

Privacy Policy

NAOS SMALL CAP OPPORTUNITIES COMPANY LIMITED

1. General

This Privacy Policy applies to NAOS Small Cap Opportunities Company Limited ACN 107 617 381 (**NSC, we, us, our**).

NSC is committed to protecting your privacy and safeguarding your personal information. This Privacy Policy explains how we collect, hold, use, disclose and protect personal information. We will regularly review this Privacy Policy to ensure our practises remain current, accurate and in adherence to the Australian Privacy Principles contained under the Privacy Act 1988 (Cth).

2. Collecting, using and disclosing your personal information

Your personal information is collected and used by NSC so that we can provide our products and services to you. If NSC does not collect your personal information, we may not be able to provide you with a product or service.

NSC uses third party service providers and your personal information is disclosed and used by these service providers. NSC ensures that each of these service providers have contractual obligations to ensure that they comply with privacy laws when dealing with your personal information. NSC uses Boardroom Pty Limited (**Boardroom**) to perform share registry services. A copy of Boardroom's privacy policy can be accessed through their website at www.boardroomlimited.com.au. NSC also uses NAOS Asset Management Limited (**NAOS**) to perform investment management services for NSC. A copy of NAOS' privacy policy can be accessed through their website at www.naos.com.au.

NSC also uses your personal information to comply with Australian taxation laws, Anti-Money Laundering and Counter-Terrorism laws and all other applicable laws; and discloses personal information to various law enforcement agencies, regulatory authorities and governments.

Your personal information may also be used for secondary purposes such as for the provision of promotional and marketing material. You can notify NSC at any time if you do not wish to receive such materials or information. Where we collect your personal information for a specific purpose not contemplated in this Privacy Policy, we will provide you with a collection notice which explains the primary purpose and any related secondary purposes for which your personal information is being collected.

We may also collect information based on how you use our website (www.naos.com.au). We use "cookies" and other data collection methods to collect information on website activity, such as the number of visitors and the number of pages viewed. This information can be collected to analyse and improve our website and to record statistics on web traffic. NSC does not use this information to personally identify you.

We do not actively seek to collect sensitive information (for example health information or information about any criminal record), unless it is necessary for our business purposes. If we do have to collect sensitive information, we will only collect, use and disclose it in accordance with privacy laws.

3. Protecting your personal information

We take all reasonable steps to protect your personal information from misuse, loss, unauthorised access, interference, modification or disclosure.

We have physical, electronic and procedural safeguards to protect your information which is held by us. For example, your personal information is stored in secured offices and access to it is protected by a range of security measures such as secure authentication, password controls, encryption, firewalls and anti-virus technology. Access to personal information is also restricted to staff whose job purpose requires access to it and we also require all employees to maintain strict confidentiality at all times regarding the personal information of our investors.

Where the personal information we collect is no longer required, we use secure methods to permanently destroy or de-identify any personal information in accordance with this privacy policy and all applicable laws.

4. Notifiable Data Breaches Scheme

In the event of any loss, or unauthorised access or disclosure of your personal information that is likely to result in serious harm to you, we will investigate and notify you and the Australian Information Commissioner as soon as practicable, in accordance with the Privacy Act 1988.

5. Accessing and correcting your personal information

If you require access to, or wish to update the personal information we hold about you, please contact NSC's designated Privacy Officer:

c/o: NAOS Asset Management Limited
MLC Centre, Level 34, 19 Martin Place, Sydney, New South Wales, 2000
Phone: + 61 2 9002 1576
Email: enquiries@naos.com.au

If you believe that the personal information we hold about you is inaccurate, incomplete or out of date, you should contact us to correct this information. We will endeavour to promptly update any personal information that is inaccurate, incomplete or out of date. If we do not agree that the personal information is inaccurate, incomplete or out of date, we will notify you in writing of our reasons to refuse any corrections. We will also notify you of what you can do if you are not satisfied with our response.

6. Complaints

If you have any questions, concerns or complaints about this privacy policy or our practices relating to the handling of personal information please contact our Privacy Officer (using the details provided above in section 5). We will try to answer any questions you may have, correct any error on our part or resolve any complaint that you may have about our information handling practices. If we do not resolve a complaint to your satisfaction, you may refer the matter to the Australian Information (Privacy) Commissioner (see www.oaic.gov.au).

(Last updated August 2018)