

EAGLE CAPITAL GROWTH FUND, INC.

CUSTOMER PRIVACY NOTICE

January 1, 2013

We collect nonpublic personal information about you from the following sources:

- (i) information we receive from you on applications or other forms and
- (ii) information about your transactions with us or others.

We do not disclose any nonpublic personal information about you to anyone, except as permitted by law, and as follows. We may disclose all of the information we collect, as described above, to companies that perform marketing services on our behalf or to other financial institutions with whom we have joint marketing agreements. If you decide to close your account(s) or no longer be a shareholder of record, we will adhere to the privacy policies and practices as described in this notice.

We restrict access to your personal and account information to those employees who need to know that information to provide services to you. We maintain physical, electronic, and procedural safeguards to guard your nonpublic personal information.

In this notice, the term “we” refers to the Fund, Eagle Capital Growth Fund, Inc.