

Privacy Notice

FACTS	WHAT DOES PALLADIUM EQUITY PARTNERS ADVISOR, LLC (“PALLADIUM”) DO WITH YOUR PERSONAL INFORMATION?			
WHY?	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.			
WHAT?	<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> <table style="width: 100%; border: none;"> <tr> <td style="width: 50%; vertical-align: top;"> <ul style="list-style-type: none"> ▪ Name ▪ Social security number ▪ Contact information (home address, business address, telephone number, email) ▪ Nationality ▪ Date of Birth </td> <td style="width: 50%; vertical-align: top;"> <ul style="list-style-type: none"> ▪ Account number or investor/LP number ▪ Tax identification number ▪ Income, assets, and financial qualifications ▪ Risk tolerance ▪ Wire transfer instructions ▪ Transaction history </td> </tr> </table> <p>When you are no longer our customer, we may continue to share information about you as described in this notice.</p>		<ul style="list-style-type: none"> ▪ Name ▪ Social security number ▪ Contact information (home address, business address, telephone number, email) ▪ Nationality ▪ Date of Birth 	<ul style="list-style-type: none"> ▪ Account number or investor/LP number ▪ Tax identification number ▪ Income, assets, and financial qualifications ▪ Risk tolerance ▪ Wire transfer instructions ▪ Transaction history
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HOW?	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 Palladium chooses to share; and whether you can limit this sharing.			
Reasons we can share your personal information	Does Palladium Share?	Can you limit this sharing?		
For our everyday business purposes - such as to process your transactions, maintain your accounts(s) or respond to court orders and legal investigations.	Yes	No		
For our marketing purposes - to offer our products and services to you	Yes	No		
For joint marketing with other financial companies	No	We don’t share		
For our affiliates' everyday business purposes - information about your transactions and experiences	Yes	No		
For our affiliates' everyday business purposes – information about your creditworthiness	No	We don’t share		
For our affiliates to market to you	Yes	Yes		
For nonaffiliates to market to you	No	We don’t share		
To limit our sharing	<p>Email: dataprivacy@palladiumequity.com</p> <p>Please note:</p> <p>If you are a <i>new</i> customer, we can begin sharing your information 30 days from the date we sent this notice. When you are <i>no longer</i> our customer, we continue to share your information as described in this notice. However, you can contact us at any time to limit our sharing.</p>			
Questions?	Email: dataprivacy@palladiumequity.com			
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Who we are	
Who is providing this notice?	Palladium Capital Management VI, LLC, Palladium Capital Management IV, LLC, Palladium Capital Management V, LLC, Palladium Heritage Management, LLC and Palladium Investment Partners, LLC
What we do	
How does Palladium protect my personal information?	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.
How does Palladium collect my personal information?	<p>We collect your personal information, for example, when you</p> <ul style="list-style-type: none"> ▪ Enter into an investment advisory contract ▪ Provide information in subscription documents or investment questionnaires ▪ Seek financial advice ▪ Make deposits or withdrawals from your account ▪ Tell us about your investment or retirement portfolio ▪ Give us your employment history <p>We also collect your personal information from others, such as affiliates or other companies.</p>
Why can't I limit all sharing?	<p>Federal law gives you the right to limit only</p> <ul style="list-style-type: none"> ▪ sharing for affiliates' everyday business purposes—information about your creditworthiness ▪ affiliates from using your information to market to you ▪ sharing for nonaffiliates to market to you
What happens when I limit sharing for an account I hold jointly with someone else?	Your choices will apply to everyone on your account - unless you tell us otherwise.
Definitions	
Affiliates	<p>Companies related by common ownership or control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> ▪ <i>Our affiliates include companies with a common corporate identity</i>
Nonaffiliates	<p>Companies not related by common ownership or control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> ▪ <i>Palladium does not share with nonaffiliates so they can market to you.</i>
Joint Marketing	<p>A formal agreement between nonaffiliated financial companies that together market financial products or services to you.</p> <ul style="list-style-type: none"> ▪ <i>Palladium does not jointly market.</i>
Other important information	
For additional information about our privacy practices under state law, visit https://www.palladiumequity.com/privacy .	