

TECHNOLOGY, MEDIA, & TELECOMMUNICATIONS

H1 Report 2026



Introduction

Nigeria's Technology, Media and Telecommunications (TMT) sector has, in recent times, been marked by a surge of commercial and regulatory activities spanning data protection enforcement, cybersecurity-related prosecutions, 5G rollout, internet and platform regulation, digital lending oversight, and the emergence of AI governance frameworks. Collectively, these developments signal a shift from a largely permissive regulatory environment to one of active, multi-agency oversight, with regulators such as the Nigeria Data Protection Commission (NDPC), Nigerian Communications Commission (NCC), Central Bank of Nigeria (CBN), Federal Competition and Consumer Protection Commission (FCCPC) and National Information Technology Development Agency (NITDA) each asserting jurisdiction over various aspects of the digital economy.

The practical effect has been broadly threefold: (i) heightened compliance exposure for operators, as enforcement actions (particularly around data protection and digital lending) have moved from advisory guidance to actual sanctions and prosecutions; (ii) accelerated infrastructure investment, driven by 5G deployment and the broader push to close Nigeria's digital divide; and (iii) growing regulatory convergence around content and platform governance, as authorities extend traditional broadcasting and telecoms frameworks to online and social media platforms. Taken together, these shifts have raised the compliance bar for TMT players, increased transaction and advisory complexity for counsel, and placed Nigeria's regulatory posture more closely in step with global trends on data, AI, and platform accountability.

The Practical Effect — Threefold

i

Heightened Compliance Exposure

ii

Accelerated Infrastructure Investment

iii

Regulatory Convergence on Platforms

News Updates

Obioma Ezenwobodo v Nigerian Communications Commission and MTN Nigeria Communications Plc (FHC/ABJ/CS/643/2025)

– On the validity or otherwise of Nigerian Communications Commission's tariff adjustment.

In January 2025, the Nigerian Communications Commission, in exercise of its statutory powers under the Nigerian Communications Act 2003, approved a 50% upward review of telecommunications tariffs. The Plaintiff challenged this tariff hike at the Federal High Court, Abuja Judicial Division sitting in Abuja. In a ruling delivered by Honourable Justice M.G. Umar on April 24, 2026, the Court dismissed the suit and held that the Plaintiff lacked the locus standi (legal standing) to maintain the action. The effect of the ruling is that the Nigerian Communications Commission's approval of the tariff review is valid, and the Nigerian Communications Commission's regulatory authority over tariff determination remains undisturbed.

MTN Nigeria & Airtel Africa:

Managing Tariff Reforms, Market Pressures and Regulatory Engagements

New Investments

\$1B+

unlocked by NCC tariff approval

— per Aminu Maida, EVC NCC

MTN Nigeria and Airtel Africa are still dealing with a tough environment due to the depreciation of Naira, inflation, and increasing cost of infrastructure. After the approval of the increase in tariffs by the NCC, which was initially 50% but was later reduced after negotiations with the Nigeria Labour Congress, both firms increased their tariffs on a phased basis from February 2025 onwards.¹

As a result, the implementation of the tariff reforms has been accompanied by a dramatic increase in capital spending. In the first six months of 2025, MTN Nigeria spent ₦565.7 billion (\$377.1 million) on infrastructure development; this is 288.4% more than was spent during the same period in 2024.² The operator additionally increased its coverage with 4G network by 2.1% to 84.6%.³ The company's CEO Karl Toriola revealed that MTN invested ₦900 billion in the expansion and maintenance of its network infrastructure in 2025, intending to spend more than ₦1 trillion in 2026.⁴

Just like Airtel, increased spending was evident, as they invested \$39 million in the second quarter of 2025 to improve their network capacity in addition to an additional \$120 million to develop a 38 megawatts data center in Lagos Eko Atlantic that is set to be launched in 2026. According to Aminu Maida, the executive vice chairman of NCC, the approval of the tariff has opened up more than \$1 billion worth of investments by telecom companies.⁵

This trend is also evident in the increase in revenue indicators among the operators, with ARPU for MTN and Airtel increasing by about 32%, despite the increased cost of services.⁶ The regulation discussions that are currently ongoing concerning quality of service, spectrum pricing, and right of way charges are important to note in the industry, especially regarding the issues of incentive to invest against consumer protection.⁷

Starlink expansion: *Nigerian Communications Commission licensing, pricing regulations, and competition implications for incumbent telecoms*

Starlink's rapid expansion in Nigeria has significantly disrupted the broadband market, with the satellite operator emerging as the country's second-largest internet service provider within two years of launch, displacing established fixed-line and mobile competitors in market share. The Nigerian Communications Commission (NCC) has actively enforced tariff compliance against Starlink, having commenced pre-enforcement action in October 2024 after the company unilaterally raised subscription prices without regulatory approval, in contravention of sections 108 and 111 of the Nigerian Communications Act 2003. Incumbent telecom and internet service operators have, in turn, raised competition concerns, arguing that Starlink's rise, alongside the NCC's approval of new satellite licensees, has created an uneven playing field relative to the pricing and infrastructure constraints imposed on terrestrial operators.

Regulatory Anchor

Sections 108 & 111

Nigerian Communications Act 2003 · tariff & pricing approvals

Industry Concern

Unlevel Playing Field

incumbents cite satellite vs. terrestrial obligations gap

AI adoption in Nigeria: *Evolving regulatory landscape*

The rapid adoption of artificial intelligence across Nigerian industries from financial services and healthcare to media and public administration, has outpaced the regulatory framework. While the National Information Technology Development Agency's Draft AI Policy and sector-specific guidance from the Central Bank of Nigeria and Nigerian Communications Commission are emerging, significant gaps remain in AI regulation.

It is however, worth mentioning that the Federal Ministry of Communications, Innovation and Digital Economy (FMCIDE), under the leadership of Honourable Minister Dr Bosun Tijani, took a coordinative rather than a directly regulatory role in AI governance. Its most recent significant move came in early July 2026, when the Ministry directed the NCC, NITDA, and NDPC to suspend enforcement of any new rules on internet platforms, online intermediaries, and other cross-cutting digital economy issues, including AI, until a harmonised national policy is developed.

This followed the NCC's draft Internet Code of Practice of December 2025, which appeared to overlap with NITDA's existing 2022 Code of Practice for Interactive Computer Service Platforms and Internet Intermediaries.

A Joint Technical Coordination Committee, drawing on the NCC, NITDA, and NDPC, has been established under the Minister's oversight to engage industry, civil society, and academia in shaping a coherent regulatory framework.

This builds on the Ministry's earlier work developing Nigeria's National Artificial Intelligence Strategy (NAIS), which was first released in draft form in August 2024. The NAIS sets out a roadmap for the ethical and responsible use of AI, identifying four categories of risk, economic, ethical, societal, and AI model risk, and adopting a risk-management approach modelled on the U.S. NIST AI Risk Management Framework.

The Ministry has also supported the National Digital Economy and E-Governance Bill, which would give regulators formal powers over data, algorithms, and digital platforms, filling the legislative gap that has existed since the 2024 draft strategy. As of early July 2026, the Bill had been passed by the National Assembly and was awaiting presidential assent. In addition, Nigeria was recently named number 1 in Africa (38 globally) by the Global Index on Responsible AI.¹²

Digital Lending Regulation:

FCCPC and CBN Joint Action Against Predatory Lenders: Enforcement in Flux

Through late 2025 and into January 2026, the Federal Competition and Consumer Protection Commission (FCCPC), working alongside the Central Bank of Nigeria (CBN), pursued an enforcement drive against digital lending platforms found to be engaging in predatory practices, under the newly issued Digital, Electronic, Online, or Non-Traditional (DEON) Consumer Lending Regulations 2025. The initiative addressed operators engaged in illegal debt-recovery practices, including borrower harassment and unauthorised access to personal data, resulting in the suspension, revocation, or blacklisting of the operating approvals of dozens of non-compliant lenders.¹⁴

Enforcement was subsequently suspended from April 15, 2026, pursuant to an interim injunction granted by the Federal High Court, Lagos, following a challenge of the validity of the Regulations by the Wireless Application Service Providers Association of Nigeria (WASPAN), who contended that telecoms-backed digital lenders fell outside the FCCPC's regulatory remit and should instead be supervised by the Nigerian Communications Commission (NCC).¹⁵ In a judgment delivered on July 20, 2026, Honourable Justice A.L. Allagoa dismissed WASPAN's originating summons and upheld the validity of the DEON Regulations stating that it was validly made within the FCCPC's statutory and constitutional powers, and consequently discharged the interim order restraining its implementation.¹⁶ The FCCPC has confirmed that the DEON Regulations are now fully operational and enforceable, and that it has resumed their implementation and enforcement.¹⁷ It should however be noted that WASPAN has appealed against the judgment to the Court of Appeal.¹⁸

Pending the appeal, the judgement removes the compliance ambiguity that existed during the suspension period. Fintechs offering digital lending in Nigeria should treat the underlying obligations, registration, transparent loan disclosures, ethical debt-recovery conduct, and data-handling protections as fully binding and actively enforced going forward, and should ensure their debt-recovery practices, data-handling protocols, and consumer-protection frameworks are brought into, or kept in, compliance without further delay.

Nigeria's Digital Economy Policy 2.0:

Government priorities and investment opportunities in the sector

The Federal Government's updated Digital Economy Policy sets out a roadmap for expanding broadband penetration, developing local talent, promoting e-government services, and attracting foreign investment into Nigeria's technology sector. Key priorities include expanding the National Broadband Plan; Project BRIDGE (a Federal Government initiative, led by the Ministry of Communications, Innovation and Digital Economy, to deploy at least 90,000 km of open-access fibre-optic cable nationwide through a public-private Special Purpose Vehicle, extending Nigeria's fibre backbone to roughly 120,000–125,000 km and connecting all 774 Local Government Areas). The estimated \$2 billion project is funded through a mix of sovereign loans and private equity, developing digital infrastructure and promoting indigenous technology companies.¹⁹

DEON
Regulations

2025

Digital, Electronic,
Online, or Non-
Traditional
Consumer Lending

Suspension & Restoration

Enforcement was suspended from 15 April 2026 pursuant to an interim injunction granted by the Federal High Court, Lagos, following WASPAN's challenge.

Regulatory Updates

Nigerian Communications Commission (NCC)

Nigerian Communications Commission's Significant Market Power (SMP) determinations and competition enforcement

The Nigerian Communications Commission continues to monitor market concentration in the telecoms sector, with SMP designations carrying significant regulatory obligations, including non-discrimination requirements and access obligations. Recent developments have implications for how dominant operators price and provide wholesale services, which in turn affect competition and smaller market players.²⁰

This is important for many different parties. From the perspective of the market leader that holds a position with SMP, this is an indication that regulation will continue to keep close tabs on the market leader's pricing and wholesale service access policies, potentially leaving it open to compliance requirements, penalties, or even changes to its commercial practices if it is deemed to be using its market power unfairly. For smaller companies or new market entrants, the implementation of SMP policies can have a direct impact on their ability to access wholesale services fairly.

For financiers, the manner in which SMP cases are enforced provides insight into the regulatory risks and the overall competitive context which will influence their returns from the sector. For consumers, the results of such rulings, especially in relation to wholesale prices like Mobile Termination Rates, will have an impact on their costs of service. Finally, for lawyers and legal advisors, this is an important subject matter as they will be involved in providing advice in relation to licensing and dispute resolution services for their clients.

SMP Toolkit

- Non-discrimination
- Access obligations
- Pricing discipline

Consumer Linkage

Outcomes on wholesale prices, particularly Mobile Termination Rates, ultimately determine end-user service costs — making SMP rulings an issue that travels all the way to the consumer's bill.

National Information Technology Development Agency's Nigeria Startup Act Implementation: Obligations for accredited startups and digital businesses

The Nigeria Startup Act 2022 continues to be implemented, with NITDA playing a central role in accrediting startups and administering the Startup Support and Engagement Portal (SSEP). Accredited startups enjoy tax incentives, simplified regulatory processes, and access to the Startup Investment Seed Fund. As of H1 2026, implementation efforts remain active but incomplete: industry stakeholders, speaking at a joint technical training session in Lagos in May 2026, continued to press for fuller implementation of the Act's fiscal incentives, citing persistent regulatory bottlenecks, limited awareness, and compliance hurdles around the startup labelling process as ongoing barriers to unlocking the Act's full benefits.²¹

E-Governance Bill

Awaiting Presidential Assent

Risk-based AI classification

- · Transparency & algorithmic audits
- · NITDA as a "super-regulator"

National Digital Economy and E-Governance Bill: Key provisions and compliance implications

The National Digital Economy and E-Governance Bill, passed by the National Assembly and awaiting presidential assent, sets out Nigeria's strategic vision for the development and governance of artificial intelligence, alongside broader digital economy and e-governance reforms. Key provisions address AI ethics, data governance, algorithmic accountability, and the responsibilities of AI developers and deployers, including a risk-based classification system for AI systems, mandatory transparency and accredited algorithmic audits, and the elevation of the National Information Technology Development Agency (NITDA) to a "super-regulator" role over algorithms, data governance, and digital platforms.²²

The Bill also introduces AI-specific compliance obligations such as annual risk assessments for systems used in public administration and critical services, and, per earlier drafts, a local content requirement that a minimum proportion of AI research conducted on Nigerian data occur within the country.²³

The development holds relevance for many classes of stakeholders. For startups and founders, accreditation under the Act will continue to serve as the key pathway to tangible benefits such as tax breaks, ease of regulatory compliance, and access to the Startup Investment Seed Fund, and thus should be considered even in light of the perceived delays. Investors and venture capitalists should also pay close attention to how quickly and consistently the Act is implemented in Nigeria as a sign of the country's investment regulations and potential public matching from the Seed Fund.

For existing digital companies and multinational companies operating within the Nigerian startup ecosystem, be it through partnerships, acquisitions, or incubation, knowledge of which entities have Startup Act accreditation can be important in ensuring the structuring of any deal or any preference that might exist as part of that accreditation process. For legal and regulatory advisers, the ever-present gap between the incentives provided by the Act and the reality of their availability becomes a matter of advice: advising clients on how best to navigate the process of accreditation and labelling, and keeping track of any developments in the regulatory space that could close those gaps.

Data localisation requirements and cloud computing guidelines

The National Information Technology Development Agency's updated guidelines, 2026 on cloud computing and data localisation require that certain categories of government data, as well as data relating to Nigerian citizens in sensitive sectors, be stored on servers located within Nigeria. These requirements have compliance implications for multinational companies, cloud service providers, and any business that processes large volumes of personal or government data.

These regulations have implications for a variety of different stakeholders. Multinational corporations and cloud service providers, especially multinational hyperscalers, now have obligations related to compliance with respect to the location of government and citizen data, which may entail investments in local data centers, partnering with Nigerian infrastructure companies, and reconfiguring contracts so that localisation can be achieved. On the other hand, local data center operators and cloud infrastructure providers stand to gain commercially from these regulations, as localisation regulations create a demand for in-country data storage capacity.

For companies handling large amounts of private or governmental data, including banks, hospitals, telcos, and government contractors – the guidelines add another level of data governance requirements that must be considered alongside the Nigeria Data Protection Act 2023. The implications include vendor sourcing, data architecture design, and cross-border data transfer agreements. For government departments and regulatory authorities, the guidelines have been issued as part of wider policy considerations concerning data sovereignty, national security, and digital infrastructure development. For legal and regulatory counsel, this is an area where advisory services could be provided around data protection audits, vendor contract review, and data localisation planning, especially for clients using offshore cloud services.

Practical Implications

Multinational hyperscalers face obligations on data location — potentially entailing local data centre investments, partnering with Nigerian infrastructure operators, and contract reconfigurations. Local data centre operators stand to benefit commercially from the localisation demand.

NBC's jurisdiction over Over-The-Top (OTT) and streaming platforms: regulatory uncertainty and litigation risk

The NBC has asserted regulatory jurisdiction over Over-The-Top (OTT) platforms operating in Nigeria, including Netflix, Showmax, Amazon Prime, and YouTube, on the basis that they provide broadcasting services to Nigerian audiences. This assertion remains legally contestable as the National Broadcasting Commission Act (2004) does not provide for digital streaming.²⁴

Indeed, this legislation gap is causing OTT services and other stakeholders in the industry to function without legal certainty regarding the applicability of the licensing, content, and broadcasting regime of the NBC to them. As the NBC's jurisdictional claim hinges on the interpretation of the concept of "broadcasting" which is not provided explicitly under the enabling Act to include streaming, the taking of any action for non-compliance by the platform, including imposing fines, licensing requirements, or content regulations, could easily be challenged and overturned on jurisdictional grounds. But by then, the damage would already have been done.

This leaves streaming companies with two options to choose from: either assume that the NBC regulatory regime does not apply to them but run the risk of being subjected to enforcement measures in the future, or work towards complying with the NBC regulatory framework ahead of time without having any statutory justification for this course of action. This creates additional regulatory uncertainties for investors who wish to enter the Nigerian streaming industry, which reinforces the importance of clarifying the law, be it through amending the NBC Act or establishing a specific OTT regulation regime.

In Scope

- **Netflix**
- **Showmax**
- **Amazon Prime**
- **YouTube**

NBC Act 2004
(pre-digital)

Option A

Voluntary Compliance

Assume the NBC regulatory regime applies and seek a licence accordingly — limiting litigation exposure but accepting a contested framework.

Option B

Challenge Jurisdiction

Continue operating without a licence and mount a legal challenge to the NBC's jurisdictional reach — preserving operational flexibility but carrying enforcement and litigation risk.

Central Bank of Nigeria's Regulatory Framework for Fintech Operations: Updated licensing categories and capital requirements

The Central Bank of Nigeria has revised its regulatory framework for fintech operators, introducing new licensing categories for Payment Service Providers, Mobile Money Operators, and Digital Finance Institutions, alongside updated capital requirements and operational standards. Fintech companies must review their licensing status to ensure alignment with the new framework and ensure that their operations comply with updated Central Bank of Nigeria guidelines on consumer protection, Anti-Money Laundering (AML) and Combating the Financing of Terrorism (CFT), and technology risk management.

CBN Circular

15 June, 2026

PSS/DIR/PUB/
CIR/001 · UBO &
data localisation

SEC's proposed Digital Assets Rules: Registration of Virtual Asset Service Providers (VASPs)

The Securities and Exchange Commission (SEC) has formalised the regulatory framework requiring all Virtual Asset Service Providers (VASPs) operating in Nigeria, including cryptocurrency exchanges, digital asset custodians, and token issuers, to register with the SEC and comply with AML/CFT requirements, investor protection standards, and capital adequacy rules. With the enactment of the Investments and Securities Act (ISA) 2025, virtual assets are now formally recognised as securities, with the SEC as the substantive regulatory authority for registering VASPs.

Central Bank of Nigeria circular on disclosure of Ultimate Beneficial Ownership and Data Localisation Requirements for Financial Institutions

On June 15, 2026, the Central Bank of Nigeria (CBN) issued a Circular referenced PSS/DIR/PUB/CIR/001/004, introducing new compliance obligations for financial institutions, such as the disclosure of ultimate beneficial ownership by financial institutions, market structure requirements and the localisation of payment transaction data in Nigeria.

The circular has significant implications for the TMT sector, particularly in relation to data governance, cloud infrastructure, and cross-border data flows. By requiring localisation of payment transaction data and Ultimate Beneficial Ownership (UBO) disclosure, the framework seeks to strengthen regulatory oversight, improve cybersecurity resilience, and safeguard sensitive financial data.

Advisory Opportunity

Reviews spanning vendor selection, contracting, data architecture and UBO mapping are now baseline client needs. Advisory practice around cross-border data transfer agreements, regulatory licensing pathways and partnership structuring are likely to see sustained demand through the remainder of 2026.

Publications

The ‘Super-Regulator’ Era: Navigating the 2026 Nigerian Digital Economy Framework

Authors: Okechukwu Ekweanya,
Elizabeth Aghaulor and Munachimso Ochiabutor

The article analyses Nigeria's proposed **National Digital Economy and E-Governance Bill**, which seeks to expand the National Information Technology Development Agency's authority as a digital-sector "super-regulator" with powers to issue binding regulations across areas such as AI, cybersecurity, cloud computing, and digital payments. It highlights the Bill's proposed Africa's first comprehensive AI governance framework, including risk-based regulation, transparency requirements for high-risk AI systems, mandatory human oversight of significant automated decisions, annual AI impact assessments, and regulatory sandboxes for innovators.

Published: [KENNA website](#) | [Lexology](#)

Strategic Legal Considerations under the Internet Code of Practice 2026

Authors: Okechukwu Ekweanya,
Chidera Mbaogu and Chinemenma Igbokwe

This Article highlights the key provisions of the 2026 Code and the Guidance Notes, drawing attention to the changes introduced relative to the 2019 Code, as well as practical actions that telecommunications companies ought to consider.

Published: [KENNA website](#)

EU AI Act Prohibited Practices for Nigerian Developers

Authors: Okechukwu Ekweanya,
Elizabeth Aghaulor and Olusola Odeku

This Article discusses the impact of the EU's AI Act on Nigerian AI developers, as the law not only applies to companies based in Europe but also to developers whose AI systems are used within the EU.

The Article focuses on the Act's eight prohibited AI practices: manipulative AI, exploitation of vulnerabilities, social scoring, emotion recognition in schools and workplaces, predictive criminal profiling, biometric categorisation for sensitive attributes, certain facial recognition technologies, and real-time remote biometric identification in public spaces.

Published: [KENNA website](#) | [BusinessDay](#) | [Lexology](#)

Nigerian Communications Commission Tightens Oversight of Ownership Changes in Communications Companies

Authors: Eunice Alasa, Sonia Onyia and
Jessica Obodo-Elue

This article discusses the impact of the joint press statement issued by the Nigerian Communications Commission (NCC) and the Corporate Affairs Commission (CAC), which introduced a significant compliance requirement for communication companies operating within Nigeria. This requirement is made pursuant to Section 90 of the Nigerian Communications Act 2003, Regulation 28(2) of the Nigerian Communications Commission (Competition Practices) Regulations 2007, and Regulation 42 of the Nigerian Communications (Licensing) Regulations 2019, which collectively empower the NCC to review and oversee transactions affecting licensees and to safeguard competition within the communications industry.

Published: [KENNA website](#)

Data Breach Response:

After the Breach — Legal Strategies for Response, Recovery & Resilience

Authors: Okechukwu Ekweanya, Sonia Onyia and Okenna Onyelu

This article explores data breaches and analyses the requisite procedures for responding to breaches in accordance with applicable data protection laws in Nigeria, as well as the preventive measures necessary to safeguard controlled personal data.

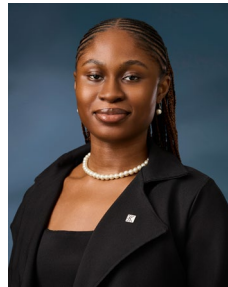
Published: [KENNA website](#) | [BusinessDay](#) | [Lexology](#)

Contributors



Okechukwu Ekweanya

Partner



Omowonuola Bamigboye

Associate



Ujunwa Agbanelo

Associate



Victory Uhunmwangho

Associate

Endnotes

1. 'Nigeria: As Telcos Begin ImplementaPercent Hike in Telecoms Tariff' (allAfrica, 23 February 2025) <https://allafrica.com/stories/202502240583.html> tion of 50 accessed 14 July 2026.
2. 'Operators Pour \$1 Billion into Nigeria's Telecoms After Tariff Hike' (TechCabal, 18 August 2025) <https://techcabal.com/2025/08/18/operators-pour-1-billion-into-nigerias-telecoms-after-tariff-hike/> accessed 14 July 2026.
3. 'MTN, Airtel ARPU Jumps 32% After Tariff Hike, But Consumers Bear Cost' (TechCabal, 20 August 2025) <https://techcabal.com/2025/08/20/nigeria-telcos-arpu-rises-31-percent/> accessed 14 July 2026.
4. Ibid.
5. n. 2
6. n. 3
7. Emma Okonji, 'Of Telecoms Tariff and Quality Service Delivery' THISDAY (Lagos, 21 May 2026) <https://www.thisdaylive.com/2026/05/21/of-telecoms-tariff-and-quality-service-delivery/> accessed 13 July 2026.
8. 'Elon Musk's Starlink Is Taking Over Nigeria's Internet Market' (Rest of World, 13 August 2025) <https://restofworld.org/2025/starlink-nigeria-internet-elon-musk/> accessed 13 July 2026.
9. Nigerian Communications Commission, 'Press Statement: NCC Commences Pre-Enforcement Action on Starlink over Price Hike' (NCC, 2024) <https://ncc.gov.ng/node/662> accessed 13 July 2026.
10. n. 3
11. National Information Technology Development Agency, National Artificial Intelligence Strategy (Federal Ministry of Communications, Innovation and Digital Economy, September 2025) <https://ncair.nitda.gov.ng/wp-content/uploads/2025/09/National-Artificial-Intelligence-Strategy-19092025.pdf> accessed 13 July 2026.
12. 'Nigeria Ranks First in Africa in 2026 Global Responsible AI Index' (TechAfrica News, 10 July 2026) <https://techafricanews.com/2026/07/10/nigeria-emerges-among-global-leaders-in-responsible-ai-governance/> accessed 14 July 2026.
13. Federal Competition and Consumer Protection Commission, 'Digital Lending: FCCPC Tackles Abuses, Issues Landmark Regulations' (FCCPC, 3 September 2025) <https://fccpc.gov.ng/digital-lending-fccpc-tackles-abuses-issues-landmark-regulations/> accessed 13 July 2026.
14. 'FULL LIST: Illegal Loan Apps Delisted by the FG (Updated 2026)' (NairaCompare, 16 April 2026) <https://nairacompare.ng/blogs/full-list-illegal-loan-apps-delisted-by-the-fg-updated-2026> accessed 13 July 2026.
15. Wireless Application Service Providers Association of Nigeria Ltd/Gte v Federal Competition and Consumer Protection Commission, Suit No FHC/L/CS/760/2026 (FHC, Lagos, interim order, April 2026) (unreported).
16. Damilola Aina, 'FCCPC resumes digital lending regulation after court victory' [2026] <https://punchng.com/fccpc-resumes-digital-lending-regulation-after-court-victory/?utm_source=rss.punchng.com&utm_medium=web#google_vignette> accessed 21 July 2026
17. Ibid
18. <https://guardian.ng/news/waspan-appeals-fccpc-consumer-lending-verdict/> <accessed 27 July 2026
19. Federal Ministry of Communications, Innovation and Digital Economy, 'Project Bridge' (FMCIDE) <https://fmcide.gov.ng/project-bridge/> accessed 13 July 2026.
20. 'Balancing Costs and Competition: Will MTR Review Rattle Telcos, Consumers?' (The Guardian Nigeria, 29 June 2026) <https://guardian.ng/technology/balancing-costs-and-competition-will-mtr-review-rattle-telcos-consumers/> accessed 13 July 2026.
21. 'Experts Seek Start-up Fiscal Incentive Implementation' (The Guardian Nigeria, 22 May 2026) <https://guardian.ng/business-services/experts-seek-start-up-fiscal-incentive-implementation/> accessed 13 July 2026.
22. Tech Hive Advisory, 'Nigeria: A 2025 Retrospective and 2026 Outlook' (Tech Hive Advisory, 29 December 2025) <https://www.techhiveadvisory.africa/insights/nigeria-a-2025-retrospective-and-2026-outlook> accessed 13 July 2026.
23. Ibid
24. International Comparative Legal Guides, 'Telecoms, Media & Internet Laws and Regulations Report 2026: Nigeria' (ICLG, 15 December 2025) <https://iclg.com/practice-areas/telecoms-media-and-internet-laws-and-regulations/nigeria/> accessed 13 July 2026.



CONTACT

LAGOS

Kenna Place
8, Ogunyemi Road, Palace
Way, Oniru PO Box 73002,
Victoria Island,
Lagos

ABUJA

1st Floor, Novare Central,
Plot 502 Dalaba Street,
Wuse Zone 5, FCT 900285,
Abuja

ENUGU

Michael Place
3, Emmanuel Ngwu Street,
Thinker Corner, 400211
Enugu State.

+234 811 395 1052, +234 811 395 1053 | counsel@kennalp.com | www.kennalp.com