

THE NDPR AUDIT IS COMING

A 5-Step Readiness Guide for Your Business



The Birdling is not a licensed DPCO, we only streamline your compliance with detailed curated logs, and evidence required to satisfy auditors through our ARGOS platform.



Executive Guide:

Comprehensive
framework for Nigerian
businesses to achieve
NDPR compliance and
audit readiness

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WHY NDPR COMPLIANCE IS NON-NEGOTIABLE

**Transition to NDPA
reinforces the need for
robust data governance**

Legal Mandate

The NDPR is a legal requirement for all entities processing personal data of Nigerian citizens. Non-compliance is not an option.

Mandatory Audits

Organizations processing data of 1,000+ subjects in 6 months or 2,000+ in 12 months must file annual Data Protection Audits with NDPC.

Consequences of Non-Compliance

Significant fines (up to 2% of annual gross revenue or ₦10 million), reputational damage, and loss of customer trust.



YOUR 5-STEP NDPR AUDIT READINESS GUIDE



Map Your Data

Determine your role:
Controller or Processor



Close the Gaps

Mitigate identified
compliance issues



Appoint Your Champion

Establish a Data
Protection Officer



Document & Report

Prepare and submit
the Annual Audit



Cultivate a Culture

Explicitly train all staff

Step 1: Map Your Data – Controller vs. Processor

Data Controller

Determines the purpose and means of processing personal data. Makes decisions about what data to collect and how to use it.

Decides data collection purposes

Obtains explicit user consent

Bears primary liability for compliance

Responsible for data security

VS

Data Processor

Processes personal data on behalf of the Controller. Acts according to the Controller's instructions and requirements.

Processes data per Controller's instructions

Implements security measures

Reports to the Controller

Shares liability for breaches

Clearly define your role and map all data flows (collection, storage, processing, sharing) to understand your obligations.

STEP 2: CLOSE THE GAPS

Mitigate Identified Compliance Issues

LB

Lawful Basis

Ensure all data collection has a lawful foundation

- Obtain explicit consent from data subjects
- Document legitimate business interests
- Maintain consent records

DM

Data Minimization

Collect only necessary data for stated purposes

- Review data collection practices
- Eliminate unnecessary fields
- Set data retention limits

SM

Security Measures

Implement technical and organizational safeguards

- Deploy data encryption protocols
- Establish access controls
- Regular security audits

DR

Data Subject Rights

Establish procedures for handling data requests

- Access request procedures
- Rectification mechanisms
- Erasure and portability processes

APPOINT YOUR CHAMPION: ESTABLISH A DATA PROTECTION OFFICER (DPO)

MANDATORY REQUIREMENT

The DPO is a mandatory requirement for many organizations under NDPR/NDPA. This individual or entity serves as the organizational champion for data protection compliance.

1

- **MONITOR INTERNAL COMPLIANCE**
- Oversee organizational compliance with NDPR/NDPA and ensure appropriate technical and organizational measures are in place.

2

- **PROVIDE EXPERT GUIDANCE**
- Offer advice on data protection matters and ensure employees understand their obligations under data protection laws.

3

- **ACT AS CONTACT POINT**
- Serve as the liaison between the organization, the NDPC, and data subjects on all data protection matters.

4

- **OVERSEE DPIAS**
- Conduct and manage Data Protection Impact Assessments to identify and mitigate risks in data processing activities.

STEP 4: DOCUMENT & REPORT - PREPARE THE ANNUAL AUDIT

Failure to submit results in significant penalties and regulatory action.

MANDATORY SUBMISSION

All organizations must submit annual Data Protection Audits to the Nigeria Data Protection Commission (NDPC) through a licensed Data Protection Compliance Organisation (DPCO).

YOUR AUDIT MUST INCLUDE:

1

Data Processing Activities

Detailed description of all data processing activities, including types of data collected, stated purpose, and parties with whom data is shared.

2

Policies & Procedures

Comprehensive documentation of all data protection policies, procedures, and organizational measures implemented to safeguard personal data.

3

Proof of Compliance

Evidence demonstrating compliance with NDPR requirements, including consent records, Data Protection Impact Assessment (DPIA) results, and audit documentation.

4

Risk Assessment Results

Outcomes of internal risk assessments, compliance reviews, and audits conducted to identify and mitigate data protection vulnerabilities.

Step 5

CULTIVATE A CULTURE - EXPLICITLY TRAIN ALL STAFF

The **human factor** is critical. Employees are the first line of defense and the most common source of data breaches.

TRAINING FOCUS AREAS

- ✱ **Awareness:** The importance of NDPR and its impact on their daily roles and responsibilities.
- ✱ **Procedures:** Handling personal data, recognizing and reporting data breaches, and responding to data subject requests.
- ✱ **Accountability:** Understanding their role in protecting organizational data and maintaining compliance standards.

BUILDING A COMPLIANCE CULTURE

Regular, mandatory training for all new and existing employees

BUILDING A COMPLIANCE CULTURE

When every team member understands their role in data protection, compliance becomes embedded in organizational DNA.

Key Takeaway

FROM READINESS TO RESILIENCE

NDPR compliance is an ongoing journey, not a one-time event.



PROACTIVE READINESS MINIMIZES RISK

Organizations that invest in compliance today build trust with customers, reduce regulatory risk, and establish a resilient data governance framework.

YOUR NEXT STEPS



Engage a Licensed DPCO

Partner with a Data Protection Compliance Organisation to guide your audit and ensure regulatory alignment.



Schedule Assessment

Conduct an internal data protection assessment to identify gaps and prioritize remediation efforts.



Begin DPO & Training

Start the DPO selection process and launch your staff training program immediately.

The time to act is **now**. Proactive compliance protects your business and demonstrates commitment to data privacy.

QUESTIONS & DISCUSSION

We welcome your questions and look forward to discussing your cybersecurity journey.



GET AUDIT-READY SECURITY ASSESSMENTS

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