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GAID 2025:

What You Need to Know

On Friday, 19th of September 2025, the General Application and Implementation Directive (GAID) 2025 of the Nigeria Data Protection Act (NDPA) 2023 which was initially published on 20 March 2025 by the Nigeria Data Protection Commission (NDPC) came into effect, replacing the Nigeria Data Protection Regulation (NDPR) 2019. GAID 2025 serves as an instrument to aid the implementation of the NDPA by providing practical guidance and directives for how organisations must manage data in Nigeria's rapidly digitising economy to comply with the provisions of the NDPA.

Key Features of GAID 2025

- 1. Registration and Classification:** GAID introduces categories of data controllers and processors based on the volume and sensitivity of personal data handled. The categories are: Ultra High Level (UHL), Extra High Level (EHL), and Ordinary High Level (OHL). UHL or EHL entities are required to register once with the Nigeria Data Protection Commission (NDPC) and must file annual Compliance Audit Returns (CAR). In contrast, OHL entities must renew their registration annually but are not required to file CARs.
- 2. Compliance Audits:** CARs must now be filed using revised templates and are subject to increased filing fees. UHL and EHL entities are required to file annually, while newly classified entities must submit their first CAR within 15 months of registration.
- 3. Data Protection Officers (DPO):** Significant data-handling entities must appoint a DPO that reports to senior management. The qualifications, responsibilities, and independence safeguards should be defined.
- 4. Risk Assessments:** Activities such as biometric collection, automated decision-making, or surveillance require a Data Protection Impact Assessment (DPIA) prior to execution.
- 5. "Operating in Nigeria" Now Includes Foreign Entities:** GAID broadens the meaning of "operating in Nigeria" to cover data controllers and processors who

are not physically present in Nigeria but target Nigerians. This means that foreign organisations processing personal data that significantly affects Nigeria's economy or security may be classified as entities of major importance and subject to GAID compliance requirements.

6. **Individual Rights:** Nigerians gain reinforced rights to rectification, access, portability, restriction, deletion, protection from certain forms of automated decision-making, and complaint resolution via a new Standard Notice to Address Grievance (SNAG) process.
7. **Sanctions:** Non-compliance attracts fines of 2-10 million naira or 1-2% of annual gross revenue (whichever is higher).

For financial institutions, GAID is a game-changer, as they hold highly sensitive information. Beyond compliance, clients and regulators will increasingly measure reliability by how responsibly firms handle personal data.

Recommend Next Steps

1. With GAID 2025 now in effect, we recommend that you:
2. Conduct a data protection audit to assess your current level of compliance.
3. Fulfil registration and classification obligations with the NDPC.
4. Appoint or confirm qualified DPOs with clear reporting lines.
5. Update privacy notices, policies, and customer consent mechanisms.
6. Train staff to embed compliance into daily operations.

Conclusion

GAID 2025 marks a shift towards stronger data protection and greater transparency. While the penalties for non-compliance are significant, the larger opportunity lies in building client trust and demonstrating operational integrity. Proactive compliance is not only essential to avoid sanctions but also critical to staying competitive in a market where data is as valuable as capital.

If you have any questions about how these changes affect your business or require assistance in conducting a data protection audit, please contact us at info@greychapellegal.com.

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