

General

Naos is committed to protecting your privacy and safeguarding your personal information. This Privacy Policy explains how Naos manages and protects personal information.

Naos adheres to the Australian Privacy Principles contained within the Privacy Act 1988 which govern how organisations handle personal information.

Scope

This policy applies to Naos Asset Management Limited (ABN 23 107 624 126) and the funds that it manages.

Policy

1. What personal information does Naos collect?

Personal information is information about you from which you can be reasonably identified. Naos collects personal information so that we can provide you with our products and services and comply with our legal obligations such as those under taxation laws and the Anti-Money Laundering and Counter-Terrorism Financing Act. If Naos does not collect your personal information, we may not be able to provide you with a product or service.

The product or service that we are providing will determine what information we will collect about you. The kinds of personal information that Naos may collect and hold about you include: your name, contact details, date of birth, citizenship, tax file number (TFN), financial information and banking details.

In addition, we may collect personal information about individuals who are not customers of Naos (e.g. business contact details of a company representative with whom we deal).

2. How does Naos collect and store personal information?

Collecting information

Depending on how you choose to interact with us, we may collect your personal information when you contact us or our service providers by telephone, by email, through our web site or complete an application form.

Naos may also collect information about you from third parties. For example, Naos may collect personal information from:

- Your authorised representatives and advisor(s); or
- Our service providers.

Collecting information from visits to Naos's website

Naos may collect information based on how you use Naos's website. Naos uses "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. No attempt is made by Naos to use this information to personally identify you.

Securing your personal information

We hold personal information in secure computer storage facilities (both in-house and at our service providers); on paper-based files; as well as in other formats. Naos takes reasonable steps to protect your information from loss and unauthorised access, destruction, use, modification or disclosure. Access to personal information held by Naos is controlled to prevent misuse or unauthorised disclosure of the information. We utilise a range of technical security measures such as secure authentication, password controls, encryption, firewalls and anti-virus technology to prevent unauthorised access to your information.

3. How does Naos use your personal information?

Naos may collect, hold, use or disclose your personal information to establish and manage your investment in our investment funds;

We may also collect, hold, use or disclose your personal information to:

- Consider any concern or complaint that you raise against Naos and/or to manage any legal action between you and Naos;
- Prevent or investigate any actual or suspected fraud, unlawful activity or misconduct;
- Identify you or establish your tax status under any Australian or foreign legislation; or
- Comply with any relevant laws, regulations, codes of practice and court orders.

4. How is personal information disclosed to others?

Naos does not sell, rent or trade personal information to, or with, third parties. In some circumstances your information may be disclosed to Naos' related entities or service providers that perform a range of services on our behalf. Examples include:

- Mailing houses and printing companies;
- Auditors and solicitors;
- Custodians and brokers;

- Registry and platform providers;
- Information Technology vendors; or
- Other consultants.

Where we disclose your information to our service providers, we will take steps to ensure that they are authorised to only use personal information in order to perform the functions required by Naos.

Depending on the nature of the product that we are providing, we may disclose your personal information to your nominated representatives (e.g. your financial adviser) and their respective service providers.

We may also disclose your personal information to law enforcement agencies, courts or government agencies where required to comply with specific legal requirements.

5. How you can access or correct your personal information

You may contact us to request access to the personal information we hold about you at any time. You may also ask us to correct information about you that you may believe is inaccurate, incomplete or out of date.

We will need to verify your identity before giving you access, or correcting your information.

In certain circumstances, Naos may not be able to correct or provide you with access to your information. In these circumstances, we will write to you to explain and provide the reasons why.

6. How you can complain if you have concerns about management of your personal information

If you have a complaint related to how Naos has managed your personal information, please contact us using the contact information below. We may ask you to place your concerns in writing in order for us to fully understand and investigate the issues you have raised. We will acknowledge any complaint in writing within five business days and make every effort to resolve your issue within a reasonable time of us being notified.

If a complaint remains unresolved, you may access an external dispute resolution service or apply to the Office of the Australian Information Commissioner (OAIC) to have the complaint heard and determined. The Commissioner may be contacted on the privacy hotline: 1300 363 992.

When we write to you about our decision, we will explain how you may access an external dispute resolution scheme or make a complaint to the OAIC.

If you have any questions about this privacy policy, if you wish to complain about how we handled personal information about you, or if you wish to access or correct your personal information, please contact Naos' Privacy Officer:

- by telephone: 02 9947 2566; or
- by email: enquiries@naos.com.au; or
- by letter: The Privacy Officer

Naos Asset Management Limited
Level 4 Domain House
139 Macquarie Street
Sydney NSW 2000

Naos Emerging Companies Long Short Equity Fund

As a result of the amendments to the Privacy Act 1988 made by the Privacy Amendment (Enhancing Privacy Protection) Act 2012 which will come into effect on 12 March 2014, some key changes have been made to the Privacy Policy of the Responsible Entity, Investment Manager, and Administrator.

A copy of the updated Privacy Policy for the Responsible Entity is located at <http://www.perpetual.com.au/privacy-policy.aspx>.

A copy of the updated Privacy Policy for the Administrator is located at <http://www.mainstreambpo.com.au/mbpo/Privacy-Policy>.