



Privacy Policy

Bespoke Wealth Limited

This Privacy Policy explains how Bespoke Wealth Limited collects, uses, stores, and discloses your personal information. We are committed to protecting your privacy and handling your information with care, transparency, and respect.

1. Who We Are

Bespoke Wealth Limited (FSP1011643) is a licensed Financial Advice Provider (FAP) regulated by the Financial Markets Authority (FMA). We provide personalised investment and financial advice services to individuals, families, trusts, and entities.

Business Name	Bespoke Wealth Limited
FSP Number	FSP1011643
Email	james.newbegin@bespokewealth.nz
Phone	027 661 6167
Address	Level 4, Textiles Building, 1 Kenwyn Street, Parnell, Auckland 1052, New Zealand
Website	bespokewealth.nz

2. Our Obligations Under the Privacy Act 2020

We are bound by the Privacy Act 2020 (the Act) and the thirteen Information Privacy Principles (IPPs) it contains. These principles govern how we collect, use, store, and disclose your personal information. This policy explains how we give effect to those principles in practice.

3. What Personal Information We Collect

To provide you with financial advice and manage your investments, we need to collect personal and financial information about you. The information we collect may include:

Personal identification information

- Full legal name and date of birth
- Contact details including address, phone number, and email address
- Identification documents such as passport or driver's licence
- Tax identification number (IRD number) and tax residency status

- Immigration status where relevant (for example, Active Investor Plus visa clients)

Financial information

- Details of your assets, liabilities, income, and expenditure
- Investment portfolios, KiwiSaver accounts, and other financial holdings
- Banking and account details required to facilitate transactions
- Risk profile, investment objectives, and time horizon

Other information

- Information about your family circumstances where relevant to your financial planning
- Preferences or requirements relating to religious, ethical, or other personal beliefs that affect how your assets are managed
- Records of our communications with you, including meeting notes and correspondence

We collect only the information that is necessary to provide you with quality financial advice. We will not collect personal information that we do not need.

4. How We Collect Your Information

We collect your personal information directly from you in most cases. This may occur when you:

- Complete our client discovery or fact-find documentation
- Communicate with us by email, phone, or in person
- Provide instructions regarding your investment portfolio
- Submit identification documentation as required under Anti-Money Laundering (AML) obligations

In some circumstances we may collect information from third parties, for example from your accountant, solicitor, or other professional advisers acting on your behalf, or from publicly available sources where relevant to the advice we are providing. We will always handle such information in accordance with this Privacy Policy.

5. How We Use Your Information

We use your personal information only for the purposes for which it was collected, or for directly related purposes you would reasonably expect. These purposes include:

- Providing you with personalised financial advice and investment management services
- Constructing and managing your investment portfolio in accordance with your goals and risk profile
- Communicating with you about your portfolio, our services, and relevant market developments
- Meeting our legal and regulatory obligations, including AML/CFT requirements and FMA reporting
- Maintaining our internal records and compliance documentation
- Improving the quality of our services

We will not use your information for direct marketing purposes without your consent, and we will not sell your information to any third party under any circumstances.

6. Who We Share Your Information With

We will only share your personal information where it is necessary to deliver our services, meet our legal obligations, or where you have given us your consent. The parties we may share your information with include:

BNP Paribas (Custodian)

Your assets are held in custody by BNP Paribas, one of the world's leading custodian banks. BNP Paribas requires certain personal and account information to administer your account and process transactions on your behalf.

Fund Managers and Investment Providers

Where we invest in managed funds or other investment products on your behalf, the relevant fund managers or investment providers may require certain information to establish and maintain your investment.

Professional Advisers

We may share information with legal counsel, accountants, or other professional advisers engaged in connection with your financial affairs, where you have authorised us to do so or where it is necessary to deliver our services.

Regulatory Authorities

We may be required to share information with the Financial Markets Authority (FMA) as our regulator, the Department of Internal Affairs (for AML/CFT compliance), Inland Revenue (IRD), or other government agencies as required by law.

External Compliance Advisers

We engage external compliance advisers for quality assurance purposes. These advisers are subject to strict confidentiality obligations and may access client records only to the extent necessary for compliance review purposes.

We do not share your information with any other third parties without your consent, except where required by law.

Where your information is shared with parties located outside New Zealand, we take reasonable steps to ensure it receives an equivalent level of protection to that required under the Privacy Act 2020.

7. Storage and Security of Your Information

We take the security of your personal information seriously. The steps we take to protect your information include:

- Storing electronic records on secure, access-controlled systems with appropriate encryption
- Limiting access to your information to those within our business who need it to perform their role
- Requiring third parties who handle your information on our behalf to maintain appropriate security standards
- Maintaining policies and procedures for identifying and responding to any data breaches promptly

In the event of a privacy breach that poses a risk of harm to you, we will notify you and the Privacy Commissioner as required under the Privacy Act 2020.

8. How Long We Retain Your Information

We retain your personal information for as long as it is needed for the purposes for which it was collected, and to meet our legal and regulatory obligations. Under FMA licensing requirements and AML/CFT legislation, we are required to retain certain records for a minimum of seven years.

When information is no longer required, it will be destroyed or deleted securely in a manner appropriate to the sensitivity of the information.

9. Your Right to Access and Correct Your Information

You have the right under the Privacy Act 2020 to request access to the personal information we hold about you, and to request that any inaccurate information be corrected.

To make an access or correction request, please contact us using the details below. We will respond to your request within 20 working days. In some circumstances we may be unable to provide access to certain information (for example, where doing so would prejudice an investigation or reveal information about another individual), and we will explain the reasons if this applies.

There is no charge for making an access or correction request. Where a request involves significant time or effort, we may charge a reasonable fee and will advise you in advance.

10. Keeping Your Information Accurate

The quality of the advice we provide depends on the accuracy and completeness of the information we hold about you. We rely on you to keep us informed of any material changes to your circumstances — such as changes to your income, assets, tax residency, or personal situation — that may affect your financial advice or the suitability of your investment strategy.

If you believe any information we hold about you is inaccurate or out of date, please contact us so we can update our records.

11. Website and Cookies

Our website at bespokewealth.nz may collect non-personal information through standard web analytics tools, such as the pages you visit and how you navigate the site. This information is used in aggregate to improve the website and is not linked to you personally.

We do not use tracking cookies to collect personal information through our website without your knowledge or consent.

12. Privacy Complaints

If you have concerns about how we have handled your personal information, we encourage you to contact us first so we can work to resolve your concern directly.

Email	james.newbigin@bespokewealth.nz
Phone	027 661 6167
Post	Level 4, Textiles Building, 1 Kenwyn Street, Parnell, Auckland 1052, New Zealand

We will acknowledge your complaint promptly and aim to resolve it within 20 working days. If we are unable to resolve your concern to your satisfaction, you may lodge a complaint with the Office of the Privacy Commissioner:

Website	privacy.org.nz
Phone	0800 803 909
Post	PO Box 10094, The Terrace, Wellington 6143, New Zealand

13. Changes to This Policy

We may update this Privacy Policy from time to time to reflect changes in our practices or legal obligations. The current version of this policy is always available on our website at bespokewealth.nz. We will notify existing clients of any material changes.

This policy was last reviewed in March 2026.

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