

NDPC BEGINS SECTOR-BY-SECTOR INVESTIGATION INTO DATA PROTECTION COMPLIANCE



Background

The Nigeria Data Protection Commission (NDPC) via public notice on August 25, 2025, announced that it has begun a sector-by-sector investigation of organisations suspected of breaching the Nigeria Data Protection Act (NDPA) 2023. A press release signed by Babatunde Bamigboye, Head of Legal, Enforcement & Regulations, explains that the investigation is mandated by sections 5(i), 6(a), 6(c), 46(3) and 47(1)–(2)(a-b) of the Act and aims to safeguard the fundamental rights, freedoms and interests of data subjects, while building trust in Nigeria’s digital economy.

Organisations under investigation

The NDPC’s probe covers 1,369 organisations across five key sectors. According to a statement released on 25 August 2025, the targeted sectors and approximate number of organisations include:

Sector	Number of Organisations	Notes
Pension companies	10	Pension fund administrators and custodians
Insurance Companies	35	Insurers responsible for underwriting and managing policies
Gaming companies	136	Operators of lotteries, sports betting, and other gaming services
Financial Institutions	795	These firms must show that their data-processing activities comply with the NDPA
Insurance Brokers	392	Brokerage firms acting as intermediaries between insurers and customers

Requirements for affected Organisations

Organisations that received compliance notice are required to respond within twenty one (21) days. They must provide the NDPC with the following:

1. Evidence of filing NDP Act Compliance Audit Returns for 2024.
- 2.Evidence of appointment of a Data Protection Officer (DPO).
- 3.Summary of Technical and Organisational measures for data protection.
- 4.Evidence of registration as a Data Controller or Processor of Major Importance.

Consequently, the NDPC has stated that failure to comply may trigger enforcement measures, including enforcement Orders, administrative fines, or criminal prosecution, as provided by the NDPA.

Next Steps

Affected organisations or their affiliated entities will need to ensure compliance with the notice. Where the stated requirements are not currently met/available, they must obtain and organise the required documentation within the twenty-one (21) day window.

Organisations not yet identified in the public list should still review their data-governance practices and ensure they align with the NDPA. Conducting internal audits, updating data-protection policies, and registering as a Data Controller or Processor (where applicable) will help avoid future sanctions and demonstrate a proactive commitment to data privacy.

Significance

This investigation marks one of the most comprehensive enforcement actions since the NDPA came into force in 2023. By targeting high-impact sectors such as banking, insurance, pensions, and gaming, the NDPC aims to enhance accountability and transparency in data handling and reassure citizens that their personal data is protected. The Commission's press release reiterates its commitment to fostering a culture of data privacy and building a trusted digital economy in Nigeria.



Babalakin and Co. is a licensed Data Protection Compliance Organisation. If you have any questions or would like more information on the issues discussed, please contact us.



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