

ASIA VENTURES LIMITED

PRIVACY POLICY

Effective: 2 October 2026

1. About this Privacy Policy

Asia Ventures Limited (NZBN 9429047108912) (“Asia Ventures”, “we”, “us” or “our”) respects your privacy and handles personal information in accordance with the New Zealand Privacy Act 2020.

This Privacy Policy explains how we collect, hold, use, disclose and protect personal information in connection with our website, www.asiaventuresnz.com, and our consulting, management consulting, policy and regulatory consulting, and citizenship-by-investment (“CBI”) facilitation services.

Personal information is information about an identifiable individual. This Policy does not limit any rights you may have under the Privacy Act 2020.

2. Personal Information We May Collect

Because some of our work involves assessing and facilitating applications, including applications connected with citizenship and passport programmes, we may handle a broad range of personal information.

Depending on the service or matter, this may include:

- name, contact details, residential address, nationality, citizenship, age and date of birth;
- passport information, copies of passports, national identity documents and other identity or travel documents;
- family, spouse, dependent and household information, including information relating to children where relevant to an application;
- employment, business, professional and educational background information;
- financial information, assets, income, source-of-funds and source-of-wealth information and supporting documents;
- information relevant to background verification, due diligence, sanctions, politically exposed person (PEP) and adverse-media screening;
- personal views, explanations, declarations and information about personal circumstances where relevant to an application, assessment or the guidance we provide;
- application forms, supporting documents and other information supplied in connection with a CBI, citizenship, residence, passport or related application;
- correspondence and communications with us, including enquiries and instructions;
- website and technical information collected through cookies and Google Analytics, such as browser, device and usage information; and
- other personal information that you, an authorised representative, a partner, an agent, a third party or a lawful public source provides to us in connection with our services.

3. How We Collect Personal Information

We may collect personal information directly from you when you contact us, use our website, seek our advice or guidance, or provide information or documentation in connection with an application.

We may also receive personal information from applicants, authorised representatives, agents, introducers, business partners and other persons involved in an application or assessment.

Where relevant to suitability and due-diligence assessments, we may also obtain or review information from third-party and public sources, including sanctions and PEP screening sources, adverse-media searches, public records, compliance databases, due-diligence providers and background verification reports.

Where the Privacy Act requires us to notify an individual about personal information collected indirectly, we will take the steps required by law, subject to any applicable statutory exceptions.

4. Why We Use Personal Information

We primarily collect and use personal information to:

- assess suitability in connection with our consulting and facilitation services, including CBI and related applications;
- review information and documentation relevant to an applicant or proposed application;
- conduct or consider background, sanctions, PEP, adverse-media and other due-diligence information;
- provide guidance, advice and assistance in connection with our services and applications;
- communicate with applicants, clients, representatives, agents and relevant partners; and
- carry out activities reasonably necessary to provide the service requested or otherwise permitted or required by law.

If information reasonably required for an assessment or service is not provided, we may be unable to assess the matter properly, provide guidance, facilitate an application or continue providing the relevant service.

5. Industry Updates and Communications

From time to time, we may send clients or contacts updates about developments in the industry or matters relevant to our services. You may ask us not to send these communications at any time by contacting us at isa@asiaventuresnz.com or by using an unsubscribe facility included in the communication, where available.

6. Disclosure of Personal Information

We may disclose personal information where reasonably necessary for the purposes described in this Policy, including to:

- partners, agents, introducers and other persons involved in preparing, reviewing or submitting an application to the relevant programme;
- Henley & Partners where relevant to the services or application concerned;
- other professional or business partners engaged in connection with the matter;
- third-party IT, data storage, hosting and server providers that support our operations;
- due-diligence, compliance, screening or background-verification providers where relevant; and
- regulators, public authorities, law-enforcement bodies or other persons where disclosure is required or permitted by law.

We do not disclose personal information more widely than is reasonably necessary for the relevant purpose.

7. Overseas Storage and Disclosure

Some of the organisations, partners, agents, service providers or systems involved in our work may be located outside New Zealand. As a result, personal information may be stored, processed, accessed or disclosed outside New Zealand.

Where an overseas transfer is a disclosure for the purposes of Information Privacy Principle 12 of the Privacy Act 2020, we will take the steps required by that principle before making the disclosure. Where an overseas service provider stores or processes information solely on our behalf and does not use it for its own purposes, different Privacy Act rules may apply.

We take reasonable care when selecting third-party service providers and, where appropriate, consider their privacy and security practices. However, we do not represent that every overseas jurisdiction has privacy laws identical to those of New Zealand.

8. Children's and Family Information

An application may require information about children, dependants or other family members. We collect and use that information only where it is relevant to the application, assessment or guidance being provided, or otherwise permitted by law. Where information about another person is supplied to us, the person providing it should have appropriate authority to do so.

9. Storage and Security

We take reasonable steps to protect personal information against loss, unauthorised access, use, modification, disclosure or other misuse.

Access to applicant and client information is restricted and is limited to a small number of authorised persons who require access for the relevant purpose. We may use third-party hosting and server providers to store or process information.

No method of transmission or electronic storage can be guaranteed to be completely secure.

10. Retention

We generally retain personal information and application-related records for seven years where that retention period is required for our records or the relevant work. We may retain information for a longer or shorter period where required or permitted by applicable law, or where reasonably necessary for an ongoing matter, dispute or legal obligation. When information is no longer required to be retained, we will take reasonable steps to securely dispose of it or de-identify it, as appropriate.

11. Website Analytics and Cookies

Our website uses cookies and Google Analytics. These technologies may collect information about how visitors use the website, including browser, device, session and usage information. We use this information to understand website usage and improve our website and services.

You may be able to restrict or disable cookies through your browser settings. Doing so may affect some website functionality.

12. Accessing and Correcting Your Personal Information

Subject to the Privacy Act 2020, you may request access to personal information that we hold about you and ask us to correct that information.

We may ask you to provide sufficient information to verify your identity and identify the information concerned. If we do not make a requested correction, we will deal with the request in accordance with the Privacy Act.

Requests should be sent to our Privacy Officer at isa@asiaventuresnz.com.

13. Privacy Complaints

If you have a concern or complaint about how we have handled your personal information, please contact our Privacy Officer. Please provide enough information for us to understand and investigate the matter. We will consider the complaint and respond as appropriate.

14. Links to Other Websites

Our website may contain links to websites operated by third parties. We are not responsible for the privacy practices of those websites. You should review the privacy information provided by the relevant third party before providing personal information to it.

15. Changes to this Policy

We may amend this Privacy Policy from time to time by publishing an updated version on our website. The updated Policy will apply from the date it is published.

16. Contact Us

Organisation	Asia Ventures Limited
NZBN	9429047108912
Privacy Officer	Isa Seow
Email	isa@asiaventuresnz.com
Address	8 Lima Place, Browns Bay, Auckland 0632, New Zealand

Website: www.asiaventuresnz.com

Last updated: 2 October 2026