

Mid-year

Legislative Prediction

S c o r e b o a r d





Introduction

As we draw closer to the end of the year, we take a moment to reflect on some of our earlier predictions around data protection and artificial intelligence in Nigeria. This scorecard is a self-assessment, helping us evaluate how our forecasts have aligned with the key developments that have shaped the regulatory landscape so far.

Using a graphical representation, we illustrate the outcomes of our predictions on a scale of 100. Each rating reflects the degree of alignment ranging from clear matches to near misses and unexpected shifts. You can read the predictions [here](#).

The score card

S/N	Prediction	Current Status	Status
1.	Finalisation of the Nigeria Data Protection Act General Application and Implementation Directive (NDP Act GAID).	The Nigeria Data Protection Commission (NDPC) published the Nigeria Data Protection Act General Application and Implementation Directive (NDP-Act GAID) on March 20, 2025.	Completed
2.	Clarity on cross-border data-flow	The NDP-Act GAID contains a Guidance Note on cross-border data transfer, recognising adequacy of decision, transfer based on Cross-Border Data Transfer Instrument (CBDTI) approved by the Commission, and derogations as a transfer mechanism. While the guidance note provides the considerations for making an adequacy decision, it does not provide a new adequacy list.	Ongoing

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		<p>Contrary to our prediction, the guide does not specify approval procedure for Binding Corporate Rules (BCRs), and module(s) of the Standard Contractual Clause (SCCs).</p> <p>Regarding Nigeria's alignment with the Global Cross-Border privacy Rules (CBPR), the National Commissioner of the NDPC announced plans for Nigeria to become an associate member of the Global CBPR Forum.</p>	
3.		<p>At the start of the year, the NDPC announced plans to enforce stricter sanctions. So far, the NDPC has launched investigations into two multinational companies for privacy violations. The Commission is also investigating the Joint Admission and Matriculation Board (JAMB) for an alleged data breach affecting the candidates.</p>	Ongoing

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		The NDPC has also issued its biggest fine of #766,242,500 against a multinational company for violating the NDPA. Additionally, the NDPC issued a compliance notice against several organisations in the insurance, banking, hospitality, pension, and gaming sectors, as part of its investigation into the compliance practices in these .	
4.	Sector-specific regulations and collaborations	Not much progress has been recorded with the development of sector-specific regulation. The Nigeria Communications Commission(NCC)is yet to make progress on the draft data protection regulations for the communications sector. However, the NDPC has partnered with various sectors such as, the Bureau for Public Procurement (BPP), National Judicial Institute (NJI) and International Organisation for Migration(IOM) among others to improve data protection awareness and regulation in Nigeria.	Ongoing

S/N	Prediction	Current Status	Status
5.	Progress with legislative effort	<p>The National Digital Economy and E-Governance Bill is nearing presidential approval after passing key legislative stages and extensive stakeholder consultations. The Control of Usage of Artificial Intelligence Technology Bill and the National AI and Robotics Sciences Bill have been consolidated into a single bill that passed its first reading in May 2025. The Nigeria Digital Sovereignty and Fair Data Compensation Bill has been sponsored in the Senate. The National Assembly is currently deliberating on two bills seeking to amend the Nigeria Data Protection Act (NDPA). The proposed amendment to the NDPA introduced in 2025 scaled its second reading.</p> <p>Additionally, the Nigeria Data Protection Act Amendment Bill 2025, was introduced into the National Assembly.</p>	Ongoing

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		The bill seeks to amend the Nigeria Data Protection Act and to enhance the accountability of application developers, regulate third-party data sharing, and strengthen the enforcement powers of the NDPC.	
6.	Progress with AI governance landscape	The NDPC retained provisions on the responsible use of emerging technologies in the final NDP-Act GAID. Notable efforts toward AI regulation have also emerged, with National Information Technology Development Agency (NITDA) drafting an AI Roadmap and the National Broadcasting Commission (NBC) proposing an AI strategy for the media sector. Additionally, the Federal Minister of Communications Innovation and the Digital Economy (FMCIDE) is set to launch the national AI strategy .	Ongoing

Series 1 and Series 2

