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The Nigerian Data Protection Compliance Playbook

NDPA 2023 is in force. The NDPC is actively enforcing. Here's how to get compliant before regulators come knocking — and how modern GRC tools are changing the game.

The era of voluntary compliance in Nigeria is over.

The Nigeria Data Protection Act 2023 (NDPA) isn't just another regulation gathering dust. It established the Nigeria Data Protection Commission (NDPC) with real teeth — the power to investigate, fine, and suspend data processing operations.

For the first time, Nigerian businesses face enforceable privacy obligations backed by significant financial penalties. And the NDPC is already using them.

This playbook cuts through the noise: what the law actually requires, who's already been caught, and how to get compliant efficiently — whether you're a fintech processing millions of BVN records or a healthcare provider managing patient data.

> **"Data protection is no longer voluntary compliance; it is now a legal obligation with enforcement consequences."**
>
> — Nigeria Data Protection Act 2023

The General Application and Implementation Directive (GAID 2025), effective 19 September 2025, adds implementation detail to every NDPA requirement. All entities processing personal data must demonstrate compliance by **31 October 2025** — that deadline has passed.

The clock is ticking.

01

Enforcement Is Real

The NDPC hasn't waited to flex its enforcement powers. Major Nigerian businesses have already been hit with penalties that should make every board member pay attention.

Organisation	Penalty	Violation
Multichoice Nigeria	₦766.2M	Inadequate consent & security
Fidelity Bank	₦555.8M	Breach response failures

These aren't token fines — up to **2% of annual gross revenue**.

2%
max fine per violation

72hrs
breach notification

Active
enforcement since Oct 2025

02

The Compliance Market Is Booming

₦13.8B
revenue 2025

256+
licensed DPCOs

₦10-20M
per audit

15%
YoY growth

Nigeria's data protection ecosystem generated ₦12 billion in 2024 and is on track for ₦13.8 billion in 2025 — driven by expanding compliance requirements and 256+ licensed DPCOs.

For consultancies, every Nigerian business that processes personal data needs professional compliance assessment. The question is whether you have the tools to serve at scale.

> **"When you bring together what the organisations and their employees earn, including the support services around compliance, that's how we estimate the ecosystem's revenue."**
>
> — Dr. Vincent Olatunji, NDPC

03

The Compliance Gap

Despite the regulatory mandate, most Nigerian businesses are nowhere near compliant:

Common Gap	Risk	NDPA
No ROPA	Critical	S.28
Missing DPAs	Critical	S.19
No 72-hr breach notification	Critical	S.24
Cross-border without safeguards	High	S.21-23
No DPIA completed	High	S.32

Traditional audits take weeks and cost ₦10-20M. Businesses either pay for an audit they can't repeat, or avoid assessment entirely.

> **What if a compliance assessment that takes weeks could be done in minutes?**

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How AKO GRC Works

Three assessment paths — from deep policy analysis to rapid self-assessment. Each produces a branded compliance report with actionable remediation steps.

1. Upload Policy
2. AI Analyses vs NDPA
3. Gap Register
4. Remediation Roadmap
5. Branded PDF Report

Policy Analysis

Upload your policy — AKO analyses against all 13 NDPA requirements plus sector overlays.

- Gap register with NDPA section refs
- Risk-rated findings (Critical/High/Medium)

Quick Compliance Scan

Instant structured scan producing a sector-specific gap register.

- Sector-aware findings (fintech, health)
- Nigerian fine exposure calculation

Readiness Assessment

Guided questionnaire covering all NDPA requirements with partial compliance detection.

- 18 sector-aware questions (CBN/NDIC/SEC)
- RED / AMBER / GREEN maturity rating

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Sector Intelligence

The NDPA 2023 establishes 13 core requirements for every Nigerian organisation processing personal data. But real compliance doesn't stop at the horizontal baseline.

Different sectors face additional obligations. A fintech processing BVN records must satisfy CBN, NDIC, and SEC requirements. A hospital must comply with the National Health Act.

AKO GRC handles this with a modular architecture: the NDPA core forms the foundation, and sector modules attach on top.

Adding a new sector is configuration, not code.

The engine and templates don't change — AKO GRC can expand into telecom, education, or public sector without rebuilding.

Fintech Module

NDPA core + CBN, NDIC, SEC, FRC

Addition	Detail
+5 reqs	CBN auth, BVN segregation, incident reporting, outsourcing, e-payments
+3 questions	BVN security, CBN incidents, outsourcing
Total	**18 requirements** (13 + 5)

Healthcare Module

NDPA core + National Health Act — 14 total requirements

Telecom, education, oil & gas, public sector on request.

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Built for Consultancies

AKO GRC is designed as a white-label platform. Every customer-facing element — name, logo, colours, report branding — is controlled by a single configuration layer.

Your brand, everywhere

- Your company name on every report
- Your colours and logo throughout
- Your domain hosting the platform

The business model

	Traditional	AKO GRC
Time to report	2-4 weeks	Minutes
Cost	₦10-20M	Fraction
Repeatability	Manual	On-demand
Scale	Headcount-limited	Unlimited

This isn't about replacing consultants — it's about giving them a tool to serve ten times more clients with the same team.

Get Started

The NDPA compliance deadline is approaching. Every day without a clear picture of your compliance posture is a day of unnecessary regulatory risk.

AKO GRC gives you that picture — in minutes, not weeks.

Try the live demo

hello-ako.co.uk

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YOUR INTERFACE TO YOUR BUSINESS

This report is intended as a decision-support tool and does not constitute legal advice.
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