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IBA Intellectual Property, Communications
and Technology Law Committee

Digital Regulations in the Metaverse Era

NIGERIA

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Data

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1. Are there any data (personal and non-personal) policies, strategies or regulations applicable to the metaverse in your jurisdiction?

Nigeria does not have any specific legislation applicable to the metaverse. However, existing laws can be applied to address various data aspects of the metaverse, as follows:

- the Nigerian Data Protection Act 2023 (NDPA), which aims to provide a legal framework for the protection of personal information and establishes the Nigeria Data Protection Commission (NDPC) for the regulation of the processing of personal information;
- the Nigerian Data Protection Regulation (NDPR), which complements the NDPA; where the NDPA is silent on an data issue, the provisions of the regulation apply;
- the Implementation Framework for the NDPR, which serves as a guide for data controllers and administrators/processors to understand the standards required for compliance within their organisations;
- the National Information Technology Development Agency (NITDA) Code of practice for Interactive Computer Service Platforms/Internet Intermediaries, which sets out best practices for interactive computer service platforms/internet intermediaries that aim to make the digital ecosystem safer for everyone and sets out measures to combat online harms, such as disinformation and misinformation. The code applies to all interactive computer service platforms, including their subsidiaries, affiliates and agents in Nigeria;
- the Guidelines for the Management of Personal Data by Public Institutions in Nigeria, which apply to all public institutions, corporations, publicly funded ventures and incorporated entities with government shareholding, mandating them to protect the personal data of data subject in all instances of processing such data; and
- the Constitution of the Federal Republic of Nigeria 1999 (as amended), namely Section 37 of the constitution, which guarantees that all citizens have a fundamental right to privacy.

Sectoral laws

In addition to the above, there are sector-specific laws that regulate data protection matters, such as the following:

- the Child Rights Act 2003, which emphasises the protection of children's privacy and data rights, ensuring their welfare and safeguarding them against exploitation in digital environments;
- the Consumer Code of Practice Regulations 2007 (otherwise known as the Nigerian Communications Commission (NCC) Regulations), which outline provisions for consumer data protection, including privacy rights and fair practices in the provision of telecoms services;
- the Consumer Protection Framework 2016, which encompasses measures to protect consumer data and privacy, promote transparency and accountability, and fair treatment in commercial transactions.
- the Cybercrimes (Prohibition, Prevention, etc) Act 2015, which addresses various forms of cybercrime, including unauthorised access to data, fraud and identity theft, with the aim of safeguarding individuals' privacy and security online; and
- the National Identity Management Commission (NIMC) Act 2007, which establishes guidelines for the management of national identity data, ensuring its security and confidentiality, while protecting individuals' privacy rights in regard to identity-related matters.

Regional laws

Article 16 of the NDPR provides that where the NDPR 2019 and its implementation framework do not provide for a data protection principle or process, the African Union Convention on Cyber Security and Personal Data Protection (Malabo Convention') 2014 and the European Union's General Data Protection Regulation (GDPR) and its judicial interpretations shall be of persuasive effect in Nigeria. The Supplementary Act A/SA.1/01/10 on Personal Data Protection within the Economic Community of West African States (ECOWAS) is also applicable.

2. How are the various personal and non-personal data associated with the metaverse protected in your jurisdiction?

There are no specific measures in place to protect personal and non-personal data associated with the metaverse in Nigeria. However, there are legal measures in place to safeguard personal information. The NITDA issued the NDPR in 2019. This regulation acts as the foundation for data protection in the country and requires that data processing is lawful, fair and only carried out with the consent of the individual whose data is being collected.

A more recent development is the NDPA, which came into effect in June 2023. This Act is expected to supersede the NDPR and offer a more comprehensive framework for data protection. While the specifics of the NDPA are still emerging, it is likely that it will build on the principles established by the NDPR.

Generally, consent, as provided in section 26 of the NDPA, is crucial and individuals generally have the right to decide whether their personal data is collected and processed. In addition, the purpose of the processing matters, as data collection and use can only occur for specific and lawful reasons, which have been explained beforehand to the data subject. Nigeria operates a 'Your Data, Your Rights' policy, pursuant to section 34 of the NDPA, whereby data subjects have the right to access, correct, erase and restrict the processing of their personal data. Furthermore, security is paramount as organisations that collect data (known as data controllers) are responsible for implementing appropriate technical and organisational safeguards to protect the data from unauthorised access, disclosure, alteration or destruction.

3. Who are the different stakeholders involved in the data value chains in the metaverse and, in the case of personal data, what are their data protection roles? How are their activities regulated under regional/national policies, strategies or regulations?

The different stakeholders are set out below.

Data subjects/users

The user of a metaverse platform is obligated by the NDPA to mitigate data protection breaches, where feasible (see section 40(3) of the NDPA). The user is also obligated to respect the privacy rights of other users as provided by the Constitution and to abide by the data protection laws in operation.

Metaverse platform providers

Where the metaverse is a central platform, the owners or entity managing the platform can be described as a data controller/processor and, as such, they are responsible for complying with the data protection laws in operation in Nigeria. However, where the metaverse is a decentralised platform, it is challenging to ascribe the data controller/processor and the corresponding data protection roles.

The activities of stakeholders are regulated by the various data protection laws. The NDPC is the body responsible for ensuring that entities subject to the NDPA are in compliance with the obligations.

Q 4. In relation to personal data, what are the data protection principles (eg, transparency) applicable on the metaverse? What are the most common types of infringement of data protection principles in the metaverse (eg, data minimisation) in your jurisdiction?

Pursuant to section 24(1) of the NDPA, the data protection principles applicable to the metaverse are the principles of lawfulness, fairness, adequacy, accuracy, specificity, storage and security.

It is important to note that the metaverse represents a rapidly evolving domain, with no established regulations specific to the metaverse. There are also no reported use cases involving the metaverse in Nigeria and, as such, it is difficult to ascertain the most common types of infringements of the data protection principles in regard to its use.

However, the prevailing data protection principles in the NDPR and the emerging NDPA are likely to be applicable to the metaverse. Potential areas of concern, based on these principles, include:

- data minimisation, more specifically the metaverse may gather excessive user data, surpassing what is necessary for the virtual experience, such as complete browsing history or biometric information;
- purpose limitation, more specifically the data collected within the metaverse might be utilised beyond the purposes disclosed and the purpose for which consent has been given, such as using avatar creation data for undisclosed advertising;
- transparency, more specifically users may lack clear information on data collection and use within the metaverse, including the extent of the data collection and who has access to such data;
- security, more specifically insufficient safeguards may leave metaverse user data vulnerable to unauthorised access or misuse due to weak security measures or data breaches; and
- user control, more specifically users may face challenges in exercising control over their data within the metaverse, including difficulties in accessing, rectifying or deleting their data.

Please note that this list is not exhaustive and, as the metaverse evolves, new data protection challenges may arise. Regulatory bodies such as the NITDA and the new enforcement body to be established under the NDPA will need to provide specific guidance for the virtual world.

The sanctions applicable to breaches of the data protection principles include:

- remedying the violation;
- ordering the payment of compensation to the data subject;
- accounting for profits realised from the violation;
- payment of a penalty remedial fee; and
- payment of fine, imprisonment for a term not more than one year or both, where the data controller or processor fails to comply with orders issued by the NDPC.

While data protection regulations are becoming increasingly important in Nigeria, the field is still relatively new. To date, there is not much case law or many decisions by regulators regarding infringements of the data protection principles.

Q 5. In relation to non-personal data, how is data sharing/licensing regulated in your jurisdiction? Is data ownership recognised? How is proprietary information, including any rights to datasets regulated in your jurisdiction? What are the most common types of infringement of these rules in the metaverse (eg, unlawful use of proprietary information) in your jurisdiction?

There are no specific regulations regulating non-personal data sharing/licensing in Nigeria.

Nigeria does not have any specific law or regulation addressing the ownership of personal data in Nigeria. The current data protection regulatory framework, as highlighted in previous questions, is focused on personal data.

There are no regulations in Nigeria addressing proprietary information, including any rights to datasets.

6. Are there any policies, strategies or regulations applicable to digital marketing in the metaverse in your jurisdiction?

There are no specific laws or policies regulating digital marketing in the metaverse. However, the general regulatory framework on advertising (including digital marketing) in Nigeria may apply, which includes:

- the Advertising Regulatory Council of Nigeria (ARCON) Act 2022, which regulates all forms of advertising (whether online or terrestrial) and marketing communications by the Nigerian advertising industry. Section 2(2) of the ARCON Act states that the Act applies to any individual, organisation, body corporate or agency of the government that engages in, regulates, sponsors or benefits from the use advertising services, advertisements and marketing communication services. It also applies to any person who sponsors or benefits from any advertisement or marketing communication service;
- the Nigerian Code of Advertising Practice and Sales Promotion and other rights/restrictions on such practices;
- the Federal Competition and Consumer Protection Act 2018; and
- the Standards Organisation of Nigeria Act 2015.

Section 57 of the ARCON Act stipulates penalties for violations of the obligations, which includes:

- a penalty of NGN 500,000;
- the Advertising Regulatory Council can direct a violator to pay compensation to any person who has suffered a direct loss as a result of the contravention;
- court action; and
- damages.

There is no reported case law or any decisions by a regulator regarding infringements of the digital marketing rules. However, in 2022, ARCON sued Meta (the parent company of Facebook, Instagram and WhatsApp) before the Federal High Court of Nigeria over a violation of the digital advertising laws and for loss of revenue as a result of Meta's continued display of unapproved adverts on its platforms.¹

7. Are there any policies, strategies or regulations in your jurisdiction focused on ensuring protection of minors' data? What is the age of consent for data protection purposes? Is it necessary to verify the consent provided by a responsible adult?

Section 31 of the NDPA provides a framework for the processing of children's data. When dealing with the data of a child or minor, the data processor is required to obtain consent from the legal guardian or parent of the child or minor. It also is fitting for the data processor to carry out age verification to ensure that the data belongs to a person above

¹ Bolanle Olabimtan, 'Court grants ARCON leave to summon Meta in N30bn suit over "violation of advert laws"', 3 May 2023, <https://www.thecable.ng/court-grants-arcon-leave-to-summon-meta-in-n30bn-suit-over-violation-of-advert-laws> accessed on 4 July 2024.

the age of 18, taking into consideration the available technology. In addition, Section 31(5) requires the NDPC to put in place regulations in relation to the processing of personal data and the provision of information and services by electronic means at the specific request of a child.

The age of consent for children for data protection purposes is 18 years old.²

The law is silent on the issue of verifying consent, as the burden of proof for establishing a data subject's consent is on the data controller (see section 26(1) of the Nigerian Data Protection Act 2023).

8. How are international data transfers regulated in your jurisdiction? Is there any case law or are there any decisions by a regulator regarding infringements of these rules in your jurisdiction?

The NDPR is the principal regulation for the time being on the regulation of international data transfers. Article 2.11 of the NDPR requires that any transfer of personal data to a foreign country must be carried out with the supervision of the Honourable Attorney General of the Federation (AGF) and is subject to an adequacy decision by the NITDA or the NDPC.

Furthermore, the data controller or administrator that intends to transfer the personal data to a foreign country must satisfy the following conditions:

- obtain the data subject's consent;
- inform the data subject, prior to obtaining their consent, of the possible risks of the international transfer;
- satisfy the requirement that the international transfer of data is necessary for the conclusion or performance of a contract concluded in the interest of the data subject between the data controller and another natural or legal person;
- the international transfer is necessary for important reasons of public interest;
- the international transfer must be necessary for the establishment, exercise or defence of legal claims;
- where the data subject is physically or legally incapable of providing consent, then the foreign transfer must be necessary in order to protect the vital interests of the data subject or that of other persons; or
- where the data subject is answerable in a duly established civil or criminal legal action/claim in the foreign country.

In West Africa, under Article 36 of the Supplementary Act A/SA.1/01/10 on Personal Data Protection within ECOWAS, a data controller can only transfer personal data to a non-member ECOWAS country, where such a country provides an adequate level of protection in regard to privacy, freedoms and the fundamental rights of individuals in relation to the processing or possible processing of such data.

There is no reported case law nor any decisions by a regulator regarding the infringement of these rules in Nigeria.

9. How is automated decision-making regulated in your jurisdiction? Is there any case law or are there any decisions by a regulator regarding infringements of the rules applicable to automated decision-making in your jurisdiction?

In Nigeria, pursuant to section 37 of the NDPA, all data subjects have the right not to be subject to automated decision-making. This right is unavailable to a data subject where the automated decision is:

2 Nigerian Data Protection Act, s 65; Child's Rights Act, s 18; Cybercrimes (Prohibition, Prevention, etc) Act, s 23.

- necessary for entering into or the performance of a contract between the data subject and a data controller;
- authorised by a written law, which establishes suitable measures to safeguard the fundamental rights and freedoms and interests of the data subject; or
- authorised by the consent of the data subject.

10. What rights are granted to individuals for protecting their rights on the metaverse and how can they exercise them? What is the level of enforcement based on private claims in your jurisdiction?

Recourse is made to the general data protection policies and regulatory framework already highlighted above, pursuant to section 34 of the NDPA. Data subjects (individuals whose personal data are collected) in Nigeria have several rights under the NDPA, which builds on the principles established in the NDPR, namely:

- the right to be informed about how their personal data are being collected, used and stored. This includes information about the data controller (the organisation collecting the data), the purpose of the processing, the categories of data collected and the recipients of their data;
- the right to access their personal data held by a data controller. This allows the data subject to verify the accuracy of the data and ensure it is being processed lawfully;
- the right to rectification of any errors or inaccuracies in their personal data, which can be corrected or updated on request;
- the right to erasure (the right to be forgotten). Under certain circumstances, the data subject can request that their personal data is erased by the data controller. This might apply if the data is no longer necessary for the purposes for which they were collected, or if consent has been withdrawn;
- the right to restrict or object to the processing of personal data in certain situations. This could involve limiting the use of data for specific purposes or preventing its disclosure to third parties;
- the right to data portability. The data subjects can request to receive their personal data in a structured, commonly used and machine-readable format. This allows them to easily transfer their data to another data controller if desired;
- the right to object to the processing of personal data for marketing purposes or where processing is based on legitimate interests; and
- the right to lodge a complaint. If a data subject believes their data protection rights have been violated, they have the right to lodge a complaint with the NDPC, the regulatory body responsible for enforcing the NDPA.

There are no recorded cases involving private claims in regard to the metaverse and, as such, the level of enforcement cannot be assessed.

11. Are there any upcoming policies, strategies or regulations that will impact the use of data on the metaverse?

There are none at the moment.

Cybersecurity

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1. Are there any cybersecurity policies, strategies or regulations applicable to the metaverse in your jurisdiction?

Yes, the Cybercrimes (Prohibition, Prevention, etc) Act 2015 is relevant. The objective of the Act, as set out in section 1, is to:

- provide an effective and unified legal, regulatory and institutional framework for the prohibition, prevention, detection, prosecution and punishment of cybercrimes in Nigeria;
- ensure the protection of critical national information infrastructure; and
- promote cybersecurity and the protection of computer systems and networks, electronic communications, data and computer programs, intellectual property (IP) and privacy rights.

The Act is applicable throughout Nigeria (section 2).

2. What are the security-by-design (physical and digital interfaces) principles applicable to the metaverse in your jurisdiction?

There are no established security-by-design principles applicable to the metaverse in Nigeria.

3. Have there been any cyber incidents in the metaverse in your jurisdiction? How do any related policies, strategies or regulations react to cyber incidents?

There are no reported cases of cyber incidents in the metaverse in Nigeria.

The Cybercrimes (Prohibition, Prevention, etc) Act 2015 is the piece of legislation that provides an effective and unified legal, regulatory and institutional framework for the prohibition, detection, prosecution and punishment of cybercrimes in Nigeria. It ensures the protection of critical national information infrastructure and promotes cybersecurity and the protection of computer systems and networks, electronic communications, data and computer programs, IP and privacy rights.

Cyber incidents, such as hacking, denial-of-service attacks, the infection of IT systems with malware and phishing attacks, are treated as an offence under the Act and perpetrators of such crimes are heavily penalised. Some of the punishments include:

- for hacking, section 6(1) of the Act stipulates a penalty of up to seven years' imprisonment, a fine of up to NGN 7m, or both a fine and imprisonment;
- for denial-of-service attacks, section 8 of the Act stipulates a penalty up to two years imprisonment or a fine up to NGN 5m, or both a fine and imprisonment;

- for phishing, section 32(1) of the Act stipulates a maximum penalty for this offence of three years' imprisonment, a fine of NGN 1m or both;
- for spamming with intention of disrupting operations, section 32(2) of the Act stipulates a maximum term of three years' imprisonment, a fine of NGN 1m, or both; and
- for the infection of IT systems with malware, Section 32(3) of the Act stipulates a maximum penalty for this offence of three years' imprisonment, a fine of NGN 1m, or both.

There is a lot of case law on cyber incidents in Nigeria, with the exception of the metaverse. Such cases although unreported are discussed on several reputable news platforms,³ including where the Federal High Court of Nigeria convicted two hackers for stealing NGN 32m.

4. Are there any cybersecurity standards in your jurisdiction specifically applicable to the metaverse? What are the main obligations they set out?

There are no cybersecurity standards specific to the metaverse in Nigeria. The metaverse is a relatively new concept and the related legal frameworks are still catching up with such technological advancements.

5. Are there any upcoming policies, strategies or regulations that will impact cybersecurity in the metaverse?

There are none at the moment. As the metaverse is a relatively new concept, the related legal frameworks are still catching up with such technological advancements.

³ Such as <https://www.channelstv.com/2022/07/24/court-jails-hacker-accomplice-for-n32m-fraud-in-uyo> accessed on 14 July 2024.



Digital identity and authentication

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Q 1. Are there any digital identity and authentication policies, strategies or regulations applicable to the metaverse in your jurisdiction?

There are currently no established digital identity and authentication policies, strategies or regulations specifically applicable to the metaverse in Nigeria. The metaverse is a relatively new concept and the relevant legal frameworks still have to catch up with such technological advancements. Regulatory bodies such as the NITDA are likely to still be gathering information and assessing the potential risks before formulating specific policies.

Q 2. What are the different types of digital identity in the metaverse? What are the different tiers and types of ID and the different levels of protection in your jurisdiction?

There is no category of digital identity in relation to the metaverse in Nigeria.

Q 3. How is self-determination exercised and protected in the metaverse in your jurisdiction?

There is no regulatory framework specific to the metaverse in Nigeria. However, by virtue of the NDPA, individuals operating within the metaverse are entitled to control the way and manner in which their personal data is used.

Please see the chapter on data for the possible sanctions that could apply to breaches of the data protection rules.

Q 4. How is the role of intermediary ID providers regulated in your jurisdiction? What are their main obligations?

The nature of the role of an intermediary ID provider entails making use of users' personal data. These ID providers are required to comply with the NDPA and the NDPC's guidelines.

Q 5. Are there any upcoming policies, strategies or regulations that will impact the digital identity and authentication process on the metaverse?

There is none at the moment.

AI on the metaverse

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1. Are there any policies, strategies or regulations applicable to AI or the use of AI on the metaverse in your jurisdiction?

At the moment, there are no policies, strategies or regulations applicable to artificial intelligence (AI) or its use in Nigeria. Both AI and the metaverse are areas that are developing rapidly. Regulatory frameworks typically take time to catch up with technological advancements. Nigeria, like many countries, is still formulating its approach to regulating AI. There have been calls for an overarching National Artificial Intelligence Policy (NAIP), but it has yet to be finalised. The existing discussions emphasise principles such as fairness, transparency, accountability and alignment with human rights. These principles will likely be extended to govern AI use in the metaverse.

2. How is transparency and accountability of AI ensured in your jurisdiction?

Nigeria's regulatory framework is currently silent on the principles of transparency and accountability of AI in Nigeria. There is no case law nor are there any decisions by a regulator regarding infringements of these rules, at the moment.

3. How is algorithmic bias mitigated in your region/country? Are there any policies, strategies or regulations aimed at promoting fairness and non-discrimination?

There are no policies dedicated to mitigating algorithmic bias in Nigeria.

There is no case law nor are there any decisions by a regulator regarding infringements of these rules, at the moment.

There are no sanctions applicable to this issue at the moment.

4. What is the intellectual property law treatment of AI-generated content in the metaverse in your jurisdiction? Who are the rightsholders of that content?

AI is not specifically covered by the Nigerian regulatory framework for intellectual property (IP). In Nigeria, the legal treatment of AI-generated content used in the metaverse is still an open question. There are no established court cases or specific regulations regarding AI and the metaverse. The Nigerian Copyright Act recognises the originality and authorship of literary, artistic and other intellectual works. However, the Act does not explicitly address who is considered the 'author' of AI-generated content. Is it the programmer who created the AI, the person who provided the data or prompts, or the AI itself?



Q 5. What stakeholders are liable for any damages caused to third parties due to the use of AI in the metaverse? What sanctions (civil, criminal and administrative) may apply in case of infringement?

Liability for damages due to the use of AI in the metaverse is likely to be determined on a case-by-case basis. The possible stakeholders that could be liable are:

- the metaverse operator or controller;
- the creator of the AI tool; or
- the user.

Possible sanctions include claims for damages, penalties, civil lawsuits and possible criminal convictions.

There is no case law nor are there any decisions by a regulator regarding infringements of these rules, at the moment.

Q 6. Are there any upcoming policies, strategies or regulations that will impact AI in your jurisdiction?

There is none at the moment.

Human rights, accessibility and digital ethics

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1. Are there any human rights, accessibility and digital ethics strategies, policies or regulations applicable to the metaverse in your jurisdiction?

There are no specific strategies, policies or regulations applicable to the metaverse in this regard. However, the NDPA is applicable, which, inter alia, lays down a protective framework for the right to privacy.

2. Considering the various health risks associated with the metaverse and related technologies, are there any strategies, policies or regulations in your jurisdiction aimed at protecting public health?

There are currently no specific regulations or strategies in Nigeria directly addressing the health risks associated with the metaverse. The metaverse is a relatively new concept and the relevant legal frameworks are still catching up with the technology.

However, Nigeria does have existing regulations that might be indirectly relevant to health considerations in the metaverse, which are detailed below.

The Nigerian Safety and Radiation Protection Act

These regulations, which set out safety standards for electronic devices, could be applicable to virtual reality (VR) headsets or other metaverse equipment. These rules might help mitigate potential risks of exposure to electromagnetic radiation.

The National Environmental Standards and Regulations Enforcement Agency (NESREA)

This agency has a mandate to protect human health from environmental hazards. If potential health risks associated with the metaverse, such as extended screen time or social isolation, become evident, the NESREA might play a role in setting safety standards for metaverse environments.

It is important to note that the legal landscape is evolving, and specific regulations addressing health risks in the metaverse are likely to be developed in the future, especially as the technology becomes more widespread.

There are currently no sanctions that might apply in this regard, nor is there any case law nor any decisions by a regulator.



Q 3. Considering the various discrimination risks associated with the metaverse and related technologies, are there any strategies, policies or regulations in your jurisdiction aimed at ensuring non-discrimination?

There are currently no regulations or specific strategies directly addressing discrimination risks in the metaverse in Nigeria. The metaverse is a relatively new concept and legal frameworks are still playing catch-up to the technological advancements. However, Nigeria has a foundation for addressing discrimination in the metaverse through existing legal frameworks and potential future developments:

1. The Nigerian Constitution: the Nigerian Constitution (section 39(1)) prohibits discrimination on various grounds, including race, religion, gender and disability. This could be applied to hold platforms or individuals accountable for discriminatory practices within the metaverse, although legal interpretations and enforcement mechanisms would need to be established.
2. NDPA: this recently enacted law (June 2023) protects individuals' data privacy and could be indirectly relevant to preventing discrimination. For example, if a metaverse platform uses personal data for discriminatory purposes (eg, targeted advertising based on race or religion), it could be a violation of the NDPA.

Looking ahead, there are areas that may require attention such as:

1. Discrimination in algorithmic systems: as the metaverse relies on algorithms for various functions, regulations might address potential bias in these systems to prevent discriminatory outcomes.
2. Content moderation and user conduct: policies promoting respectful and inclusive behaviour within the metaverse could be developed by platforms or regulatory bodies. This could involve mechanisms for reporting and addressing discriminatory behaviour by users.
3. Accessibility standards: regulations or industry standards might be established to ensure the metaverse is accessible to people with disabilities, preventing discrimination based on ability.

Q 4. Considering the risks to the freedom of expression and censorship associated with the metaverse, are there any strategies, policies or regulations in your jurisdiction aiming to mitigate them promote freedom of expression and non-censorship?

There are no specific strategies, policies or regulations relating to the metaverse. However section 39(1) of the Constitution of the Federal Republic of Niger guarantees the right to freedom of expression.

Q 5. Considering the risks of misinformation and the risks associated with fake news and deep fakes on the metaverse, are there any strategies, policies or regulations in your jurisdiction aiming to mitigate them/promote freedom of expression and non-censorship?

There is no legal framework aimed at mitigating deep fakes on the metaverse. However, on 7 September 2021, the Federal Government of Nigeria alerted the general public to deep fake news perpetrated by online media.

There are currently no sanctions that might apply to prevent such activities, nor is there any case law nor any decisions by a regulator.

6. Are there any strategies, policies or regulations in your jurisdiction aiming to ensure accessibility and inclusion in the metaverse? How are they enforced?

There are currently no established regulations or specific strategies directly focused on accessibility and inclusion in the metaverse in Nigeria. The metaverse is a new concept, and legal frameworks are still trying to catch-up with the technology.

However, the National Policy on Persons with Disabilities (2018) promotes equal opportunities and participation for people with disabilities in all spheres of life. While not directly addressing the metaverse, it sets a precedent for ensuring inclusion in regard to new technologies.

There are no sanctions applicable in this regard. There is no case law nor are there any decisions by a regulator regarding infringements.

7. Are there any policies, strategies or regulations in your jurisdiction focused on ensuring the protection of minors on the metaverse?

The rapid emergence of the metaverse has outpaced the development of specific legal frameworks in Nigeria. Consequently, there are currently no established regulations or policies directly focused on protecting minors in this virtual environment. However, Nigeria possesses a legal foundation for safeguarding children online through existing legislation. Sections 8, 15, 32, 33 and 35 of the Child Rights Act of 2003 guarantee fundamental rights for minors, including privacy, education and protection from harmful information or exploitation. The principles enshrined in this Act could be extended to encompass the virtual world of the metaverse.

Furthermore, the NITDA plays a crucial role in promoting the safe and responsible use of technology. In future, the NITDA might issue specific guidelines or recommendations for metaverse platforms regarding child protection. These measures could encompass age verification protocols, parental control features and content moderation strategies to create a safer virtual environment for young users.

There are no sanctions applicable in this regard. There is no case law nor are there any decisions by a regulator regarding infringements.

8. Are there any policies, strategies or regulations in your jurisdiction focused on ethics-by-design on the metaverse? How are these rules enforced?

The nascent nature of the metaverse presents a challenge for legal frameworks in Nigeria, as established policies and regulations have not yet caught up in regard to the technology's ethical considerations.

However, a foundation exists for implementing ethics-by-design principles within the metaverse, drawing on existing legislation and ongoing discussions. The recently enacted NDPA of June 2023 offers a crucial starting point. Its emphasis on data minimisation, user consent and robust security safeguards can be extended to the design and development of metaverse platforms. This promotes data privacy and fosters responsible data handling practices within virtual environments. Furthermore, the NITDA plays a significant role in advocating for the safe and ethical use of information



technology. As the metaverse continues to evolve, the NITDA is well-positioned to develop guidelines or best practices to encourage ethical design considerations for metaverse platforms. These guidelines could encompass a range of areas, including user privacy, algorithmic fairness, transparency and user wellbeing.

There are no sanctions applicable in this regard. There is no case law nor are there any decisions by a regulator regarding infringements.



9. Are there any upcoming policies, strategies or regulations that will impact human rights, accessibility and digital ethics requirements in the context of the metaverse in your region/country?

There are none at the moment.

Competition law

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1. Are there any competition strategies, policies or regulations applicable to the metaverse in your jurisdiction?

Currently, there are no specific competition strategies, policies or regulations directly targeting the metaverse in Nigeria. However, the existing provisions in the Federal Competition and Consumer Protection Act (FCCPA) 2018 are applicable to the virtual environment. The primary aim of the FCCPA is to promote fair competition, prevent anti-competitive practices and protect consumers' interests across various sectors of the economy.

2. Are there any strategies, policies or regulations or best practices on how to carry out an antitrust and competition risk assessment?

In Nigeria, the strategies, policies and regulations for carrying out an antitrust and competition risk assessment are primarily governed by the FCCPA.

The main provisions of the FCCPA include the prohibition of anti-competitive agreements (Part VIII of the FCCPA), abuse of dominance (Part IX of the FCCPA) and mergers (Part XII of the FCCPA) that may substantially decrease competition.

Sanctions for violations of these provisions include civil penalties, criminal prosecution for egregious misconduct and administrative remedies, such as fines or divestiture orders, as can be gleaned from the provisions of sections 69, 73 and 74 of the FCCPA.

While there is limited case law and regulatory decisions specifically addressing infringements of the competition rules in Nigeria, the FCCPA empowers the Federal Competition and Consumer Protection Commission (FCCPC) to enforce these provisions and take appropriate action against anti-competitive practices.

3. What are the rules regarding market dominance and barriers to entry applicable to the metaverse in your jurisdiction?

In Nigeria's current regulatory landscape there are no specific rules or regulations targeting market dominance and barriers to entry within the metaverse. However, existing competition laws and regulations, such as the FCCPA, remain applicable.

Section 70 of the FCCPA bans abuse of dominance and anti-competitive practices that may create barriers to entry for new market participants.

There is no case law nor any decisions by a regulator regarding infringements of these rules.

4. Are there any specific gatekeepers' obligations applicable to the metaverse in your jurisdiction?

There are no gatekeepers, sanctions, case law nor decisions by a regulator regarding this matter, at this time.

Q 5. Are there any competition strategies, policies or regulations in your country/region applicable to the metaverse that aim to promote standardisation and access to fair and non-discriminatory licences?

There are currently no established competition strategies, policies or regulations specifically applicable to the metaverse in Nigeria that directly promote standardisation and access to fair and non-discriminatory licences. The metaverse is a new concept, and legal frameworks are still catching up with the technological advancements. However, there are some existing initiatives and potential future developments that could lay the groundwork for a competitive and inclusive metaverse in Nigeria.

The NITDA plays a role in promoting the development of IT standards in Nigeria. As the metaverse evolves, the NITDA might collaborate with industry stakeholders to develop interoperability standards. These standards could ensure users can move between different metaverse platforms without encountering compatibility issues.

Section 2(1) of the Nigerian Copyright Act protects creative works and expressions. This could be applied to content created within the metaverse. However, the Act might need to be adapted to address the unique licensing considerations applicable to virtual environments.

There are no sanctions applicable in this regard at this time. There is no case law nor any decisions by a regulator regarding infringements of these rules

Q 6. Are there any competition strategies, policies or regulations in your jurisdiction applicable to the metaverse that aim to promote interoperability in the metaverse?

No competition strategies, policies and regulations applicable to the metaverse exist in Nigeria. There are no sanctions, case law nor any decisions by a regulator at this time.

Q 7. Are there any upcoming policies, strategies or regulations that will impact competition in your jurisdiction?

There are no upcoming policies, strategies or regulations that will impact on competition at this time.

Intellectual property

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1. What are the public policies, strategies or regulations relating to intellectual property which are applicable to the metaverse in your jurisdiction?

In Nigeria, the legal landscape surrounding intellectual property (IP) in the metaverse is still evolving. Currently, there are no established regulations or specific policies directly focused on this area. However, Nigeria has a foundation of existing legal frameworks and ongoing discussions which could be applied to address IP considerations in the virtual world. This includes the Nigerian Copyright Act 2022, which protects original works of authorship, including literary, artistic, musical and dramatic works. The Act could be applied to creative content created within the metaverse, such as avatars, virtual environments or digital artwork. However, the Act might need to be adapted to address the unique aspects of ownership and licensing specific to a virtual environment.

Other legislation includes the Trademark Act 2004 and the Patent and Design Act 2004.

2. How are intellectual property rights to 'virtual objects', 'buildings' and 'avatars', etc, protected in your jurisdiction?

There are no precise IP rights relating to virtual objects, buildings or avatars in the metaverse. However, under the Nigerian Copyright Act, computer programs are protected as literary works, and this may broadly be construed to accommodate copyright protection in the metaverse.

For trademark protection, Nigeria uses the ninth edition of the Nice Classification, an international classification of goods and services established by the Nice Agreement in 1957, for its trademark registrations. Although the registration does not recognise trademark protection in the metaverse, such protection may be classified under Class 9, specifically as 'recorded and downloadable material'. This is attributable to the three-dimensional (3D) component of the metaverse, which may be used to create renderings in the metaverse. Trademarks in the metaverse can also be protected under the following classes:

- Class 35, concerning the provision of advertising services via the internet;
- Class 36, concerning the provision of financial services via the internet;
- Class 38, concerning telecoms services, chat room services, portal services, email services, providing user access to the internet, radio and television broadcasting; and
- Class 42, concerning protection for marks involving scientific and technological services and the creation maintenance and hosting of websites.

3. How are digital replicas of physical objects protected in your jurisdiction?

In Nigeria, the legal protection for digital replicas of physical objects is not entirely clear cut. There are no specific laws directly addressing this issue. However, the Nigerian Copyright Act protects original works of authorship, including artistic



works. A digital replica of a physical object could be considered an artistic work if it meets the originality threshold (ie, it shows a certain degree of creative expression and is not a mere copy of the original object). Copyright protection would extend to the digital replica itself, not the physical object it represents, as can be gleaned from section 10 of the Copyright Act.

Q 4. How is user-generated content and other derivative works protected in your jurisdiction?

For derivative works, section 9 of the Copyright Act provides that only the owner of a copyright has the right to create or authorise someone else to create an adaptation of that work. Consequently, for a derivative work to be protected, the creator must obtain consent or exclusive rights from the original author of the work from which the new work will be derived.

Q 5. Are there any collective rights management organisations active in your jurisdiction that also manage intellectual property rights in the metaverse?

There is none at the moment. However, there is the Copyright Society of Nigeria (COSON) and the Musical Copyright Society of Nigeria (MCSN). The COSON is responsible for collecting and distribution royalties to music artists in Nigeria. The MCSN is responsible for copyright management and royalty collection in Nigeria.

Q 6. How are intellectual property rights protected and enforced on the metaverse in your jurisdiction?

The existing Nigerian IP framework, including laws on copyright, trademarks and patents (as discussed above) might offer some level of protection for digital creations in the metaverse. However, there are uncertainties regarding the enforcement mechanisms within this virtual space.

Q 7. Are there any intellectual property strategies, policies or regulations in your jurisdiction applicable to the metaverse that aim to promote interoperability in the metaverse?

There is none at the moment.

Q 8. Are there any competition strategies, policies or regulations in your jurisdiction applicable to the metaverse that aim to promote standardisation and access to fair and non-discriminatory licences?

Nigeria does have competition policies and regulations aimed at promoting fair competition and preventing anti-competitive practices. The primary legislation governing competition is the FCCPA. While this legislation does not specifically address the metaverse, its provisions could apply to issues related to standardisation and access to fair and non-discriminatory licences within virtual environments. See the chapter on competition for more information.

9. Are there any other intellectual property issues related to the metaverse addressed in your jurisdiction?

There are several other potential IP issues relating to the metaverse, however there is currently no legislation to address them. These issues include:

- trademarks and branding: more specifically protecting trademarks and brand identities in the metaverse is a growing concern. Nigerian businesses might need to consider registering their trademarks for use in virtual environments to prevent others from using similar marks on virtual goods or services;
- non-fungible tokens (NFTs) and digital ownership. NFTs are a type of cryptocurrency used to represent the ownership of digital assets. The legal implications of NFTs in the metaverse are still being debated. Issues such as ownership rights, resale rights and the legal status of virtual items linked to NFTs need clarification;
- the right of publicity; which protects an individual's image and likeness from unauthorised commercial use. In the metaverse, this could become relevant if someone uses a person's likeness to create a virtual avatar for commercial purposes without their consent;
- domain names and metaverse addresses: more specifically, as the metaverse develops, virtual spaces and locations might require unique address systems. There could be potential conflicts over domain names similar to existing trademarks or disputes regarding the ownership of virtual land; and
- enforcement challenges: more specifically, enforcing IP rights in a borderless virtual world like the metaverse presents challenges. International cooperation and clear legal frameworks will be crucial for effective enforcement.

10. What are the roles of metaverse providers?

There are no laws or guidelines stipulating the role of metaverse providers in Nigeria. However, in general, metaverse providers should be law abiding and ensure that the platform provided does not infringe users' rights.

11. How does your jurisdiction moderate content and how does it balance this with freedom of expression?

The digital age, and especially the arrival of the metaverse, presents a fascinating but complex challenge: how to ensure a safe and inclusive online environment, while upholding the fundamental right to the freedom of expression. This dilemma is particularly relevant in Nigeria, where the legal landscape is already grappling with this balance.

On one hand, Nigerian legislation like the Child Rights Act offers a foundation for content moderation within the metaverse. This can help protect users, especially minors, from exposure to harmful material. Additionally, the principles enshrined in Nigeria's emerging data protection framework could be extended to the metaverse, potentially assisting in the fight against misinformation and hate speech.

However, striking the right balance is crucial. Overly broad content moderation practices could stifle free speech, a cornerstone of Nigerian democracy as guaranteed by the Constitution. Nigerian law provides some guardrails. The existing legislation addresses hate speech, incitement to violence and defamation, creating a framework for content moderation that respects legal boundaries.

The path forward in Nigeria is likely to involve a multifaceted approach. Metaverse platforms should have clear and accessible community guidelines that are demonstrably rooted in Nigerian legal principles. Transparency is key, namely



ensuring that users understand these guidelines and have a clear path to appeal content removal decisions. Additionally, the NITDA could play a valuable role in shaping best practices for content moderation within the Nigerian metaverse. These best practices should prioritise user safety, while respecting the right to free expression.

Ultimately, successfully navigating this tension will be essential for fostering a safe and expressive virtual environment for Nigerians within the metaverse.



12. Are there any by-design notice mechanisms?

There are no such mechanisms provided under Nigerian laws.



13. Are there any upcoming policies, strategies or regulations relating to intellectual property in your jurisdiction?

There are none at the moment.

Digital transactions and ownership

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1. Are there any relevant policies, strategies or regulations applicable to tokens, non-fungible tokens (NFTs) and digital assets on the metaverse in your jurisdiction? Is there any case law or are there any decisions by a regulator regarding this matter?

The regulatory framework surrounding the metaverse in Nigeria is currently in a nascent stage. While there is an absence of specific legislation directly targeting the metaverse, the Securities and Exchange Commission (SEC) took a proactive step in May 2023. The SEC issued regulations governing the issuance and offering of digital assets by digital platforms and the custody of digital assets. These regulations establish a framework for companies issuing tokens within the metaverse, ensuring investor protection and the secure storage of these assets.

Furthermore, the Finance Act of 2023 brought digital assets under the purview of the Capital Gains Tax (CGT) Act. This implies that any capital gains accrued from the sale of digital assets, such as NFTs, are now subject to the ten per cent capital gains tax. These developments highlight the government's commitment to regulating the burgeoning digital asset space. However, with respect to the metaverse itself, the regulatory landscape remains ambiguous. It is prudent to stay abreast of any forthcoming regulations that may emerge in response to this evolving technology.

There is no case law nor any decisions by a regulator regarding this matter, at this time.

2. Are there any relevant policies, strategies or regulations applicable to digital transactions on the metaverse in your jurisdiction? Is there any case law or are there any decisions by a regulator regarding this matter?

None exist at this time.

3. How is property defined on the metaverse? Are there any relevant policies, strategies or regulations applicable to the ownership of digital assets on the metaverse in your jurisdiction?

Nigeria does not yet have any specific laws that directly acknowledge the ownership of digital assets in the metaverse. However, the SEC's regulations focus on the issuance and offering of digital assets on digital platforms and the custody of digital assets (tokens). While not explicitly mentioning property on the metaverse, they establish a framework for companies issuing tokens within the metaverse. This implies that there is a form of ownership recognition for these digital assets. In addition, the Finance Act of 2023 brought digital assets within the purview of the CGT Act. This means that profits from selling digital assets, such as NFTs, are subject to capital gains tax. By taxing these transactions, the government acknowledges a level of ownership associated with digital assets. See section 2 of the Finance Act 2023, which amended section 3 of the CGT Act, for more details.

There is no case law nor any decisions by a regulator regarding this matter, at this time.



4. How are property transfers regulated in your jurisdiction?

Real property is regulated by the Land Use Act of Nigeria. For there to be an effective transfer of property, the consent of the Governor of the State, where the real property is located, must be obtained. Personal property is regulated by the general law of contract. There is no specific regulation for the transfer of assets in the metaverse.

There is no case law nor are there any decisions by a regulator regarding this matter at this time.



5. How are currencies, including cryptocurrencies, used in the metaverse regulated in your jurisdiction? Who are the main stakeholders and what are the obligations? What sanctions (civil, criminal, administrative) may apply for non-compliance with the obligations?

There are no policies or regulations on the use of cryptocurrency in the metaverse. However, on the use of cryptocurrency generally, the Central Bank of Nigeria (CBN), in its circular dated 22 December 2023, provided guidelines for financial institutions on how they should open accounts, provide designated settlement accounts and settlement services and act as channels for forex inflows for firms transacting in crypto-assets.⁴

Furthermore, the SEC mandates the registration of the offering and sale of digital tokens that are considered securities.

The main stakeholders are detailed below.

Issuers

According to the SEC's Rules on the Issuance, Offering Platforms and Custody of Digital Assets, issuers of cryptocurrencies must conduct an initial assessment filing to ascertain whether such cryptocurrencies qualify as securities warranting registration. If the SEC determines that a cryptocurrency is definitely a security, issuers are obliged to register such assets.

Users

The users of cryptocurrency are required to comply with the law, including remitting ten per cent of the gains made from the disposal of digital assets, which includes cryptocurrencies.

Financial regulators

Regulators such as the CBN and the SEC and other relevant regulators are responsible for putting in place a governing framework for the use of cryptocurrencies to ensure consumer protection, market integrity and financial stability.

Metaverse platform providers

Such providers have an obligation to ensure that the use of cryptocurrencies on their respective platforms is compliant with the applicable regulatory frameworks.

The sanctions for non-compliance range from criminal charges to monetary fines.

4 Financial Policy and Regulation Department, CBN, 'Guidelines on Operations of Bank Accounts for Virtual Assets Service Providers (VASPs)', 22 December 2023 www.cbn.gov.ng/Out/2024/FPRD/GUIDELINES%20ON%20OPERATIONS%20OF%20BANK%20ACCOUNTS%20FOR%20VIRTUAL%20Asset%20Providers.pdf accessed 3 July 2024.

Q 6. How are transactions and the ownership of assets in the metaverse taxed in your jurisdiction? What sanctions (civil, criminal, administrative) may apply for non-compliance with these obligations?

In Nigeria, the taxation of transactions and the ownership of assets in the metaverse is a grey area due to the nascent nature of the metaverse itself. Currently, there are no specific regulations or laws that address this topic. However, based on recent developments, the Finance Act of 2023 brought digital assets within the purview of the CGT Act. This means that any profits from selling digital assets, such as NFTs, could be subject to the ten per cent capital gains tax. This suggests the government is open to taxing transactions involving metaverse assets, even if the legal framework surrounding such ownership is not fully established. If the metaverse evolves to include income-generating activities, such as the renting of virtual land or sale of virtual goods, these earnings could potentially be taxed as income.

There are currently no sanctions applicable in this regard.

Q 7. Are there any upcoming policies, strategies or regulations that will impact digital transactions in your jurisdiction?

There are none at the moment. However there is a proposed draft of the National Blockchain Adoption Strategy released by the National Information Technology Development Agency, which may impact digital transaction.

Q 8. Are there any upcoming policies, strategies or regulations that will impact ownership of assets on the metaverse in your jurisdiction?

None at the moment. However, there is a proposed draft of the National Blockchain Adoption Strategy released by the National Information Technology Development Agency, which may impact the ownership of assets on the metaverse



Digital marketing and consumer protection

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Q 1. Are there any relevant policies, strategies or regulations applicable to digital marketing on the metaverse in your jurisdiction?

The ARCON Act is the apex law regarding advertising and marketing communications in Nigeria. It covers both terrestrial and online advertisements.

Q 2. Are there any relevant policies, strategies or regulations regarding misleading advertising or other unfair commercial practices on the metaverse in your jurisdiction?

There are no policies, strategies or regulations applicable to instances of misleading advertising or other unfair commercial practices on the metaverse in Nigeria. However, recourse could be made to the provisions of the ARCON Act, which is the apex law regulating advertising and marketing communications. It covers both terrestrial and online advertisements.

Section 57 of the ARCON Act stipulates a penalty of at least NGN 500,000 for violators or persons who fail to comply with the obligations provided in the Act.

There is no case law in regard to this matter.

Q 3. Are there any relevant policies, strategies or regulations aiming to promote consumer protection on the metaverse in your jurisdiction?

There are none at this time.

Q 4. What is the minimum information that should be provided to consumers? Who are the stakeholders responsible for providing this information?

Section 114(1) of the FCCPA stipulates that a consumer is entitled to receive information (notice, document or visual representation) in the prescribed format, if such a format has been specified, or in plain language, if no specific format has been prescribed, in the form of a notice, document or visual representation. Information is deemed to be in plain language, as outlined in section 114(2) of the Act, if it can be reasonably concluded that an ordinary consumer, belonging to the category of individuals for whom the notice, document or visual representation is intended, possessing average literacy skills and minimal experience as a consumer of the relevant goods or services, would be able to comprehend the content.

The Federal Competition and Consumer Protection Commission (Administrative Penalties) Regulations 2020, stipulate a penalty of NGN 50,000 and NGN 500,000 for individuals and corporate violators, respectively.

There is no reported case law nor any decisions by a regulator regarding this matter as it relates to the metaverse.

Q 5. Are there any relevant policies, strategies or regulations applicable to platform-to-consumer relationships in your jurisdiction? What are the main obligations of the platform providers?

The relevant law regulating the platform-to-consumer relationships in Nigeria is the Advertising Regulatory Council of Nigeria (ARCON) Act 2022 and the Nigerian Code of Advertising Practice Sales Promotion and Other Rights/Restrictions on Practice (6th edition). The code provides that all advertisements and marketing communications directed at the Nigerian market using the internet or other electronic media must comply with the following requirements as contained in the code.

There is also the Federal Competition and Consumer Protection Act 2019, the Advertising Regulatory Council of Nigeria Vetting Guidelines 2017, the Standard Organization Act 2015 and the Nigerian Data Protection Act 2023.

There are several obligations which digital platform providers must comply and they are all contained in the aforementioned laws. Some of which are the abiding by the principles of advertising regulations, fair competition practices and compliance with the Nigerian data protection legal and regulatory requirements

Sanctions that may apply for non-compliance with these regulations include, liability for personal damage, reprimand, fines, withdrawal of license, lawsuits, etc.

Q 6. Are there alternative dispute resolution mechanisms available for consumers in your jurisdiction? How are they implemented on the metaverse?

In Nigeria, there is a multi-door courthouse system in various states, such as Lagos and Abia, etc, which offers alternative dispute resolution to aggrieved parties. However, these systems are not applicable in the metaverse.

Q 7. Are there any upcoming policies, strategies or regulations impacting digital marketing on the metaverse in your jurisdiction?

There are none at this time.

Q 8. Are there any upcoming policies, strategies or regulations impacting consumer protection on the metaverse in your jurisdiction?

There are none at this time.



Liability and insurance

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Q 1. Are there any relevant policies, strategies or regulations applicable to liability on the metaverse in your jurisdiction?

Generally, in Nigeria, there are no policies, strategies or regulations touching on liability in the context of the metaverse. However, existing laws relating to cybersecurity, intellectual property, consumer protection and data privacy may have implications for liability issues arising within the metaverse.

Q 2. Are there any relevant policies, strategies or regulations applicable to insurance for damages caused on the metaverse in your jurisdiction?

There are none at this time.

Q 3. What are the civil liability/tort liability rules applicable to the metaverse in your jurisdiction? Who are the responsible stakeholders in the case of damages?

There are no civil liability rules dedicated to the metaverse in Nigeria. It is important to note that civil liability rules are generally governed by the principles of tort law, judicial precedents and statutes.

The responsible stakeholder in the case of damages would depend on the specific circumstances of the tort. But, typically individuals, corporations or entities found to have caused harm through negligence or intentional wrongdoing will be liable.

There is no case law nor any decisions by a regulator regarding civil liability/tort liability in the metaverse.

Q 4. How are liability rules enforced on the metaverse in your jurisdiction? Who are the responsible stakeholders in the case of damages?

There is no reported use case in this regard involving the metaverse in Nigeria.

The responsible stakeholder in the case of damage in the metaverse is the metaverse platform operator/controller. They has a duty of care to ensure the safety of users in the metaverse.

Nigerian sanctions for non-compliance with the relevant obligations may be determined by the existing legislation relating to cybersecurity, intellectual property and consumer protection, depending on the peculiarity of the obligations and the transaction.

There is no case law nor any decisions by a regulator regarding this matter.

Q 5. Are there any relevant policies, strategies or regulations applicable to criminal liability on the metaverse in your jurisdiction?

There are none at this time.

Q 6. Are there any upcoming policies, strategies or regulations impacting liability (civil/tort/criminal) on the metaverse in your jurisdiction?

There are none at this time.

Q 7. Are there any upcoming policies, strategies or regulations impacting insurance on the metaverse in your jurisdiction?

There are none at this time.



Jurisdiction and governance

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Q 1. Are there any upcoming policies, strategies or regulations setting out rules on how to identify the governing law on the metaverse?

There are none at this time.

Q 2. Are there any upcoming policies, strategies or regulations setting out rules on how to identify the jurisdiction on the metaverse? Is there any case law or are there any decisions by a regulator regarding determining the jurisdiction on the metaverse in your jurisdiction?

There are none at this time.

Q 3. What are the competent regulators and government bodies tasked with ensuring compliance with the applicable laws on the metaverse in your jurisdiction?

There are no specific regulators and government bodies for ensuring compliance with the applicable laws in the metaverse in Nigeria.

Q 4. Are there any available dispute resolution mechanisms in your jurisdiction?

The available dispute resolution mechanisms in Nigeria are related to litigation and alternative dispute resolution, such as mediation, arbitration and conciliation, which are governed by the country's Arbitration and Mediation Act 2023.

Q 5. How is arbitration implemented on the metaverse in your jurisdiction?

There are no procedures, guidelines or laws on implementing arbitration in the metaverse.



6. Are there any upcoming policies, strategies or regulations regarding determining the governing law and jurisdiction on the metaverse in your jurisdiction?

There are none at this time.