

STATEMENT OF PRIVACY POLICY AND PRACTICES
UTICA PHYSICIANS' ASSOCIATION, LTD.
UNITED PROFESSIONALS' ASSOCIATION, LTD.

1. OUR PLEDGE TO YOU

At Utica Physicians' Association, Ltd. and United Professionals' Association, Ltd. (UPAL), one of our top priorities is making sure that the information we have about our members and clients is protected and secure. We value our relationship with you and work hard to preserve your privacy and ensure that your preferences are honored. At the same time, the very nature of our relationship may result in us collecting or sharing certain types of information about you. We explain how we use customer information in this privacy policy statement. We invite you to state your choices in the Customer Preferences section. We will honor your selection.

You have a right to know how information about you is used and protected. Most data remains within the corporate family, and is used to do business with you. Some is shared with others to process your account or for marketing. We explain how we use information in this privacy policy statement. We invite you to state your choices in the Customer Preferences section. We will honor your selection.

UPAL does not disclose any non-public personal information about our clients or former clients to any third party, except as required by law. UPAL may, however, disclose such non-public personal information to its affiliates and business partners in order to provide products or services to you or to support our business needs. In order to maintain the confidentiality of such information, we restrict access to non-public information about our clients to those employees and business parties who need to know that information. We and our business partners maintain physical, electronic and procedural safeguards, in accordance with strict standards, in order to guard the non-public personal information of our clients and former clients. Our agreements with our business partners require that they maintain the confidential information entrusted to them.

2. INFORMATION WE COLLECT

We collect information:

- you give to us on applications, surveys, registration forms, etc.;
- you give to us when you make a purchase, or other account information such as balance, payment history or credit card usage;
- you or others give to us about your credit history;
- others give to us to make sure that the data you provide is accurate and up-to-date. This may include information about you from employers, banks, or insurers.

3. HOW WE SHARE INFORMATION

- We **do not** share information that we have about you with anyone except in response to subpoenas or for other legal reasons.
- We only share the minimum necessary information with our affiliates (members of our corporate family) or companies outside our corporate family that perform services on our behalf. We share information to process transactions, respond to your inquiries, or provide information about the products or services that we offer.

We share

- data provided by customers
- purchase/account data
- credit history data
- verifying data
- other – data provided by customers to set-up accounts, provide online secure account access when utilizing a third party platform or to process account transactions when authorized by the client.

We **do not** share information about you with non-affiliates (companies outside our organization) for them to contact you for their own marketing purposes.

The law permits us to share information about our current and former customers with government agencies or authorized third parties under certain circumstances. For example, we may be required to share such information in response to subpoenas or to comply with certain laws.

4. HOW WE PROTECT INFORMATION

- We strive to protect your data and safeguard it from unauthorized individuals.

5. FORMER CUSTOMERS

- We **do not** share information about our former customers with anyone except in response to subpoenas or for other legal reasons.
- We **do not** share information about our former customers with companies outside our organization for them to contact you for their own marketing purposes.

6. CLIENT PREFERENCES

Since we only share your information as indicated above in order to facilitate your investment elections by establishing your account or accounts and transacting business on your behalf as authorized, there is no need to limit our sharing of your information further.

However, if you wish to limit our information sharing further, please advise us below in the ways you would prefer further limitation. We will honor all client requests.

Account Holder

Date