

Countdown to the GAID 2025 – Is your organization ready?

The General Application and Implementation Directive 2025 (GAID) is set to take effect on September 19, 2025. This Directive establishes a clear framework to support compliance with the Nigeria Data Protection Act 2023 (NDPA), addressing emerging challenges in data protection, setting expectations for data controllers, processors, and other stakeholders, and ultimately fostering a robust, privacy-conscious digital ecosystem in Nigeria.

The GAID 2025 introduces several key reforms that organizations should pay close attention to:

- **Data Subject's Standard Notice to Address Grievance:** The GAID introduces the SNAG which provides an accessible mechanism for aggrieved data subjects to formally notify a data controller or data processor of an alleged violation of their data privacy rights.
- With the repeal of the NDPR 2019, GAID expands the circumstances under which DPIAs are mandatory. These now include the development of communication software for data subjects, financial services delivered via digital platforms, healthcare services, e-commerce activities, and the use of surveillance cameras in publicly accessible areas. DPIAs are also required for educational institutions processing student records, hospitality service providers, and organisations engaging in cross-border data transfers.

- The GAID also introduces a new obligation for Data Protection Officers (DPOs) to prepare a semi-annual data protection report which must be submitted to an authorized officer of the data controller or data processor who is responsible for receiving the Record of Processing Activities (RoPA).



For further enquiries about the innovations of the GAID 2025 or to discuss how our team can support your organization's compliance with the Nigeria Data Protection Act 2023, please contact our Data Protection & Privacy Team at ipanddataprotection@thelawcrest.com.