



DID YOU KNOW?

DO YOU KNOW HOW LONG YOUR ORGANISATION CAN RETAIN CUSTOMERS PERSONAL DATA?

Did you know that:

- Based on the provisions of Regulation 2.1(c) of the Nigeria Data Protection Regulations 2019 (“NDPR”) every company that processes the personal data of Nigerian citizens and residents is required to only store such personal data for the period within which it reasonably requires such personal data.
- The NDPR Implementation Framework, 2020 (“the NDPR Framework”) requires all organisations to clearly specify the timeframe within which they will store the personal data of their customers in their Data Privacy policy, terms of service or other binding documents with the data subjects or customers. What this means, therefore, is that your organisation is required to:
 - (i) determine the length of time that it wishes to retain customer’s personal data based on its needs; and
 - (ii) indicate such retention period in its privacy policy or notice.
- Where the retention period is not specified in your organisation’s privacy policy, the NDPR Framework provides that the retention period shall be:
 - (a) up to 3 (three) years after the last active use of a digital platform by the Data Subject;

- (b) up to 6 (six) years after the last transaction in a contractual agreement between the Data Controller and the Data Subject;
- (c) Upon the presentation of evidence of death by a deceased's relative; and
- (d) immediately upon request by the Data Subject or his/her legal guardian where:
 - (i) no statutory provision provides otherwise; and
 - (ii) the Data Subject is not the subject of an investigation or suit that may require the Personal Data that is sought to be deleted.

If you have any questions in relation to how long your organisation may store customers' personal data or require any assistance with regard to data protection or information about our practice area offerings, please contact us at: dpteam@uubo.org or Jumoke.lambo@uubo.org. UUBO is a licensed Data Protection Compliance Organisation with a specialised team who are prepared to engage with you and provide any data protection assistance you may require.