WishLane — Third-Party / Outsourcing Register

Platform: WishLane (wishlane.com) **Business model:** Donation-based personal crowdfunding platform **Document type:** Compliance — third-party / subprocessor & outsourcing register **Last updated:** July 4, 2026 **Owner / contact:** John Akyiano — jakyiano@gmail.com

1. Purpose

This register lists the third-party providers WishLane relies on, the function each performs, the data shared with them, their relevance to WishLane's AML/CTF and sanctions program, and the basis on which WishLane relies on and oversees them. It supports the "outsourcing / third-party reliance" questions in payment-partner and regulatory reviews and should be read with the AML/CTF & Sanctions Policy.

2. AML / CTF / sanctions-relevant providers

Provider	Function	Data shared	AML/CTF/sanctions role	Basis of reliance & oversight
Stripe	Payment processing, settlement, recipient onboarding & payouts	Payment/card data (collected by Stripe), recipient identity/KYC data, contribution records	**Core.** Identity/KYC verification of recipients (Connect Express); **sanctions screening of connected accounts**; card-fraud screening (Radar); refusal of unsupported/sanctioned-country accounts	Regulated/licensed payment provider; Stripe Connect Account Agreement & Services Agreement; funds held until Stripe verification; reliance documented in the Sanctions Risk Assessment
Anthropic (Claude)	AI analysis layer within transaction monitoring	Aggregated campaign context + transaction-pattern summary (campaign text, aggregated counts/totals) — **no raw transaction exports, no card data**	**Support only.** Decision-support risk read on already-flagged cases; does not act autonomously and does not move funds	Commercial API terms; used only on rule-flagged cases; human makes the final decision; documented in the Transaction Monitoring Program

3. Infrastructure & communications providers

Provider	Function	Data shared	Basis of reliance & oversight
Neon	Managed PostgreSQL database	Platform application data (accounts, campaigns, contributions, monitoring alerts)	Cloud database provider; access restricted via credentials/secrets
Vercel	Application hosting/deployment; media storage (Vercel Blob)	Application traffic; uploaded campaign media; environment secrets	Cloud hosting provider; security headers and platform controls applied
Resend	Transactional email (verification, notifications)	Recipient email addresses and message content	Email delivery provider
Twilio	SMS delivery (one-time passcodes)	Phone numbers for OTP delivery	SMS provider; used for account verification/authentication

4. What WishLane performs in-house

The following are **not** outsourced and are operated by WishLane: the rule-based transaction-monitoring engine; campaign risk rating; contribution-limit enforcement; the held-funds control; Acceptable-Use enforcement and campaign moderation; and human review and resolution of monitoring alerts.

5. Oversight & review

WishLane's oversight of these providers rests on: selecting a **regulated payment provider (Stripe)** for the money-movement, KYC, and sanctions-screening functions; sharing only the data each provider needs for its function; and reviewing this register and the reliance it documents at least annually and upon any material change, consistent with the Independent Review Policy. The principal open item — the scope of **donor-side sanctions screening** performed through Stripe and the card networks — is tracked in the Sanctions Risk Assessment.

This register is current as of the date above and is reviewed at least annually. It is maintained by the compliance contact and made available to payment partners and regulators on request.