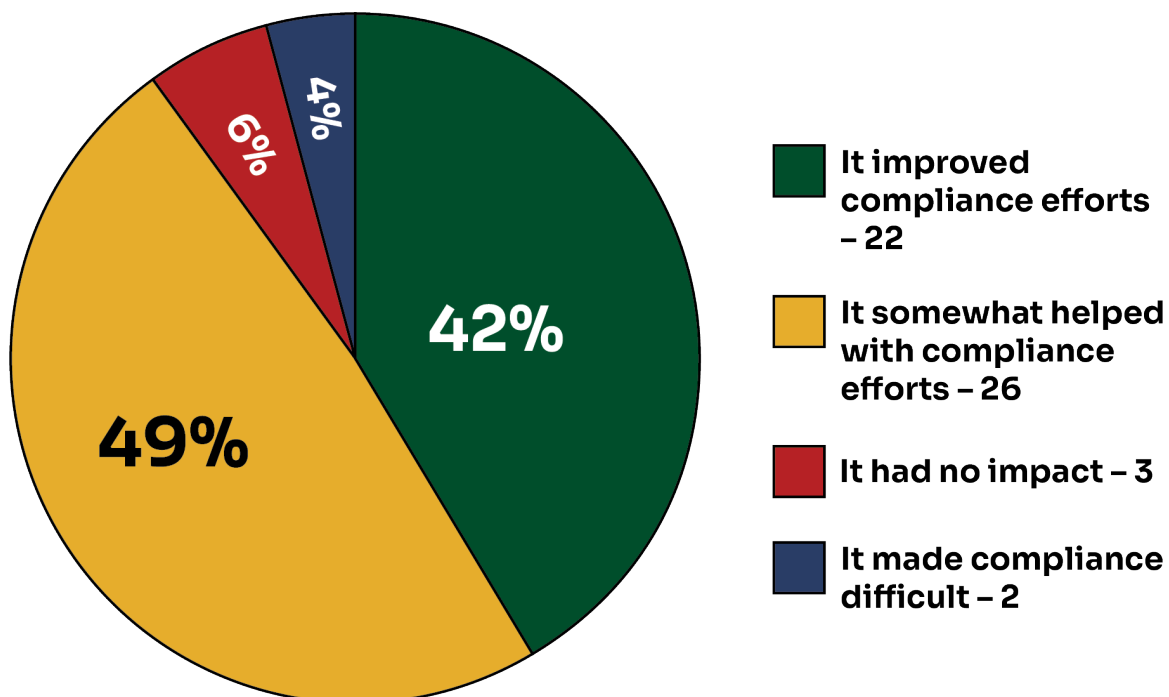
Question 10: Rate the state of public awareness on the NDP Act in 2025.



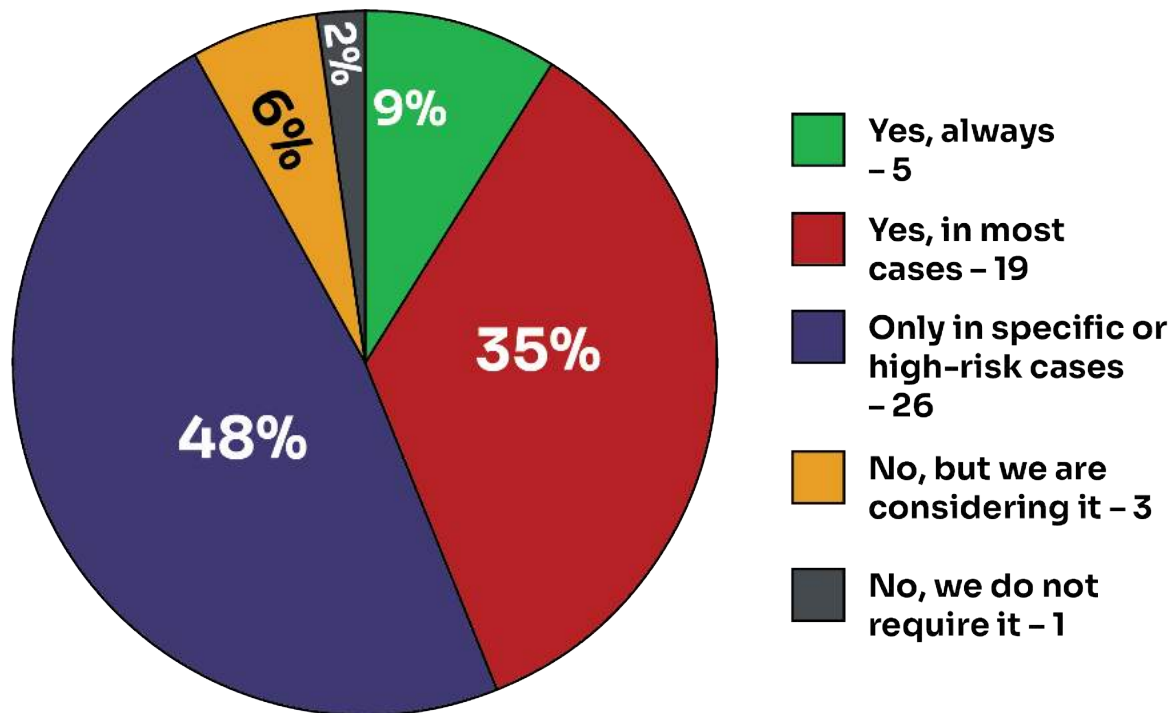
Question 11: How has the Audit Template assisted DPCOs in preparing and filing compliance audit returns?



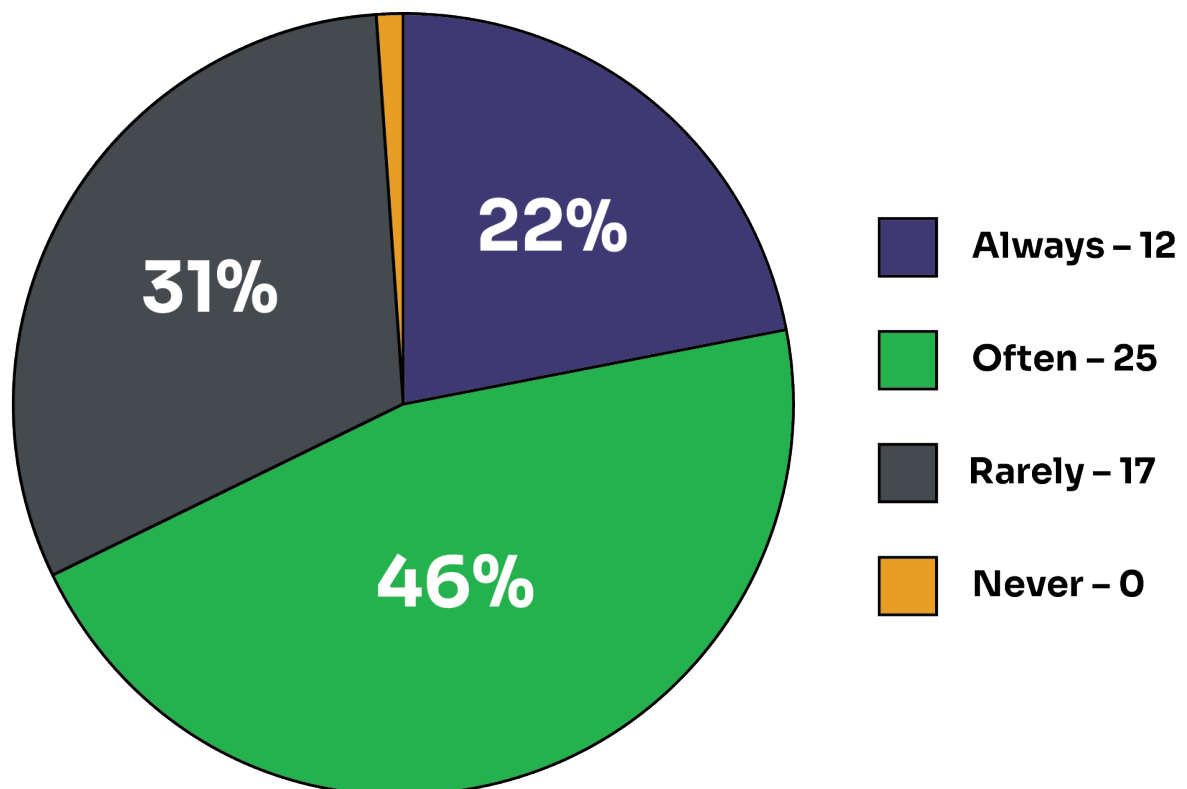
Question 12: How did the Nigeria Data Protection Commission's DPIA template influence Data Controllers/Processors of Major Importance (DCPMI) compliance efforts?



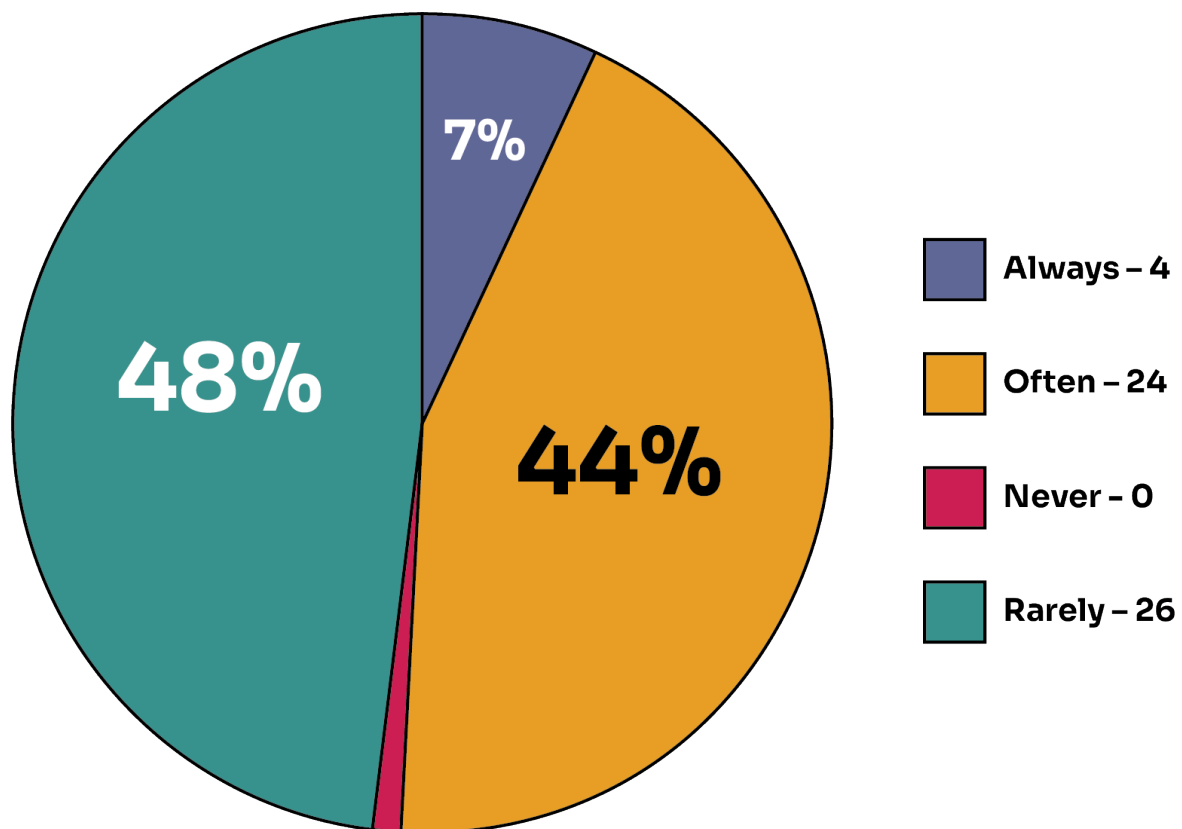
Question 13: Do data controllers mandate their third-party processors to comply with registration and compliance audit returns obligations?



Question 14: Do organisations provide clear privacy notices to customers or data subjects?



Question 15: How often do organisations engage DPCOs for data protection policy documents?



6.0 HUMAN CAPITAL DEVELOPMENT

6.1 Awareness and Capacity-Building

In 2025, the Nigeria Data Protection Commission made efforts to reinforce this pillar, which is a major stride in its Strategic Roadmap and Action Plan (SRAP). The Commission significantly expanded its awareness and capacity-building programs, strengthening the country's data protection ecosystem. Through a series of nationwide sensitisation campaigns, workshops, and stakeholder engagements, the Commission reached out to public institutions, private organisations and educational institutions across different sectors.

Adequate capacity-building programs, which leveraged digital platforms, local media, and community outreaches, helped to educate millions of Nigerians on their data privacy rights and the importance of compliance with the Nigeria Data Protection Act, 2023. The Commission also launched specialised training for Data Protection Officers (DPOs), legal practitioners, and ICT professionals to build a competent, compliant workforce.

Engagements and collaborations with MDAs and professional bodies helped integrate data protection and privacy into their daily engagements, ensuring long-term impact. These efforts have not only raised awareness but have also empowered organisations and individuals to uphold privacy rights and foster trust in Nigeria's digital economy.

S/N	ORGANISATION	BACKGROUND	PARTICIPANTS
1	Abuja Geographic Information Systems (AGIS)	The training committee conducted trainings for staff of AGIS on data protection & privacy in order to raise their awareness and approach towards the safe and proper handling of personal information. The training was centred on an overview of the NDP Act 2023, the principles of data processing, as well as the technical & organisational measures that should be implemented.	250

2	Nigeria INGO Forum (NIF)	The Commission facilitated training for members of the Nigeria INGO Forum, highlighting the role of data controllers/processors with emphasis on the need to comply with the NDP Act.	90
3	Means/Square Database Environmental Resource Management and Studies	The NDPC in collaboration with Means/Square Database Environmental Resource Management and Studies, organised a training for youths and public servants in data protection and privacy. The facilitators provided an in-depth understanding of the Nigeria Data Protection Act, 2023, including the principles of processing personal data, data subject rights, and other critical areas.	210
4	Nigeria Insurers Association	The training committee facilitated a training for the staff of Nigeria Insurers Association. The session provided an overview of the NDP Act, highlighting key technical and organisational measures.	105
5	A-PLUS	The training committee facilitated a training for the staff of A-Plus. The session provided an overview of the NDP Act, highlighting key technical and organisational measures.	40
6	Women in Cybersecurity	The training committee facilitated a virtual training for Women in Cybersecurity. The training session provided an overview of the NDP Act 2023, highlighting key technical measures in safeguarding of personal data.	60

7	Benue State Civil Servants	The Commission in collaboration with the Benue State Digital Infrastructure company trained 40,000 civil servants, equipping them with the knowledge and skills on the data protection. Topics include: introduction to data protection and privacy, principles of data processing, data subjects rights, data security and more.	40,000
8	Katsina State Directorate of Information Communication Technology (KATDICT)	NDPC in collaboration with the KATDICT organised a workshop on data protection and privacy, emphasising the urgent need to integrate data protection and privacy into Nigeria's fast expanding tech ecosystem.	70
9	Nigeria Postal Service (NIPOST)	A virtual training was conducted for staff of the Nigeria Postal Service (NIPOST) with an introduction to data protection/privacy, and the obligations of controllers/processors in accordance with the NDP Act, 2023.	500
10	International Organisation for Migration (IOM)	The Commission facilitated a training for staff of IOM. The training covered the introduction to data protection and privacy, an overview of the NDP Act, 2023 including the technical and organisational measures to educate their staff on the safe handling of personal data.	33
11	Abuja Hotel Owners Association	The training committee organised a workshop for members of the Abuja Hotel Owners' Association. The training session delved into an overview of the NDP Act, 2023, the roles of data controllers and processors, as well as the technical and organisational measures in safeguarding of personal data.	116

12	Techlytics Webinar	A virtual training/webinar was conducted for Techlytics Africa, an ICT firm. The virtual session provided insights on the NDP Act, 2023, and highlighted key technical and organisational measures for the organisation.	20
13	Society for Corporate Governance Nigeria (SCGN)	The Commission facilitated a workshop on data protection and privacy for the management and staff of SCGN. The workshop featured discussions on ethical handling of data, lawful processing, cross-border data transfer, as well as the essential technical and organisational measures to safeguard personal data.	13
14	NBA Young Lawyers Association	A hybrid training was conducted for members of the NBA Young Lawyers Association in Abuja. The workshop highlighted the principles on safe and ethical handling of data, the lawful processing of data, cross-border data transfers, as well as the essential technical and organisational measures to safeguard personal data.	2000
15	Chartered Institute of Project Managers in Nigeria (CIPM)	The Commission in collaboration with CIPM organised a workshop on data protection and privacy for project management professionals to help them cultivate a culture of data privacy.	13
16	Nascon Allied Industries	A general training was held for staff of Nascon Allied Industries in Lagos State. The workshop featured an overview of the NDP Act, 2023, the lawful basis for processing data, the rights of data subjects, as well as the essential technical and organisational measures to safeguard personal data.	30

17	Independent Corrupt Practices and other related offences Commission (ICPC)	The Commission held a training for staff of ICPC. The workshop featured discussions on the ethical handling of data, the lawful basis of processing, cross-border data transfers, as well as the essential technical and organisational measures to safeguard personal data, thereby helping the staff to develop and cultivate a culture of data privacy.	30
18	NUBASS Edutech Conference	The training committee conducted a two-day training for the National Union of Bauchi State Students (NUBASS) on the introduction to data protection and privacy, the overview of the NDP Act, 2023, the principles and lawful basis of personal data processing, as well as the essential technical and organisational measures to safeguard personal data.	111
19	Coronation Securities	The Commission held a training for staff of Coronation Securities. The workshop featured discussions on the ethical handling of data, the lawful basis of processing, cross-border data transfers, as well as the essential technical and organisational measures to safeguard personal data, thereby helping the staff to develop and cultivate a culture of data privacy.	7
20	Nigerian Society of Engineers (NSE)	The Commission held a training for the Nigeria Society of Engineers. The workshop featured discussions on the safe and ethical handling of data, the lawful basis for processing data, the principles of data protection and privacy, as well as the essential technical and organisational measures to safeguard personal data.	140

21	Nigeria Institute for Cancer Research and Treatment (NICRAT)	The training committee held training for staff members of NICRAT. The training session delved into areas such as introduction to data protection & privacy, the lawful basis for processing, data subject's rights, and cross-border transfers of data.	55
22	Chartered Institute of Powered Engineers of Nigeria (CIPEN)	The training committee held training for staff members of CIPEN. The training session delved into areas such as introduction to data protection and privacy, the lawful basis for processing, data subject's rights, cross-border transfers of data, as well as the essential technical and organisational measures to safeguard personal data.	18
23	National Orientation Agency (NOA)	The training committee held training for staff members of NOA. The training session delved into areas such as introduction to data protection and privacy, the lawful basis for processing, data subject's rights, cross-border transfers of data, as well as the essential technical and organisational measures to safeguard personal data.	21
24	Nigerian Immigration Service (NIS)	The Commission held a training for the Command and Control Centre staff of the Nigerian Immigration Service (NIS). The training session aimed to enhance awareness and build capacity in data protection in the immigration sector. The training equipped participants with the needed knowledge for compliance with the NDP Act, 2023.	35

25	NYSC Orientation Camp, Kubwa, Abuja	A lecture was delivered on the importance of data protection and privacy with the rapid rise of emerging technology and the increased internet usage among youth, the need to be privacy conscious, rights as data subjects and career opportunities available in the ecosystem.	10,000
26	National Judicial Institute (NJI)	The Commission held training for staff of the NJI. The training session aimed to enhance awareness and build capacity in data protection in the law sector. The training equipped participants with the needed knowledge and compliance with the NDP Act, 2023.	48

6.2 Second Edition of the International Journal of Data Privacy and Protection (IJDPP 2)

The Commission successfully announced the Call for Papers (CFP) for the second edition of the International Journal of Data Privacy and Protection with the theme, **"Advancing Compliance and Safeguarding Rights in the Age of Emerging Technologies"**. This research work further solidifying the Commission's position as a leader in shaping the global digital discourse on data protection and privacy. This milestone publication builds upon the momentum of the inaugural edition, offering cutting edge research, in-depth analysis, and cross-sector insights from leading academics, policymakers, and industry experts.

The second edition delves into timely and critical topics, including the ethical use of AI, cross-border data transfers, digital identity systems, and the growing tension between digital innovation and individual rights. With contributors across different sectors and jurisdiction, the journal serves as a dynamic platform for fostering collaboration between jurisdictions, bridging the gap between research and practice, and influencing regulatory evolution. It also serves as a valuable resource for legal practitioners, technologists, civil society groups, and students seeking authoritative perspectives on the ever-evolving landscape of data protection.

6.3 Launch of the Virtual Privacy Academy (VPA)

In a ground-breaking move to make data protection and privacy accessible, engaging, impactful and easy to understand, the Nigeria Data Protection Commission launched the Virtual Privacy Academy (VPA) programme. This first-of-its-kind platform uses short, captivating video modules to break down complex data protection concepts to make it easy to understand for Nigerians.

Whether you are a student, entrepreneur, civil servant, or tech enthusiast, the Academy offers easy-sized learning on privacy rights, data handling best practices, and digital safety, all from your smartphone or computer. After completing the modules, participants receive certificates, adding value to their personal and professional development.

This innovative idea merges convenience with credibility, ensuring millions can now learn at their own pace while contributing to a more privacy-conscious Nigeria. NDPC's regulatory leadership ensures that the Virtual Privacy Academy is not just an educational tool but a national movement toward smarter, safer, and more responsible data usage.

7.0 NDPC Feature

Data Protection as the Catalyst for Nigeria's Trillion-Dollar Digital Economy

By Ibukunoluwa Owa

Introduction: A Vibrant Year for Innovation

The year 2025 has been a defining period for Nigeria's digital trajectory. From the successful roll out of Project Bridge to the massive expansion of fibre optic cables spanning thousands of kilometers across our geopolitical zones connecting rural communities to the heart of our digital economy the physical connectivity of Nigeria is reaching unprecedented levels.¹

This infrastructure is further bolstered by a maturing legislative landscape. The public reading of the National Digital Economy and E-Governance Bill 2025,² and the issuance of the **Nigeria Data Protection Act – General Application and Implementation Directive 2025 (NDP Act – GAID)**,³ have signaled to the world that Nigeria is ready to lead. Furthermore, the inclusion of our leaders in global rankings like the TIME100 AI list,⁴ and the global recognition garnered by the **Nigeria Data Protection Commission (NDPC)**, a notably one being the award of Outstanding Data Protection Authority at the PICASSO Awards Africa, confirms that the world is watching our progress.⁵ However, amidst this progress, one element sits quietly but firmly at the center of Nigeria's digital transformation: Data Protection. As we move toward a trillion-dollar digital economy, it has become clear that dominance is no longer measured by natural resource reserves, but by the sophistication of a nation's digital economy and its ability to utilise data for sustainable economic growth.⁶

This article explores data protection as the foundational pillar of Nigeria's trillion-dollar economy. It examines the current implementation imperative for digital acceleration and the pivotal role of a secure data exchange layer in unlocking economic potential. It then discusses

¹ [Project Bridge | The Federal Ministry of Communications, Innovation and Digital Economy (accessed 15 January, 2026).]

² [Public Hearing on National Digital Economy and e-Governance Bill 2025 Holds in Abuja | The Federal Ministry of Communications, Innovation and Digital Economy (accessed 15 January, 2026)]

³ [Resources – Nigeria Data Protection Commission (accessed 15 January, 2026).]

⁴ [Bosun Tijani: The 100 Most Influential People in AI 2025 | TIME (accessed 15 January, 2026).]

⁵ [NDPC Wins PICASSO Award for Outstanding Data Protection Authority – (accessed 15 January, 2026).]

⁶ [From Oil to Data: What is the Real Wealth of Nations in the 21st Century TRENDS Research & Advisory - From Oil to Data: What is the Real Wealth of Nations in the 21st Century? – (accessed 15 January, 2026).]

the necessity of safeguards and a trust framework, and the strategy for obtaining this in practice. Finally, the article highlights the NDPC's leadership at the continental and global levels, demonstrating how Nigeria's trust architecture effectively transcends borders to foster a secure, integrated digital future.

The Implementation Imperative: Bridging the Gap

While 2023 and 2024 were years of legislative excellence, 2025 marks the era of the Implementation Imperative. We have moved beyond the “what” of the **Nigeria Data Protection Act (NDP Act)** to the “how”. To navigate this, the Commission has adopted the “PARAMETERS” framework: Principles, Accountability, Rights, Audits, Management, Ethics, Technical Measures, Education, Remediation, and Sovereignty. This framework ensures that as we scale, we are not only checking boxes, but operationalising trust.

Nigeria has also made significant strides in implementing the three core components of **Digital Public Infrastructure (DPI)**. Our instant payment system, NIBSS, has been globally recognised as the 1st Payment System in Africa to reach “MATURITY” on the Africa Nenda's IPS Inclusivity spectrum.⁷ In National Identity, the **National Identity Management Commission (NIMC)** has achieved the monumental milestone of registering over 120 million citizens.⁸ Yet, for a country as rich in talent and resources, the third-pillar Data Exchange remains the final frontier. While data exchange is currently happening in silos for specific use cases, we have yet to fully operationalise a national data exchange layer. This is the “unlock” required to harness Nigeria's rich and varied data sets. Without a secure and safe data exchange layer, we are merely sitting on a goldmine without a map.

The Human Impact: Data Exchange in Practice

What does an effective and secure data exchange mean for the average Nigerian? Consider the use case of a citizen in a rural community, such as Aiyetoro Gbedde in Kogi State. With a functional exchange layer similar to Tanzania's Jamii platform and interoperability system, a citizen from Aiyetoro Gbedde could seamlessly obtain and verify their National Identity Number and financial history to access government grants or credit facilities in minutes, rather than months/years.⁹

7 [NIGERIA EMERGED THE WINNER as NIBSS Instant Payment (NIP) attains 1st Instant Payment System (IPS) in Africa to reach 'MATURITY' on the AfricaNenda's IPS Inclusivity spectrum - NIBSS (accessed 15 January, 2026).]

8 [Enrolment Dashboard June 2025 | NIMC - National Identity Management Commission (accessed 15 January, 2026).]

9 [Tanzania Jamii Platforms - DPI Exemplar Stories (A4 Book) (accessed 15 January, 2026).]

In education, the “once-only” principle changes the lives of our youth; a graduate from the University of Lagos could instantly provide a verified digital transcript for a Master’s application to the University of Cambridge in the United Kingdom, or a driver could renew their license without the burden of repetitive data submissions. By breaking down these administrative silos, a secure data exchange ensures that the adoption of government services is wide and the benefits are tangible for the citizens; the people this infrastructure is built for.

Safeguards as the Fuel for Innovation: The Trust Framework

As we grow in our digital economy, the need for adequate safeguards is necessary to fuel innovation and economic growth. The United Nations Digital Public Infrastructure Safeguards—Trust, Inclusion, Interoperability, Security, and Transparency are not abstract ideals; they are the practical manifestation of data protection, and are necessary for a trust framework.¹⁰ Interestingly, all these safeguards fall under the umbrella of data protection. Without these safeguards, we face risks that could push our progress back by decades. Data protection is therefore, the fuel required for innovation and economic growth. Safeguards ensure that:

- a. Fast Payments thrive:** Consent management and security mechanisms, such as those refined in our recent regulatory sandboxes, are robust enough to prevent fraud.
- b. Government-People relationships are transformed:** Transitioning from a relationship of suspicion to one of digital trust.
- c. Innovation is inclusive:** Ensuring that the most marginalised are not left behind or exploited by biased algorithms through mandatory **Data Privacy Impact Assessments (DPIAs)**.

Nigeria currently possesses all the vital ingredients necessary to sustain an operational trust framework for a modern digital age.

Firstly, at the governance level, the NDP Act and the NDP Act - GAID provide a robust legal framework, ensuring that data processing is governed by global best practices.

Secondly, the **National Information Technology Development Agency (NITDA)** provides critical technical standards for the digital ecosystem, some examples being the draft technical standards for a secure, interoperable **Digital Public Infrastructure (DPI)**,¹¹ a Code of Practice for

¹⁰ [The United Nations Universal DPI Safeguards – UN Universal Safeguards for Inclusive Digital Public Infrastructure (accessed 15 January, 2026).]

¹¹ [NITDA Releases Draft Technical Standards for Digital Public Infrastructure (DOP) Opens Public Consultation – <https://www.woleolanipekun.com/wp-content/uploads/2025/04/NITDA-Releases-Draft-Technical-Standards-for-Digital-Public-Infrastructure-DPI-Opens-Public-Consultation.pdf> (accessed 15 January, 2026).]

online platforms,¹² and guidelines for local software development.¹³

Thirdly, Nigeria has a mature identity management ecosystem led by the **National Identity Management Commission (NIMC)**,¹⁴ which manages Nigeria's national identity database alongside credible third-party verifiers.

Fourthly, the NDPC ensures accountability through express audit and compliance provisions under the NDP Act, mandating operational policies such as transparent Privacy Policies, continuous staff training, and the implementation of **Records of Processing Activities (ROPA)**.

Ultimately, data protection is the intrinsic and foundational element of this trust framework.¹⁵ Without data protection, the “transactional friction” (fear of fraud, identity theft, or misuse) becomes too high for a digital economy to scale to its full potential.¹⁶

As Nigeria pursues its ambitious goal of a trillion-dollar digital economy, digital trust has become a national imperative. It is the cornerstone that allows for citizen confidence in the Government, across all sectors. By fostering an environment where inclusivity and security are guaranteed, the NDPC is catalysing the economic and social development required for a prosperous and sustainable digital future.

The Strategy: A “Whole-of-Government” Approach

Real change, however, requires Change Management within public service delivery. The Commission has been intentional in making strategic moves to achieve this “Whole-of-Government” approach, particularly through our collaborative approach with various strategic stakeholders both locally and internationally through the following, among others:

- **Direct Participation:** Actively collaborating in the creation of the National Data Exchange Platform (NGDX).
- **Strategic MoUs:** Entering into agreements with key public organizations to harmonise data handling protocols and resolve fragmented oversight.

12 [NITDA Code of Practice for Interactive Computer Service Platforms/Internet Intermediaries -<https://nitda.gov.ng/wp-content/uploads/2022/10/APPROVED-NITDA-CODE-OF-PRACTICE-FOR-INTERACTIVE-COMPUTER-SERVICE-PLATFORMS-INTERNET-INTERMEDIARIES-2022-002.pdf> (accessed 15 January, 2026).]

13 [NITDA Guidelines for Nigerian Content Development in Information and Communication Technology (ICT) - <https://nitda.gov.ng/wp-content/uploads/2020/11/GNCFinale2211.pdf> (accessed 15 January, 2026).]

14 [National Identity Management Commission - <https://nimc.gov.ng/> (accessed 15 January, 2026).]

15 [Shalhoub, Z.K., “Digital Trust: A Cornerstone of the Digital Economy”, Digitisation Promises to Reshape Fiscal Policy, 2019.]

16 [Kuner, C., et al. (2023). “Data Protection as a Pillar of Digital Trust in Global Trade.” International Data Privacy Law, Oxford University Press.]

- **Collaborative Education:** Launched the Responsible Data Management Course, for public servants to ensure a data protection culture permeates every level of government.¹⁷

Global Alignment and National Sovereignty

To ensure that a trust framework transcends beyond its borders, Nigeria, through the NDPC is prioritising the harmonisation of laws on data protection within its borders. Through our leadership in the **Network of African Data Protection Authorities (NADPA)** Regulatory Harmonisation Working Group, our associate membership in the **Global Cross-Border Privacy Rules (CBPR)** Forum, and our active role in the **Global Privacy Assembly (GPA)**, we are ensuring that Nigerian data can move securely across borders to grow our economy.¹⁸

Furthermore, we are advocating for coordinated regulation, including joint enforcement measures, to allow for a unified legal front against global data challenges. This ensures that our “Sovereignty” is not about isolation, but about the assertive capability to protect Nigerians wherever their data travels.

How Data Protection Translates to Economic Growth

Data protection acts as a catalyst for economic growth by fostering a culture of digital trust, enabling seamless and secure data exchanges across three critical axes; **inter-governmental agency (G2G)**, **government-to-business (G2B)**, and within the **private sector (B2B)**. When data flows through these channels securely, it eliminates the inefficiencies of a siloed information system, ensuring that the data aggregated is clean and accurate. This clean data can then serve as the bedrock for advanced analytics, allowing for precise resource allocation and informed policy-making that reflects the actual needs of citizens.

Furthermore, this enhances service delivery, as verified and secure data allows for faster, and transparent public service delivery and reduces privacy risks such as identity theft and fraud, among other risks.

By institutionalising data protection, Nigeria signals to the global community that it is a data protection compliant economy; a status needed to our Foreign Direct Investment flows, and Gross Domestic Product. Ultimately, a mature data protection ecosystem elevates

¹⁷ [The free online course on responsible data management, launched by the Nigeria Data Protection Commission (NDPC) in partnership with data.org, is currently ongoing. We urge all Level 1 participants, comprising Cohorts 1, 2, and 3, to complete the first phase of this course promptly to ensure readiness for Level 2, which will commence in October. | Nigeria Data Protection Commission (NDPC) | Facebook (accessed 15 January, 2026).]

¹⁸ []

Nigeria's standing on the global stage, providing us with the strategic bargaining power necessary to negotiate international partnerships and trade agreements that will secure our economic future and cement our position as a leader in the global digital economy.

Conclusion: The Independent Oversight Imperative

As Nigeria continues to advance in its Digital Economy and prepares for the deployment of its National Data Exchange, the independent oversight of the NDPC remains the most critical factor in unlocking the value of our data. We have transitioned from an enforcement dichotomy to a restorative justice model that prioritises remediation and ecosystem maturity.

Data protection is no longer a peripheral concern; it is at the very centre of our goal to become a trillion-dollar economy. By operationalising trust through the parameters of the NDP Act, we are ensuring that every Nigerian can participate in the digital economy with confidence, dignity, and security. We are building more than a digital economy; we are building a legacy of trust.

8.0 COOPERATION AND COLLABORATION

8.1 NDPC Hosts African Data Protection Authorities on a Data Governance Study Tour to Strengthen Continental Collaboration

The Nigeria Data Protection Commission recently hosted a high-level delegation of Data Protection Authorities (DPAs) from different African countries, namely, Botswana, Eswatini, Tanzania, The Gambia, Mozambique, and Sierra Leone on a Study Tour in Abuja, Nigeria. The strategic initiative reflects NDPC's unwavering commitment to fostering a robust culture of data protection and privacy within the continent's evolving digital ecosystem.

Held in FCT Abuja, the heart of Nigeria's capital, the tour served as a knowledge-sharing platform with the aim of deepening regional collaboration and harmonising data protection standards across Africa. Participating DPAs were taken through Nigeria's progressive data governance framework, including the implementation of the Nigeria Data Protection Act (NDP Act), 2023, the Commission's regulatory strategies, stakeholder engagement models, and its ambitious drive for compliance within both public and private sectors.

The tour also featured interactive sessions, technical demonstrations, and field visits that highlighted NDPC's innovative tools, supervisory techniques, and capacity-building efforts. By showcasing its achievements and regulatory best practices, the Commission positioned itself as a leading voice in the African data protection landscape.

This landmark tour strengthens Nigeria's role as a regional hub for data protection excellence and signals a new era of collaborative governance for Africa's digital future.

8.2 NDPC Hosts the Somali Data Protection Authority on a Virtual Study Tour

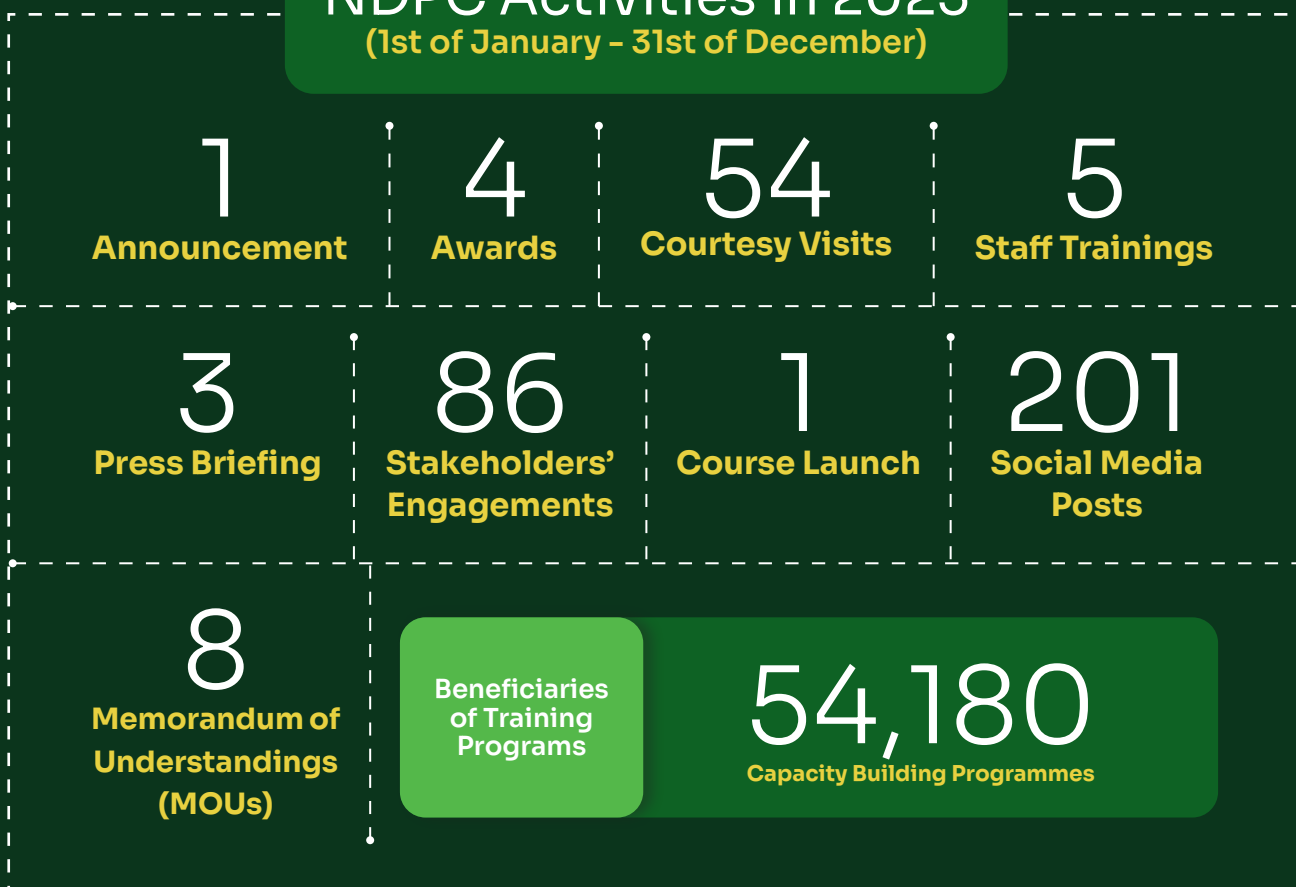
In a remarkable display of regional collaboration and knowledge-sharing, the Nigeria Data Protection Commission (NDPC) hosted the Somali Data Protection Authority on a virtual study tour. The engagement served as a strategic platform for advancing the culture of data protection and privacy across Africa.

During the session, the Commission showcased its institutional framework, regulatory strategies, and key achievements in fostering data privacy, compliance, and digital trust in Nigeria. Topics covered included policy development, enforcement mechanisms, stakeholder engagement, and the Commission's innovative approach to building a data-driven economy.

The Somali delegation expressed strong interest in Nigeria's data protection journey, and commended NDPC's commitment to transparency and excellence. The virtual study tour not only highlights Nigeria's thought leadership in data governance but also reflects a shared African vision for responsible data management and cross-border collaboration in the digital era.

8.3 Year in View

NDPC Activities in 2025 (1st of January – 31st of December)



8.4 Gallery

Courtesy Visits



Dr Vincent Olatunji led a delegation from the NDPC on a courtesy visit to the Head of Civil Service of the Federation, Hon. Didi Esther WalsonJack (January 13th, 2025)



Dr Vincent Olatunji led a delegation from the NDPC on a courtesy visit to the Secretary to the Government of the Federation, Sen. George Akume (January 21st, 2025)



Dr Vincent Olatunji received a delegation from Google, Meta and Microsoft on a courtesy visit to the Commission. (February 12th, 2025)



Dr Vincent Olatunji, paid a courtesy visit to the Administrator of the National Judicial Institute (NJI), Justice Salisu Garba Abdullahi. (February 21st, 2025)



At the inauguration of a 10-member Service Compact (SERVICOM) committee for Nigeria Data Protection Commission (NDPC), Dr Vincent Olatunji was joined by the National Coordinator of SERVICOM, Mrs. Nnenna Akajemeli. (March 18th, 2025)



Dr Vincent Olatunji led a delegation from the NDPC on a courtesy visit to the Office of the Coordinating Minister of Health and Social Welfare, Prof. Muhammed Ali Pate. (April 17th, 2025)



Dr Vincent Olatunji led a delegation from the NDPC on a courtesy visit to the Permanent Secretary of the Ministry of Communication, Innovation and Digital Economy, Mr Rafiu Adeladan (May 30th, 2025)



Dr Vincent Olatunji received a delegation from Police Service Commission on a courtesy visit to the Commission led by the Chairman, Retired Deputy Inspector General of Police, Hashimu Salihu Argungu, mni. (June 5th, 2025)



Dr Vincent Olatunji led a delegation from the NDPC on a courtesy visit to the Director-General of the Bureau of Public Procurement (BPP), Dr Adebawale Adedokun (June 11th, 2025)



Dr Vincent Olatunji received a delegation from the Medical and Dental Council of Nigeria (MDCN) on a courtesy visit to the Commission led by the Registrar/CEO, Prof. Fatima Kyari. (July 4th, 2025)



Dr Vincent Olatunji led a delegation from the NDPC on a courtesy visit to the Director-General/CEO of the Nigeria Social Insurance Trust Fund (NSITF), Mr Oluwaseun Faleye. (July 9th, 2025)



Dr Vincent Olatunji led a delegation from the NDPC on a courtesy visit to the Director-General of the National Directorate of Employment (NDE), Mr Silas Ali Agara. (July 11th, 2025)



Dr Vincent Olatunji led a delegation from the NDPC on a courtesy visit to the French Embassy in Abuja. (July 31st, 2025)



Dr Vincent Olatunji led a delegation from the NDPC on a courtesy visit to the Acting Country Director of the World Food Programme (WFP), Mr Christophe Boutonnier, at the WFP office in Abuja. (August 22nd, 2025)



Dr Vincent Olatunji led a delegation from the NDPC on a courtesy visit to the Director-General of the National Orientation Agency (NOA), Mallam Lanre Issa-Onilu, at the NOA Headquarters in Abuja. (September 11th, 2025)



Dr Vincent Olatunji led a delegation from the NDPC on a courtesy visit to the Corps Marshal of the Federal Road Safety Corps (FRSC), Shehu Mohammed, mni. (October 8th, 2025)



Dr Vincent Olatunji received in audience the Special Assistant to President Bola Ahmed Tinubu, GCFR, on Youth Initiatives (Monitoring and Delivery), Hon. Titilope Gbadamosi. (October 9th, 2025)



Dr Vincent Olatunji, received a delegation from Nasarawa State University, Keffi (NSUK), led by the Deputy Vice-Chancellor (Academics), Professor Muhammad Maikano Ari. (October 9th, 2025)



Dr Vincent Olatunji, received the Alara of Ilara Kingdom, Epe Division, Lagos State, His Royal Majesty, Oba (Dr) Olufolarin Olukayode Ogunsanwo, on a courtesy visit to the Commission's headquarters. (October 10th, 2025)



Dr Vincent Olatunji, led a delegation from the Commission to the French Embassy in Lagos, where they were received by the Regional Economic Department team of the Embassy, led by the Economic Counsellor and Delegate to the Head of the Regional Economic Department, Lagos Office, Ms Laura Marie. (October 15th, 2025)



Dr Vincent Olatunji, received in audience representatives of Civil Society Organisations (CSOs) led by the Programme Manager of Global Rights, Esosa Oviawe, on a courtesy visit to the Commission. (November 6th, 2025)



Dr Vincent Olatunji, received in audience the President and CEO of Africa Digital Infrastructure Company Limited (AfDIC), Mr Terwase Gbade Hemboar, and his team at the Commission's headquarters (November 10th, 2025)



Dr Vincent Olatunji, received a team from Tiktok ,led by its Lead on Government Relations and Public policy for the Middle East,Turkey, Africa, Pakistan and South Asia(METAPSA), Mr Emir Gelen, on a courtesy visit to the Commission (November 13th, 2025)



Dr Vincent Olatunji, received delegates from the Association of Nigeria Bookmakers (ANB) and the Nigeria Licensed Lottery Operators Forum (NLLOF), led by NLLOF Chairman, Mr Chima Onwuka, on a courtesy visit to the Commission. (November 19th, 2025)

International Collaborations



Dr Vincent Olatunji participated as a panelist at the Centre for Information Policy Leadership (CIPL) Annual members' summit 2025 in Washington D.C., USA. (March 5th, 2025)



Dr Vincent Olatunji led a delegation that participated at the ID4Africa Summit in Addis Ababa, Ethiopia. (May 21st, 2025)



The Nigeria Data Protection Commission (NDPC) participated in the Global Cross Border Privacy Rules (CBPR) Workshop held at the Village Hotel, Sentosa, Singapore (June 5th, 2025)



Dr Vincent Olatunji participated in a cybersecurity study tour to Estonia, organised by the National Cybersecurity Coordination Centre at the Office of the National Security Adviser. (June 19th, 2025)



The Nigeria Data Protection Commission (NDPC) was represented at the ECOWAS Knowledge Exchange in Senegal. (August 4th, 2025)

NADPA & AGM 2025



The 8th edition of the Network of African Data Protection Authorities' (NADPARAPDP) Conference and Annual General Meeting (AGM) was hosted by the NDPC in Abuja. (May 6th, 2025)



The first plenary session at NADPA was themed: **"Data Privacy and Protection Regulation"**. (May 6th, 2025)



The second plenary session at NADPA was themed: **"Economic Growth & Privacy"** (May 6th, 2025)



The first fireside chat focused on **"Harnessing the Potential of Open-Source AI while Ensuring Data Protection"**. (May 6th, 2025)



The third plenary session at NADPA was themed: **"Innovation & Privacy"**. (May 7th, 2025)



The second fireside chat focused on **“Safeguarding Trust in Africa’s Digital Identity System: The Nigerian Experience.”** (May 7th, 2025)



The first breakout session focused on **“Shaping Africa’s Privacy Future: Preparing the Next Generation of Privacy Professionals”.** (May 7th, 2025)



The fourth plenary session at NADPA was themed: **“Artificial Intelligence & Privacy”.** (May 7th, 2025)



The fifth and final plenary session at NADPA was themed: **“Bridging the Digital Divide: Strategies to Facilitate Seamless Cross-Border Digital Trade and Improve Digital Infrastructure”.** (May 7th, 2025)



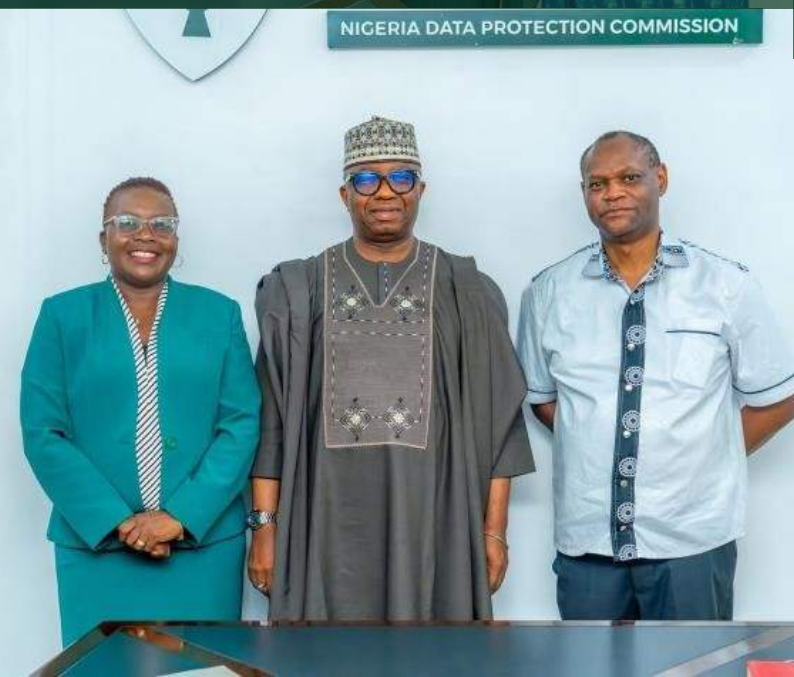
Dr Vincent Olatunji was a member of the panel discussion at the second breakout session during NADPA with the theme: **“Guardians of Privacy: Strengthening Africa’s Data Protection Authorities in the Digital Age”.** (May 7th, 2025)



At NADPA, NDPC in partnership with Mastercard featured a Masterclass titled **“Enabling Privacy and Innovation through Privacy Enhancing Technologies (PETs)”**. (May 7th, 2025)



After the NADPA Conference & AGM, Dr Vincent Olatunji, received delegations from the Moroccan, Zambian, Zimbabwean, Somalian and Gambian DPAs at the Commission’s headquarters. (May 9th, 2025)



Trainings



The NDPC organized a 2-day training on data protection and privacy for staff of Abuja Geographic Information Systems (AGIS). (January 23rd, 2025)



The NDPC organized a data protection training workshop for the Nigeria INGO Forum (NIF). (February 5th, 2025)



The NDPC organized data protection training for civil servants in Benue State. (March 24th, 2025)



The Nigeria Data Protection Commission (NDPC) facilitated a high impact data protection workshop in Katsina state for delegates across the Northwest Zone of Nigeria. (April 10th, 2025)



The Nigeria Data Protection Commission (NDPC) in partnership with Mastercard organised a workshop on Data Protection Impact Assessment (DPIA) for Data Protection Officers across both the public and private sectors (May 5th, 2025)



The Nigeria Data Protection Commission (NDPC) organized a data protection induction training for Command-and-Control Centre staff of the Nigeria Immigration Service (NIS). (June 17th, 2025)



The Nigeria Data Protection Commission (NDPC) organized a data protection induction training for members of the Hotel Owners Forum Abuja. (June 25th, 2025)



The Nigeria Data Protection Commission (NDPC) organized a data protection induction training for staff of the Nigerian Upstream Petroleum Regulatory Commission. (June 26th, 2025)



The Nigeria Data Protection Commission (NDPC) organized a data protection training for the Chartered Institute of Professional Managers of Nigeria (CIPMN). (July 21st, 2025)



The Nigeria Data Protection Commission (NDPC) organized a data protection training for the Nigerian Society of Engineers (NSE). (August 8th, 2025)

Global Privacy Assembly 2025



The National Commissioner attended the Global Privacy Assembly with staff of the Commission (September 15th, 2025)



The National Commission had a strategic meeting with delegates from the United States Departments of State and Commerce, the Federal Trade Commission, and the Future of Privacy Forum at the Global Privacy Assembly. (September 16th, 2025)



The National Commissioner represented Nigeria at a Closed-Door meeting at the Global Privacy Assembly 2025. (September 17th, 2025)

Awards



The National Commissioner /CEO of NDPC was honored with a Cybersecurity & Digital Trust Leadership Award and a Certificate of Appreciation. (October 6th, 2025)



The National Commissioner was inducted into the Ekiti State University (EKSU) Alumni Hall of Fame at the 12th Global Convention of EKSU Alumni. (November 3rd, 2025)



The NDPC was named Outstanding Data Protection Authority (DPA) of the year at the Picasso Awards Africa in Ghana. (December 4th, 2025)

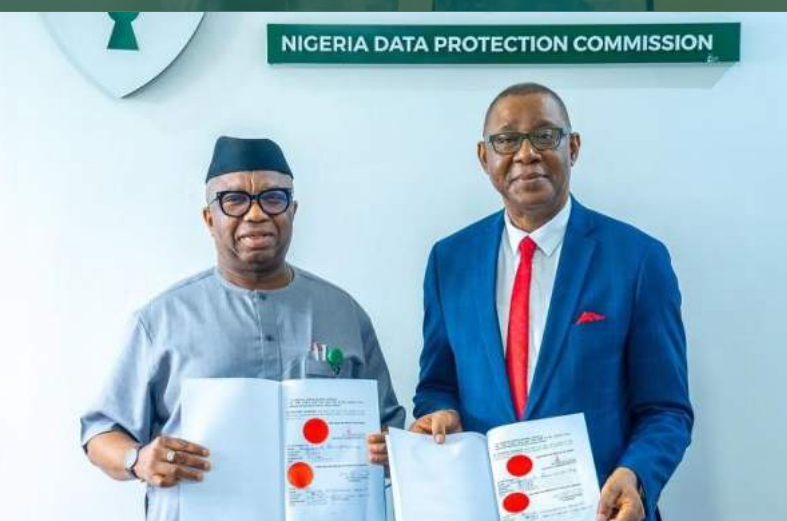
MoUs



The Nigeria Data Protection Commission (NDPC) signed a Memorandum of Understanding (MoU) with the Data and Knowledge Information Privacy Protection Initiative (DKIPPI). (March 21st, 2025)



The Nigeria Data Protection Commission (NDPC) signed a Memorandum of Understanding (MoU) with MasterCard. (May 5th, 2025)



The Nigeria Data Protection Commission (NDPC) signed a Memorandum of Understanding (MoU) with the Digital Africa Consult. (June 13th, 2025)



The Nigeria Data Protection Commission (NDPC) signed a Memorandum of Understanding (MoU) with the Bauchi State Government. (August 13th, 2025)



The Nigeria Data Protection Commission (NDPC) virtually signed a Memorandum of Understanding (MoU) with SmartComply Technologies Solutions Limited. (November 18th, 2025)

National Certification Program



The National Certification Program for Data Protection Officers in Nigeria was unveiled by the Honourable Minister of Communications, Innovation, and Digital Economy, Dr. Bosun Tijani. (January 20th, 2025)



Dr Vincent Olatunji offered words of encouragement and support to participants at the training of the first cohort of Data Protection Officers in Abuja. (January 24th, 2025)



Dr Vincent Olatunji, engaged with participants at the Abuja center, offering words of encouragement and gathering feedback on their experience. (January 31st, 2025)

National Privacy Week 2025



At the press conference marking the opening of National Privacy Week, which aligns with the Global Privacy Day 2025, Dr Vincent Olatunji, delivered a welcome address and ecosystem briefing. The event also featured the unveiling of the NDPC's Annual Report and the maiden edition of its Journal. (January 28th, 2025)



As part of the 2025 National Privacy Week, Dr Vincent Olatunji delivered a lecture on the importance of data protection and privacy at the Abuja NYSC Camp. (January 30th, 2025)



As part of the activities marking National Privacy Week 2025, staff of the Nigeria Data Protection Commission (NDPC) visited Banex Plaza in Abuja for a sensitisation session on data protection and privacy. (January 31st, 2025)



As part of the National Privacy Week 2025 celebrations, the Nigeria Data Protection Commission (NDPC) organised a novelty match among agencies under the Federal Ministry of Communications, Innovation, and Digital Economy. (February 3rd, 2025)

Translation of the NDP Act



The Nigeria Data Protection Commission (NDPC), in the collaboration with Meta Inc., translated the Nigeria Data Protection Act (NDP Act) into Hausa, Igbo, Yoruba.



9. Extra Features

RIDDLES

Riddle 1:

You lock me with something only you should know. If you share me, I'm useless. If you forget me, you're stuck outside. What am I?

Answer: _____

Riddle 2:

I reflect who you are but hold more than meets the eye—your choices, searches, and secrets. Companies crave me. Who am I?

Answer: _____

Riddle 3:

You can't see me, but I follow you from site to site, learning your tastes to show you things you didn't ask for. Who am I?

Answer: _____

Riddle 4:

I look like someone you trust and ask for just a little info. Give it to me, and I ruin your day. Who am I?

Answer: _____

Riddle 5:

I scramble, hide, or mask your data. Without me, anyone can read your secrets. What am I?

Answer: _____

ANSWERS:

Digital Footprint

Encryption

Password

Cookies

Phishing Mail

Word Wrangle

TCAIPRYVADA

TZITIDANIIMMANOA

TLPTOOIMENUSAPRII

DICRPIABGYNESVY



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