



2009

The Securities and Exchange Commission adopted Regulation S-P in June 2000. This regulation deals with notification to individuals regarding the privacy of their personal information. These regulations require all financial services companies to disclose at least annually the types of personal information collected from their clients. Firms are also required to disclose whether any information is shared with third parties.

**Becker Capital Management, Inc.
Client Privacy Notice**

We consider our relationship with our clients one of our most important assets. We strive to maintain your trust and confidence in our firm. We are committed to protecting your *personal information*.

Information We Gather

- In the course of our business relationship, we receive from you, your name, address, telephone number, and social security or tax payer identification number.
- In our discussions with you, we also gather information necessary to make informed portfolio management decisions regarding asset allocation, income needs, tax ramifications, etc.
- In transactions for your account, we generate and receive information that is used to execute transactions on your behalf with the financial institution that serves as your custodian.

How We Protect Your Personal Information

Becker Capital Management, Inc. will internally safeguard your nonpublic personal information by restricting access to only those employees who provide services to you or those who need access to your information to service your account. In addition, we will maintain physical, electronic and procedural safeguards that meet federal and/or state standards to guard your nonpublic personal information.

Becker Capital Management will not disclose any information about you unless:

- We receive your prior written consent
- We have been advised that your accountant, attorney or consultant is requesting the information on your behalf
- We are legally required to provide the information to a governmental agency
- We are dealing directly with your custodial representative

We do not disclose any nonpublic information about our clients or former clients to anyone, except as discussed above.

This statement is for your information only; no action is required by you. If you have any questions or require any further information, please do not hesitate to call Janeen McAninch at 503-223-0284.