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Client Alert

Data Protection Compliance in Nigeria: Audits & Filing Requirements

One of the key compliance obligations under Nigeria's data protection laws is the **Data Protection Compliance Audit (DPCA)**. This applies to Data Controllers and Processors—organizations handling personal data—who must assess their compliance with the Nigeria Data Protection Act (NDPA) and directives from the Nigeria Data Protection Commission (NDPC). The result of this audit, the **Compliance Audit Report (CAR)**, must be filed annually with the NDPC by March 15 for the previous year's data processing activities.

Who Needs to Comply?

If your organization processes the personal data of **2,000+ individuals within 12 months**, you must conduct a DPCA and file a CAR. Many organizations may underestimate their data volume, but sources like - visitor logs; client/vendor databases; mailing lists; CCTV footage; records of exemployees, customers, and third parties should all be reviewed to determine compliance obligations. Commonly processed data subjects include employees, next-of-kin, customers, vendors, and office visitors.

Compliance Process

To meet this requirement, organizations must engage a licensed **Data Protection Compliance Organization (DPCO)** to conduct the audit and file the CAR. Failure to comply may lead to regulatory sanctions.

Key Deadline for 2025

For the 2024 audit cycle, organizations meeting the 2,000+ data subject threshold must complete their DPCA and file their CAR **by March 15**, **2025**. Upon successful submission, the NDPC issues an audit trust mark, serving as proof of compliance.

How TEMPLARS Can Help

TEMPLARS is a licensed DPCO, ready to assist with:

- Conducting DPCAs & filing Compliance Audit Returns
- Advising on data protection best practices
- Guiding you through regulatory changes