



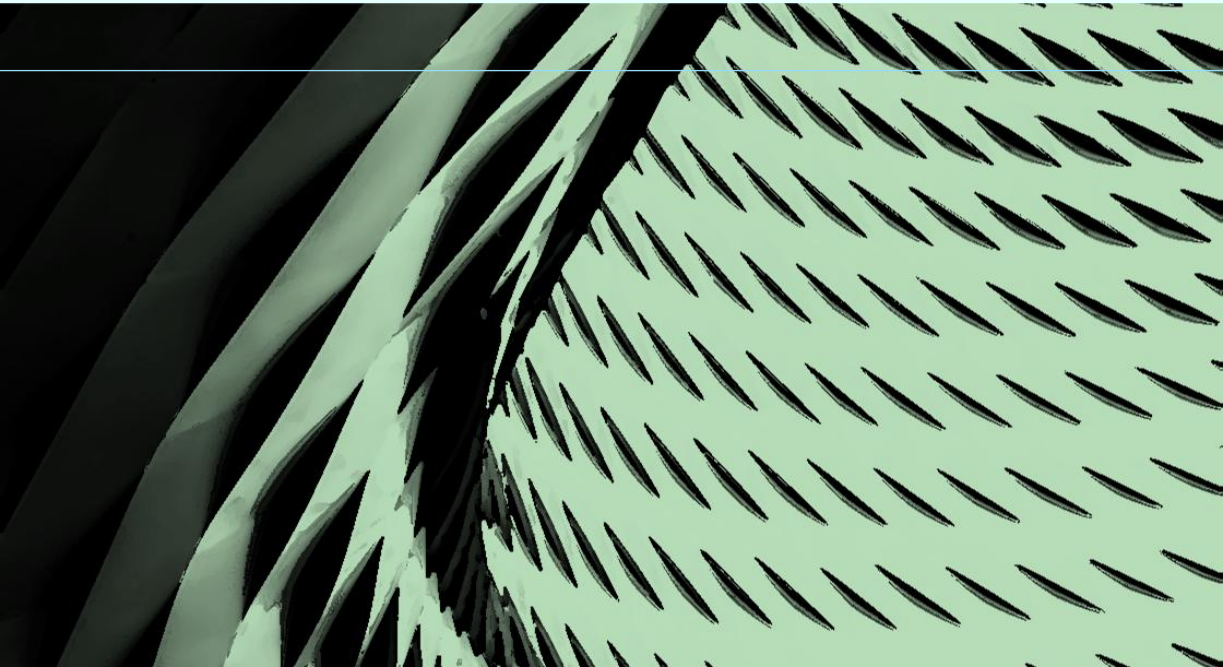
## Regulatory Update

# Nigeria Data Protection Commission Commences Mass Compliance Enforcement Drive Across Sectors

# Introduction

Nigeria’s data protection regime has entered a new and more assertive phase. With the Nigeria Data Protection Act (NDPA), 2023, firmly in force and the General Application and Implementation Directive (GAID) scheduled to take effect on 19th September 2025, the Nigeria Data Protection Commission (NDPC) (“Commission”) is no longer content with policy pronouncements. It has begun deploying its full investigative and enforcement powers.

The Commission’s most recent step, a sector-wide compliance notice, marks a clear turning point. On Monday, 25th August 2025, the Commission, through its official channels, publicly released the names of organisations in the financial, insurance, pension, and gaming sectors, issuing them a 21-day ultimatum to demonstrate their compliance status. For organisations and their boards, the message could not be clearer: data protection obligations are now a matter of regulatory urgency.

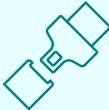


## The 21-Day Notice and Its Scope

The Commission’s directive requires affected organisations to:



Provide evidence of filing their 2024 Compliance Audit Returns (Section 6(d) of the NDPA).



Submit details of their appointed Data Protection Officer (Section 32 of the NDPA).



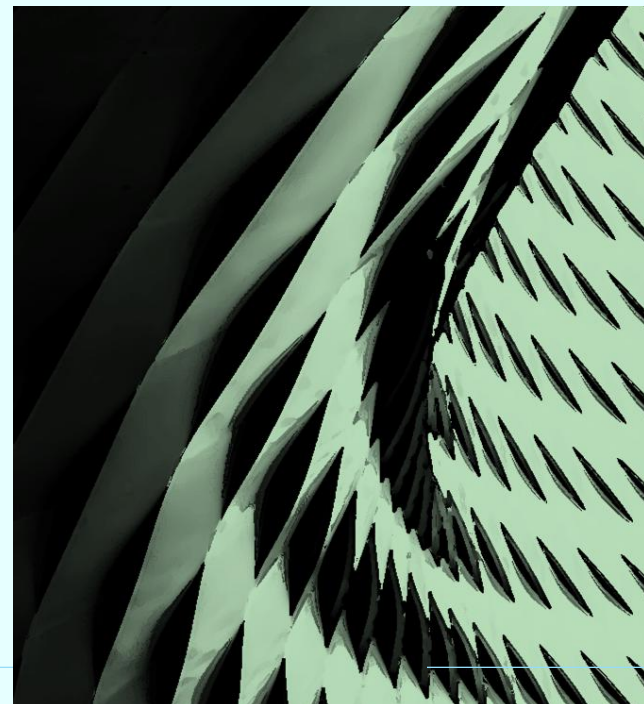
Provide a summary of their technical and organisational safeguards (Section 39 of the NDPA).



Provide evidence of registration as a Data Controller or Processor of Major Importance (Section 39 of the NDPA).

The legal authority for these demands is grounded in Sections 5(i), 6(a), 6(c), 46(3), and 47(1-2) of the NDPA, which empower the NDPC to demand records, impose sanctions, and prosecute non-compliance.

What makes this intervention particularly significant is its breadth. The sweep covers virtually the entire financial services ecosystem: 795 banks, 392 insurance brokers, 35 insurance companies, 10 pension firms, and 136 gaming operators, making a total of 1,368 organisations. By publishing the list of organisations publicly, the NDPC has signalled a deliberate strategy of transparency. This approach transforms what might once have been a quiet regulatory exercise into a reputational stress test for regulated entities.



## A Pattern of Escalating Enforcement

Notably, this notice does not stand in isolation. It builds on earlier, high-profile sanctions that have shaped the regulatory landscape. In July 2025, MultiChoice Nigeria was fined ₦766.24 million for intrusive data practices and unlawful cross-border transfers, penalties aggravated by what the NDPC described as inadequate

remediation measures. A year earlier, in August 2024, Fidelity Bank received a ₦555.8 million fine for processing personal data without informed consent, at the time the Commission's heaviest sanction.

Together, these precedents confirm that the NDPC's enforcement agenda is

comprehensive. It does not target only deliberate breaches but also failures of governance, oversight, and remediation. The clear message to organisations and their boards is that lapses in data protection, whether direct or indirect, are now squarely within the Commission's enforcement radar.

## Implications for Businesses

For the organisations named in this enforcement sweep, compliance is both immediate and non-negotiable. However, the implications extend far beyond those directly identified.

The Commission has shown that it is willing to act sector-wide, using both traditional legal authority and modern tools such as social media to enforce accountability.

The risks are multidimensional. Non-compliance exposes organisations not only to significant financial penalties but also to reputational damage that can undermine stakeholder confidence. Equally, the Commission's demand for evidence of governance structures, such as the appointment of a Data Protection Officer (DPO) and proof of

adequate safeguards, underscores that compliance is far more than a box-ticking exercise. Organisations are now required to demonstrate real maturity in their data governance frameworks, supported by verifiable records and robust processes.



# Conclusion

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At Stren & Blan Partners (SBP), we view this development as a defining moment in Nigeria's data protection landscape. As a licensed Data Protection Compliance Organisation (DPCO), we support clients in navigating these obligations with both legal precision and practical execution. Our expertise spans the preparation of compliance audit returns, structuring and documenting DPO roles, developing and evidencing technical and organisational safeguards, and securing registrations as Data Controllers or Processors of Major Importance, among other services.

Beyond documentation, we assist boards in designing remediation frameworks and embedding compliance into governance structures, helping organisations convert regulatory risk into regulatory assurance.

For more information or tailored support on data protection compliance measures, please contact: [corporateservices@strenandblan.com](mailto:corporateservices@strenandblan.com)

# About SBP

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Stren and Blan Partners is a world-class ingenious law firm with a beautiful blend of the brightest minds and well-rounded individuals championed with sole responsibilities of providing solutions to business problems and equally finding answers to the questions of our clients. We are a team always guided by our professional ethics. Also, honesty and transparency have been our watchwords in practice.

Stren & Blan Partners is a full-service commercial Law Firm that provides legal services to diverse local and multinational corporations. We have developed a clear vision for anticipating our clients' business needs and surpassing their expectations, and we do this with an uncompromising commitment to Client service and legal excellence.

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