



# TMT NUGGETS:

## Q4 2025 Review

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## INTRODUCTION

The fourth quarter of 2025 was marked by accelerated regulatory intervention, landmark judicial pronouncements, and rapid commercial and technological evolution in the Telecommunications, Media and Technology (TMT) ecosystem. Across telecommunications, digital platforms, media and entertainment, intellectual property, data protection, and cybersecurity, regulators and courts increasingly asserted oversight in response to market growth, consumer protection concerns, and emerging systemic risks.

This Q4 2025 TMT review attempts to provide an analysis of the most significant legal, regulatory, and policy developments in the sectors during the period. It highlights key regulatory initiatives of the Nigerian Communications Commission (NCC), pivotal court decisions reinforcing consumer and data rights, major industry transactions and investments, and evolving approaches to intellectual property protection, digital trade, and cybersecurity resilience. Set against broader continental and global trends, this publication is intended to equip industry participants, investors, and stakeholders with practical insight into the risks, opportunities, and compliance priorities defining Nigeria's fast-evolving TMT landscape as the market transitions into 2026.

## TELECOMMUNICATIONS



### NIGERIAN COMMUNICATIONS COMMISSION ISSUES DRAFT INTERNET CODE OF PRACTICE 2025

In October 2025, the NCC released the Draft Internet Code of Practice 2025 for stakeholder consultation. The proposed Code seeks to extend regulatory oversight to Internet Access Service Providers ('IASPs') and online platforms that

facilitate digital communications in Nigeria. It introduces compliance obligations relating to governance structures, reporting requirements, and cooperation with regulatory directives, including content takedown requests; and if finalised, the Code is expected to expand the regulatory and compliance framework applicable to telecom operators and digital service providers operating within Nigeria's internet ecosystem.<sup>1</sup>

### NCC ISSUES DRAFT SPECTRUM ROADMAP 2025-2030<sup>2</sup>

The NCC further refined the nation's wireless strategy with the release of the Draft Spectrum Roadmap 2025-2030 in late Q4. This roadmap identifies the 60 GHz license-exempt band as a priority for multi-gigabit wireless systems, which will facilitate high-speed "last-mile" connectivity in dense urban environments. Additionally, the regulator is moving toward the formal integration of Satellite-to-Mobile deployments. This non-terrestrial network strategy is designed to bridge the rural connectivity

<sup>1</sup> NCC, Draft Internet Code of Practice, <https://ncc.gov.ng/sites/default/files/2025-10/Draft-Internet-Code-of-Practice-2025.pdf>

<sup>2</sup> <https://ncc.gov.ng/media-center/public-notice/ncc-unveils-draft-5-years-spectrum-roadmap-and-draft-guidelines-use-60>

gap, targeting the 46% of Nigerians who reside in areas where traditional tower infrastructure is commercially unviable.

### **INCREASE IN TELECOM SUBSCRIPTIONS AND BROADBAND PENETRATION**

In November 2025, NCC released data showing that Nigeria’s active mobile subscriptions had risen to approximately 177.4 million, while total internet subscriptions reached about 144.8 million. Broadband penetration had approached 50.6%, reflecting sustained demand for data services despite persistent infrastructure and cost-related challenges. While the figures demonstrate continued expansion of the telecom sector, broadband penetration remains below the targets set under the National Broadband Plan, highlighting the need for accelerated infrastructure deployment<sup>3</sup>.

### **MTN NIGERIA ANNOUNCES FIBRE EXPANSION TO EIGHT MILLION HOMES BY 2028**

MTN Nigeria announced plans in October 2025 to expand its fibre infrastructure to connect up to eight million homes by 2028 as part of its long-term network investment strategy. The initiative aligns with the Federal Government’s broadband and digital economy objectives and is expected to enhance fixed broadband availability for households and enterprises.<sup>4</sup>

### **NIGERIAN COMMUNICATIONS COMMISSION APPROVES SPECTRUM LEASING ARRANGEMENT BETWEEN MTN AND T2**

In October 2025, the NCC approved a spectrum leasing arrangement under which MTN Nigeria will lease spectrum resources from T2 (formerly 9Mobile), in the 900MHz and 1800MHz bands. The arrangement supports the implementation of national roaming services and enhances network capacity while allowing T2 to improve coverage and service quality without significant capital expenditure. The approval highlights the increasing regulatory acceptance of spectrum sharing and infrastructure collaboration within the telecommunications sector.<sup>5</sup>

### **MTN GROUP BECOMES AFRICA’S FIRST 300 MILLION-USER TELCO**

On the 18<sup>th</sup> November 2025, MTN announced that it had surpassed 301.3 million subscribers across its 16 operating markets, becoming the first African telecommunications operator to reach this milestone. The development reflects the scale of MTN’s operations across the continent and highlights the growing consolidation and expansion of pan-African telecommunications networks.<sup>6</sup>

### **AIRTEL AFRICA AND SPACEX’S STARLINK ANNOUNCE SATELLITE CONNECTIVITY PARTNERSHIP**

On the 16<sup>th</sup> December 2025, Airtel Africa announced a partnership with SpaceX’s Starlink to introduce Direct-to-Cell satellite technology across 14 African markets from 2026. The initiative is expected to enable messaging and data services via satellite for users in unserved or hard-to-reach areas. The

<sup>3</sup> Technext24 – Nigeria got 1.6 million new active Internet subscribers; broadband penetration reached 49.89 % in October 2025 → <https://technext24.com/2025/12/05/nigeria-1-6-million-internet-subscribers>

<sup>4</sup> Tech Africa News, MTN Nigeria Unveils Plan to Connect 8 Million Homes with Fibre Network by 2028, <https://techafricanews.com/2025/10/10/mtn-nigeria-unveils-plan-to-connect-8-million-homes-with-fibre-network-by-2028/>

<sup>5</sup> Techpoint Africa, MTN spectrum lease deal revives hope for T2mobile, <https://techpoint.africa/news/mtn-spectrum-lease-with-t2mobile/>

<sup>6</sup> Tech Cabal, MTN becomes Africa’s first 300 million-user telco — <https://techcabal.com/2025/11/18/mtn-becomes-africas-first-300-million-user-telco/>

development may influence connectivity models and regulatory considerations within Nigeria and across the West African sub-region<sup>7</sup>.

## JUDICIAL BREAKTHROUGHS AND THE ENFORCEMENT OF CONSUMER RIGHTS

### ANENE V. MTN NIGERIA<sup>89</sup> - THE AFFIRMATION OF "QUIET ENJOYMENT"

One of the most significant legal decisions of Q4 2025 was the Supreme Court's final resolution of *Anene v. MTN Nigeria Communications PLC*. The case originated from an incident in May 2014 when the appellant, Mr Anene Ezugwu, was abruptly disconnected from a live radio program on Vision FM 92.1 Abuja due to deductions from his airtime for "caller tunes" services he claims not to have subscribed to. Despite complaining and receiving a partial refund of NGN700, the deductions continued, allegedly causing him embarrassment and emotional distress.

The Supreme Court upheld the original trial court's award of NGN5,000,000.00 in general damages and NGN500,000.00 in litigation costs, while also granting NGN3,000,000.00 as the cost of appeal. The judgment is a watershed moment for several reasons:

- a. **Contractual Sanctity:** The court held that a service provider's failure to render timely and proper service constitutes a breach of the consumer's contractual and statutory rights.
- b. **Deterrence of Impunity:** The Supreme Court decried the "growing impunity" of service providers who choose to pursue needless litigation rather than offering prompt redress or apologies.
- c. **Quiet Enjoyment:** The ruling affirms the right of telecommunications subscribers to "quiet enjoyment" of their purchased airtime without the "obnoxious invasion" of unsolicited adverts and services.

## MEDIA AND ENTERTAINMENT



### NOLLYWOOD AND MUSIC INDUSTRY GROWTH

Nigeria's media industry continues its trajectory as one of the fastest-growing creative industries globally. Nollywood produces an estimated 2,500 movies annually, ranking as the world's second-largest film industry.<sup>10</sup> The music sector, with over 30 million monthly listeners

<sup>7</sup> Reuters, *Airtel Africa teams up with Starlink to launch direct-to-cell service in 14 markets* — <https://www.reuters.com/business/media-telecom/airtel-africa-teams-up-with-starlink-launch-direct-to-cell-service-14-markets-2025-12-16>

<sup>8</sup> <https://businessday.ng/news/legal-business/article/the-failure-to-render-timely-and-proper-service-constitutes-a-breach-of-consumer-rights/>

<sup>9</sup> ANENE V MTN Nigeria Communications PLC (2025) 16 NWLR (PT 2010)

<sup>10</sup> UNESCO (2021), *The African Film Industry: Trends, Challenges and Opportunities for Growth*. <https://unesdoc.unesco.org/ark:/48223/pf0000379165/PDF/379165eng.pdf.multi>

globally<sup>11</sup>, about 500 music producers, and an estimated 1,000 record labels<sup>12</sup>, generates over \$2 billion in annual revenue<sup>13</sup>.

The motion picture and music recording industries contributed approximately 1.97 trillion naira (\$1.4 billion) to Nigeria's GDP in 2024. Industry growth accelerated significantly with the adoption of streaming platforms. On a broader economic valuation, the entertainment and media sector, inclusive of films, music and digital content, is worth nearly \$15 billion in 2025.

### CONSUMER PROTECTION DECISION

In October 2025, the Lagos State High Court in Suit no: LD/ADR/2297/2019 between MultiChoice Nigeria Limited and Mr Ben Onuora, delivered its judgment and ordered MultiChoice Nigeria Limited to pay ₦5 million in general damages to subscriber Ben Onuora, the Obi of Okwudor in Imo State (Claimant), for wrongful and willful disconnection of his active cable TV subscription.

The judgment held MultiChoice liable for breach of the Federal Competition and Consumer Protection Act 2018, and Section 13 of the Lagos State Consumer Protection Agency Law 2015. The Court also ordered MultiChoice to immediately reconnect and restore the Claimant's subscription and extend his viewing period to cover the duration of wrongful disconnection, with interest on the judgment sum at 10 per cent per annum until full payment.

### NIGERIA HOSTS AFRICA'S PREMIER MEDIA CONVERGENCE PLATFORM

The National Broadcasting Commission (NBC) successfully hosted Africast 2025, Africa's premier broadcast and media technology event, from October 20-24, 2025, at the Balmoral Convention Centre in Ikeja, Lagos. The 14th biennial edition, themed "Navigating the Digital Surge: Building a Resilient African Media Ecosystem for the Future," convened over 3,000 participants from more than 30 countries, solidifying Nigeria's leadership role in shaping continental media policy.

The summit was a strategic response to the rapid digital transformation reshaping the media landscape, and it addressed critical issues, including content authenticity in the AI era, data privacy, platform accountability, digital inclusion, and the balance between media freedom and responsible regulation.

### MTV DISCONTINUES MUSIC-ONLY CHANNELS AMID STRATEGIC RESTRUCTURING

Several of MTV's dedicated music video channels, including MTV Music, MTVS 80s, MTV 90s, Club MTV, and MTV Live, ceased broadcasting on the 31<sup>st</sup> of December 2025. This is part of a broader decision to restructure by Skydance-Paramount Global, the parent company, to refocus its content strategy towards reality television and entertainment programming. This shift reflects the continued decline of traditional scheduled music television, driven by the rise of streaming services and digital platforms as primary channels for music consumption.

<sup>11</sup> Spotify, *Loud & Clear Report* (2024/2025 updates <https://loudandclear.byspotify.com/>) and IFPI *Global Music Report*. [https://www.ifpi.org/wp-content/uploads/2024/03/GMR2025\\_SOTI.pdf](https://www.ifpi.org/wp-content/uploads/2024/03/GMR2025_SOTI.pdf)

<sup>12</sup> National Council for Arts and Culture (NCAC) & RegalStone Capital, *Baselines to Billions: Nigeria's Music Market Intelligence Report (2025)*, <https://ncac.gov.ng/wp-content/uploads/2025/11/RegalStone-Baseline-to-Billions-New.pdf>

<sup>13</sup> PwC (PricewaterhouseCoopers), *Global Entertainment & Media Outlook*. <https://www.pwc.com/ng/en/publications/entertainment-and-media-outlook.html>

### **NETFLIX MOVES TO ACQUIRE WARNER BROS. DISCOVERY IN \$82.7 BILLION DEAL**

Netflix announced a landmark agreement to acquire Warner Bros. Discovery, Inc. in a transaction valued at \$82.7 billion, representing one of the largest consolidations in the global entertainment sector. Under the proposed cash-and-stock arrangement, each Warner Bros. Discovery shareholder will receive \$23.25 in cash and \$4.50 in Netflix stock per share, valuing the company at \$72 billion in equity.

The transaction remains conditional on Warner Bros. Discovery completing the separation of its Global Networks division into a newly publicly traded entity, Discovery Global, expected by Q3 2026. Upon completion, Netflix will gain control of Warner Bros.' extensive film and television library, as well as HBO and HBO Max, signalling a significant expansion of its content portfolio.

As of the time of preparing this report, the deal has been amended to an all-cash transaction to provide greater financial certainty for shareholders and fend off a rival hostile bid from Paramount Global. Under the revised terms, Warner Bros. Discovery (WBD) stockholders will now receive the full \$27.75 per share in cash, eliminating the original \$4.50 stock component of the offer. This structural change is intended to expedite the regulatory process and accelerate the path to a final shareholder vote, which is expected by April 2026.

### **PARAMOUNT CHALLENGES NETFLIX WITH \$108 BILLION OFFER**

Paramount Skydance Corporation on 1<sup>st</sup> of December, 2025, submitted a \$108.4 billion hostile bid for Warner Bros. Discovery, directly challenging Netflix's acquisition plan. Paramount's offer of \$30 per share exceeded Netflix's \$28 per share, raising questions about the sales process and strategic direction for Warner Bros. Discovery.

Paramount has actively pursued the company since September 2025, submitting multiple acquisition proposals. The proposed transaction has drawn political scrutiny, with former U.S. President Donald Trump highlighting concerns over potential market concentration should Netflix's acquisition proceed.

### **LEADERSHIP TRANSITION AT SPOTIFY**

On the 30<sup>th</sup> of September 2025, Spotify announced that its founder and CEO, Daniel Ek, will step down from his executive role in January 2026, transitioning to Executive Chairman. Gustav Söderström, Chief Product and Technology Officer, and Alex Norström, Chief Business Officer, will assume co-CEO roles and join the Board of Directors, subject to shareholder approval.

Daniel Ek, who founded Spotify in 2006 and scaled it into the world's largest audio streaming service with over 700 million users, described the move as formalising operational leadership, allowing him to focus on strategic direction while Söderström and Norström handle day-to-day management.

### **NIGERIA'S MUSIC INDUSTRY GENERATES \$600 MILLION ANNUALLY**

In December 2025, the Minister of Art, Culture, Tourism, and the Creative Economy, Hannatu Musawa, highlighted in *Baselines to Billions: Nigeria's Music Market Intelligence Report* that the Nigerian music industry currently generates approximately \$600 million (₦901.6 billion) annually. Projections indicate growth to over \$1 billion by 2033, driven by an estimated average annual growth rate of 7%.

The report, developed jointly by the National Council for Arts and Culture and investment advisory firm Regal Stone Capital, notes multiple revenue streams, including streaming royalties, live performances, brand partnerships, publishing and songwriting, and emerging monetisation channels such as social media and virtual platforms.

### **GOVERNMENT CONSIDERS MEDIA TAX RELIEF PROPOSAL**

The President of the Federal Republic of Nigeria, Bola Ahmed Tinubu, appears to have endorsed a series of proposals submitted by the Nigeria Guild of Editors (NGE) aimed at supporting the struggling media sector. The NGE requested corporate tax relief for ten years, VAT exemptions, tax deductions, and access to affordable financing. The President urged editors to exercise their gatekeeping responsibilities with patriotism and integrity, warning against misinformation and irresponsible reporting that could undermine national cohesion and democratic stability.

### **HIGHEST-GROSSING FILM OF 2025 -BEHIND THE SCENES**

Multi-award-winning actress and producer Funke Akindele reinforced her position in Nollywood as her latest film, Behind the Scenes, grossed ₦1.767 billion in under four weeks from its Nigerian cinema debut, making it the highest-grossing Nollywood film of 2025. This marks Funke Akindele’s third film to surpass the ₦1 billion milestone, following A Tribe Called Judah and Everybody Loves Jenifa, the latter holding records for Nollywood’s biggest opening weekend and highest overall box office gross to date.

### **INTELLECTUAL PROPERTY**



#### **NIGERIA APPROVES REFORMS TO BOOST DIGITAL TRADE AND PROTECT INTELLECTUAL PROPERTY:**

The Federal Executive Council (FEC) of Nigeria has approved a set of reform policies aimed at strengthening digital trade and modernising the country’s intellectual property framework and its digital economy. Amongst

the approved frameworks are the National Intellectual Property Policy and Strategy (NIPPS) and the Ratification of the African Continental Free Trade Area (AfCFTA) Protocol on Digital Trade. The frameworks outline efforts to boost innovation and research commercialisation, and provide for Intellectual Property education to be integrated into the curricula of universities, polytechnics and research institutions to build capacity in the field.

#### **THE NATIONAL INTELLECTUAL PROPERTY POLICY AND STRATEGY (NIPPS):**

The NIPPS aims to merge the Trademarks, Patents, and Designs registries into a single commission, streamlining the registration process. It also calls for automation of digital filing systems for trademarks, patents and designs in collaboration with the World Intellectual Property Organisation

(WIPO), a move expected to make registration faster, more transparent and accessible. The framework allows intellectual property assets to serve as collateral for loans, potentially opening new financing pathways for startups and inventors.

### **THE RATIFICATION OF THE AFCFTA PROTOCOL ON DIGITAL TRADE**

The AFCFTA Protocol aims to harmonise digital commerce rules across African countries. The AFCFTA Protocol covers cybersecurity standards, electronic transactions, digital payments, consumer rights, and factors to enable safe and seamless trade across borders. Ratifying the AFCTA Protocols positions Nigeria to play a leading role in shaping the continent's digital trade landscape.

### **INDUSTRIAL PROPERTY ADMINISTRATION SYSTEM**

The Nigeria Trademarks Registry had introduced the Industrial Property Administration System (IPAS) Cloud Native Edition, Version 4.0, revolutionising trademark administration in Africa's most populous nation. The cutting-edge, cloud-based platform, first previewed at WIPO's webinar in February 2025, promises faster processing times, enhanced security protocols, and improved accessibility for applicants and practitioners. The modernisation effort coincides with increased registry activity. The Trademarks Registry published its latest Trademark Journal (Vol. 1, No. 3) on the 30<sup>th</sup> of September 2025, inviting oppositions to newly advertised trademarks within a two-month period, which expired on the 1st of December 2025.

### **WORLD INTELLECTUAL PROPERTY ORGANIZATION STRENGTHENS CAPACITY BUILDING INITIATIVES**

World Intellectual Property Organisation (WIPO) Nigeria organised several key capacity-building events during Q4 2025, including an IP Learning Workshop for Winners of the WIPO National IP Essay Competition 2025 on the 1<sup>st</sup> – 3<sup>rd</sup> of December, 2025, and a specialised workshop on Advancing Innovation in Nigeria through Technology Transfer on 31<sup>st</sup> October, 2025. WIPO Nigeria also collaborated with the International Telecommunication Union and the World Health Organisation to release a technical brief on the application of artificial intelligence in traditional medicine under the Global Initiative on AI for Health. This reflects growing recognition of the intersection between emerging technologies and traditional knowledge systems.

### **COPYRIGHT ENFORCEMENT**

The Nigerian Copyright Commission (Copyright Commission) ramped up its anti-piracy efforts, conducting nationwide operations that resulted in the seizure of over 469,000 pirated materials and the arrest of over 57 suspected offenders. The crackdown targeted a broad spectrum of media formats, including books, music, and films. This reflects the Copyright Commission's commitment to protecting creative works and strengthening enforcement across Nigeria's media and entertainment sector.

### **NG DOMAIN SUSPENSIONS**

The Nigerian Copyright Commission, in collaboration with the Nigerian Internet Registration Association (NIRA), suspended several .ng domains involved in the large-scale illegal distribution of music and audiovisual content. This initiative highlights a strategic shift towards combating digital piracy, emphasising the growing legal and compliance risks for digital platforms that host or distribute copyrighted material without authorisation.

## TECHNOLOGY



### FEDERAL GOVERNMENT LAUNCHES TWO INVESTMENT FUNDS TO EMPOWER THE CREATIVE AND DIGITAL ECONOMY

The Nigerian Federal Government is launching two new investment funds in 2026 under the Investment in Digital and Creative Enterprises Programme (iDICE) program to boost the country's tech and creative sectors. As part of this rollout, the government made an anchor investment in a \$64 million

fund managed by Ventures Platform to support high-growth startups. The initiative is backed by global institutions like the International Finance Corporation (IFC) and British International Investment to attract private capital and de-risk the Nigerian market. The Federal Government has highlighted the move as a strategic step to empower Nigerian youth and drive the Renewed Hope economic agenda. Ultimately, the program aims to create millions of jobs by providing young entrepreneurs with the funding and digital skills needed to scale their businesses.<sup>14</sup>

### NATIONAL DIGITAL ECONOMY AND E-GOVERNANCE BILL, 2025 REACHES THIRD READING

The National Digital Economy and e-Governance Bill, 2025, reached its third reading in November and is expected to be signed into law by President Bola Ahmed Tinubu. This legislation is a landmark development for Nigeria's digital transformation, aiming to provide a comprehensive legal and regulatory framework for the country's digital economy and e-governance. Key provisions include the legal recognition of electronic communications, records, and contracts, the digitisation of government operations, and the deployment of advanced infrastructure such as fibre-optic networks and communication towers. The bill is expected to significantly contribute to Nigeria's projected \$1 trillion economy, with the digital economy accounting for 21% of GDP by 2027.<sup>15</sup>

### HOUSE OF REPRESENTATIVES PASSES NIGERIAN FINTECH REGULATORY COMMISSION BILL FOR SECOND READING

The House of Representatives has passed the Nigerian Fintech Regulatory Commission Bill (HB.2389) for its second reading to centralise the industry's oversight. Currently, fintechs must navigate a fragmented regulatory landscape involving the CBN, SEC, NITDA, NDPC, and FCCPC, leading to overlapping rules and compliance hurdles. The bill proposes establishing a single, specialised Fintech Regulatory Commission to serve as the primary statutory body for the entire digital financial sector. This unified structure is designed to simplify licensing, regulation, and supervision, making it easier for local and international firms to operate in Nigeria. By removing regulatory bottlenecks, the legislation aims to boost investor confidence and accelerate innovation within Nigeria's rapidly evolving financial technology space.<sup>16</sup>

<sup>14</sup> <https://guardian.ng/business-services/fg-to-launch-two-new-investment-funds-for-nigerian-startups/>

<sup>15</sup> <https://nass.gov.ng/documents/billdownload/11219.pdf>

<sup>16</sup> <https://technext24.com/2025/10/30/fintech-bill-passes-second-reading/>

### CBN ISSUES CIRCULAR ON REVISED CASH-RELATED POLICIES

The CBN issued a circular directing all financial institutions to remove all charges and limits on cash deposits while setting weekly withdrawal limits of ₦500,000 for individuals and ₦5 million for corporate bodies across all channels. Under the new regime, which is effective from 1<sup>st</sup> January 2026, withdrawals exceeding these thresholds will attract fees of 3% and 5% for individuals and corporate customers, respectively, on the excess amount withdrawn. Daily ATM withdrawals are now limited to ₦100,000 per customer. The CBN has also withdrawn previous exemptions for diplomatic missions and scrapped special authorisations for large-scale cash access. The limit on over-the-counter encashment of 3<sup>rd</sup> party cheques was retained at ₦100,000.<sup>17</sup>

### CYBERSECURITY CRISIS AND SYSTEM RESILIENCE

The rapid digitalisation of the Nigerian economy in 2025 was accompanied by a severe escalation in cyber threats. According to the Esentry Eagle's Eyes Q3 2025 cybersecurity report<sup>18</sup> data breaches in Nigeria surged by 1,047 per cent compared to the previous quarter. Attackers logged an average of 6,101 attacks per week, representing a shift toward organised, identity-driven campaigns. Adversaries increasingly bypassed traditional technical vulnerabilities to gain access using valid credentials harvested from previous leaks, demonstrating a level of patience and precision that suggests the presence of sophisticated, intentional actors.<sup>19</sup> The impact of this crisis was most visible in the banking sector, where 81.5% of banks across Africa reported experiencing a cyber threat in the past year. In Nigeria, the systemic vulnerabilities of the banking infrastructure were exacerbated by technical failures during "technology upgrades." In October 2025, FirstBank customers were unable to access digital services for six days, while Zenith Bank faced login issues for three days following an update. These outages hindered access to banking services and significantly impacted customer trust, prompting a continent-wide mobilisation to increase infrastructure investment and deploy real-time fraud detection systems.<sup>20</sup>

### ARTIFICIAL INTELLIGENCE REGULATIONS



In Q4 2025, global AI regulation shifted from theoretical frameworks to active enforcement and significant legislative delays. The quarter was defined by the U.S. executive order centralising federal control, European delays for high-risk system compliance, and a wave of new state and national laws.

<sup>17</sup> [https://www.cbn.gov.ng/Out/2025/CCD/CIRCULAR ON REVISED CASH-RELATED POLICIES.pdf](https://www.cbn.gov.ng/Out/2025/CCD/CIRCULAR%20ON%20REVISED%20CASH-RELATED%20POLICIES.pdf)

<sup>18</sup> <https://www.esentry.io/articles/esentry-q3-2025-report>

<sup>19</sup> <https://allafrica.com/stories/202512050588.html>

<sup>20</sup> <https://www.itedgenews.africa/2025-report-85-of-african-banks-bet-on-ai-as-cyber-attacks-rise-to-81/>

## United States

- **National Policy Framework:** On December 11, 2025, a landmark Executive Order titled "Ensuring a National Policy Framework for Artificial Intelligence" was signed. It established an "AI Litigation Task Force" to challenge state-level safety laws (like those in California) that potentially restrict interstate commerce.
- **California Transparency Acts:** Despite federal pushback, Governor Gavin Newsom signed SB 53 (Transparency in Frontier AI Act) on September 29, 2025, and additional laws in October requiring age verification and protocols for AI chatbots to address self-harm.
- **Employment Bias Rules:** California's first comprehensive framework for addressing algorithmic bias in hiring took effect on October 1, 2025, requiring employers to conduct bias testing and retain automated decision data for four years.
- **New York Safety Bill:** On December 19, 2025, New York signed a comprehensive AI safety and transparency bill aimed at aligning with California's standards.

## European Union

- **EU AI Act Implementation Delay:** On November 19, 2025, the European Commission proposed delaying the full implementation of the EU AI Act for high-risk systems until December 2027.
- **New Support Infrastructure:** To assist with compliance, the Commission launched the AI Act Service Desk and a Single Information Platform on October 8, 2025.
- **Italy's National Law:** Italy enacted Law No. 132 of 2025 on October 10, becoming the first EU member to establish a national statute that adds criminal penalties for illegal deepfakes and mandates parental consent for users under 14.

## United Kingdom

- **Liability Guidelines:** On October 27, 2025, the Financial Markets Law Committee clarified that AI should be legally treated as a tool rather than an agent to maintain legal certainty in financial markets.
- **AI Growth Lab:** The government unveiled a new blueprint on October 21, 2025, introducing AI sandboxes and an AI Growth Lab to test products under relaxed regulatory conditions.

## Asia and Other Regions

- **China's Standards:** In November 2025, China implemented three new national standards focusing on the security and ethical use of generative AI.
- **India Synthetic Media Rules:** On October 22, 2025, MeitY proposed draft amendments to the IT Rules requiring clear labelling (e.g., watermarks or metadata) for all AI-generated content.
- **Colombia's AI Bill:** The National Congress issued a positive report for Bill 043 of 2025, which aims to classify AI systems by risk levels and create a National Authority for AI.
- **Brazil's Sandbox:** Brazil launched its first AI and Data Protection Regulatory Sandbox on October 14, 2025.

- Nigeria’s AI Control and Regulation Bill: In late 2025, a new dedicated AI bill progressed through the National Assembly. If enacted, it will mandate compulsory registration and licensing for all AI developers and users in Nigeria and establish a National Artificial Intelligence Council to supervise all AI activities.

## DATA PROTECTION



### NDPC V. META<sup>21</sup>

One of the most high-profile enforcement actions of 2025 was the NDPC's dispute with Meta Platforms, Inc., regarding behavioural advertising and alleged unauthorised cross-border data transfers. In February 2025, the NDPC imposed a \$32.8million remedial fee and eight corrective orders on Meta for violating user privacy on Facebook and Instagram.

The legal battle ended on 3<sup>rd</sup> November 2025, when the Federal High Court adopted an out-of-court

settlement as a consent judgment. While the settlement terms led to the "setting aside" of the original massive fine, it placed Meta under strict corrective mandates, including:

- Revising its privacy policy to align with Nigerian law.
- Ensuring explicit user consent is obtained before targeted advertising.
- Providing written assurances of compliance to the NDPC.

This case signals a turning point in how African regulators engage with global tech giants, asserting digital sovereignty and demanding localised compliance.

## AFRICAN CONTINENTAL HARMONIZATION AND DIGITAL SINGLE MARKET:

In December 2025, the African Union (AU) validated the Continental Data Governance Frameworks in Addis Ababa. This milestone aims to create a Digital Single Market by 2030 by harmonising rules for cross-border data flows. Complementing this, the AfCFTA Protocol on Digital Trade (with eight new annexes) establishes a unified regulatory baseline for the continent, ensuring that data protection becomes a facilitator of, rather than a barrier to, intra-African trade.

<sup>21</sup> <https://businessday.ng/news/article/meta-ndpc-resolve-32-8m-privacy-dispute-out-of-court/>

## GLOBAL REGULATORY SHIFTS AND SANCTIONS:

- **EU Digital Omnibus Package:** Proposed in November 2025, this package seeks to simplify the GDPR, clarify the status of pseudonymized data, and curb "abusive" Data Subject Access Requests (DSARs) to reduce administrative burdens on businesses.
- **Billion-Euro Penalties:** High-profile enforcement continues, with TikTok (€530m) and Uber (€290m) facing massive fines for unlawful cross-border data transfers to China and the US, respectively.
- **Post-Quantum Cryptography (PQC):** NIST finalised the first global PQC standards (FIPS 203, 204, and 205) in August 2025. Organisations are now urged to migrate to these standards to defend against "Harvest Now, Decrypt Later" attacks that threaten current encryption methods.
- **Meta Platforms – €479 million (Spain):** Issued in late 2025 by a Madrid court, this fine resulted from Meta's unlawful processing of user data between 2018 and 2023. The court ruled that Meta's "contract necessity" pretext for data harvesting gave it an unfair competitive advantage over Spanish media publishers.
- **Capita plc & Capita Pension Solutions – £14 million (UK):** In October 2025, the UK Information Commissioner's Office (ICO) finalised a £14 million fine (reduced from an original £45 million) following a 2023 cyberattack. The breach exposed sensitive data, including passport images and financial details, of roughly 6.6 million individuals.
- **Sprinter Megacentros del Deporte – €1.56 million (Spain):** The Spanish DPA fined this sporting goods retailer in Q4 2025 for failing to implement sufficient technical security measures and for inadequately informing users after a cyberattack.
- **Finnish SA – S-Bank Fined for Major Authentication Vulnerability:** The Finnish Data Protection Authority imposed a €1.8 million fine on S-Bank following a software bug that allowed customers to log into others' accounts using their own credentials. The investigation revealed that the bank failed to adequately test the new login functionality before deployment and did not respond promptly to customer reports of anomalies. The fine was adjusted after considering a separate penalty from the Financial Supervisory Authority regarding the same incident.
- **Italian SA – Right of Access Fine for Failure to Provide Call Recordings:** Italy's Garante fined a bank €100,000 for failing to fulfil a subject access request from a fraud victim seeking recordings of customer service calls. The Authority reiterated that telephone recordings containing personal data must be provided within the GDPR's 30-day window, even if the request relates to internal bank transfers. This decision highlights the importance of recognising voice recordings as personal data that must be accessible to data subjects.
- **Finnish SA – Aktia Bank Fined for Identity Confusion Disruption:** Aktia Bank was fined €865,000 by the Finnish SA after a technical change to its strong electronic authentication service caused a disruption where users could view the private data of other customers. The regulator found that the bank demonstrated significant shortcomings in its change management and testing procedures, particularly given the sensitive nature of the financial and health data involved. Although the breach was short-lived and affected roughly 350 people, the fine reflects the high standard of care required for authentication services.
- **Italian SA – Sanctions for Nursery School Over Surveillance and Child Photos:** The Italian Garante fined a nursery school €10,000 for publishing sensitive photos of children—including

images of them sleeping and eating—on its website and Google Maps profile without valid legal grounds. The investigation found that the school’s video surveillance system lacked necessary safeguards and that parental consent was neither freely given nor informed, as it was a prerequisite for enrollment. The school was ordered to delete the archived images and immediately cease the unlawful processing.

- French CNIL – Samaritaine Fined for Hidden Workplace Cameras: The French Data Protection Authority (CNIL) fined department store Samaritaine €100,000 for installing cameras disguised as smoke detectors in employee storage areas. The CNIL found that the store failed to conduct a Data Protection Impact Assessment (DPIA), did not consult its Data Protection Officer, and unlawfully recorded audio of employee conversations. The ruling emphasised that while covert surveillance may be used in exceptional circumstances, this specific implementation was disproportionate and lacked the required transparency.

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