

GOFUNDMEAFRICA LTD. (FLUTTERGIVE)

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



Flow of Funds

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Purpose

This document illustrates how donations move through the FlutterGive crowdfunding platform, operated by GOFUNDMEAFRICA LTD. It describes the collection, holding, and disbursement of funds, and the compliance controls applied at each stage.

Fund Flow Overview

The flow of funds on the Platform follows a single, auditable path:

Step 1 — Collection: A donor contributes to a campaign through our licensed payment partner using card, bank transfer, or mobile money. The donor's payment is processed directly through the payment partner's PCI-DSS certified infrastructure.

Step 2 — Settlement to Platform Account: The donation is collected into a segregated settlement account held with our licensed payment partner, separate from GOFUNDMEAFRICA LTD operating funds. Campaign balances are tracked per campaign in the Platform's database.

Step 3 — Fee Deduction: Platform fees and, where applicable, cross-border fees are deducted from the campaign amount at the point of collection. Donor tips (voluntary) are separated from campaign funds.

Step 4 — KYC Verification Gate: Before any payout can be authorized, the campaign organizer must complete KYC verification — government-issued ID, proof of address (within 90 days), and live selfie. Submissions are reviewed manually by our compliance team. Payout destinations are name-matched to the verified legal identity.

Step 5 — Sanctions & PEP Screening: Organizers and payout beneficiaries are screened against global sanctions lists (OFAC, UN, EU, UK HMT) and PEP databases before authorization. Any

potential match triggers an escalation review.

Step 6 — Withdrawal Request: The verified organizer requests a withdrawal from their dashboard. Email OTP verification is required. Withdrawal eligibility is subject to the platform's minimum withdrawal threshold.

Step 7 — Manual Approval: Every withdrawal is reviewed and approved manually by an administrator before the transfer is executed. No automated disbursement occurs.

Step 8 — Disbursement: The payment partner transfers funds to the organizer's bank account or mobile money wallet, name-matched to the KYC-verified identity. Webhook confirmation is required for status updates.

Step 9 — Record-Keeping: All collection, verification, screening, approval, and disbursement events are logged with timestamps and retained for a minimum of five (5) years in compliance with the Money Laundering (Prevention and Prohibition) Act 2022 and FATF Recommendation 11.

Key Controls at Each Stage

Stage	Control
Collection	PCI-DSS Level 1 processor; no raw card data stored on Platform
Holding	Segregated settlement account; per-campaign balance tracking
KYC Gate	Government ID + Proof of Address + Live Selfie, manually reviewed
Payout Matching	Bank or mobile money name-matched to KYC-verified identity
Sanctions Screening	OFAC, UN, EU, UK HMT; PEP databases
Withdrawal	Email OTP + manual admin approval
Disbursement	Licensed payment partner; webhook confirmation
Audit	5-year retention; auditable trail available to regulators

Segregation of Funds

Campaign funds are held in a segregated settlement account maintained with our licensed payment partner and are kept separate from GOFUNDMEAFRICA LTD's operating funds. The Platform does not use campaign funds for any purpose other than disbursing them to the verified campaign organizer.

Refund & Escalation Path

If a campaign is cancelled, taken down for a policy violation, or reported for fraud before funds are withdrawn:

- Withdrawals are disabled immediately.
- Funds held for the campaign are frozen in the settlement account pending investigation.
- Affected donors are notified and offered a refund where funds remain undisbursed.
- Refunds are processed back to the original payment method through the same licensed payment partner.

Record-Keeping & Reporting

All transaction logs, KYC records, sanctions screening results, and moderation actions are retained for a minimum of 5 years. Records are available to regulators, financial intelligence units, and licensed payment partners upon lawful request.

Contact

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