



Data Protection Policy

Aid for Rural Education Access Initiative (AREAi)

Policy Document By

Aid for Rural Education Access Initiative (AREAi)

Compliance with NDPA 2023 & GAID 2025

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1. Introduction

Aid for Rural Education Access Initiative (AREAi) (“we”, “our”, or the “Organisation”) is committed to protecting the personal data of its staff, volunteers, beneficiaries, donors, partners, and other stakeholders. We recognise the importance of data privacy and ensure that all personal data we collect and process is handled in a manner consistent with applicable data protection laws, our mission, and our values.

This policy establishes AREAi’s framework for responsible data processing and ensures compliance with the Nigeria Data Protection Act (NDPA) 2023 and the General Application and Implementation Directive (GAID) 2025. It reflects AREAi’s commitment to the communities it serves — many of whom are among the most vulnerable populations in Nigeria.

2. About AREAi

Who We Are

AREAi was founded in 2014 as a grassroots, non-profit organisation focused on increasing access to, and improving the quality of, education for marginalised, rural, and under-resourced communities across Africa, particularly Nigeria. AREAi is registered with the Corporate Affairs Commission (CAC) and headquartered in Abuja, with a branch in the United States.

Geographic & Legal Context

AREAi’s principal operations are in Nigeria. We therefore prioritise compliance with the NDPA 2023 and GAID 2025 as our primary data protection framework. Where we work with international partners or transfer data outside Nigeria, we additionally ensure compliance with any applicable international standards and implement the safeguards described in Section 12 of this policy.

3. Scope of the Policy

This policy applies to:

- All staff, volunteers, contractors, interns, and third-party service providers working with or on behalf of AREAi.
- All personal data held by AREAi, whether in digital (e.g., databases, cloud storage, email systems) or physical (e.g., paper registration forms, printed records) format.
- All processing activities carried out by AREAi: collection, storage, use, transfer, deletion, and sharing of personal data.
- All AREAi programmes, including those involving children, out-of-school youth, and other vulnerable groups.

4. Definitions

- **Data:** Characters, symbols, and binary on which operations are performed by a computer, stored or transmitted in the form of electronic signals, in any format or on any device.
- **Personal Data:** Any information relating to an individual who can be identified or is identifiable, directly or indirectly, by reference to an identifier such as a name, identification number, or any item that can be readily linked to an individual.
- **Sensitive Personal Data:** Personal data relating to an individual's genetic or biometric data, race or ethnic origin, religious or similar beliefs, health status, sex life, political opinions or affiliations, or trade union memberships.
- **Children's Data:** Personal data of any individual under the age of 18. AREAi applies heightened protections to children's data given the nature of its work in education and community development.
- **Consent:** Any freely given, specific, informed, and unambiguous indication — whether by written or oral statement or affirmative action — of an individual's agreement to the processing of personal data. Consent on behalf of a child must be provided by a parent or legal guardian.
- **Processing:** Any operation performed on personal data, including collection, storage, modification, sharing, and deletion.
- **Data Controller:** AREAi; the organisation that determines how and why personal data is processed.
- **Data Processor:** Third parties (vendors, partners, service providers) that process data on behalf of AREAi under a Data Processing Agreement.
- **Data Subject:** A person whose personal data is collected and processed by AREAi (e.g., a child enrolled in a learning centre, a community beneficiary, a donor, or a staff member).
- **Data Protection Officer (DPO):** The person appointed by AREAi in accordance with the NDPA 2023, responsible for overseeing data protection compliance and acting as the primary point of contact for data subjects and regulators.
- **NDPA:** The Nigeria Data Protection Act 2023.
- **NDPC:** The Nigeria Data Protection Commission — the statutory body responsible for enforcing the NDPA 2023.
- **NDPA GAID:** The Nigeria Data Protection Act General Application and Implementation Directive (2025).

5. Legal Basis for Processing

In line with Section 25 of the NDPA 2023, AREAi processes personal data only when it has identified a valid legal ground. AREAi relies on one or more of the following:

- **Consent:** Where we ask for explicit, informed permission from individuals (e.g., beneficiary registration, surveys, digital platforms). Consent for children's data must be obtained from a parent or legal guardian.

- **Legitimate Interest:** When processing is necessary for our organisational mission (e.g., programme delivery, monitoring & evaluation, impact reporting) and a balancing test confirms this does not override the rights and freedoms of data subjects. AREAi documents all legitimate interest assessments.
- **Contractual Necessity:** For staff, volunteers, consultants, or service provider contracts where processing is required to perform the agreement.
- **Legal Obligation:** Where processing is required to comply with a legal or regulatory obligation applicable to AREAi.
- **Vital Interests:** In limited circumstances where processing is necessary to protect the life of a data subject or another person (e.g., in emergency response contexts).

6. Principles of Data Protection

AREAi commits to the following principles in all data processing activities:

- **Lawfulness, Fairness & Transparency:** We process data only on a lawful basis and in ways that are fair and transparent to data subjects.
- **Purpose Limitation:** We collect personal data only for specified, explicit, and legitimate purposes and do not process it in ways incompatible with those purposes.
- **Data Minimisation:** We collect only the data that is strictly necessary for our stated purpose.
- **Accuracy:** We take reasonable steps to ensure personal data is accurate, complete, and kept up to date.
- **Storage Limitation:** We retain data only as long as necessary for the purpose for which it was collected, or as required by law. See Section 13 for retention schedules.
- **Integrity & Confidentiality:** We protect data using appropriate technical and organisational measures to prevent unauthorised access, disclosure, loss, or damage.
- **Accountability:** We take responsibility for our data-processing practices and maintain records to demonstrate compliance with this policy and the NDPA 2023.

7. Data Collection & Use

Categories of Data Collected

AREAi may collect and process the following categories of personal data:

- Identification data: names, age, date of birth, gender, photographs.
- Contact data: address, phone number, email address.

- Programme data: enrolment records, attendance, learning assessments, progress reports.
- Financial data: donor details, bank information for staff payroll (processed under strict access controls).
- Sensitive data: health information where relevant to programme participation, collected only with explicit consent.

How We Collect Data

- **Directly from Data Subjects:** Through registration forms, programme applications, surveys, consent forms, and digital platforms.
- **From Partners / Third Parties:** When we work with schools, government agencies, community leaders, or other partner organisations.
- **Automatically:** Via website interactions, analytics tools, or digital learning platforms (users are informed via privacy notices).

8. Consent

Consent is one of AREAi's primary legal bases for processing, particularly for beneficiary data and communications. AREAi's consent practices are:

- Consent is obtained clearly, using simple and understandable language appropriate to the audience.
- Where required, explicit consent is sought for special categories of data.
- Consent is freely given — no coercion or pressure — and individuals may refuse without adverse consequences.
- Data subjects are informed of their right to withdraw consent at any time, and a simple mechanism to do so is provided.
- Consent to transfer data to third parties is obtained separately before any such transfer.

Consent for Children's Data

Note: AREAi works primarily with children and young people. Where beneficiaries are under 18, consent must be obtained from a parent or legally recognised guardian. AREAi programme staff must not process a child's personal data without first securing and documenting parental/guardian consent. Consent forms must be retained securely for the duration of the programme and for at least five years thereafter.

Procuring Consent

At the time of collecting personal data, AREAi will:

- Clearly communicate the specific purpose for which data is being collected before collection begins.
- Ensure consent is obtained freely, without fraud, coercion, or undue influence.
- Verify that the data subject (or their guardian, for children) has the legal capacity to provide consent.

- Record consent in written or electronic format using clear, plain language.
- Inform data subjects of their right to withdraw consent at any time, as provided in Section 35 of the NDPA 2023.
- Obtain fresh, explicit consent before transferring personal data to any third party.

9. Sensitive Personal Data & Children's Data

Sensitive Personal Data

AREAI processes sensitive personal data only when:

- There is a valid lawful basis for processing under the NDPA 2023; and
- Explicit consent has been obtained from the data subject (or parent/guardian for a child), unless a specific statutory exception applies.

Sensitive data is subject to enhanced security controls, strict access restrictions, and additional staff training. Processing activities involving sensitive data must be documented in ARAI's Data Register.

Children's Data

Given ARAI's primary focus on education for children and young people, children's personal data is treated as inherently sensitive and is afforded the highest level of protection across all programmes. ARAI will:

- Never use children's data for purposes beyond the specific programme for which it was collected.
- Store children's records with strict access controls limited to authorised programme staff.
- Anonymise or delete children's data as soon as it is no longer required for programme purposes.
- Conduct a Data Protection Impact Assessment (DPIA) before launching any new programme or system that involves processing children's data at scale.

10. Data Security & Protection

AREAI implements appropriate technical and organisational measures to protect personal data against unauthorised access, loss, destruction, or disclosure. These include:

- **Access Control & Authentication:** Only authorised staff and volunteers may access sensitive data. Access is role-based and reviewed quarterly.
- **Encryption:** Personal data is encrypted in transit and at rest where technically feasible, particularly for digital programme records and donor data.

- **Secure Storage:** Physical records are stored in locked cabinets with restricted key access. Digital data is stored on secure, password-protected, regularly backed-up systems.
- **Access Logs & Audit Trails:** Where practicable, systems maintaining sensitive personal data shall log access and modification events, reviewable by the DPO.
- **Staff Onboarding & Offboarding:** Access to personal data systems is granted on joining and revoked immediately upon separation from AREAi. All staff complete data protection training before being granted access.
- **Regular Training:** All staff, volunteers, and relevant partners receive periodic training on data protection principles, security practices, and incident reporting.
- **Incident Response:** AREAi maintains a documented breach response process for detecting, containing, investigating, and reporting data security incidents.

11. Data Breach Notification

A data breach is any incident leading to accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to personal data held or processed by AREAi.

Internal Response

- Any suspected or confirmed data breach must be reported immediately to the DPO by the staff member who discovers it.
- The DPO will assess the breach within 24 hours of notification to determine its scope, risk level, and appropriate response.
- Containment measures must be implemented without delay.

Regulatory Notification

Note: Under Section 40 of the NDPA 2023, AREAi must notify the Nigeria Data Protection Commission (NDPC) of a breach that poses a risk to the rights and freedoms of data subjects within 72 hours of becoming aware of it. If notification cannot be made within 72 hours, a reasoned explanation for the delay must accompany the notification.

Notification to Data Subjects

- If a breach is likely to result in high risk to individuals' rights or freedoms, AREAi will notify affected data subjects without undue delay.
- Notification will describe the nature of the breach, the likely consequences, and the measures taken or proposed to address it.
- All breaches and responses are to be recorded in AREAi's Breach Register maintained by the DPO.

12. Third-Party Sharing & International Transfers

Engaging Third-Party Processors

Before engaging any third party to process personal data on AREAi’s behalf, AREAi will:

- Conduct due diligence to assess the third party’s data protection practices and security standards.
- Enter into a written Data Processing Agreement (DPA) specifying: the scope and purpose of processing; security requirements; confidentiality obligations; sub-processing restrictions; data subject rights assistance; and data return or deletion upon termination.
- Require third parties to notify AREAi of any breach involving AREAi personal data within 24 hours.

International Transfers

Where AREAi transfers personal data outside Nigeria (e.g., to cloud providers or international partners), we comply with Section 41 of the NDPA 2023 and ensure at least one of the following safeguards is in place:

- The receiving country has been determined by the NDPC to provide an adequate level of data protection.
- Appropriate contractual clauses approved by the NDPC are incorporated into the transfer agreement.
- The data subject has given explicit informed consent to the transfer after being informed of the risks.
- Data is adequately anonymised prior to transfer, removing any identifiable information.

13. Data Retention & Disposal

AREAi retains personal data only for as long as necessary for the purpose for which it was collected, or as required by Nigerian law. The following indicative retention periods apply:

Category of Data	Retention Period	Basis / Notes
Beneficiary / programme records (adults)	5 years after programme end	Monitoring, evaluation & donor reporting requirements
Children’s programme records	Until the child turns 23, or 5 years after programme end — whichever is later	Child safeguarding obligations; legal limitation periods

Staff / volunteer HR records	7 years after end of engagement	Employment law and tax obligations
Donor records	7 years after last donation	Financial regulations and audit requirements
Website / analytics data	12 months	Rolling anonymisation after 12 months

When data reaches the end of its retention period, AREAi will securely delete or anonymise it in accordance with Section 42 of the NDPA 2023. Physical records will be shredded; digital records will be permanently deleted from all systems, including backups, within 30 days of the retention period ending.

14. Data Subject Rights

Under the NDPA 2023 and applicable data protection law, data subjects have the following rights. AREAi will respond to all valid requests within 30 days of receipt, free of charge:

- **Right of Access (Section 35 NDPA):** You may request a copy of the personal data AREAi holds about you and information on how it is processed.
- **Right to Correction:** You may request that inaccurate, incomplete, or outdated personal data be corrected.
- **Right to Deletion (“Right to be Forgotten”):** You may request deletion of your personal data where it is no longer necessary for the purpose collected, where consent is withdrawn, or where processing is unlawful.
- **Right to Restrict Processing:** You may request that AREAi limits how it uses your data in certain circumstances (e.g., while accuracy is being verified).
- **Right to Object:** You may object to processing based on legitimate interest or for direct marketing purposes. AREAi will cease processing unless it can demonstrate compelling legitimate grounds.
- **Right to Data Portability:** Where technically feasible, you may request your personal data in a structured, commonly used, machine-readable format.
- **Right to Withdraw Consent:** You may withdraw consent at any time. Withdrawal does not affect the lawfulness of processing carried out prior to withdrawal.

How to Exercise Your Rights

Requests should be submitted to the Data Protection Officer at info@areai4africa.org or in writing to AREAi’s head office. AREAi will verify the identity of the requestor before processing any request. If AREAi is unable to respond within 30 days, it will notify the data subject of the reason for delay and the expected response date.

Complaints

If you are dissatisfied with AREAi’s response to a data protection matter, you have the right to lodge a complaint with the Nigeria Data Protection Commission (NDPC) at www.ndpc.gov.ng. AREAi encourages data subjects to contact us first so that we can attempt to resolve the matter directly.

15. Data Protection Officer (DPO)

AREAI will appoint a suitably qualified Data Protection Officer (DPO) in accordance with the NDPA 2023. The DPO operates independently and reports directly to ARAEI's Executive Leadership. The DPO may not be penalised for performing their duties.

The DPO is responsible for:

- Overseeing compliance with this Policy and applicable data protection law.
- Maintaining ARAEI's Data Register and Breach Register.
- Responding to data subject requests within statutory timelines.
- Conducting or coordinating Data Protection Impact Assessments (DPIAs) for high-risk processing activities.
- Designing and delivering data protection training for staff and volunteers.
- Monitoring and auditing data processing practices across ARAEI.
- Acting as the primary liaison with the NDPC.

Contact details for the DPO are made publicly available on the ARAEI website and in programme materials.

16. Training & Awareness

All staff and volunteers will complete mandatory data protection training before being granted access to personal data systems. Refresher training will be conducted at least annually, and immediately following any significant policy change or data breach incident.

Training will cover: the principles and legal requirements of the NDPA 2023; ARAEI's specific data protection obligations; handling of children's data and sensitive personal data; recognising and reporting data breaches; and data subject rights. Completion of training is recorded and monitored by the DPO.

17. Policy Review & Updates

This Data Protection Policy will be reviewed at least annually, or whenever there is a significant change in: data protection law or regulation; ARAI's data processing activities; technology infrastructure; or organisational structure. Reviews are led by the DPO in consultation with senior leadership.

Material updates will be documented in the Version Control table (Section 18), approved by ARAI's Executive Director, and communicated to all staff, volunteers, and relevant partners within 30 days of adoption.

18. Version Control

Version	Date	Description of Change	Approved By
1.0	07/12/2025	Initial creation and adoption of the Data Protection Policy.	

19. Contact Information

For questions, concerns, or requests relating to your personal data, or to exercise your data subject rights, please contact:

Data Protection Officer — ARAI	
Email	info@areai4africa.org
Address	DigiHub, No. 2, ICS Close (off ICS Drive by Jawako Hospital), Dakibiyu, Abuja, Nigeria
Phone	+234 (0) 702 500 3565
Website	www.areai4africa.org
NDPC	Nigeria Data Protection Commission: www.ndpc.gov.ng (for escalated complaints)