NDPA starter checklist

Twenty practical checks to see where your organisation stands against the Nigeria Data Protection Act 2023 and GAID 2025.

Use this checklist to get a quick picture of your organisation's data protection position. Tick each item that is fully in place. Anything left unticked is a gap to plan for.

Know your data

- [ ] We have a list of the personal data we collect, why we collect it and where it is stored.
- [ ] We know which of that data is sensitive (health, religion, ethnicity, biometrics, children's data).
- [ ] We know which suppliers and partners receive personal data from us.
- [ ] We know whether any personal data leaves Nigeria, and where it goes.

Lawful and fair use

- [ ] Each purpose has a recorded lawful basis (consent, contract, legal obligation, vital interests, public task or legitimate interests).
- [ ] Where we rely on consent, it is freely given, specific, recorded and easy to withdraw.
- [ ] Our privacy notice explains clearly and truthfully how we use personal data.
- [ ] We only collect what we need and do not reuse data for unrelated purposes.

Registration and accountability

- [ ] We have checked whether we are a data controller or processor of major importance and registered with the NDPC if required.
- [ ] We know whether we must file an annual compliance audit return, and when it is due.
- [ ] A named person is responsible for data protection, and a data protection officer is appointed where required.
- [ ] Senior management reviews data protection at least once a year.

Security and retention

- [ ] Access to personal data is limited to staff who need it, and removed when people leave.
- [ ] Devices and accounts are protected with strong passwords and multi factor authentication.
- [ ] Personal data is backed up and the backups have been tested.
- [ ] We have a retention schedule and securely delete data we no longer need.

Rights, breaches and people

- [ ] We can recognise and answer requests from individuals to access, correct or delete their data.
- [ ] We have a breach response plan that allows us to notify the NDPC within 72 hours where required.

- [ ] We have written agreements with suppliers who process personal data for us.
- [ ] Staff have received data protection training in the last 12 months.

What next

Count your ticks. Fewer than 15 means there are important gaps. Start with the data inventory, privacy notice and breach plan, because the other items depend on them.

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