

ACQUISITION AUDIT

Savanna Ridge Credit

Where acquisition spend leaks, what could get the ad accounts shut, and the 90 days of work that fixes both, in order and costed.

ILLUSTRATIVE SAMPLE · FICTIONAL COMPANY. This is a worked example, not a client engagement. Savanna Ridge Credit is invented. Every figure in this document illustrates the shape and depth of the deliverable; none reports a real result. A real audit follows the same structure against your own accounts, site and market. Platform policy references are summarised as at October 2026 and must be re-checked against the current policy page before anyone acts on them.

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1.0

Summary

Savanna Ridge Credit (fictional) is a CBK-licensed digital lender with three products repayable in 30, 60 and 120 days. It spends roughly KES 2.4M a month (about US\$18,500) across Google and Meta to acquire borrowers it cannot yet follow from the ad to the first loan, while most of that spend promotes products the two platforms do not allow it to advertise. None of the three findings below is a creative problem.

2

live compliance risks (critical)

KES 1.5M/mo

63% of paid spend promotes products the platforms can disapprove

9%

of first loans can be traced back to an ad click

The three things that matter

- 1. Your two best-selling loans cannot be advertised where you are spending.** The 30-day and 60-day products fail Google's 61-day floor and Meta's 90-day ban, and they carry KES 1.5M a month of paid spend (C-01). Every disapproved ad is a lost day of spend and a mark on the ad account. Move paid acquisition to the 120-day loan, which clears both platforms, and take the shorter products to search, app-store and owned channels, where the rule does not apply.

2. Eleven of your fourteen rate-bearing ads show a monthly rate with no APR and none of the components of total cost of credit (C-02). This is a licence-risk finding, not a spend one: LN 191 of 2026, reg. 51, requires every ad that mentions cost to show both. It is a one-week fix with your compliance lead and the largest risk reduction in the document.

3. You buy and optimise on installs, and only 9% of first loans can be traced to an ad click. Source A installs cost KES 90 and 11% take a first loan (about KES 820 each). Source B installs cost KES 190 and 34% do (about KES 560). The budget follows the KES 90. Measurement stops before the money does (\$5.0).

What we recommend, in order

#	ACTION	OWNER	EFFORT	WHEN
1	Pull the 30- and 60-day creative from Meta and Google; move the budget to the 120-day loan	Us	2h	Days 0–30
2	Rebuild the ad template: APR, period basis, fees and a representative example in the ad itself	Us + your compliance lead	1 week	Days 0–30
3	Sync STOP across the SMS vendor, email and Customer Match audiences	Your data team	1 day	Days 0–30
4	Send the first-loan event to GA4 and Google Ads; optimise to first loans, not installs	Your data team	1 day	Days 31–60
5	Build two search pages for the short-tenor products, which can no longer be bought	Us	3 weeks	Days 31–60

Everything else in this document is either sequenced behind these five or deliberately deferred, with the reason stated (\$6.0).

2.0

Search and content audit

Crawled 52 URLs; 41 indexable, 29 indexed. Search Console shows 3,400 impressions a month and 96 clicks, 68% of them on the brand name.

AREA	FINDING	IMPACT
Indexation	12 indexable pages not indexed: 8 thin advisory articles and 4 county pages with near-identical copy	Crawl budget is not the issue at 52 URLs; quality signals are. Merge or improve, do not submit again
Architecture	The two loan product pages sit three clicks from home and receive 2 internal links each	The pages that make money get the least internal authority
What ranks	/fees-and-charges/ sits at position 14–19 for a mid-funnel evaluation query with clear commercial intent	Moves with the fee-table fix and the new search pages (\$6.0)
What should rank	No page targets the short-tenor terms in §4.0, which paid search can no longer buy	Demand with no owner, and KES 1.5M a month of spend that has to move
Technical	Mobile LCP 4.1s on loan pages, driven by an uncompressed hero image and a chat widget; CLS fine	Fix alongside the fee-table change, not as its own project

2.4 Licence and regulator check (CBK, ODPC)

Savanna Ridge's trading name, licence line and registered address match its CBK directory entry on all nine landing pages and in both ad accounts, and its ODPC registration shows the same legal entity. The one mismatch is the Google Play financial-services declaration, which still carries the pre-2026 licence wording (C-05). The consent and opt-out gap is in §3.0 (C-03).

2.5 Content: attribution and review

The advisory library gives borrowers financial guidance, which search engines treat as “your money or your life” content. Today 11 of 15 articles have no named author, no reviewer and no date of last review.

- Add author and reviewer attribution with credentials, and a visible “last reviewed” date on every advisory article.
- Route new articles through compliance once, in batches, rather than one at a time. Batching is what keeps a publishing cadence alive in a regulated business.
- Retire or merge the eight thin articles instead of padding them.

What we checked and found sound: HTTPS and canonicals, the XML sitemap, robots directives, and structured data on the loan product pages.

3.0

Compliance risk register

Fourteen items checked across three platforms (Google Ads, Meta, Google Play) and nine landing pages. Two are live risks. Three need action this quarter. The remaining nine were checked and found sound, and are listed so you know what was examined.

CRITICAL · 2

WATCH · 3

CLEAR · 9

ID	AREA	FINDING	SEVERITY
C-01	Platform tenor	30-day and 60-day loans advertised on Google and Meta. Google allows personal-loan ads only for loans repayable in 61 days or longer; Meta bans loans of 90 days or less.	CRITICAL
C-02	Ad copy	Eleven of fourteen rate-bearing ads show a monthly rate with no APR or total-cost-of-credit components (LN 191/2026, reg. 51).	CRITICAL
C-03	Consent	Promotional SMS continued for six days after a STOP reply: the opt-out is not synced to the SMS vendor or the Customer Match list (LN 191/2026, reg. 82(1)(I); Data Protection (General) Regulations 2021, reg. 16(2)).	WATCH
C-04	Landing page	The fee table sits inside a “View charges” accordion. Google requires fees visible without a click or hover.	WATCH
C-05	App store	The Google Play Kenya financial-services declaration still names the pre-2026 licence wording; it should match the app’s current CBK directory entry.	WATCH
C-06	Verification	Google Ads advertiser identity verification complete; business name matches the licensed entity.	CLEAR
C-07	Account history	No restriction or suspension events on any ad account in the last 12 months.	CLEAR
C-08	Creative	No “guaranteed approval” or “no credit check” language in any live ad.	CLEAR
C-09	Disclosure	Physical address, registered company name and CBK licence line present and visible on all nine landing pages reviewed.	CLEAR
C-10	Landing page	Privacy policy and terms linked from every form.	CLEAR
C-11	Targeting	No age, gender or postcode exclusions on loan campaigns.	CLEAR
C-12	Lead forms	Consent wording and data-use notice present on in-app sign-up and all Meta lead forms.	CLEAR
C-13	Records	Creative approval log kept by compliance for the last 12 months.	CLEAR
C-14	Brand	Company pages and ad account names match the licensed entity.	CLEAR

The tenor trap. Google allows personal-loan ads only for loans repayable in 61 days or longer. Meta bans ads for short-term loans of 90 days or less. A 75-day loan clears Google and fails Meta; a 120-day loan clears both. Designing the advertised product to 91+ days opens both channels. That is a product decision, not a marketing one, which is why it is raised here rather than in the plan.

4.0

Search demand map

Demand grouped by the stage the searcher is at, with who owns the results today. Volumes are monthly, Kenya, and illustrative.

CLUSTER	STAGE	VOLUME	WHO RANKS TODAY	SAVANNA RIDGE TODAY
Mobile loan basics	Problem	14,000	Banks, regulator guidance, two publishers	Not ranking
Short-term loan options	Solution	8,200	Comparison sites, two lenders	Page 3
Short-tenor product terms (\$4.2)	Evaluation	2,600	Lenders' own product pages	No page
Fees and repayment	Evaluation	1,100	Lenders' own fee pages	Positions 14–19
Brand	Decision	1,900	Savanna Ridge	Position 1

4.2 Short-tenor terms: where paid spend can no longer go

The 30-day and 60-day products account for KES 1.5M a month of paid spend that the platforms can disapprove. No organic page targets their terms. These are the terms where an organic page can plausibly reach the first page inside 90 days: evaluation intent, modest competition, and Savanna Ridge already has the product facts.

PRODUCT	MONTHLY PAID SPEND TO MOVE	PAGE TO BUILD
30-day loan	KES 0.9M	One product page with the full cost, repayment and eligibility, written for the search a borrower actually makes
60-day loan	KES 0.6M	One explainer comparing the 30-, 60- and 120-day loans by cost, term and eligibility

Deliberately not targeted: the “mobile loan basics” cluster. It is large, but banks and regulator guidance own it, and it would take longer than 90 days to move. Revisit at the Day-90 review.

5.0

Measurement and attribution

WHAT IS MEASURED	WHAT IT HIDES	FIX
App installs in Google Ads and Meta, optimised to installs	Which installs became first loans. Source A: KES 90 an install, 11% first loans, about KES 820 each. Source B: KES 190, 34%, about KES 560 each	Send the app's first-loan event to GA4 and Google Ads, then optimise to first loans, not installs
Platform-reported installs, per platform	Double counting: the two platforms together claim 1.4× the installs the app analytics recorded	One source of truth: first loans by first and last touch, from the loan system
Monthly channel report	Only 9% of first loans can be traced to an ad click, so channel cost is judged on installs	Report leading indicators monthly; judge channels on cost per first loan

6.0

The 90-day plan

Sequenced by three rules: stop money leaving before bringing money in, unblock measurement before anything that needs measuring, and schedule anything with an external deadline backwards from that deadline.

DAYS 0–30 · STOP THE LOSS

- 1. Pull the 30- and 60-day creative from Meta and Google and move the budget to the 120-day product (C-01). — us, 2h
- 2. Rebuild the ad template with the APR, period basis, fees and a representative example (C-02). — us + your compliance lead, 1 week
- 3. Sync STOP across the SMS vendor, email and Customer Match audiences (C-03). — your data team, 1d

DAYS 31–60 · BUILD THE GAP

- 4. Two search pages for the short-tenor products, which can no longer be bought (\$4.2). — us, 3 weeks
- 5. Move the fee table above the fold on the two loan pages (C-04). — us, 2h
- 6. Join the first-loan event to GA4 and Google Ads. Everything after this gets measured properly. — your data team, 1d
- 7. Correct the Google Play declaration to match the current CBK directory entry (C-05). — your compliance lead, 1h

DAYS 61–90 · COMPOUND

- 8. Three problem-stage guides, compliance-reviewed in one batch rather than one at a time. — us + your compliance lead, 4 weeks
- 9. Reallocate budget to the source with the lowest cost per first loan. — us
- 10. Leading-indicator reporting live from week 9. — us

COST VIEW	IN-HOUSE HOURS	AGENCY HOURS	OUTSIDE SPEND
Days 0–30	17	22	—
Days 31–60	9	62	—
Days 61–90	10	84	Budget moved, not added

What we left out, and why. Link building, a blog cadence increase and a technical migration all came up and are all deferred. None of them changes a number inside 90 days, and two are hard to justify before the measurement fix lands.

7.0

Board memo

The one page for whoever signs off budget. Every audit includes one.

To: CEO and CFO, Savanna Ridge Credit · **From:** Momentum AdWorks · **Re:** Acquisition Audit findings

Bottom line. Acquisition is running, but it is exposed and under-measured. Two compliance issues could get the ad accounts restricted; both are fixable within 30 days. Most of the paid budget promotes products the platforms do not allow, and the budget currently follows the cheapest install rather than the cheapest first loan.

Risk. Two critical items (loan tenor on Google and Meta; APR missing from rate ads). Three watch items with owners. No history of account restrictions to date.

Money. Current paid spend is about KES 2.4M a month. KES 1.5M of it (63%) promotes the 30- and 60-day products. A first loan costs about KES 820 from the source the budget favours and about KES 560 from the source it does not.

Decision needed. (1) Product and credit leads to confirm that paid acquisition moves to the 120-day loan, and to decide whether a 91+ day product is worth designing. (2) Compliance lead to own the ad template rebuild this month. (3) Data team to send the first-loan event to GA4 and Google Ads this month. (4) Approve the Days 31–60 build: about three weeks of agency time, no added media budget.

What happens if we do nothing. The ad accounts stay one policy review from restriction, and budget decisions keep being made on installs rather than loans.

Appendix A

Two of the tickets

Every action in §6.0 ships as a ticket your developer or marketer can pick up without a meeting.

SR-02 · Rebuild the ad template with the APR

Assets: every ad template that mentions a rate or fee. Show the APR, whether the rate is per month or per year, the fees and a representative example inside the ad itself, and mirror them on the landing page. Do not change the product terms.

Acceptance: all fourteen rate-bearing ads show the APR and the cost components; the compliance lead has signed off the template. **Effort:** 1 week.

SR-03 · Send first loans to GA4

From the loan system, send a "first_loan_disbursed" event with value and the original click ID when a borrower's first loan is paid out. Pass it to GA4 and to Google Ads as a conversion, and optimise the app campaigns to it.

Acceptance: a test loan appears in GA4 within 24h with the right source. **Effort:** 1 day.

Appendix B

Platform and regulator reference

A real audit carries a dated reference for every platform and regulatory finding: the policy or rule, the version read, and the date. This sample shows the format only. Policies and rules change; always read the current source before acting.

FINDING	SOURCE	WHAT IT GOVERNS	READ
C-01	Google Ads	Personal loans: repayable in 61 days or longer	14 Oct 2026
C-01	Meta	Financial and insurance products: loans of 90 days or less not allowed	14 Oct 2026
C-02	CBK	Non-Deposit Taking Credit Providers Regulations 2026 (LN 191/2026), reg. 51: APR and total-cost components in any ad that mentions cost	21 Oct 2026
C-03	CBK / ODPC	LN 191/2026, reg. 82(1)(l); Data Protection (General) Regulations 2021, reg. 16(2): opt-out and consent	21 Oct 2026
C-04	Google Ads	Financial products: address, fees and licence links visible without a click or hover	14 Oct 2026
C-05	Google Play	Financial-services declaration, Kenya	14 Oct 2026

What happens next

After the walkthrough

You keep the report, the board memo and every ticket. Run the plan in-house, with us, or with anyone else.

- **The Day-3 Risk Flash.** Any critical compliance or tracking risk, emailed within 72 hours of access, with the evidence and the fix.
- **Five pre-checks.** Send up to five new ads or landing pages in the 30 days after the walkthrough and we review them for compliance before they go live.
- **A Day-30 check-in call,** booked on the walkthrough call.
- **If you would like us to run the plan,** the retainer is quoted in its own proposal after the walkthrough.

This was a sample. Savanna Ridge Credit is invented and every figure here is illustrative. The Acquisition Audit is quoted to your scope in Kenya shillings, takes two weeks from kickoff, and starts on the 1st or the 15th. momentumadworks.net/acquisition-audit/