

MATIAS AGUAYO

-Residency & Citizenship-



A STRATEGIC GUIDE FOR GLOBAL INVESTORS

Residency & Citizenship *Blueprint*

A clear, honest framework for building a second residency, a second passport, and a long term Plan B.

2026 EDITION · INVESTOR'S GUIDE

MATIAS AGUAYO

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*"Your country of birth should never define where, or
how, you choose to live."*

MATIAS J. AGUAYO GROVE

Welcome.

Before we dive in, a quick word on why this guide exists, and how to use it.

This blueprint was written for one kind of reader: the investor or family that has started to look beyond a single passport, a single tax residency, and a single jurisdiction. You may already know exactly what you want. You may have just started asking the question. Either way, the work begins with clarity.

What follows is not a sales document. It is a structured walkthrough of how second residencies and second citizenships actually work in 2026, written in plain English. You will find the five routes to a second nationality, the difference between residency and citizenship, the real numbers behind the major Golden Visa and Citizenship by Investment programmes, and the alternative pathways most advisors never mention.

Two things to keep in mind as you read. First, every situation is genuinely different. Programme minimums, processing times, and even the existence of a given route can change between the moment this guide is published and the moment you act. Second, no document can replace a conversation. The most valuable part of the work I do happens after the brochure is closed, when we sit down and design something that actually fits your life.

If at any point you would like to talk it through, you can [book a free strategy call here](#). There is no obligation, and there is no pitch waiting on the other side. Just a conversation.

Welcome aboard.

Matias J. Aguayo Grove

INVESTMENT MIGRATION ADVISOR · PARTNER, HOLBORN ASSETS

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Eight chapters, three reference tables, one honest framework.

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About Me.

Investment Migration Advisor. Chilean and Spanish citizen. Based in Barcelona.

Hi, I'm Matias. A Chilean and Spanish citizen, currently based in Barcelona. I've spent the past four years as an Investment Migration Advisor.

Today I'm a Partner at Holborn Assets, one of the largest investment migration firms in the world, where I also serve as Head of the Greece and Malta Golden Visa programmes.

Coming from South America, I understand the drive to seek better conditions for safety, stability, and opportunity. Where you're born shouldn't define your future.

If you're exploring a second residency, a second passport, or a long term Plan B, I'm here to help. I've walked that path myself.

"Your country of birth should never define where, or how, you choose to live."

MATIAS J. AGUAYO GROVE

If you would like to talk through your own situation in a free, no obligation conversation, you can [book a strategy call here](#).

Chapter II

Residency & Citizenship, Not the Same Thing.

Two words people use interchangeably, two completely different legal realities.

Most people lose hours of due diligence before they realise these are not the same thing. Confusing them is the single most common, and most expensive, mistake in this industry.

Residency, in plain terms

A residency permit gives you the legal right to live, work, or study in a country that is not your own. You remain a citizen of your original country. Your passport does not change. What changes is where you are allowed to base yourself, for how long, and under what conditions. Some residencies require physical presence. Others, like most Golden Visas, do not, or have very light time on land requirements. Residencies can also unlock travel across entire blocs: an EU residency, for example, grants visa free access to the 29 Schengen countries.

Citizenship, in plain terms

Citizenship is a full membership in a country. You receive its passport, the right to vote, the right to consular protection, and, in most cases, the right to pass that nationality on to your children. Citizenship is generally permanent. It can be held alongside other nationalities if both countries permit dual citizenship. A strong passport typically opens 170 to 190 destinations either visa free or with a visa on arrival.

Why the distinction matters

A residency permit is a tool. A second citizenship is an inheritance. The right answer depends on what you are actually solving for. If you want optionality, low maintenance, and the ability to relocate when needed, a residency is often enough. If you want a generational asset that survives political and economic cycles, citizenship is the goal.

Most investors I work with use residency as the bridge to citizenship: enter through a residency programme, hold it for the required number of years, then naturalise. Others stop at residency because their goals do not justify the additional time, cost, or stay requirements. Both can be the correct answer. Choosing without understanding the difference is the wrong one.

Chapter III

Why a Second Residency or Citizenship Matters.

Six reasons families, founders, and investors are quietly diversifying their passports.

A second nationality, or even a strong second residency, is no longer an exotic luxury. It is risk management. Optionality has become a serious asset class.

Travel access

A second passport can lift you from 40 destinations to over 180, between visa free and visa on arrival. Fewer queues, fewer rejections, dramatically less time lost at consulates.

Time saved

Strong passports turn business travel into a Tuesday morning, not a six week embassy project. Saving time is, for most of my clients, the most undervalued benefit.

Business and capital access

EU residency or citizenship opens 27 markets, banking corridors, and B2B counterparties that quietly close their doors to non residents.

A real Plan B

Political instability, currency controls, conscription, civil unrest. A second residency is the insurance policy you set up before you need it, not after.

Tax optimisation

Some jurisdictions offer territorial taxation, special expat regimes, or zero income tax on global income. Structured properly, and always with proper tax counsel, this can be transformative.

Live, work, study

For many families the real prize is access to European universities at local fees, world class healthcare, or a calmer environment to raise children.

180+

DESTINATIONS WITH TOP
PASSPORTS

25 yrs

HOLBORN TRACK RECORD

100%

CLIENT APPROVAL RATE TO
DATE

Optionality and legacy

This last point is what most investors come back to. A second citizenship is not just for you. It typically extends to your spouse, your children, and in many programmes to parents and even grandparents. Once granted, it can be passed down to future generations. You are not buying a document. You are buying a generational option that your grandchildren can still draw on.



PAUSE

Optionality is the asset.

There is no perfect programme. There is only the one that fits the way you actually live, invest, and travel.

Chapter IV

The Five Routes to a Second Citizenship.

Five doors. Most people only qualify for one. Almost no one knows that.

These are the five typical ways to obtain a nationality you were not born with. Every country has its own citizenship laws and not every country allows every route, but in practice almost every case falls into one of these five.

01. Naturalisation

The classic route: live legally in a country for a number of years (usually 5 to 10), meet language and integration requirements, pass a citizenship test, and apply. It is patient, predictable, and slow. It requires real, physical presence in most jurisdictions.

02. Marriage

Many countries shorten the path to citizenship for spouses of nationals. Timelines and conditions vary widely, but it is the most common acceleration mechanism. It also tends to be the most scrutinised.

03. Birth on the territory (Jus Soli)

Some countries, especially in the Americas, automatically grant citizenship to anyone born on their soil. It does not require effort or planning, only timing, and is outside most readers' control today.

04. Descent (Jus Sanguinis)

If you have a parent, grandparent, or in some cases a great grandparent who was a citizen of a given country, you may be entitled to that nationality by right. Italy, Ireland, Portugal, Spain, Greece, Germany, Hungary, Poland and many others have generous descent programmes. The cheapest, fastest, and most powerful route, when you qualify. We return to this in Chapter IX.

05. Economic investment

For those who do not qualify through routes one to four, investment is the only practical way to acquire a second nationality, or the residency that leads to it, in a reasonable timeframe. This is the universe of Golden Visas and Citizenship by Investment programmes that the rest of this guide is about.

A word of honesty.

Most people in the world cannot qualify through routes 1 to 4. The conventional paths are long, complex, and often emotionally draining. Investment is the only realistic option for those who have the capital and do not have the ancestral line.

Chapter V

Investment Migration, Without the Marketing.

What it actually is, who it is for, and how it is structured.

In the simplest terms, investment migration is an exchange. You contribute to a foreign country's economy. In return, that country grants you residency or, in some jurisdictions, direct citizenship.

Contributions take many forms: real estate purchases, government bonds, private equity or venture funds, business investment with job creation, or non refundable donations to a sovereign development fund. The right vehicle depends on your goals, your tolerance for illiquidity, and your timeline.

Residency by Investment

You contribute capital and receive a residency permit. You can live, work, or study in the country. In the European Union, residency grants visa free travel within the 29 country Schengen area. Most Golden Visas allow you to keep the residency without physically relocating. Citizenship can usually be obtained later, after a period of legal residency and meeting the country's minimum stay requirements.

Citizenship by Investment

You contribute capital and receive citizenship directly, often within months. You get a second passport, voting rights in many cases, and the ability to pass that nationality on. Europe no longer offers direct citizenship by investment. The remaining direct CBI programmes are in the Caribbean, the Pacific, parts of Africa, and a small number of exceptional discretionary routes in Europe.

In the next three chapters we look at the actual programmes, side by side, with the numbers that matter: how much, how long, who qualifies, and what you get in return.

The Programme Country Index

Citizenship by Investment programmes, compared.

	ANTIGUA	DOMINICA	GRENADA	SAO TOME	ST LUCIA	TÜRKIYE	VANUATU
<i>Est. Time to Citizenship</i>	4 Months	4 Months	4 Months	5 to 7 Yrs	4 Months	4 Months	2 Months
<i>Donation, Single</i>	\$230k	\$200k	\$235k	n/a	\$240k	n/a	\$130k
<i>Donation, Family of 4</i>	\$230k	\$250k	\$235k	n/a	\$240k	n/a	\$160k
<i>Minimum Investment</i>	\$300k	\$200k	\$270k	\$90k	\$300k	\$400k	n/a
<i>Investment Period</i>	5 Years	5 Years	5 Years	5 Years	5 Years	3 Years	n/a
<i>Physical Stay for Citizenship</i>	5 days	No	No	Minimal	No	No	No
<i>Children up to age</i>	30	30	30	30	30	18	30
<i>Dependent Parents</i>	Over 55	Over 55	Over 55	Over 55	Over 55	Over 55	No
<i>Unmarried Siblings</i>	Yes	No	Yes	No	No	No	No
<i>Visa-Free Countries</i>	153	143	147	63	148	116	92
<i>Visa-Free to UK and Schengen</i>	Yes	Yes	Yes	Schengen	Yes	No	Yes
<i>Global Passport Ranking</i>	26th	32nd	31st	69th	30th	45th	53rd
<i>Language Test</i>	No	No	No	Yes	No	No	No
<i>Tax on Global Income</i>	No	No	No	No	No	No	No
<i>Free Education</i>	No	No	No	Limited	No	Yes	No
<i>Employment Rights</i>	No	No	Limited	Limited	No	Yes	No
<i>Subsidised Healthcare</i>	No	No	No	Basic	No	Yes	No
<i>Intl. Banking Access</i>	No	No	No	Limited	No	Yes	No
<i>Visits Required</i>	5 Days	None	None	Minimal	None	1 Visit	None

Continues on the next page with the Residency by Investment programmes.

The Programme Country Index

Residency by Investment programmes, compared.

	AUSTRALIA	GREECE	HUNGARY	ITALY	LATVIA	MALTA	PANAMA	PORTUGAL	USA EB-5	USA EB-3
<i>Est. Time to Citizenship</i>	4 to 6 Yrs	7 Years	8 Years	10 Years	10 Years	n/a	5 Years	10 Yrs (7 CPLP)	5 Years	5 Years
<i>Donation, Single</i>	n/a	n/a	n/a	€1m	n/a	€130k	n/a	n/a	n/a	n/a
<i>Donation, Family of 4</i>	n/a	n/a	n/a	€1m	n/a	€130k	n/a	n/a	n/a	n/a
<i>Minimum Investment</i>	n/a	€250 to 800k	€250k	€250k	€60k	n/a	\$300k	€500k	\$800k to \$1m	\$45k
<i>Investment Period</i>	n/a	n/a	n/a	2 Years	5 Years	5 Years	5 Years	5 Years	5 to 8 Yrs	n/a
<i>Physical Stay for Citizenship</i>	3 Years	6 Mo / Yr	6 Mo / Yr	6 Mo / Yr	10 Years	No	5 Years	5 Wks / 5 Yr	3 Yr / 5 Yr	30 Months
<i>Children up to age</i>	23	21	18	18	18	No limit	25	21	21	21
<i>Dependent Parents</i>	Over 55	No	Yes	Yes	Yes	Yes	No limit	Yes	Yes	No
<i>Unmarried Siblings</i>	No	No	No	No	No	No	No	No	No	No
<i>Time to Residency</i>	1 to 2 Yrs	2 Mo	2 to 3 Mo	5 Years	1 to 3 Mo	6 to 9 Mo	1 to 3 Mo	12 Mo	1 to 2 Yrs	18 to 24 Mo
<i>Visa-Free Countries</i>	171	188	171	192	164	n/a	140	189	186	186
<i>Visa-Free to UK and Schengen</i>	Yes	Yes	n/a	Yes	Yes	Schengen	Yes	Yes	Yes	Yes
<i>Global Passport Ranking</i>	7th	6th	7th	3rd	9th	7th	26th	5th	8th	8th
<i>Language Test</i>	Yes	Yes	Yes	No	Yes	Yes	No	Yes	No	No
<i>Tax on Global Income</i>	Yes	Yes	Yes	Yes	Yes	No	No	No	No	Yes
<i>Free Education</i>	Yes	Yes	Yes	Yes	Yes	Yes	No	Yes	Yes	Yes
<i>Employment Rights</i>	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
<i>Subsidised Healthcare</i>	Yes	Yes	Yes	Yes	Yes	Yes	No	Yes	Yes	Yes
<i>Intl. Banking Access</i>	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
<i>Visits Required</i>	Yes	1 Visit	1 Visit	Yes	1 / Year	1 Visit	1 / 2 Yrs	1 Visit	1 Visit	Yes

Numbers reflect publicly announced programme parameters as of 2026. They change. Always confirm current rules before committing capital. [Book a free strategy call](#) for current figures and a personalised shortlist.

Chapter VII

Europe's Top Golden Visas, Compared.

Five programmes, one continent, very different trade-offs.

If your endgame is European residency, and possibly EU citizenship, five programmes deserve your attention. They are not interchangeable. The right one depends on your priorities: speed, cost, citizenship potential, and whether you actually intend to live in Europe.

	GREECE	PORTUGAL	MALTA	ITALY	LATVIA
<i>Lowest entry investment</i>	€250k Conversion Real Estate	€500k Funds, €325k Hospitality	€99k Donation, €14k / yr lease or €375k purchase	€250k Startup	€10k Donation, €50k to €100k share capital
<i>Residency type</i>	Permanent Residency, plastic renews every 5 yrs	2 year renewable Residency	Permanent Residency, renews every 5 yrs	2 years initial, then renews every 3 yrs	5 year renewable Residency
<i>Minimum stay to keep</i>	Zero days per year	14 days every 2 years	Zero days per year	Zero days per year	One day per year
<i>Time to Citizenship</i>	After 7 years of physical residency	10 years, 7 years via CPLP, only 7 days per year required	After 5 to 7 years of physical residency	After 10 years of physical residency	After 10 years of physical residency
<i>Best for ...</i>					
<i>Strategic fit</i>	Best value, most flexible PR via real estate	Citizenship without relocation	Lowest entry PR if you don't mind the donation side	Italy focused investors	Cheapest Schengen access if you accept a yearly visit

The Portugal exception

Portugal is the only Golden Visa in Europe that allows you to obtain citizenship without living in the country full time. The minimum physical presence to maintain residency is just 7 days per year. The CPLP route can shorten the path to citizenship to 7 years. For most investors who want EU citizenship without relocating, Portugal is the answer.

Physical residency, for most other EU countries, means living locally for at least 183 days per year while holding legal residency. Greece remains the king for entry level EU Residency. Portugal remains the king for EU Citizenship without relocation.

Chapter VIII

Direct Citizenship by Investment.

Every country where capital can still lead, directly, to a second passport.

Europe closed most of its direct citizenship doors in the last few years. What remains, across the Americas, the Caribbean, Africa, and the Pacific, is still the fastest path from cheque to passport that exists today.

COUNTRY	PROGRAMME	INVESTMENT	TIME
<i>Americas</i>			
El Salvador	<i>Freedom Visa, Crypto-native CBI</i>	Donation US\$1m (BTC / USDT)	4-6 weeks
Argentina SOON	<i>CBI, launching 2026 / 27</i>	Investment approx. US\$500k	Launch 4Q26
<i>Caribbean</i>			
Antigua & Barbuda	<i>NDF or real estate</i>	Donation US\$230k / RE US\$300k+	4-6 months
Dominica	<i>EDF or real estate</i>	Donation US\$200k / RE US\$200k+	4-6 months
Grenada	<i>NTF or real estate, plus US E-2</i>	Donation US\$235k / RE US\$270k+	4-6 months
St Kitts & Nevis	<i>SISC, accelerated path</i>	Donation US\$250k / RE US\$325k+	10-12 weeks
St Lucia	<i>NEF, bonds or enterprise</i>	Donation US\$240k / RE US\$300k+	4-6 months
<i>Africa</i>			
Sao Tome & Principe	<i>CPLP donation</i>	Donation US\$90k	8 weeks
Sierra Leone	<i>USDT accepted, ECOWAS access</i>	Donation US\$150k+ (USDT)	4-6 months
Botswana COMING	<i>SADC mobility, pre-launch 2026</i>	Donation US\$75k pre-launch	TBD, 2026
<i>Europe, exceptional routes</i>			
Malta CBE	<i>Citizenship by Exception, discretionary</i>	Mixed architecture from EUR 1m	36+ months
Austria	<i>§10(6) exceptional contribution</i>	Investment EUR 3m+ typical	24-36 months
Serbia	<i>Citizenship by Exception, discretionary</i>	Case by case, strategic investment	6-12 months
Turkey	<i>Real estate, bond or deposit</i>	Real estate US\$400k+	6-8 months
<i>Asia & Pacific</i>			
Vanuatu	<i>DSP, BTC / USDT / fiat accepted</i>	Donation US\$130k (BTC / USDT / fiat)	1-2 months
Nauru	<i>EPP, climate resilience</i>	Donation US\$105k	4-5 months
Cambodia CBE	<i>Citizenship by Exception, Royal Decree</i>	Donation US\$250k / Inv. US\$305k	3-6 months

Chapter IX

The First Step Is Always Your Family Tree.

Before you spend a euro, look back two or three generations.

When a new client comes to me, the very first question I ask is not "what is your budget." It is: tell me about your grandparents. Where were they born, where were they citizens, and do you still have documents?

I ask because descent, or *jus sanguinis*, is by far the cheapest, fastest, and most powerful route to a strong passport. I obtained my own Spanish citizenship this way, through ancestry, for a fraction of what an investment route would have cost.

Many first world countries offer direct citizenship routes by descent. The thresholds vary, but the principle is the same: if a direct ancestor was a citizen of that country, you may be entitled to that nationality today, with little more than the right paperwork.

Countries that frequently grant citizenship by descent

Italy, Spain, Portugal, Ireland, Greece, Germany, Hungary, Poland, the Czech Republic, Croatia, Lithuania, Latvia, and a number of others all maintain meaningful descent routes. Each has its own generational limit, its own evidentiary standards, and its own quirks. Some open and close their programmes politically. Italy, for example, has tightened recently. Others remain very generous.

What to do, in order

One. Map your family back to your great grandparents. Write down where each of them was born and what citizenship they held at birth and at death.

Two. Collect what you can: birth certificates, marriage certificates, naturalisation papers, passport copies.

Three. Identify any line that crosses a country with a generous descent law. That is your starting point.

Four. [Book a free call with me](#) before assuming anything. The rules are deceptively detailed, especially around women in the line, naturalisation by an ancestor, and the year of the relevant birth. This is exactly the kind of work I do, and where to start is the first decision worth getting right.

Chapter X

Beyond Investment. The Visas Most Advisors Forget.

Lighter, cheaper routes that work brilliantly if you actually plan to move.

Investment migration has a quiet trade off. Golden Visas let you renew without physically relocating, but that is also why naturalisation often takes a decade or more. If you are willing to actually move, much cheaper doors open.

Digital Nomad Visas

You show proof of a remote job, freelance contracts, or stable digital income, and a long list of countries will grant you residency. Spain, Portugal, Greece, Italy, Estonia, Croatia, the UAE, several Latin American countries and many others now run dedicated programmes. The investment is typically zero, beyond proving you can support yourself. The path to citizenship runs through normal naturalisation timelines.

Independent Means and Passive Income Visas

If you have savings, a pension, dividends, or rental income that covers the local thresholds, you can qualify for residency without investing in a specific asset. The most popular among my clients:

Portugal D7, the original retiree and passive income visa, still one of the most efficient routes to EU residency and eventual citizenship.

Greece FIP, Financial Independent Person, very accessible income thresholds with full Schengen access.

Spain Non Lucrative Visa, a clean way into Spain for those with passive income, no work activity allowed locally.

Rentistas visas across Latin America, Uruguay, Paraguay, Panama, Costa Rica and others, with modest income requirements and friendly tax regimes.

Plan B Residencies on Light Stay Requirements

For investors who want a tax residency or a true Plan B without uprooting their life, Paraguay deserves attention. Territorial taxation, foreign sourced income not taxed locally, and a temporary residency card that requires only brief physical presence to maintain. Other Latin American countries operate similar logic. The work is matching them to your actual tax position with proper counsel on both sides.

A useful frame.

Golden Visa programmes are designed for investors who want optionality without commitment. Income, nomad, and independent means visas are designed for people who actually want to move. If you are not sure which describes you, that is the first conversation worth having. [Book one here.](#)



About Holborn Assets.

Twenty five years of helping clients protect their wealth and secure their place in the world.

Holborn Assets is one of the world's leading financial services and wealth management groups, with over 25 years of experience helping clients protect their wealth and secure their place in the world.

To date, we have processed over 1,200 Golden Visas across more than 40 nationalities, with a 100% client approval rate. One firm. One consistent result.

18

INTERNATIONAL
OFFICES

500+

STAFF
WORLDWIDE

\$3 Bn+

ASSETS UNDER
MANAGEMENT

24,000+

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Stay Connected.

The best decisions come from being fully informed. Here is where the conversation continues.

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Long form, jurisdiction by jurisdiction breakdowns. Programme deep dives, real client case studies, and the trade offs no glossy brochure will ever mention.

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Let's design your blueprint, together.

If you'd like to discuss your personal situation, explore your options, or get a second opinion on any programme or investment route, I'm happy to help.



BOOK A FREE STRATEGY CALL

Scan the QR code or click it to book a free strategy call.
Or contact me directly at matias.aguayo@holbornassets.com
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Read this before acting on anything in this guide.

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Immigration legislation and Golden Visa programme rules are subject to change. All investment and immigration decisions carry inherent risks, including rejection and loss of capital. Past performance or analysis does not guarantee future results. Do your own research (DYOR) before acting.

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MATIAS AGUAYO
-Residency & Citizenship-



*"Your country of birth should never define
where, or how, you choose to live."*

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