

EASYPAY INTERNATIONAL SERVICES LTD

DATA PROTECTION AUDIT REPORT

MARCH, 2025

3Consulting

EXECUTIVE SUMMARY

3CONSULTING LIMITED, a licensed Data Protection Compliance Organization (DPCO), offers a comprehensive array of services encompassing various privacy disciplines. These include compliance assessments, training, program design, policy development, auditing, consulting, and other services aimed at ensuring adherence to the Nigeria Data Protection Act (NDPA) and any relevant foreign data protection laws or regulations applicable in Nigeria, as stipulated under Article 33 of the NDPA.

This audit aimed to verify the adequacy of EASYPAY's technical and organizational measures in guaranteeing compliance with the Nigeria Data Protection Act (NDPA). Additionally, it aimed to evaluate the EASYPAY monitoring mechanisms for assessing the efficacy of compliance with established policies and procedures. The audit encompassed the following scopes and descriptions:

SCOPE	DESCRIPTION
Governance & Accountability	The extent to which information governance accountability, policies and procedures, performance measurement controls, and reporting mechanisms to monitor data protection compliance to NDPA is in place and in operation throughout the organization
Awareness & Training	The provision and monitoring of staff data protection, records management and information security training, including awareness of data protection regulation requirements relating to their roles and responsibilities.
Data Processing and Sharing	The design and operation of controls to ensure processing and sharing of personal data complies with the principles of NDPA.
Administration	Managing/handling all aspects of data protection procedures, and practices digitally.
Capturing	The process of collecting and acquiring data in a secure and compliant manner digitally. This involves capturing data from various sources, such as internal systems, external databases, or third-party vendors, while adhering to established data protection policies and procedures.
Actions On Security	Measures to safeguard data from unauthorized access, breaches, and misuse. This includes establishing access controls, authentication mechanisms, and authorization processes to ensure only authorized personnel can access and modify data.

The scope may take into account any data protection issues or risks which are specific to EASYPAY, and/or any data protection issues or risks which affect their specific sector or organizations more widely. It aims to address future data privacy and protection technology needs, assess the current technology stack, and pinpoint any deficiencies in basic functionality related to data privacy and protection.

AUDIT SUMMARY

Audit Scope Area	Assurance Rating	Overall Opinion
Governance & Accountability	High	The organization has established a robust governance and accountability framework, with policies and procedures designed to safeguard personal information. However, areas for improvement have been identified, and recommendations have been provided to enhance compliance and ensure the proper handling of personally identifiable information.
Awareness & Training	Reasonable	The organization's staff awareness and training programs provide a reasonable level of assurance in data protection compliance. However, further improvements are necessary to strengthen these initiatives and reinforce compliance practices.
Data Processing & Sharing	High	The organization demonstrates a high level of assurance in its data processing and sharing practices, maintaining strong compliance with data privacy regulations.
Administration	High	The organization has a high level of assurance in the scope of administration, having the relevant controls in place to handle data across stated platforms.
Capturing	High	The organization has a high level of assurance in the scope of capturing, from collection, processing, and storage of data.
Action On Security	High	The organization has a high level of assurance in the scope of information security across all stated platforms.

GENERAL SUMMARY

EASYPAY has demonstrated a level of compliance with the NDPA requirements by engaging the services of the DPCO (3Consulting) prior to their 2024/2025 data privacy audit to ensure compliance.

The audit was conducted following 3Consulting's data protection audit methodology. The key elements of this audit are:

- Questionnaire;
- Interview with staff;
- Review of website;
- Review of previous audit report.

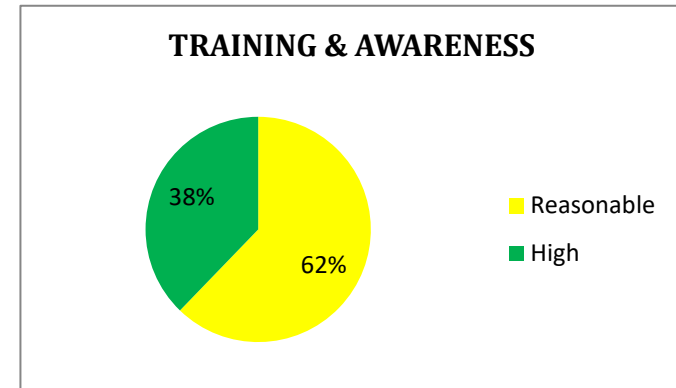
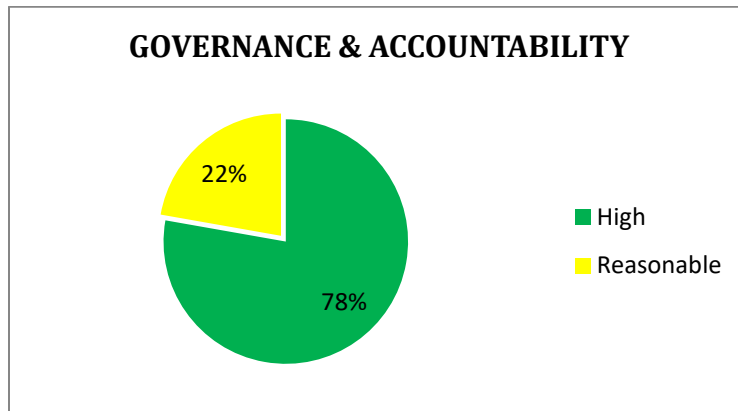
PRIORITY RECOMMENDATION

High
Reasonable
Limited
Very Limited

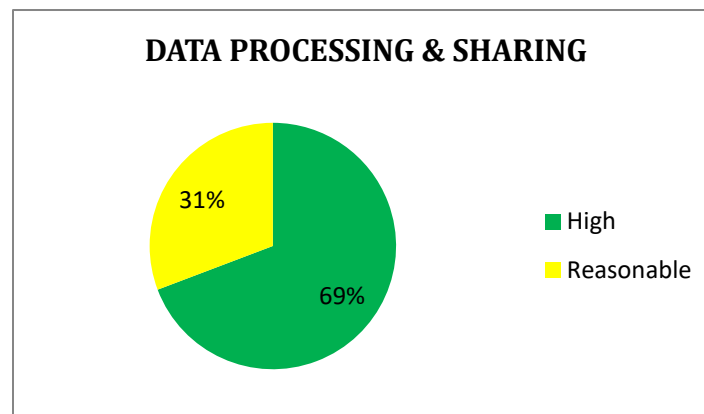
The bar chart shows a breakdown of the priorities assigned to our recommendations.

CHARTS & GRAPHS

The Pie charts below show the summary of the percentage breakdown of the assurance rating given for the governance & accountability and training & awareness scope.

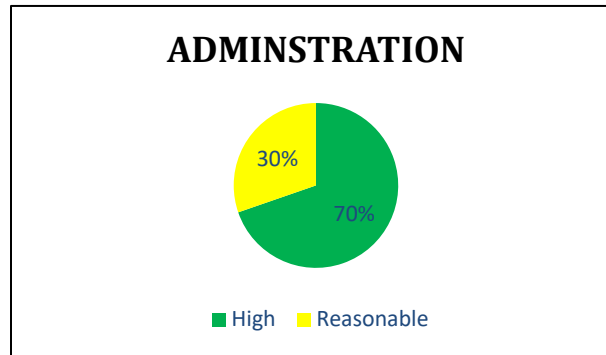


The Pie chart below shows the summary of the percentage breakdown of the assurance rating given for the data processing and sharing scope.

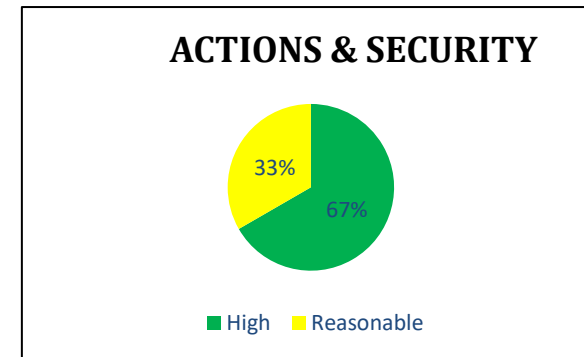
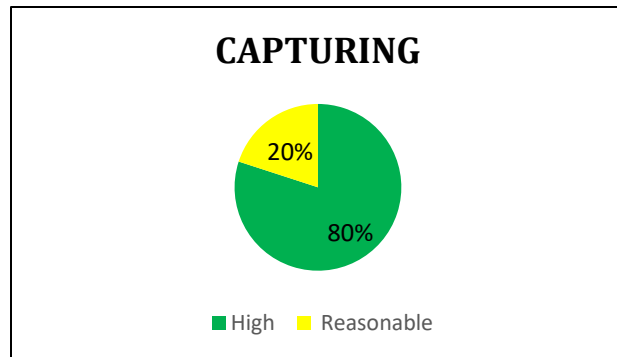


CHARTS & GRAPHS

The Pie chart below shows the summary of the percentage breakdown of the assurance rating given for the Administration scope



The Pie chart below shows the summary of the percentage breakdown of the assurance rating given for the Capturing and Action on Security scope.



ORGANIZATION		EASYPAY BILL	
DATA PROTECTION OFFICER (DPO)		Lucky Omonedo	AUDIT REF- EASYPAY 002NDPA
SECTOR		Fintech	
EMAIL OF DPO		lucky.omonedo@easypaybills.ng	
GOOD PRACTICE			
EASYPAY has reaffirmed its commitment to compliance with the Nigeria Data Protection Act by engaging a specialized data protection compliance organization. This engagement focuses on an Implementation Review to evaluate the effectiveness of previously recommended measures, ensuring continuous improvement and sustained compliance. Additionally, it includes the review and development of robust data protection policies, comprehensive compliance audits, and targeted training programs, reinforcing EASYPAY’s dedication to maintaining the highest standards of personal information security.			
AREAS FOR IMPROVEMENT			
DETAILS OF OBSERVATION			
1.0	The privacy policy on the website does not reflect the NDPA and does not address the right of data subjects.		
1.1	A requirement to create a procedure for protecting data subjects’ privacy by including all aspects of privacy issues in the design of products, services, business processes, and physical infrastructures. There is a recommendation for a privacy-by-design program to help build and strengthen this business approach.		
1.2	There is no indication of any control in place to prevent unauthorized access or modification of data during processing		
SUMMARY OF AGREED CORRECTIVE ACTIONS			
Item	Action by	Corrective action to be taken	
1.0	EasyPay	The privacy policy should be updated to align with the NDPA and reviewed to ensure it comprehensively addresses data subjects' rights, including access, rectification, erasure, and objection to processing.	
1.1	EasyPay	Appropriate systems and mechanisms must be in place to ensure consent is obtained, recorded, and managed in compliance with applicable data protection regulations.	
1.2	EasyPay	Organizations should establish a structured procedure to embed data privacy considerations into the design of products, services, business processes, and physical infrastructures. Implementing a privacy-by-design framework will ensure that privacy risks are proactively identified and addressed, fostering a culture of compliance and data protection from the outset. It is recommended that a formal privacy-by-design program be adopted to reinforce this approach and enhance overall data governance.	

1.3	EasyPay	There should be indication of a control in place to prevent unauthorized access or modification of data during processing	
AUDIT CLOSED			
	DP Auditors	Grace Nwokoye Ifunanya Onyiriagwu Victor Ovie-Whiskey Abinusawa Opeyemi	
	DPO	Lucky Omonedo	

Disclaimer

The issues raised in this report are the only ones that came to our attention during the audit and aren't necessarily an exhaustive list of all the things that need to be done better.

The management of EASYPAY is in charge of making sure that sufficient governance and internal control mechanisms are in place.

While we take every precaution to make sure that our audit report is fair and accurate, we cannot accept responsibility for any loss or damage experienced by any person or organization, including a third party, as a result of using this report, regardless of how such loss or damage was created. We disclaim responsibility for any harm caused by any person or organization, including a third party, as a result of their acting or abstaining from acting based on the information in this report.

This report is an exception report that is intended only for EASYPAY. The audit report is not meant to be compared to any other audit reports because the audit's scope areas and controls were specifically customized to EASYPAY.