

Overview

The purpose of the CoVenture Privacy Policy (the Policy) is to provide clear principles on how CoVenture manages personal information.

Objective: To provide clear, concise and appropriate principles and guidance on the management of personal information that arise for CoVenture its directors, officers, employees, contractors, investors and representatives in relation to CoVenture business activities.

Scope: The Policy applies to all CoVenture directors and employees and contractors responsible for any functions which affect CoVenture investors or personnel involved in the investments, and their privacy.

Effective Date 30 October 2025

Introduction

1. CoVenture is committed to protecting and respecting your privacy and complying with applicable privacy laws.
2. This Policy sets out how and what personal information is collected, used, stored, and disclosed in relation to a third party's relationship with CoVenture.
3. This Privacy Policy may change from time to time. References to 'we', 'us', and 'our' in this Privacy Policy mean CoVenture and are deemed to include references to our employees, contractors, officers, directors, agents or delegates, where applicable.

Definitions

1. In this Policy, the following terms have the following meanings:

CoVenture means CoVenture NZ Limited and its respective affiliates.

Personal Information means information about an identifiable individual, as defined in the Privacy Act.

Privacy Act means the Privacy Act 2020.

What Personal Information do we collect?

1. We may collect and process Personal Information such as an individual's:
 - full legal name, date of birth, driver's licence number, passport number, relationship status, postal or residential address, email address, telephone number, nationality, income, bank account details, taxation details;
 - accounting and financial information relating to a person's involvement in a CoVenture investment; and
 - accounting and financial information relating to any investment in CoVenture's assets.

2. We collect Personal Information for the purposes set out in clause 5 (Purposes of collection).

3. The provision of some information is optional. However, if you choose not to provide certain information, we may be unable to perform the relevant services.

How we collect the Personal Information

1. The Personal Information that we collect may be collected through various means, including through forms that are completed by you or in other communication with CoVenture such as by phone, email or post.

2. If you provide CoVenture with Personal Information about someone else, you must make sure that you are authorised to disclose that information to CoVenture and that, without CoVenture taking any further steps required by applicable data protection or privacy laws, we may collect, use, store and disclose such information for the purposes described in this Policy.

Purposes of collection

1. The purposes for which Personal Information may be used by CoVenture in and outside New Zealand include:

- a. as required by law, such as in connection with our obligations under know-your-client (KYC), anti-money laundering and countering financing of terrorism (AML/CFT) and Inland Revenue (IRD) regulation;
- b. in connection with the operation of our business, including processing of applications, redemptions, transfers, deposits, payments, generating reports, and record keeping of investment portfolios;
- c. carrying out our obligations arising from any contracts entered into between you and us;
- d. for statistical and research purposes (on an anonymised basis);
- e. providing you with alerts, newsletters or information that you requested or signed up to;
- f. complying with laws and regulations applicable to CoVenture or any of our related companies (as defined in the Companies Act 1993) in or outside New Zealand;
- g. legal proceedings, including collecting overdue amounts and seeking professional advice;
- h. researching, designing and launching services or products including seminars/events/forums;
- i. promoting and marketing services and products (subject to your exercise of the opt-out right in relation to receiving commercial electronic messages);
- j. purposes directly related or incidental to the above; or
- k. for any other purpose authorised by you or permitted by law.

Disclosure of the Personal Information

1. We will only disclose your Personal Information in accordance with this Policy and the Privacy Act.
2. We will keep Personal Information collected in connection with your investment in or involvement with CoVenture confidential but may provide Personal Information to third parties where necessary or appropriate to facilitate the purpose for which information was collected pursuant to this Policy.
3. We may disclose your Personal Information to Government entities and other external data providers that hold information about you in order to verify that the information provided by you is consistent with the records held by such entities for the purpose of complying with our KYC, AML/CFT and IRD obligations.
4. We may disclose Personal Information where we are required to do so by law, court order, subpoena or other legal process, including investigation by tax authorities or law enforcement authority. Where possible and appropriate, we will notify you if we are required by law to disclose your Personal Information.
5. We will not otherwise disclose your Personal Information to a third party unless you have provided your consent.
6. Personal Information may be disclosed between related companies and our personnel and those of our agents or delegates. Those related companies, personnel, agents and delegates will treat and handle such Personal Information in a manner consistent with this Policy and applicable laws.

Security and protection of the Personal Information

1. We store Personal Information that is in electronic form on secure servers.
2. We may provide your Personal Information to third parties contracted by us in order to perform data storage and data processing services on our behalf. We will take all reasonable steps to ensure that these third parties comply with our instructions and do not use your Personal Information for any other purpose.
3. Unfortunately, the transmission of information via the internet is not completely secure. Once we have received your Personal Information, we will use all reasonable procedures and security features to try to protect your Personal Information from misuse, loss, disclosure, and unauthorised access. However, by providing us with your Personal Information over the internet you acknowledge that the provision of that information is at your own risk, and that we cannot guarantee the security of such Personal Information.
4. In the event we become aware that Personal Information has been lost or subject to unauthorised access, misuse, interference or disclosure, we will take steps to contain and rectify the data breach and comply with any applicable notification obligations.

Where we store the Personal Information

1. The intended recipient of your Personal Information is CoVenture.

2. We may store your Personal Information on servers and services both within New Zealand and offshore (including third party cloud-based services and storage, such as Office365, Sharepoint, and Google Drive).

3. We may access and use that Personal Information in and outside New Zealand.

Retaining the Personal Information

1. We only retain Personal Information for so long as it is necessary for the purposes for which the information can lawfully be used, including if CoVenture is required to obtain such Personal Information by applicable laws such as obligations under KYC, AML/CFT and IRD regulations.

Your Consent and Rights

1. By making an application to become an investor or agreeing to be a person involved in an investment, you consent to the collection, storage, use, and disclosure of your Personal Information as outlined in this Privacy Policy. Under the Privacy Act and other relevant law, CoVenture acknowledges that an investor, person involved in an investment, or an interested party have the right:

- a. to check whether CoVenture holds their Personal Information and to request access the Personal Information held by CoVenture;
- b. to request CoVenture to correct as soon as reasonably practicable any Personal Information relating to them that is inaccurate; and
- c. to object to the use of their Personal Information for marketing purposes and CoVenture agrees to not use their Personal Information for marketing purposes after they communicate their objection to CoVenture.

2. It is your responsibility to let us know if the Personal Information which we hold about you needs to be corrected or updated.

3. By making an application to become an investor or agreeing to be a person involved in an investment, you consent to receipting commercial electronic messages from Pencarrow (i.e. direct marketing) and agree that we are not required to include a functional unsubscribe facility in such direct marketing messages. You may at any time exercise your right to opt-out from receiving non-essential communications by notifying our Finance Manager that you wish to optout from the use of your Personal Information for direct marketing purposes.

4. In accordance with the Privacy Act, CoVenture has the right to and may charge a reasonable fee for processing or responding to any request to access or correct Personal Information.

Role and Responsibilities

- 1. The Managing Director is CoVenture's nominated Privacy Officer and is responsible for this Policy.
- 2. The Policy will be reviewed bi-annually or more frequently should circumstances require it.

Contacting Us and Complaints Process

1. If you have any questions about the privacy or security of your Personal Information, would like to request access to or correction of your Personal Information, or if you have a concern about a breach of privacy or a privacy complaint, please contact CoVenture here: patrick@coventure.co.nz
2. CoVenture will deal with any privacy complaint(s) by investigating the complaint(s), and providing a response to the complainant within 20 working days, provided that we have all necessary information and have completed any investigation required. In cases where further information, assessment or investigation is required, CoVenture will seek to agree alternative time frames with you.