

<b>FACTS</b>	<b>WHAT DOES PALISADE CAPITAL MANAGEMENT, L.L.C. (“PALISADE”) DO WITH YOUR PERSONAL INFORMATION?</b>	
<b>WHY?</b>	Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.	
<b>WHAT?</b>	<p>The types of personal information we collect and share depend on the product or service you have with us. This information can include:</p> <ul style="list-style-type: none"> <li>▪ Social security number</li> <li>▪ Income</li> <li>▪ Assets</li> <li>▪ Risk tolerance</li> <li>▪ Wire transfer instructions</li> <li>▪ Transaction history</li> </ul> <p>When you are no longer our customer, we continue to share information about you as described in this notice.</p>	
<b>HOW?</b>	All financial companies need to share customers’ personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customers’ personal information; the reasons Palisade chooses to share; and whether you can limit this sharing.	
<b>Reasons we can share your personal information</b>	<b>Does Palisade Share?</b>	<b>Can you limit this sharing?</b>
<b>For our everyday business purposes</b> - such as to process your transactions, maintain your accounts(s) or respond to court orders and legal investigations.	Yes	No
<b>For our marketing purposes</b> - to offer our products and services to you	No	We don’t share
<b>For joint marketing with other financial companies</b>	No	We don’t share
<b>For our affiliates' everyday business purposes</b> - information about your transactions and experiences	Yes	No
<b>For our affiliates' everyday business purposes</b> – information about your creditworthiness	No	We don’t share
<b>For nonaffiliates to market to you</b>	No	We don’t share
<b>Questions?</b>	Call Brad Goldman, Managing Director, General Counsel & Chief Compliance Officer at (201) 585-7733 or (800) 330-9966 or visit us on the web at <a href="http://www.palisadecapital.com">http://www.palisadecapital.com</a>	



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### Who we are

<p><b>Who is providing this notice?</b></p>	<p>This notice is being delivered by Palisade Capital Management, L.L.C., Palisade Strategic Fund (Cayman) Limited, Palisade Strategic Fund (Domestic) LLC, Palisade Long Short Alpha Fund (Cayman) Limited, Palisade Long Short Alpha Fund (Domestic) LLC, Hermes Partners, LP, Palisade Private Partnership, LP, Palisade Private Holdings, LLC, Palisade Private Partnership II, LP, Palisade Private Holdings II, LLC, Palisade Concentrated Equity Partnership, LP, Palisade Concentrated Holdings, LLC, Palisade Concentrated Equity Partnership II, LP, Palisade Concentrated Holdings II, LLC, Palisade Capital Grand, Inc., Palisade Capital Advisors, LLC and Axe Houghton Associate Investment Fund, LLC.</p>
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### What we do

<p><b>How does Palisade protect my personal information?</b></p>	<p>To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings.</p>
<p><b>How does Palisade collect my personal information?</b></p>	<p>We collect your personal information, for example, when you</p> <ul style="list-style-type: none"> <li>▪ Enter into an investment advisory contract</li> <li>▪ Seek financial advice</li> <li>▪ Make deposits or withdrawals from your account</li> <li>▪ Tell us about your investment or retirement portfolio</li> <li>▪ Give us your employment history</li> </ul>
<p><b>Why can't I limit all sharing?</b></p>	<p>Federal law gives you the right to limit only</p> <ul style="list-style-type: none"> <li>▪ sharing for affiliates' everyday business purposes—information about your creditworthiness</li> <li>▪ affiliates from using your information to market to you</li> <li>▪ sharing for nonaffiliates to market to you</li> </ul> <p>State laws and individual companies may give you additional rights to limit sharing.</p>

### Definitions

<p><b>Affiliates</b></p>	<p>Companies related by common ownership or control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> <li>▪ <i>Our affiliates generally include entities associated with private funds advised and managed by Palisade.</i></li> </ul>
<p><b>Nonaffiliates</b></p>	<p>Companies not related by common ownership or control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> <li>▪ <i>Palisade does not share with nonaffiliates so they can market to you.</i></li> </ul>
<p><b>Joint Marketing</b></p>	<p>A formal agreement between nonaffiliated financial companies that together market financial products or services to you.</p> <ul style="list-style-type: none"> <li>▪ <i>Palisade does not jointly market.</i></li> </ul>

