

## **PRIVACY PRACTICES**

We know how important confidentiality is to our customers and are committed to protecting your privacy. As part of that commitment, we have developed the following Privacy Practices.

As we continue to offer state-of-the-art-financial services technology, Utica Physicians' Association, Ltd. (UPAL) will ensure that strict privacy standards are maintained.

### **Privacy Expectations**

We understand that customers expect privacy and security in handling their financial transactions. Therefore, we recognize the need to safeguard sensitive information about you and your finances. We strive to maintain high standards and procedures to protect you.

### **Collection, Retention and Use of Information**

UPAL collects, retains and uses information concerning you and your financial transactions only when we believe that it will help us develop new products and services as well as to determine opportunities to better serve you or to comply with certain laws and regulations. We are happy to provide you with information on why we are collecting and retaining information upon your request.

### **Restrictions on Disclosing Information to Outside Parties**

We do not disclose specific information about you or your accounts or other personal data to outside parties for their independent use except if:

- (a) you request or authorize it;
- (b) the information is provided to process a transaction initiated by you; or
- (c) the disclosure otherwise is lawfully permitted or required.

### **Privacy in Business Relationships with Outside Third Parties**

Sometimes we are required to provide personal information about you to a third party, such as a vendor, to provide support for one of the services you have requested. These companies agree to maintain our confidential information about you and your products/services with us and must abide by applicable law.

### **Opting Out**

You may inform us at any time that we may not share any of your private, personal information ("opt out") merely by emailing Don Orchard at [dorchard@upal.com](mailto:dorchard@upal.com) or Laura Lumley at [llumley@upal.com](mailto:llumley@upal.com) or by calling the UPAL office at 918-747-5585 [or toll free in Oklahoma by calling 800-259-6262] and informing us what information you wish restricted from further disclosure.

UPAL reserves the right to modify these Privacy Practices as needed, along with related provisions, at any time.