

GOFUNDMEAFRICA LTD. (FLUTTERGIVE)

DEVELOPMENT, OWNERSHIP, OPERATION
AND MANAGEMENT OF SOFTWARE
APPLICATIONS, WEBSITES, PLATFORM MANAGEMENT,
DATA MANAGEMENT
RC NO: 9638310



Age Gating & Minors Policy

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Purpose

This Age Gating & Minors Policy (the "Policy") sets out GOFUNDMEAFRICA LTD's approach to ensuring that individuals under the age of 18 (minors) do not create accounts, initiate campaigns, receive donations, or participate in any financial activity on the FlutterGive crowdfunding platform (the "Platform").

This Policy should be read alongside our Terms of Service, KYC/AML Policy, and Privacy Policy.

Policy Statement

Minors are strictly prohibited from:

- Registering an account on the Platform.
- Creating or organizing a crowdfunding campaign.
- Receiving donations or withdrawals.
- Acting as a beneficiary of a campaign without an adult legal guardian as the accountable organizer.
- Monetizing content or receiving payouts through the Platform.

FlutterGive does not knowingly permit, facilitate, or enable any financial activity by minors.

Minimum Age Requirement

The minimum age to use the Platform is **18 years**. All users must confirm during signup that they are 18 or older. Providing false information about age is a violation of our Terms of Service and results in immediate account termination.

Age Verification Controls

FlutterGive applies layered age-gating controls to prevent minors from accessing financial features:

Self-Declaration at Signup: Users must affirm they are at least 18 years old before completing registration.

Identity Verification (KYC): Before any payout can be authorized, users must complete KYC verification by submitting a government-issued photo ID showing date of birth, proof of residence issued within the last 90 days, and a live selfie for identity matching.

Compliance Review: KYC submissions are manually reviewed by our trained compliance team. Where the ID indicates the applicant is under 18, the KYC is rejected, the account is flagged, and no payout is authorized. Where fraud is suspected, the account is suspended pending investigation.

Ongoing Monitoring: Where we become aware (through reports, automated signals, or third-party notification) that a user may be a minor, the account is immediately flagged and withdrawals are disabled pending verification.

Campaigns Benefiting Minors

FlutterGive allows campaigns to be created **for the benefit of a minor** (e.g., a child's medical treatment or education) provided that:

- The campaign organizer is a legal adult (parent, guardian, or verified NGO).
- The organizer completes full KYC verification.
- The organizer is fully responsible and accountable for the funds raised.
- Payouts go only to the verified adult organizer's name-matched account, never directly to a minor.

This ensures legitimate fundraising for minors can occur while ensuring no minor ever receives or controls funds directly.

Reporting Suspected Minors

If any user, donor, or third party becomes aware that a minor may be using the Platform, report via our Trust & Safety team at trust@fluttergive.com. Reports are reviewed promptly. Where a minor is confirmed, the account is terminated immediately and any undisbursed campaign funds are frozen pending refund to donors.

Consequences of Violation

Where a user is found to have misrepresented their age or enabled a minor to access financial features:

- The account is suspended or terminated.
- Any pending payouts are frozen or cancelled.

- Any disbursed funds may be subject to recovery action.
- The matter may be reported to applicable regulators or law enforcement where warranted.
- The user is permanently blacklisted from the Platform.

Parental/Guardian Rights

Where a parent or legal guardian becomes aware that a minor has accessed the Platform without consent, they may:

- Contact us at trust@fluttergive.com.
- Request immediate account termination and deletion of the minor's personal data, subject to applicable legal retention requirements.

We will action such requests promptly and in accordance with the Nigeria Data Protection Act 2023.

Alignment with International Standards

This Policy aligns with the Nigeria Data Protection Act 2023 (NDPA), the UN Convention on the Rights of the Child (UNCRC), the EU General Data Protection Regulation (GDPR) where applicable (including Article 8 on child's consent), and FATF Recommendations on customer due diligence.

Policy Review

This Policy is reviewed at least annually and updated as required to reflect changes in law, regulation, payment partner requirements, or platform operations.

Contact

- **Trust & Safety:** trust@fluttergive.com
- **Compliance:** legal@fluttergive.com
- **Support:** support@fluttergive.com